

Social Media Policy



Frobel Education's Executive Board oversee policy and procedure for its educational services:



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By: Executive Board

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The purpose of this policy is to set out a framework, processes and procedures that facilitate Frobels Education and its Centres, to make effective use of social media in a safe and constructive manner, whilst observing all legal and best practice requirements and uphold the good reputation of the Organisation.

The widespread availability and use of social networking applications bring opportunities to communicate with various groups in new ways. Whilst recognising the benefits which using social media brings, this policy sets out the principles designed to ensure that all staff members use social media responsibly so that the confidentiality of learners, staff and the reputation of Frobels Education and its Centres is safeguarded. Staff members must be conscious at all times of the need to keep their personal and professional lives separate when using social media.

The Internet provides an increasing range of social media tools that allow users to interact with each other. Whilst recognising the important benefits of these media for new opportunities for communication, this policy sets out the principles that Frobels staff, governors and contractors are required to follow when using social media.

It is essential that learners/learners, parents and the public at large have confidence in Frobels Education's decisions and services. The principles set out in this policy are designed to ensure that staff members use social media responsibly so that confidentiality of learners and staff members and the reputation of Frobels Education and its Centres is safeguarded. In this context, **staff members must be conscious at all times of the need to keep their personal and professional lives separate.**

Any misuse of social media must be reported promptly to the CEO, whether carried out by learners, parents/guardians or staff members.

The internet is fast moving technology and it is impossible to cover all circumstances or emerging media therefore the principles set out in this policy must be followed closely, irrespective of the medium or platform. Purpose of policy and guidance.

All users must be aware that as soon as a post is made online, it is no longer within the private sphere or in the control of the original poster.

All Frobels Education ICT systems may be monitored in accordance with the Acceptable Use Policy, so personal privacy cannot be assumed when using Frobels Education hardware.

Centres can monitor the usage of its own internet and email services without prior notification or authorisation from users (staff, contractors and learners) when justifiable concerns have been raised re: electronic communication. This will be in line with Frobels Education's investigation procedures.

Authorised staff should only use official social media organisation sites for communicating with learners, to enable learners to communicate with one another or for professional organisation marketing and recruitment.

Specific, named administrators will be responsible for maintaining the content of organisation websites. There will be regular communication between the Hub Manager and Centre Managers to identify what content is appropriate for posting on the Frobels Education platforms.

Staff must give permission for their images to be used in relation organisation produced materials accessible by members of the public (online or in print), whether controlled by the organisation or

not. Photographs must be checked carefully to ensure that children who are on the restricted list are never shown on the websites.

Permissions must be sought for images of children/young people to be used in organisation produced materials, clear reference to online usage needs to be made when permissions are requested.

Cyber Bullying

Cyberbullying is making use of information and communications technology, particularly mobile phones and the internet, to deliberately undermine, humiliate or otherwise cause distress to the person on the receiving end. Members of the Frobel Education community must not use social media and the internet to attack, insult, abuse or defame learners, their family members, colleagues, other professionals, other organisations (including Frobel Education).

Cyber Bullying and Cyber Harassment, like other forms of bullying and harassment, imply a relationship where an individual has some influence or advantage that is used improperly over another person or persons, where the victim is subjected to a disadvantage or detriment, and where the behaviour is unwarranted and unwelcome to the victim. However, in this case the technological environment has meant that the acts of bullying and harassment now include the use of information and communications technology including email and social networking.

It should be noted that a person does not need to directly experience this form of victimisation in order for it to be classed as cyber bullying/harassment. The fact that a person is unaware that offensive or derogatory comments about them have been placed on websites still fits the criteria of cyber bullying/harassment.

Staff should not personally engage with cyberbullying incidents and should immediately report incidents to their Centre Manager, who will report the matter to the CEO.

If a member of Staff is the victim (receives any threats, abuse or harassment from members of the public through their use of social media), they should keep any records of the abuse and if appropriate, screen prints of messages or webpages with time, date and address of the site. Staff must report such incidents using the organisation's procedures. Support is also available; Central Services can signpost this.

Frobel Education will consider it a potential disciplinary matter if users utilise any information and communications technology, including email and social networking sites, in such a way as to bully/harass others in Frobel Education or in partner organisations, learners or parents, whether this takes place during or outside of work.

Staff members and learners need to be aware that no matter what the privacy settings on their social media/networking site, inappropriate/derogatory information about a colleague in Frobel Education or one of its Centres, or partner organisations, other learners or parents, can find its way into the public domain even when not intended.

If a member of staff is the perpetrator of the incident/s the situation will then be investigated and if appropriate, the Disciplinary or Capability Procedure will be followed.

If a learner is the perpetrator of the incident/s the situation will be initially investigated in line with Frobel Education behaviour and pupil disciplinary policy. Where appropriate the police will be consulted.

Where a potential criminal offence has been identified, and reported to the police, Frobels Education will ensure that any internal investigation does not interfere with police enquiries. Staff who are victims of cyber-bullying or harassment will be offered support by their line manager and where suitable, occupational health.

The organisation owes a duty of care to employees to take reasonable steps to provide a safe working environment free from bullying and harassment.

For this reason, it is essential that Senior Leaders take appropriate steps to deal with any incident where it is alleged that a staff member has subjected others to abusive or personally offensive emails, phone calls or content on social networking sites such as Facebook, Twitter, or by any other means.

If a Senior Leader is made aware of such an allegation, they should deal with it in the same way as any other incident of bullying or harassment in line with Frobels Education policies, by the appropriate person investigating the allegations promptly and appropriately and providing the victim with appropriate support to demonstrate that the matter is being dealt with seriously.

Senior Leaders should encourage staff to preserve all evidence by not deleting emails. In addition, logging phone calls and taking screen-prints of websites would all help towards supporting an investigation. If the incident involves illegal content or contains threats of a physical or sexual nature, the Senior Leaders should consider advising the employee that they should inform the police.

In the event that such evidence contains indecent images of children, it is an offence to save, send, or alter an image or to show it to anyone else. Therefore, the evidence must be placed in a secure location such as a locked cupboard where others will not be able to see it. In these circumstances the Police must be contacted immediately for advice. The DSL must be informed at the earliest moment.

This policy section applies to employees, workers and contractors.

This policy sets out the Organisation's position on use of social media, whether conducted on Organisation systems and in work time or your own private systems or devices in your own time.

For the purposes of this policy, social media is any online platform or application that allows parties to communicate instantly with each other or to share data in a public forum. This includes social forums such as Facebook, X, Instagram, and LinkedIn. Social media also includes blogs and video and image-sharing websites such as YouTube and TikTok.

Staff should be aware that there are a number of legal implications associated with the inappropriate use of social media. Liability can arise under the laws of: ▪ Defamation ▪ Copyright ▪ Discrimination ▪ Contract ▪ Human Rights ▪ Protection from harassment ▪ Criminal Justice ▪ Data Protection.

In all communications from members of staff/employees of Frobels Education, staff should: a) be conscious at all times of the need to keep personal and professional lives separate. Staff should not put themselves in a position where there is a conflict between their work and personal interests. b) not engage in activities involving social media which may bring Frobels Education and its Centres into disrepute. c) not represent their personal views as those of Frobels Education or its Centres on any social medium. d) not discuss personal information about learners, staff and any other professionals

that they interact with as part of their job, on social media. e) follow safeguarding principles f) be open, honest, ethical and professional; g) use jargon-free, plain English in professional communication; h) be actioned within an agreed time frame; i) use the method of communication that is most effective and appropriate to the context, message and audience; j) be cost effective.

Frobel Education respects the privacy of its employees. However, postings made on a personal account may attain a wide readership and will therefore be considered public rather than private. Publicly accessible postings may be investigated if there is a suspected breach of this or related policies.

If an employee is found to have breached this policy, they may be subject to disciplinary procedure. If a criminal offence is considered to have been committed, further action may be taken to assist with the prosecution of the offenders.

Your responsibilities

Social media can offer a useful means of keeping in touch with friends and colleagues, and can be used to exchange views and thoughts on shared interests, both personal and work-related.

The Organisation does not object to you setting up personal accounts on social media and networking sites on the internet, in your own time. However, you must not do so on Organisation systems or devices or in work time.

You must not link your personal social networking accounts or blogs to the Organisation 's website, social networking site or profile without the Organisation 's prior consent.

You must limit your use of social media on your own devices to your official rest breaks.

You must not disclose Organisation secrets, breach copyright, defame the Organisation or its clients, suppliers, customers or any individual who works for the Organisation, or disclose personal data or information about any individual who works for the Organisation, on social media.

Social media posts or blogs should not be insulting or abusive to employees, workers, contractors, suppliers, Organisation contacts, clients or customers.

Staff members are strongly encouraged not to identify themselves as staff members of Frobel Education in their personal social media platforms. This is to prevent information on these sites from being linked with Frobel Education and its Centres, and to safeguard the privacy of staff members. This does not include professional networking sites.

Staff should not have contact through any social medium with any learner from Frobel Education or any other organisation. Staff are advised not to communicate on social media platforms with ex-learners except via professional networking sites for professional reasons.

Staff should decline 'friend requests' from learners they receive in their personal social media accounts.

Information staff members have access to as part of their employment, including personal information about learners and their family members, colleagues and other parties must not be discussed on their personal social media platforms.

Photographs, videos or any of images of learners or learners must not be published on personal social media platforms without prior permission of parents/carers and the Frobel Centre. Permission should be gained through existing Centre procedures.

3Frobel Education email addresses and other official contact details must not be used for setting up personal social media accounts or to communicate through such media unless pre-approved by the CEO.

Caution is advised when inviting work colleagues to be 'friends' in personal social networking sites. Social networking sites blur the line between work and personal lives and it may be difficult to maintain professional relationships.

Staff are strongly advised to ensure that they set up and regularly review the privacy levels of their personal sites as strictly as they can and to opt out of public listings on social networking sites to protect their own privacy. Staff members should keep their passwords confidential, change them often and be careful what is posted online; it is not safe to reveal home addresses, telephone numbers and other personal information.

Staff should also select carefully their social media profile picture as it is an extension to their professional image online.

Social media should not be used for work related communication. Communication should be through Frobel Education email or contact details held by the Frobel Education Centres.

Any misuse or abuse of social media must be reported to the Head of Centre, who in turn reports the matter to the CEO as soon as noticed, especially when concerning a pupil, parent/guardian or employee. Where a member of staff is a parent/guardian as well as an employee of Frobel Education.

Frobel Education recognises the risks associated with use of the Internet and social media and regulates their use to ensure this does not damage the Frobel Education or its Centres, its staff and the people it serves. Principal amongst these risks are: • access to inappropriate material; • civil or criminal action relating to breaches of legislation; • cyber bullying by learners/learners; • damage to the reputation of Frobel Education or its Centres; • disclosure of confidential information; • inappropriate behaviour, criticism and complaints from external sources; • loss or theft of personal data; • offending behaviour toward staff members by other staff or learners/learners; • other misuse by staff including inappropriate personal use; • social engineering attacks - i.e. the act of manipulating people into disclosing confidential material or carrying out certain actions; • staff members openly identifying themselves as Frobel Education personnel and making disparaging remarks about the organisation and/or its policies, about other staff members, learners or other people associated with Frobel Education. • damage to professional reputations with current and future employers. • virus or other malware (malicious software) infection from infected sites.

Compliance with related policies

Social media should never be used in a way that breaches any of the Organisation 's other policies. If an internet post would breach any of our policies in another forum, it will also breach them in an online forum.

For example, you are prohibited from using social media to:

- breach our obligations with respect to the rules of relevant regulatory bodies
- breach any obligations contained in our policies relating to confidentiality breach our Disciplinary Policy or procedures
- harass or bully colleagues in any way
- post insulting, abusive, bullying or 'trolling' comments regarding colleagues, contractors, suppliers, clients or customers
- post anything that is likely to be harmful to the Organisation 's reputation
- unlawfully discriminate against colleagues or third parties
- breach our data protection rules (for example, never disclose personal information about a colleague online)
- breach any other laws or regulatory requirements.
- You should never provide references for other individuals on social or professional networking sites, as such references, positive and negative, can be attributed to the organisation and create legal liability for both the author of the reference and the Organisation.

References to the Organisation

If reference is made to your employment or to the Organisation, you should state to the reader that the views that you express are your views only and that they do not reflect the views of the Organisation. You should include a notice such as the following:

'The views expressed on this website/blog are mine alone and do not reflect the views of my employer'

You should always be conscious of your duty to act in good faith and in the best interests of the Organisation under UK law. The Organisation will not tolerate criticisms posted in messages in the public domain or on blogs about the Organisation or any other person connected to the Organisation.

You must not bring the Organisation into disrepute through the content of your posts.

Any misuse of social media as mentioned above may be regarded as a disciplinary offence and may result in dismissal without notice.

You should be aware that any information contained in social media may be used in evidence, if relevant, in any disciplinary proceedings.

Staff will not communicate with parents/carers or learners via any form of networking site, personal mobile or email. Where there is a need to communicate directly with parents/carers (i.e. on organisation trips) staff will have access to organisation provided equipment i.e. mobile phones.

Business Use of Social Media

If your job duties require you to speak on behalf of the Organisation in an online social media environment, you must still seek approval for such communication from your manager, who may require you to have training before you are permitted to participate in social media on behalf of the Organisation.

Similarly, if you are invited to comment about the Organisation for publication anywhere, including in any social media outlet, you should inform your manager and you must not respond without prior written approval.

If you disclose your affiliation with the Organisation on your business profile or in any social media postings, you must state that your views do not represent those of your employer, unless you are authorised to speak on our behalf. You should also ensure that your profile and any content you post are consistent with the professional image you present to clients and colleagues.

Third parties

You must not disclose any information that is confidential or proprietary to the Organisation or to any third party that has disclosed information to the Organisation.

Confidential Information and Intellectual Property

You must not post comments about sensitive business-related topics, such as the Organisation 's performance, or do anything to jeopardise trade secrets, confidential information and intellectual property. You must not include the Organisation 's branding, logos or other trademarks in any social media posting or in your profile on any social media platform.

You are not permitted to add business contacts (such as customers or suppliers) made during the course of your employment to personal social networking accounts.

Details of business contacts made during the course of your employment are regarded as Organisation confidential information, and are the property of the Organisation. This includes information contained in databases such as address lists contained in Outlook, or business and contacts lists created and held on any electronic or social media format, including but not limited to LinkedIn and Facebook.

On termination of employment you must provide the Organisation with a copy of all such information, surrender or delete all such information from your personal social networking accounts, and destroy any further copies of such information that you may have.

Monitoring

The Organisation reserves the right to monitor, intercept and review, without further notice, staff activities using our IT resources and communications systems, including but not limited to social media postings and activities, to ensure that our rules are being complied with and for legitimate business purposes and you consent to such monitoring by your use of such resources and systems.

Procedure

Breaches of this policy will be dealt with under the Organisation 's Disciplinary Procedure. You should be aware that the Organisation regards breach of any part of this policy as gross misconduct that may result in disciplinary action up to and including dismissal without notice.

If you become aware of information relating to the Organisation posted on the internet, you should bring this to the attention of: **Mr Abdul Khan, CEO**

This Policy Section refers to Learners and Parents

When a public post is reported concerning non-employee members of the organisation community, this will be investigated and responded to by Frobel Education. Further action may be taken to assist with the prosecution of the offenders.

In cases where staff are also parents connected to the organisation, they are advised to use professional judgment (in reference to child protection and safeguarding policies) when communicating with children or young people also connected to the organisation community.

Communication with learners/learners will take place face-to-face or via a staff member's organisation email address only.

A staff member will not communicate with a pupil/learner via their personal mobile phone or using personal email addresses. All communication with learners will be via organisation platforms and devices.

The Organisation has many lines of communication to maintain positive working relationships with parents/carers. These may include: letters, telephone calls, emails, face-to-face meetings, the website, tweets, Facebook, a half termly publication, progress reports and parents' evenings. Effective communications not only deliver the specific information required, but also enable organisations to demonstrate values and ethos. Communication with parents/carers should always reinforce parental support and engagement.

Communications will seek to establish open and positive relationships with parents, whilst always ensuring that these relationships are professional. To this end parents should always be addressed in an appropriate manner using formal mediums of communication i.e. telephone, email, letter.

Permissions must be sought for images of children/young people to be used in organisation produced materials, clear reference to online usage needs to be made when permissions are requested.

Staff must give permission for their images to be used in relation organisation produced materials accessible by members of the public (online or in print), whether controlled by the organisation or not. Photographs must be checked carefully to ensure that children who are on the restricted list are never shown on the websites.