



# Social Media Policy

**Approval and Review:**

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# Italia Conti Associates Social Media Policy

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# Italia Conti Associates

## Social Media Policy

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### 1) Introduction

1.1 Italia Conti Associates embraces the benefits and opportunities of using Social Media as a tool for communication and networking. Social Media allows Italia Conti Associates to engage with its students, their parents/guardians and the general public. It allows us to celebrate our students' successes and to raise our online profile.

1.2 We also recognise that Social Media plays an important part in the lives of our students, their parents/careers, and the wider community of which Italia Conti Associates is part of.

1.3 Italia Conti Associates also recognises that everyone has everyone has the right to freedom of expression<sup>1</sup>.

1.4 Along with the many benefits of Social Media, however, there are also risks which users need to be aware of. Social Media can be used to post ideas anonymously, and its very spontaneity and topical nature (which is one of its most attractive features), can sometimes encourage users to adopt a less cautious approach when expressing their thoughts or reactions to the wider world. This can lead to Social Media posts which can have a negative impact on the Social Media user themselves or can cause reputational damage to institutions or individuals. Social Media posts of this nature can give rise to civil or criminal proceedings.

1.5 This policy has been designed to support users in their use of Social Media. It provides clear guidance which will help to ensure that users can enjoy the benefits of Social Media in a safe and responsible way.

1.6 This policy applies to users who have an **active relationship** with Italia Conti Associates, (either as a staff member, student, parent/carer, contractor, supplier, etc), and whose Social Media use either includes reference to their status as an Italia Conti Associates student/staff member, and/or who reference (either directly or indirectly) Italia Conti Associates in their communications.

1.7 The policy aims to:

- ensure that the use of Social Media is responsibly undertaken;
- ensure consistent standards in Social Media use;
- ensure that the confidentiality of students, their family and friends, teachers and administrative staff, other stakeholders, and the reputation of Italia Conti Associates, are safeguarded.

1.8 This policy should be read in conjunction with the following policies/documentation:

*Bullying and Harassment Policy*  
*Complaints and Appeals Policy*  
*Data Protection Policy*  
*Equal Opportunities Policy*

*Behaviour Policy*  
*Prevent Policy*  
*Safeguarding and Child Protection Policy*  
*Student Code of Conduct*

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<sup>1</sup> Article 10 of the Human Rights Act 1998.

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### 2) Responsibility

2.1 The Franchisee shall have the ultimate responsibility for the implementation of this policy.

### 3) Scope/definitions

3.1 For the purposes of this policy, "Italia Conti Associates" refers to any school that operates under an Italia Conti Associates' franchise agreement.

3.2 For the purpose of this policy, the term 'user' can refer to:

- a) someone who has been enrolled on a course of study with Italia Conti Associates,
- b) someone who is employed under a contract of employment with Italia Conti Associates,
- c) someone providing teaching services as a self-employed contractor to Italia Conti Associates, d) someone providing goods and services under a contract to Italia Conti Associates, e) someone who has a connection with either a staff member or student at Italia Conti Associates, e.g., parent/carer/family member, etc.

3.3 For the purpose of this policy, the term 'Social Media' is used to describe methods of electronic communication that allow comments and content to be shared with others (an 'audience'). This audience can either be 'public' (anyone who can access the Social Media application or website) or can be a 'private', (only those with special permission can view the material). Social Media usually allows its users to interact and chat in an informal and topical manner. Most Social Media platforms offer almost instantaneous and ephemeral communication, (although much of the content can be accessed at a later date, and may never be deleted).

3.4 Social media applications often have online discussion forums, chatrooms, media posting sites, blogs and other types of online social spaces. It includes (but is not limited to) applications such as Facebook™, Flickr™, Instagram™, LinkedIn™, Pinterest™, Snapchat™, Twitter™, Wechat™, and WhatsApp™. Tik Tok

3.5 This policy's definition of social media also covers web-based services, for example, blogs, video, and image-sharing websites such as Tik-Tok™ and YouTube™. The use of technology such as mobile phones, cameras, smart-watches or other devices is also covered by this policy. This list is not exhaustive as this policy will also relate to other emerging forms of technology used for communicating via social media.

3.6 This policy applies to Social Media uploaded from any geographic location, both on and outside Italia Conti Associates owned or controlled premises, and to communications sent on devices to an individual, group or the wider world.

3.7 This policy is intended to guide users in the use of social media where they make reference to Italia Conti Associates and its staff and students.

3.8 **The use of Italia Conti Associates logos, crests, typefaces or brands on any personal web space or on any online, or offline medium without prior consent is prohibited.** These are registered trademarks, patents and remain the intellectual property of Italia Conti Associates. Use of these elements is an infringement of copyright.

3.9 Italia Conti Associates may ask users to remove Internet postings which are deemed to constitute a breach of 3.8. Failure to comply with such a request may, in itself, result in disciplinary action or civil action.

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### 4) Legal Framework

4.1 Italia Conti Associates is committed to ensuring that all users engage with Social Media in a responsible way which ensures that they do not breach any relevant laws or obligations. Inappropriate disclosure of confidential information is likely to breach:

- The Human Rights Act 1998;
- The Common Law duty of confidentiality;
- Data Protection Act 2018.

4.2 All Italia Conti Associates users should be aware that the content they share through social networking applications, even if they are on 'private' spaces, may still be subject to a variety of criminal and civil laws. These can include law relating to copyright, data protection, libel, defamation, harassment, freedom of information, protection of adults and young people, e.g. Safeguarding Vulnerable Groups Act 2006. All users must also operate in line with the Italia Conti Associates' *Equality of Opportunity Policy*.

### 5) Principles

5.1 Italia Conti Associates encourages users to use Social Media in a responsible and respectful way; it can be used by users to celebrate achievement, to support their peers, and to express well-considered opinions.

5.2 In using Social Media, Italia Conti Associates asks users to respect the rights and opinions of others, their privacy, and not to disclose confidential, sensitive or privileged information that may breach any legal or common law obligations.

5.3 Users can be held personally responsible for any material they upload, and should their Social Media posts infringe any existing Italia Conti Associates' policies, they may be subject to disciplinary measures.

5.4 Users must not represent their personal opinions as being those of Italia Conti Associates: Italia Conti Associates has its own Social Media channels for this purpose.

5.5 Users should not use Social Media for airing grievances or reporting crimes. There are existing channels for dealing with these issues, e.g. Italia Conti Associates' *Complaints Policy*. Note: users reporting such incidents via Social Media might compromise any subsequent court case.

5.6 Whilst Italia Conti Associates recognises the right of users to voice their honest opinion in Social Media posts, users should not use Social Media and the internet to purposefully attack, insult, abuse or defame others. False or malicious allegations can lead to legal action brought by others.

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### 6) Personal Use of Social Media

6.1 Italia Conti Associates encourages Social Media users to connect with their family, friends, fellow students and the wider community. Users are free to share Italia Conti Associates official posts or media that they have recorded in public spaces which are free from any copyright, safeguarding/welfare, confidentiality or licensing restrictions.

**Communications with the Principal:** students/parents/caregivers are reminded that they can only connect with their Principal through the local Associates' School's account(s).

**Communication between staff and students:** for safeguarding/welfare purposes, staff and students are prohibited from contacting each other through personal social media or email accounts.

6.2 If parents, care-givers or wider members of the community wish to communicate with members of staff, they should only do so through official Italia Conti Associates account(s) created for this purpose.

6.3 Users and the wider Italia Conti Associates community should not create or post images or videos from Italia Conti Associates activities without permission. This applies to activities which take place on private premises which Italia Conti Associates control or have authority over, e.g. classes, rehearsals, and performances. The publication of such material may be an infringement of copyright laws. Images taken at Italia Conti Associates events, when such permission has been granted by Italia Conti Associates, are for the sole and private use of that individual and their use must be in accordance with any terms and conditions imposed by Italia Conti Associates at the time.

6.4 Users should seek the permission of the copyright holder before posting any material which might belong to others. This permission should be given in such a way that the user can provide proof of permission should there be any query afterwards, e.g. in a written document or electronic communication. The copyright holder should always be acknowledged in the post.

6.5 Users should check the terms and conditions of any Social Media account they are signing up for. This is because users may lose legal control and/or ownership of any material that they might upload. This could lead to material being posted on other websites without the user's knowledge. This might lead to material reaching an unintended audience, or be used in ways that the user did not expect.

6.6 Users should not send "friend" requests to members of staff (as per 6.1).

6.7 Users should take care with the personal information they reveal on Social Media sites so they do not inadvertently put themselves or others at risk.

6.8 Some examples of unacceptable use of Social Media can be found in **Appendix 1**.

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### 7) Official Italia Conti Associates Social Media Accounts

7.1 The Marketing Team and IT staff have full responsibility for running the Italia Conti Associates' official website, including setting up those for individual schools, and any Social Media platform(s). No other Social Media platforms may be set up by any students, parent or member of staff that can be associated and recognised as Italia Conti Associates.

### 8) Monitoring of Internet Use

8.1 Italia Conti Associates may monitor usage of its Internet, online content, online services, computer networks and email services without prior notification or authorisation from users.

### 9) Breaches of the Policy

9.1 Any breach of this policy that leads to a breach of confidentiality, defamation or damage to the reputation of Italia Conti Associates, or any acts that render Italia Conti Associates liable to third parties, may result in legal action, disciplinary action or sanctions in line with published Italia Conti Associates' policies.

### 10) Relationship with other Italia Conti Associates policies

10.1 If an internet post would breach any of Italia Conti Associates' policies in another context, it will also breach them in an online forum. For example, users are prohibited from using Social Media to:

- breach Italia Conti Associates' obligations with respect to the rules of relevant regulatory bodies;
- breach any obligations they may have relating to confidentiality;
- breach the Italia Conti Associates *Behaviour* policies or related rules, policies and procedures;
- defame or disparage Italia Conti Associates or affiliates, parents, staff, students, business partners, suppliers, vendors or other stakeholders;
- harass or bully other users in any way or breach the Italia Conti Associates *Anti-harassment and Bullying Policy; Behaviour*
- unlawfully discriminate against other users or third parties or breach the Italia Conti Associates' *Equal Opportunities, Diversity and Inclusion Policy*;
- breach Italia Conti Associates' *Data Protection Policy*.
- breach any other laws, e.g., the use of Social Media in a false or misleading way, for example, by claiming to be someone else or by deliberately making misleading statements).

Behaviour online is often permanently recorded and so users must be extra cautious as it may affect their future professional reputation.

10.2 Users must also be aware of the particular risks to internet security that social media presents and take any extra measures necessary not to allow any of their actions on Social Media sites to create vulnerability to any Italia Conti Associates systems.

### 11) Related Policies

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## **Appendix 1: Examples of unacceptable use of Social Media\***

- Publishing personal contact information (without that individual's permission).
- Any material that could bring Italia Conti Associates, its staff (or former staff), students (or former students), into disrepute, or compromise a safe study environment.
- Postings that constitute a criminal offence.
- Postings that constitute harassment, discrimination or bullying.
- Postings that contain privileged information, e.g. information about personal matters, surveys, or documents not yet approved for publication.
- Postings created under fake identities or which use the identity of others.
- Postings that imply that they are the opinion of Italia Conti Associates.
- Postings that discuss complaints or criminal or civil proceedings involving Italia Conti Associates.
- Postings that might constitute a contempt of court.
- Postings that imply that Italia Conti Associates has endorsed a commercial product or service.
- Sharing statements that might relate to, or compromise an ongoing disciplinary process.
- Postings that might interfere with ongoing legal proceedings.
- Postings that include the official Italia Conti Associates logo.

\*This list is not exhaustive.



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## Appendix 2: Examples of Cyberbullying\*

The use of Social Media to:

- spread rumour, innuendo, lies or gossip.
- spread aggressive, threatening or intimidating comments, or to incite others to take part in such behaviour.
- make offensive remarks or content about individuals or groups of individuals.
- mock individuals (whether by design or recklessly).

\*This list is not exhaustive

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## Appendix 3: Advice on safe use of Social Media

The following advice is provided by the **Suzy Lamplugh Trust**<sup>2</sup>:

- Avoid sharing your personal details such as your address, phone number, routine or place of work.
- Review your privacy settings to make sure that only your friends can see your profile details and pictures.
- When posting about your life, or with someone online, talk about where you've been rather than where you're going.
- Avoid adding people that you don't know, as contacts or friends.
- Do not share your passwords with anyone. If you think you may have revealed it accidentally, change the password as soon as possible.
- Try to use memorable hard to guess passwords, such as a phrase or fact, rather than using the automatic log-in function offered on some browsers, and change them regularly.

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<sup>2</sup> Suzy Lamplugh Trust. (2019). safety-online. Retrieved July 30th, 2021, from Suzy Lamplugh Trust: <https://www.suzylamplugh.org/safety-online>

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## Appendix 4: Reporting offensive materials

The following are external agencies/organisations to whom offensive material on the Internet can be reported.

### **Child Exploitation and Online Protection Command (CEOP)**

<https://www.ceop.police.uk/Safety-Centre/>

If you are worried about online abuse, or are concerned that a child is being groomed or being exploited, you can make a report using the link. CEOP is part of the National Crime Agency.

**Childline** <https://www.childline.org.uk/>

Childline acts as a confidential source of help for young people under the age of 19yrs.

**Internet Watch Foundation** <https://www.iwf.org.uk/>

Internet users can report material that sexually exploits children via their online reporting portal, link at: <https://www.iwf.org.uk/about-us/our-international-work/reporting-portals/>

### **National Crime Agency**

Internet users can report serious and organised crime via this weblink:

<https://www.nationalcrimeagency.gov.uk/contact-us>

### **Other Agencies**

A comprehensive list of agencies that can provide help or reporting tools can be found at:

<https://saferinternet.org.uk/guide-and-resource/need-help>

END