

SOCIAL MEDIA POLICY - AGENCY WORKERS

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GSL Education recognises and embraces the numerous benefits and opportunities that social media offers. While our agency workers are encouraged to engage, collaborate and innovate through social media, they should also be aware that there are some associated risks, especially around issues of safeguarding, bullying and personal reputation.

PURPOSE OF THE POLICY:

- The purpose of this policy is to encourage responsible, thoughtful practice, to protect agency workers engaged by GSL Education; client schools/trusts and their employees, students and communities; and to promote the effective use of social media as part of the school/trust activities, in line with their own policies.
- This policy covers personal and professional use of social media and aims to encourage its safe use by agency workers engaged by GSL Education.
- The policy applies regardless of whether the social media is accessed using GSL Education IT facilities and equipment, school's IT facilities and equipment, or equipment belonging to agency workers engaged by GSL Education.
- Personal communications via social media accounts that are likely to have a negative impact on professional standards, GSL Education's reputation, or client school/Trust's reputation are within the scope of this policy.
- This policy covers all agency workers working at all levels and grades

ROLES, RESPONSIBILITIES AND PROCEDURE:

Agency Workers should:

- be aware of their online reputation and recognise that their online activity can be seen by others including employers, parents, pupils and colleagues on social media;
- ensure that any use of social media is carried out in line with this policy and other relevant policies, including those of client schools/trusts

- be aware that any excessive or inappropriate use of social media at work or on placement or between placements may result in disciplinary action;
- be responsible for their words and actions in an online environment. They are therefore advised to consider whether any comment, photograph or video that they are about to post on a social networking site is something that they want pupils, colleagues, other employees, or even future employers, to read. If in doubt, don't post it!

Managers and Consultants are responsible for:

- addressing any concerns and/or questions agency workers may have on the use of social media;
- operating within the boundaries of this policy and ensuring that all agency workers understand the standards of behaviour expected of them.

Human resources (HR) are responsible for:

- giving specialist advice on the use of social media;
- implementing and reviewing this policy.

DEFINITION OF SOCIAL MEDIA:

Social Media is a broad term for any kind of online platform which enables people to directly interact with each other. It allows people to share information, ideas and views. Examples of social media include blogs, Facebook, LinkedIn, Twitter, Google+, Instagram, Tik Tok, Snap Chat, Myspace, Flickr and YouTube.

ACCEPTABLE USE:

Agency workers should be aware that content uploaded or shared to social media is not private. Even if you restrict it to 'friends', there is still capacity for it to be re-posted or distributed beyond the intended recipients. Therefore, agency workers using social media should conduct themselves with professionalism and respect.

Agency workers should not upload any content on to social media platforms that:

- is confidential to GSL Education, its staff, clients or agency workers; the client school/trust or its staff, students or community
- amounts to bullying

- amounts to unlawful discrimination, harassment or victimisation
- brings GSL Education and/or client schools/trusts into disrepute
- contains lewd, sexually explicit, threatening or similarly inappropriate or offensive comments, images or video clips
- undermines the reputation of GSL Education and/or client schools/trusts, and/or individuals
- is defamatory or knowingly false
- breaches copyright
- is in any other way unlawful.

Agency workers should be aware of both professional and social boundaries and should not therefore accept or invite 'friend' requests from pupils or ex-pupils under the age of 18, or from parents on their personal social media accounts such as Facebook. All communication with parents via social media should be through the school/trust's social media accounts, in line with their policies. Staff and agency workers should note that the use of social media accounts during the working day or whilst on placement is not permitted.

Use of social media in practice for agency workers - for personal and professional use

Agency workers must not have 1:1 communication, including direct messaging (DM), with pupils through any social media, apart from via approved school/trust accounts and only with express permission or direction from the school/trust. All use of school/trust platforms must comply with their policies and procedures.

Agency workers should not request or accept any current student of the School of any age or any ex-student of the School under the age of 18 as a friend, follower, subscriber or similar on any personal social media account unless they are the parent of the pupil or a close family member. It is advisable that agency workers do not have contact with past pupils (above school age).

Any communication received from current pupils on any personal social media sites must be reported immediately to the school/trust DSL and GSL Education consultant.

If any agency worker is aware of any inappropriate communications involving any student in any social media, these must immediately be reported to the school/trust DSLs.

Agency workers must ensure that, wherever possible, and where the social media platform allows, their privacy settings on social media sites are set so that pupils cannot access information relating to their personal lives or follow them on their personal accounts.

All email communication between agency workers and pupils of the client School/trust on school/trust business must be made from an official school/trust email account (any deviation from this in an emergency must at once be reported to the school/trust and GSL Education consultant).

Agency workers should not use personal email accounts or personal mobile phones to contact pupils of the School, nor should any such contact be accepted, except in circumstances such as school trips or away matches that have been given prior approval.

Agency workers should not post or publish on the internet or on any personal social networking platform, any reference to GSL Education, client Schools/Trusts or their colleagues (apart from in the context of using social media for networking or marketing purposes, such as LinkedIn), parents, pupils or family related information or discuss pupils or colleagues or criticise GSL Education, client schools/trusts or staff.

Agency workers may like, share or make appropriate comments in response to GSL Education, client school/trust official social media accounts.

Agency workers must not post images on any social media account that includes pupils.

Agency workers are instructed to consider the reputation of GSL Education and client schools/trusts in any social media activity.

Guidance and advice for staff

Most common social networking platforms are inherently insecure places to have discussions which contain any sensitive information. Privacy laws can be violated and the reputation of GSL Education, schools and trusts can be damaged if the public sees a discussion of any sensitive information taking place on social networking. Agency workers should be aware that these types of cases can result in disciplinary action.

Workplace Privacy

GSL Education respects agency workers' rights to privacy and to express themselves. However, agency workers must also respect, and diligently protect, the privacy of fellow agency workers, consultants, staff members, pupils, parents, and others. Privacy and confidentiality must be maintained in every possible way. Agency workers must not discuss pupil or family related information via social

networking and public social media, texting, or online unless it is an approved medium and for a school/trust related purpose.

Agency workers are advised to be extremely cautious in conversations with other agency workers, parents and volunteers in social networking, on the basis that privacy laws can be violated even if a person's name is not shared.

GSL Education recommends that agency workers use security and privacy settings provided by social networking platforms. Regardless of privacy settings, agency workers are advised to be respectful and responsible in all activity if it in any way involves or references GSL Education, Client schools/trusts, job, or those staff they work with. Agency workers must understand that on-line content is difficult, if not impossible to retract once posted or sent.

Agency workers should recognise that there is the possibility of being legally liable for something inappropriate that is shared online.

If a member of the media or non-traditional online media (including bloggers) contacts an agency worker about the business of GSL Education, client schools/trusts, or other staff/agency workers (e.g., programmes, services, pupils, parents, clubs, policies, practices, or additional business information of any kind), the individual must contact GSL Education before responding.

SAFEGUARDING:

The use of social networking platforms introduces a range of potential safeguarding risks to children and young people.

Potential risks can include, but are not limited to:

- online bullying;
- grooming, exploitation or stalking;
- exposure to inappropriate material or hateful language;
- encouraging violent behaviour, self-harm or risk taking.

In order to mitigate these risks, there are steps you can take to promote safety on line:

- You should not use any information in an attempt to locate or meet a child.
- Ensure that any messages, photos or information comply with existing policies.

Reporting safeguarding concerns

- Any content or online activity which raises a safeguarding concern must be reported to the GSL Education safeguarding officer and the safeguarding lead in the client school/trust
- Any online concerns should be reported as soon as identified as urgent steps may need to be taken to support the child.
- With regard to personal safeguarding for agency workers, you should report any harassment or abuse you receive online in relation to your work with us, to GSL Education.

REPORTING, RESPONDING AND RECORDING CYBERBULLYING INCIDENTS:

- Agency workers should never engage with cyberbullying incidents. If you discover a website containing inaccurate, inappropriate or inflammatory written material relating to you, or images of you which have been taken and/or which are being used without your permission, you should immediately report this to your manager/consultant, who will also inform the Compliance Manager
- Agency workers should keep any records of the abuse such as text, emails, voicemail, website or social media. If appropriate, screen prints of messages or web pages could be taken and the time, date and address of site should be recorded.

ACTION BY GSL EDUCATION: INAPPROPRIATE USE OF SOCIAL MEDIA:

- Following a report of inappropriate use of social media, the senior manager will conduct a prompt investigation with the support and guidance of the compliance manager
- If in the course of the investigation, it is found that a pupil submitted the material to the platform, the client school/trust will be informed and the school policy and procedures will be followed
- The compliance manager, where appropriate, will approach the platform hosts to ensure the material is either amended or removed as a matter of urgency, ie within 24 hours. If the platform requires the individual who is complaining to do so personally, GSL Education will give their full support and assistance.
- Checks will be carried out to ensure that the requested amendments or removals are made. If the platform(s) does not co-operate, the compliance manager will follow the appropriate procedures of reporting and complaints
- If the material is threatening and/or intimidating, senior management will, with the member agency workers's consent, report the matter to the police.

- The member of agency worker will be offered full support and appropriate stress counselling.

BREACHES OF THIS POLICY BY AGENCY WORKERS:

Any agency worker suspected of committing a breach of this policy (or if complaints are received about unacceptable use of social networking that has potentially breached this policy) will be investigated in accordance with the GSL Education's bullying or disciplinary procedure. The agency worker will be expected to co-operate with the investigation which may involve:

- handing over relevant passwords and login details;
- printing a copy or obtaining a screenshot of the alleged unacceptable content;
- determining that the responsibility or source of the content was in fact the agency worker.

The seriousness of the breach will be considered including the nature of the content, how long the content remained visible on the social media platform, the potential for recirculation by others and the impact on GSL Education and/or the client school/trust or the individuals concerned.

Agency workers should be aware that actions online can be in breach of the harassment/IT/equality policies and any online breaches of these policies may also be treated as conduct issues in accordance with the disciplinary procedure. If the outcome of an investigation leads to disciplinary action, the consequences will be dealt with in accordance with the appropriate procedures. Serious breaches could result in the dismissal of the agency worker. Where conduct is considered to be unlawful, and/or meet the harm threshold for LADO referral, GSL Education will report the matter to the police and other relevant external agencies.

MONITORING AND REVIEW:

From time to time client schools/trusts will monitor or record communications that are sent or received from within the school/trust's network.

This policy will be reviewed on a yearly basis and, in accordance with the following, on an as-and-when-required basis:

- legislative changes;
- good practice guidance;
- case law;
- significant incidents reported.

This policy does not form part of any agency worker's contract of employment and may also, after consultation with the trade unions, be amended from time to time by GSL Education.

LEGISLATION:

Acceptable use of social networking must comply with UK law. In applying this policy, GSL Education will adhere to its rights, responsibilities and duties in accordance with the following:

- Regulation of Investigatory Powers Act 2000
- General Data Protection Regulations (GDPR) 2018
- The Human Rights Act 1998
- The Equality Act 2010
- The Defamation Act 2013

The internet is a fast-moving technology and it is impossible to cover all circumstances or emerging media – the principles set out in this policy must be followed irrespective of the medium. When using social media, staff should be aware of the potential impact on themselves and GSL Education, client schools/trusts, young people and communities, whether for work-related or personal use; whether during working hours or otherwise; or whether social media is accessed using GSL Education's equipment, the school/trust's equipment or using the agency worker's equipment. Agency workers should use discretion and common sense when engaging in online communication. There are some general rules and best practice in GSL Education's Staff Rules, which agency workers must adhere to.