



## SOCIAL MEDIA POLICY

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## 1. Introduction

1.1. This policy recognises that in the light of the rapid evolution of social networking technologies, LEAPS Suffolk requires a robust policy framework so that all employees and volunteers are aware of our expectations and the rules they are expected to follow when using social media both inside and outside of LEAPS Suffolk work activities.

1.2. This policy is designed to ensure everyone uses social media responsibly in order to safeguard our organisation, attendees, their families, staff, volunteers and members of the wider community. It is crucial that attendees are safeguarded and that parents, attendees and the public at large have confidence in our services. Responsible use of social media will ensure that the confidentiality and privacy of attendees, volunteers and members of staff are maintained and that the reputation and integrity of LEAPS Suffolk is protected.

1.3. This policy should be read in conjunction with other relevant LEAPS Suffolk policies in particular, but not limited to, the Safeguarding Children and Adults Policy, Mobile Phone Policy, Employee Handbook, Disciplinary Policy, and Equality Policy.

1.4. This policy takes into account the provisions of the DfE's statutory advice for on Keeping Children Safe in Education (September 2022), the non-statutory guidance on the Prevent Duty (June 2015)

## 2. Scope and definitions

2.1 This policy applies to all employees and volunteers (regardless of age) working at, or providing a service at LEAPS Suffolk

2.2 This policy covers the personal use of social media as well as the use of social media for LEAPS Suffolk purposes (whether official or not), including the use of websites hosted and maintained on behalf of the organisation

2.3 This policy covers the use of social media as defined in paragraph 3 of this policy and also personal blogs and any posts made on other people's blogs and to all online forums and notice boards. The guidance, rules and principles set out in this policy must be followed irrespective of the social media platform or medium.

2.4 In this policy, the following definitions apply: -

**Social media** - means any type of interactive online media that allows parties to communicate instantly with each other or to share data in a public forum. Social media includes but is not limited to, online social forums such as Twitter, Facebook and LinkedIn and also covers blogs, chatrooms, forums, podcasts and video-image-sharing websites such as YouTube, Flickr, Reddit, Instagram, Snapchat and Tumblr. The internet is a fast-moving technology and it is impossible to cover all examples of emerging social media in this policy.

**Adults** – means any person regardless of age either employed or volunteering at LEAPS Suffolk

### **3. Key Principles**

3.1 Adults have an important role to play in equipping our attendees to stay safe online, regardless of whether this is at our activities or at home. Adults therefore need to be aware of the risks associated with the use of social media and in particular about the provision and sharing of information in the social media arena.

3.2 Adults must not, whether deliberately or inadvertently and whether in their working time or in their personal time, provide, publish or share inappropriate information on or via any social media platform or medium about themselves, LEAPS Suffolk or the wider community.

3.3 Adults are accountable for and must take responsibility for all information published or shared by them on social media websites and for any views expressed by them on any such sites, whether in their working time or in their personal time and which may come into the public domain.

3.4 All adults who provide, publish or share information which causes harm or distress or which has the potential to cause harm or distress or to cause reputational damage to LEAPS Suffolk and the wider community will be managed as appropriate by the Founder/Director (also Designated Safeguard Lead) and the Board of Trustees in accordance with the Disciplinary and Grievance Policy, Safeguarding Children and Adults Policy and the Whistleblowing Policy. This may lead to referring to the police, other professional agencies such as LADO and in some cases, instant dismissal.

### **4. Roles and responsibilities**

The Director has direct responsibility:

- for ensuring all adults and volunteers at LEAPS Suffolk are familiar with this and all related policies.
- for taking all reasonable steps to enable adults working with children and young people to work safely and responsibly and to support safer working practice in general with regard to the use of the internet and other communication technologies
- for taking all reasonable steps to assist adults to monitor their own practices and standards with regard to the use of the internet and other communication technologies
- for setting clear rules in relation to the expected standards of behaviour relevant to social networking for educational, personal or recreational use
- for giving a clear message that unlawful or unsafe behaviour or practice is unacceptable and that where appropriate, disciplinary, legal and/or other action will be taken
- for ensuring that all concerns raised in relation to the accessing of social media or social networking sites are investigated promptly and appropriately

- to take all reasonable steps to minimise the risk of misplaced or malicious allegations being made against all adults working at LEAPS Suffolk
- to take all reasonable steps to prevent adults working at LEAP Suffolk abusing or misusing their position of trust.

Employees and volunteers at LEAPS Suffolk must

- ensure they are familiar with the contents of this policy
- adhere to and apply the rules, guidance and principles in this policy in all aspects of their work and in their personal time
- act in accordance with their duties and responsibilities under this policy and the statutory/ non statutory advice and guidance referred to
- raise any concerns or queries in connection with this policy with the Managing Director or Board of Trustees
- attend or complete any training provided in relation to the use of the internet or any other communication technologies
- never, in any circumstances, abuse or misuse their position of trust.
- Take responsibility for their actions

## **5. Safer social networking practice**

5.1 Adults must be aware of the risks and dangers of revealing personal information on social networking sites. Disclosing personal information on social networking sites may compromise an adult's personal safety and security and it also increases the potential for identity theft by third parties and increases the potential for attendees, their families or friends having access to adults outside of our environment. Personal information includes information such as a home address, home and mobile telephone numbers and details relating to place of work.

5.2 Adults, particularly those new to LEAPS Suffolk, must review their social networking sites when they commence employment or a voluntary post and should ensure that they have the appropriate privacy settings in place to ensure that information available publicly about them is appropriate and accurate. This should include reviewing any photographs or images that may cause embarrassment to them and/or to LEAPS Suffolk and the wider community.

## **6. Responsibilities when using social media**

6.1 Adults must take responsibility for their personal telephones and any personal electronic devices and must keep their personal telephone numbers, login details, passwords, pin details and personal email addresses private and secure.

6.2 Where there is a need to contact parents or carers. A work mobile must be used and only by the Lead, or a Deputy Lead, all are members of the senior safeguard team. Unless it is previously agreed with the Lead or Deputy Lead.

6.3 Adults must understand who is allowed to view the content on their social media pages of any websites they use and how to restrict access to certain groups of people. Appropriate privacy settings are vital.

6.4 Adults must not request, or respond to a request for any personal information from or about an attendee.

6.5 Adults must not engage in conversations about attendees with their parents or carers or with any other person by any form of social networking or social media.

6.6 Adults must only use their official LEAPS Suffolk email address or work mobile phone for communicating with attendees who are known to be living independently and/or who plan their own activities. This must be kept to a minimum. Any communications with attendees (including by email, telephone or text communications) outside of agreed protocols will be treated as a very serious conduct matter.

6.7 Adults must never “follow” or allow themselves to be “followed”, or make a “friend” of or have any contact with an attendee on any social networking site.

6.8 Adults must be cautious about any form of social networking contact with former attendees particularly where siblings or other relatives continue to attend the LEAPS Suffolk or may attend in future.

6.9 Adults must be cautious about following or being followed by parents/carers of attendees, accepting parents of attendees as friends on Facebook or having contact with parents/carers on any social networking site. Adults must be mindful at all times of the boundaries between their work and personal life in accordance with the Key Principles detailed in this policy.

6.10 Adults must also be cautious when inviting work colleagues to be friends on social networking sites. Social networking sites can blur the boundaries between work and personal lives and it may be difficult to maintain professional relationships.

6.11 Adults must not use social media and the internet in any way to attack, insult, criticise, abuse or defame attendees, family members of attendees, colleagues, the management or Board of Trustees and the wider community. Adults must always show respect to others when using social media.

6.12 Adults must never post derogatory remarks or offensive comments on-line or engage in on-line activities which may bring them or the organisation and the wider community into disrepute or which could be interpreted as reflecting negatively on their professionalism.

6.13 Adults must not represent their personal views on any social media forum as being in any way linked to, or being the views of LEAPS Suffolk.

6.14 Photographs, videos or any other types of images of attendees and their families or images depicting staff members or where the organisation can be identified must not be published on social

media. Unless this is agreed in advance and only on the official LEAPS Suffolk page. Permission must also be sought before any image can be published.

6.15 Where social networking and other web-based sites have fields in the user profile relating to job title or information, adults should not put any information onto the site which could identify LEAPS Suffolk

6.16 Adults must at all times be mindful of the standards applicable to their profession and act in accordance with those standards.

6.17 Adults must devote the whole of their time and attention to their duties during working hours. Personal use of the internet is not permitted during working hours and any breach of this provision will be regarded as a conduct matter and disciplinary action taken as appropriate.

6.18 Confidentiality issues must be considered at all times in relation to social networking and the use of social media. All employees are bound by a common law duty of fidelity. There are also other laws which protect the organisation's confidential information which adults working at LEAPS Suffolk may have access to during the course of their work. Confidential information includes but is not limited to person identifiable information for example attendee and employee records, information protected by the Data Protection Act 1998.

6.19 Adults must ensure that they do not provide, publish share or otherwise disclose any confidential information about themselves or about the organisation and breach of their duty of fidelity or be in breach of other laws relating to confidentiality and privacy including the Human Rights Act 1998, and the Data Protection Act 1998.

6.20 Adults must ensure they understand their obligations under the Equality Act 2010 and under the organisations Equality Policy. Breaches of these will be considered a serious misconduct matter. Adults should also be aware that they could be held personally liable for their own discriminatory actions under the Equality Act 2010. If, for example an adult were to harass a co-worker online or engage in a discriminatory act in relation to one of the protected characteristics under the Equality Act 2010, this may result in legal action being taken against them.

6.21 Adults should also be aware that there are other laws relating to libel, defamation, harassment and copyright which may apply to information, published or posted by them on social media and which could lead to legal action being taken against them.

6.24 All concerns about communications, social contact or social media/social networking issues must be raised with the Managing Director immediately.

## **7 Access to inappropriate images**

7.1 There are no circumstances which justify adults possessing indecent images of children or vulnerable adults, whether in working time or in an adult's personal time. Adults who access and/or possess links to such material or websites will be viewed as a significant and potential threat of harm

to children. Appropriate action will be taken against the adult concerned in these circumstances which, for the avoidance of doubt, could include action under the organisation's Safeguarding Policy (which could lead to police and Local Authority involvement) and disciplinary action (which could result in dismissal without notice on the grounds of gross misconduct). Where indecent images of children are found by any adult, the Managing Director/Safeguard Lead must be informed immediately.

7.2 Adults must not use equipment belonging to the LEAPS Suffolk to access pornography or adult or explicit material of any kind. Personal equipment containing these images or links to them must not be brought into any activity provided by LEAPS Suffolk. If any adult uses the organisations equipment or personal equipment to access pornography or links to it, this will raise serious concerns about the suitability of the adult concerned to work with children and young people. This will lead to an investigation and may lead to disciplinary action and any other action considered appropriate in the circumstances.

7.3 Adults must ensure that attendees are not exposed to any inappropriate information, images or web links. Given the needs of the people we support, an attendee may at times bring their own iPad or tablet, or may use the work phone as a means of decompressing. This must be supervised by the session lead or deputy at all times. Any concerns or potential issues identified by any adult must be reported immediately to the session lead.

## **8. Cyberbullying and Trolling**

8.1 "Cyberbullying" can be defined as "the use of modern communication technologies to embarrass, humiliate, threaten or intimidate an individual in the attempt to gain power and control over them.'

8.2 If cyberbullying takes place, adults should keep records of the abuse, texts, e-mails, website or instant messages and should not delete the said texts, e-mails or 10 messages. Adults are advised to take screen prints of messages or web pages and to be careful to record the time, date and location of the site.

8.3 Trolling" can be defined as "circumstances where a person shows discord on the internet by starting arguments or upsetting people by posting inflammatory messages in an online community with the deliberate intent of provoking readers into an emotional response;'

8.4 If trolling occurs, adults are advised to take screen prints of messages and should not delete any evidence of trolling.

8.5 Adults must report all incidents of cyberbullying and/or trolling to the Managing Director. Any such incidents will be taken very seriously. Adults who have been subjected to cyberbullying or trolling may wish to seek the support of a professional association representative.

## **9. The Prevent Duty**

9.1 LEAPS Suffolk has a vital role to play in equipping children and young people to stay safe online, both in and outside our activities and also in protecting pupils from the risks of extremism and

radicalisation. Section 26 of the Counter-Terrorism and Security Act 2015 places a duty on specified authorities in the exercise of their functions, to have due regard to the need to prevent people from being drawn into terrorism (the Prevent Duty).

9.2 Terrorist organisations, such as ISIL, are attempting to radicalise and recruit young people through extensive use of social media and the internet. As with any other online risks of harm, every adult at LEAPS Suffolk must be aware of the risks posed by the online activity of extremist and terrorist groups.

9.3 The Prevent guidance is available on the shared drive for staff and volunteers to access

9.4 For the avoidance of doubt, if any adult working at LEAPS Suffolk has a concern that a particular attendee or group of attendees is at risk of radicalisation or terrorist exploitation, through social media or otherwise, they must immediately contact the Safeguard Lead and follow the organisation's normal safeguarding procedures.

## **10. Breaches of Policy and Other Issues**

10.1 Any breach of this policy and the duties, responsibilities, professional standards and legal obligations referred to will be regarded as a serious matter and action including disciplinary action in appropriate circumstances will be taken. In serious cases involving employees this may lead to dismissal without notice on the grounds of gross misconduct.

10.2 Where there has been a breach of this policy, LEAPS Suffolk will also take whatever action is considered appropriate in order to protect the reputation and integrity of the organisation.

11.3 Adults must be aware that any breach of this policy involving a breach of the laws, professional codes or other statutory provisions referred to in this policy may result in legal or other action being taken against them by a body or person other than the organisation.