



Social Media Policy

Approved by Senior Leadership Team	5 th March 2024
Signatory: Hayley Newton-Jarvis	CEO & Principal
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Next review due:	31 st August 2026

The Franchisee is responsible for the implementation and oversight of this Policy.

This policy shall normally be reviewed every 3 years

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1. Introduction

- 1.1 Italia Conti embraces the benefits and opportunities of using Social Media as a tool for communication. Social Media allows our staff to engage with our students and the general public, to celebrate success and to raise our online profile. We also recognise that Social Media offers numerous opportunities for personal networking and promotion, particularly where Italia Conti invite guest practitioners who are active in the industry to direct or choreograph productions, deliver professional preparation classes or guest workshops. Effective use of Social Media has become a vital part of the skills set required by creative and performing arts professionals and Italia Conti would not wish to unreasonably stymie this, recognising the benefit to both students and the institution.
- 1.2 Along with the many benefits of Social Media, however, there are also risks which staff 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 Social Media user themselves or can cause reputational damage to staff or fellow professionals, or even to the institution itself. Additionally, once a Social Media post has been made, it is often available for many years and can give an incorrect impression that can affect an individual's reputation and employability.
- 1.3 This policy has been designed to support staff in their use of Social Media. It provides clear guidance which will help to ensure that staff can enjoy the benefits of Social Media in a safe and responsible way.
- 1.4 This policy applies to current staff whose Social Media use either includes reference to their status as an Italia Conti employee, and/or who reference (either directly or indirectly) Italia Conti in their communications.
- 1.5 The policy aims to:
 - minimise any unwarranted risks to Italia Conti using Social Media;
 - ensure that the use of Social Media is responsibly undertaken;
 - ensure consistent standards in Social Media use;
 - ensure that the confidentiality of students, employees and stakeholders, and the reputation of Italia Conti, are safeguarded;
 - to make staff aware of the potential impact social media could have on themselves, Italia Conti and others; and
 - to provide guidance on etiquette and best practice when using social media platforms.

2. Scope / definitions

- 2.1 For the purposes of this policy, "Italia Conti" refers to the Italia Conti Arts Centre, Italia Conti Associate Schools and Companies.
- 2.2 For the purposes of this policy, the term "staff" includes those who are staff members employed directly by Italia Conti; it also includes those who are providing services on

a contracted or freelance basis, visiting professionals, or external contractors who provide services on behalf of Italia Conti. It also applies to trainees, volunteers and other individuals who work or provide services on behalf of Italia Conti, Associate Schools & Companies.

- 2.3 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 or logins 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).
- 2.4 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™. This policy's definition of social media also covers web-based services, for example, blogs, video, and image-sharing websites such as Flickr™, Tik-Tok™, OnlyFans™ and YouTube. The use of technology such as mobile phones, cameras, smart- watches or other handheld 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. This policy applies to all social media use whether or not expressly listed in this paragraph.
- 2.5 It also extends to the use of the chat function in all conferencing software, whether these are used in a scheduled teaching and learning session or for communication between students when collaborating at other times. The recording function in MS Teams means that the contents of a 'chat' remain available after the session has closed for all participants to view.
- 2.6 Italia Conti values academic freedom (i.e., the freedom within the law to question and test received wisdom and to put forward new ideas and controversial or unpopular opinions, without risk to employment or privileges) and this must be taken into account when applying this policy.
- 2.7 This policy applies to Social Media uploaded from any geographic location, both on and outside Italia Conti owned or controlled premises, and to communications sent on devices to an individual, group or the wider world. It is intended to guide current employees in the use of Social Media where they make reference to Italia Conti and its staff and students.
- 2.8 **The use of Italia Conti 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: use of these elements is an infringement of copyright.

3. Legal Framework

3.1 Italia Conti is committed to ensuring that all staff use 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
- Employment Rights Act 1996
- Professional Codes of Conduct

3.2 All Italia Conti staff 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's *Equal Opportunities Policy*.

4. Principles

4.1 If staff use social media in a professional capacity, either through an Italia Conti or through a Professional Personal Account, they must make sure that their communications do not:

- **bring Italia Conti into disrepute**, for example, by making defamatory or disparaging comments about individuals, other organisations or groups, or Italia Conti, or by posting inappropriate content or using inappropriate language;
- **breach confidentiality or data protection requirements**, for example, revealing confidential information owned by Italia Conti, or the personal data of any individual who has not given appropriate consent for their data to be published;
- **breach copyright or other intellectual property rights**, for example, using someone else's content without their permission or by breaking the terms of any permission granted;
- **do anything that may be considered discriminatory against, or bullying or harassment of, any individual or group**, for example, making offensive or derogatory comments relating to sex, gender, race, disability, sexual orientation, religion, belief or age; using social media to bully another individual; or posting images that are discriminatory or offensive or linking to such content; or breach Italia Conti's policies or the terms of service of the social network;
- **go against our duty of care to our students and other members of staff** for example crossing the line between an appropriate student and member of staff contact.

4.2 Italia Conti encourages staff to use Social Media in a responsible and respectful way;

it can be used by staff to celebrate achievement, to support their peers, and to express well-considered and truthful opinions.

4.3 In using Social Media, Italia Conti asks staff 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;
- remain mindful of their digital footprint and exercise caution in all their use of social media or any other web-based presence they have. This includes written content, videos or photographs and views expressed either directly or by 'liking' certain pages or posts or following certain individuals or groups.
- adopt the highest security settings on any personal profiles they have;
- exercise care when using dating and social media websites where staff could encounter students;
- not make contact with students, their guardians or family members, accept or initiate friend requests or follow students' or their guardians' accounts on any social media platform; and
- not connect with or correspond with students personally via social media or other methods of communication until at least 6 months after the student has left.

4.4 Staff are expected to use Social Media in a way that does not contravene any existing Italia Conti policy or the terms and conditions of their terms of employment.

4.5 Staff must use Social Media in accordance with any existing legislation or common law requirements, and in accordance with the terms and conditions of their Social Media provider.

4.6 All staff members must be conscious at all times of the need to keep their personal and professional lives separate. This policy applies to personal use of Social Media as well as the use of Social Media for official Italia Conti purposes, and includes websites hosted and maintained on behalf of the Italia Conti Associate Schools and Companies.

4.7 Staff are held personally responsible for any material they upload and should their Social Media posts infringe any existing Italia Conti policies, they may be subject to disciplinary measures.

4.8 Staff must not represent their personal opinions as being those of Italia Conti; Italia Conti has its own Social Media channels for this purpose.

4.9 Staff should not use Social Media for airing grievances or reporting crimes. There are existing channels for dealing with these issues, e.g., the Grievance Policy and Procedure in the Staff Handbook and Italia Conti's *Complaints Policy & Procedures*. Note: staff reporting such incidents via Social Media might compromise any subsequent court case.

4.10 Whilst Italia Conti recognises the right of staff 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.

4.11 Italia Conti may take disciplinary action where users have been reckless or careless in

their Social Media communication.

4.12 Italia Conti may require users to remove Social Media/Internet postings which are deemed to constitute a breach of this policy. Failure to comply with such a request may in itself result in disciplinary action or civil action.

4.13 This policy is not intended to affect the ability of the Italia Conti community to use relevant Social Media for purely professional purposes.

5. Personal Use of Social Media

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

5.2 Staff are reminded that they can only connect directly with their students through their official Italia Conti email account. For safeguarding/welfare purposes, staff are prohibited from contacting students through their personal social media or email accounts. (The only exception would be where the student concerned was also a family member). Any requests that staff receive from students should be declined so that communication, including the potential for any direct messaging, remains within established Italia Conti channels (Italia Conti e-mail being the preferred option for this).

5.3 In the event that staff receive a request from a student on social media, the established course of action is to decline and, should the member of staff wish, follow up with an e-mail on Italia Conti e-mail to inform the student that they are prohibited from connecting with current students on social media and to refer them to this policy.

5.4 In the event that direct contact with an Italia Conti student is made inadvertently through Social Media (i.e. – through a dating website or app), this should be disclosed immediately to a member of the Senior Leadership Team. This is also reflected in the corresponding student policies, emphasising that it is a responsibility also shared by students to make a disclosure.

5.5 The professional appearance (or otherwise) of Social Media accounts and their posts may sometimes be reviewed by prospective employers, students or other contacts in the industry. This research could be used to infer a user's personality or employability.

5.6 Information that staff gain in the course of their involvement with Italia Conti must not be used for unfair personal gain nor passed on to others who may use it in the same way. Staff are reminded that they have a duty of confidentiality which is written into their contract of employment.

5.7 Staff and the wider Italia Conti community should not create or post images or videos from Italia Conti activities or of Italia Conti students without permission. This applies to activities which take place on private premises which Italia Conti control or have authority over, e.g. classes, rehearsals, and performances and extends to instances where staff might encounter students outside of Italia Conti (i.e. – if teaching classes at external dance studios where Italia Conti students may be in attendance). The publication of such material may be an infringement of copyright laws. Images taken at Italia Conti events, when such permission has been granted by Italia Conti 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 at the time.

- 5.8 Staff 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 staff member 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.
- 5.9 Staff 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 staff member's knowledge. This might lead to material reaching an unintended audience or be used in ways that the staff member did not expect.
- 5.10 If a staff member discloses an affiliation with Italia Conti on their profile or in any social media postings, they must state that their views do not necessarily represent those of Italia Conti. However, staff should be aware that they will still be perceived as a representative of Italia Conti, and such a disclaimer would not prevent appropriate disciplinary action.
- 5.11 Staff should not send "friend" requests to students or their parents or close relatives or solicit connections with students, their parents or close relatives on social media in any other way as this could be deemed to create a conflict of interest or call in to question their objectivity. This applies to personal and professional accounts. Where a staff member is unsure whether it is appropriate to accept a friend request, they should consult with the HR department. Where a student has left Italia Conti, a staff member may accept a "friend" request or a request to follow a private account at the point at which the time elapsed since the student's leaving Italia Conti exceeds 6 months and providing the student is over the age of 18.
- 5.12 Staff should take care with the personal information they reveal on Social Media sites so they do not inadvertently put themselves or others at risk. Staff members are encouraged to familiarise themselves with the privacy settings for each social media platform and share only at a level that they consider to be appropriate. Further advice and guidance for staff on managing and protecting their online reputation can be found in **Appendix 2**.
- 5.13 A checklist of examples of unacceptable use of Social Media can be found in **Appendix 1**.

6. Official Italia Conti Social Media Accounts

- 6.1 The Senior Leadership Team (SLT), Marketing and IT staff have full responsibility for running the Italia Conti's official website, and its Facebook™, Twitter™, Instagram™, and YouTube™ sites. No other Social Media platforms may be set up by any member of staff or student that can be associated and recognised as Italia Conti.

7. Social media in an emergency

- 7.1 Social media provides important information channels for staff, students and wider stakeholders during an emergency situation, and it is vital that the information provided is timely, consistent and accurate. All communications on social media from Italia Conti

in an emergency situation will be issued via the central Italia Conti social media accounts. In order to minimise the risk of issuing conflicting and/or incorrect information, it is vital that all other social media accounts do not post information or updates during a live incident and await further direction from Italia Conti's Emergency Actions Response Team.

8. Escalating concerns and issues

- 8.1 Should a social media account appear to have been a victim of unauthorised access, or a post from a corporate or professional personal account attracts a number of negative comments, staff should flag this with SLT in a timely manner, who can record the incident and comments and advise on how best to respond. (Contact: Speakup@italiaconti.co.uk).
- 8.2 Where this could potentially result in a personal data breach this must also be reported to the DPO Offices in accordance with our breach management processes (DPO@italiaconti.co.uk).

9. Monitoring of Internet Use

- 9.1 Italia Conti monitors usage of its Internet, online content, online services, and email services without prior notification or authorisation from users.
- 9.2 Users of Italia Conti email and internet services should be aware that anything they create, store, send or receive using Italia Conti's ICT system may be monitored at any time.

10. Breaches of the Policy

- 10.1 Any breach of this policy that leads to a breach of confidentiality, defamation or damage to the reputation of Italia Conti or any acts that render Italia Conti liable to third parties may result in legal action, disciplinary action or sanctions in line with the published Italia Conti policies for staff.
- 10.2 Italia Conti may ask users to remove Internet postings which are deemed to constitute a breach of this policy. Failure to comply with such a request may, in itself, result in disciplinary action or civil action.

11. Relationship with other Italia Conti policies

- 11.1 If an internet post would breach any of Italia Conti's policies in another forum, it will also breach them in an online forum. For example, users are prohibited from using Social Media to:
- breach the *Use of E-mail, Internet & Communication Systems* guidance contained within the Staff Handbook
 - breach Italia Conti's obligations with respect to the rules of relevant regulatory bodies
 - breach any obligations they may have relating to confidentiality
 - breach the Italia Conti *Code of Conduct and Disciplinary* policies or related rules, policies and procedures
 - defame or disparage Italia Conti 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 *Bullying & Harassment Policy*
- unlawfully discriminate against other users or third parties or breach the Italia Conti's *Equal Opportunities Policy*
- breach Italia Conti's *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.

11.2 Users must also be aware of the particular risks to internet security that Social Media presents and so to comply with Italia Conti's policies on internet security and digital safety, and must take any extra measures necessary not to allow any of their actions on Social Media sites to create vulnerability to any Italia Conti systems.

12. Related Policies

- Safeguarding and Child Protection Policy
- Prevent Risk Assessment
- Equal Opportunities Policy
- Staff Code of Conduct
- Student Code of Conduct
- Use of E-mail, Internet & Communication Systems Procedure
- Data Protection Policy and Privacy notices
- Bullying and Harassment Policy
- Academic Freedom and Freedom of Speech Codes of Practice
- Disciplinary Policy
- Harassment, Sexual Misconduct and Sexual Violence Policy

1) Appendix 1: Checklist of examples of unacceptable use of Social Media*

- Personal contact information (without that individual's permission).
- Any material that could bring Italia Conti, 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, etc.
- Postings created under fake identities or which use the identity of others.
- Postings that imply that they are the opinion of Italia Conti.
- Postings that discuss complaints or criminal or civil proceedings involving Italia Conti.
- Postings that might constitute a contempt of court.
- Postings that imply that Italia Conti 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 logo.

**This list is not exhaustive.*

****** Examples of cyberbullying may include 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

2) Appendix 2: Good practice in Social Media use

Your professional reputation is part of your current and future career, therefore managing your online reputation is essential. Anything you post online or send by email is potentially public and permanent, even if you subsequently delete posts and emails and if you use privacy settings.

For reviewing the content of your Social Media posts, always consider:

- 1) The impression people will form of you.
 - Would you be happy for the message to be seen publicly?
- 2) The content of your message.
 - Does it show you as a professional practitioner?
 - What judgements might be made of your professionalism and potential employability?
- 3) The accuracy of your content?
 - Is it true?
 - Could it give rise to a civil claim or criminal liability?
- 4) The presentation of your content.
 - Does it look professional?
 - Is it appropriately worded?
- 5) Is your use of Social Media complying with current Italia Conti policies?
- 6) Does your use of Social Media comply with any professional codes of conduct that apply to you?
- 7) Are you revealing privileged or confidential information?
- 8) Are you complying with data protection law?
- 9) Are you blurring the line between your professional and personal life?
 - Is the way you are presenting yourself going to undermine your professional relationships with your students?

Check your privacy settings

When using social networking websites it is important that you are in control of who can see your account details and content, including photos, albums, posts, status updates and any personal information. Accounts for Twitter, Facebook and Instagram can be set to private.

Friend or foe

It is a good idea to remove any friends, or customise the privacy settings for current friends, if access to your personal activity could compromise your position.

Be careful about comments you post on your friends' walls; if their profile is not set to private, your posts will be visible to everyone. Sharing content with others means that it is out of your control.

It is important, regardless of which setting you use, to assume that every post you make could

be made public, as friends' settings do not guarantee privacy.

Using email

All emails sent from an Italia Conti account should be regarded as public, especially as a 'data subject access' request could be made under the Data Protection Act. Emails should always be in professional language and appropriate to being an employee. It should also be noted that where a private email account is used for issues associated with work, it has in some cases been deemed as a work account and therefore also subject to the rules of professional language and conduct.

In short, do not send an email that you would not be happy for your employer or a colleague to read.

For technical advice on safely using Social Media, use this link to the National Cyber Security Centre at: <https://www.ncsc.gov.uk/guidance/social-media-how-to-use-it-safely>

Further References:

Association of Schools and College Leaders UK www.ascl.org.uk

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