



## Social Media Policy for Norlanders

### 1. INTRODUCTION

- 1.1 This policy is in place to minimise the risks to Norland College Limited ("Norland") and its stakeholders through the use of social media. For the purposes of this policy, social media is defined as any type of interactive online media that is dedicated to live or scheduled uploads, community-based input, interactions, content and information sharing, and collaboration through the building of networks and communities. This includes social forums and networking sites, anonymous apps, blogs, social bookmarking, social curation and wikis, video and image sharing websites, and similar facilities.
- 1.2 Whilst recognising the benefits of this medium for new opportunities of communication, this policy sets out the principles that all Norlanders are expected to follow when using social media.
- 1.3 It is crucial that all stakeholders, including students, Newly Qualified Nannies (NQNs), Norlanders, staff and the public at large have confidence in Norland. The principles set out in this policy are therefore designed to ensure that the use of social media is responsibly undertaken and that confidentiality of staff, students, NQNs, Norlanders, placements, children, families and clients of Norland is maintained, and the reputation of Norland is safeguarded.

### 2. GUIDING PRINCIPLES

- 2.1 Norlanders should maintain professionalism, integrity and confidentiality when using social media. *Code of Professional Responsibilities: clause 4.6.*
- 2.2 Norlanders should never share any content on social media that could damage Norland's reputation, or that of another member of the Norland community, whether directly or indirectly. *Code of Professional Responsibilities: clause 4.7.*
- 2.3 Norlanders should draw a clear line between their professional and personal life on social media, either by ensuring their personal accounts are suitably professional or by ensuring that personal accounts are locked down using the highest privacy settings. *Code of Professional Responsibilities: clause 3.4.*
- 2.4 Norlanders should respect children's and families' right to privacy and confidentiality and act in the best interests of children at all times with regards to social media use. *Code of Professional Responsibilities: Core Standard 1.*



2.5 Norlanders should check any social media content carefully prior to publication to ensure they are fully adhering to the requirements sent out in this policy and the Code of Professional Responsibilities.

### **3. SCOPE**

3.1 This policy deals with the use of all forms of social media, including but not limited to Facebook, LinkedIn, Twitter, Google+, Wikipedia, Instagram, TikTok, SnapChat, Pinterest, flickr, YouTube and all other social networking sites, chatrooms, internet postings and blogs. The internet is a 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 irrespective of the medium.

3.2 This policy covers personal use of social media as well as the use of social media for official Norland purposes, including social media sites hosted and maintained on behalf of Norland.

3.3 This policy applies at all times when a Norlander is representing Norland or otherwise associated with Norland.

3.4 This policy shall also apply to Norlanders at all times and places in circumstances where failing to apply this policy may:

- affect the health, safety or wellbeing of a member of the Norland community, children, families or a member of the public;
- have repercussions for the orderly running of Norland; or
- bring Norland into disrepute.

3.5 This policy does not form part of any contract between Norland and its Norlanders and Norland may amend it at any time.

### **4. PERSONNEL RESPONSIBLE FOR IMPLEMENTING THE POLICY**

4.1 The Head of Marketing, Student Recruitment and Brand with the Head of Careers and Consultancy have overall responsibility for the effective operation of this policy.

4.2 Responsibility for monitoring and reviewing the operation of this policy and making recommendations for change to minimise risks lies with the Head of Marketing, Student Recruitment and Brand with the Head of Careers and Consultancy who will review this policy periodically to ensure that it meets legal requirements and reflects best practice.

4.3 The Head of Marketing, Student Recruitment and Brand with the Head of Careers and Consultancy have a specific responsibility for operating within the boundaries of this policy,



ensuring that all Norlanders understand the standards of behaviour expected of them and taking action when behaviour falls below its requirements.

- 4.4 All Norlanders are responsible for the success of this policy and should ensure that they take the time to read and understand it. Questions regarding the content or application of this policy should be directed to the Head of Marketing, Student Recruitment and Brand or Head of Careers and Consultancy.

## **5. COMPLIANCE WITH RELATED POLICIES AND AGREEMENTS**

- 5.1 Social media should never be used in a way that breaches any of Norland's other policies. If an internet post would breach any of Norland's policies in another forum, it will also breach them in an online forum. For example, you are prohibited from using social media to:
- breach Norland's obligations with respect to the rules of relevant regulatory bodies;
  - breach any obligations contained in those policies relating to confidentiality;
  - breach Norland's Fitness to Practise Policy;
  - breach the Norland Code of Professional Responsibilities;
  - harass or bully students, NQNs, other Norlanders or other third parties in any way;
  - breach Norland's Data Protection Policy; or
  - breach any other laws or regulatory requirements.
- 5.2 Norlanders who breach any of the above policies may be subject to action under Norland's Cause for Action policy, which may result in a warning or disciplinary action up to and including expulsion from Norland.

## **6. PROHIBITED USE**

- 6.1 You must avoid making any social media communications that could damage Norland's interests or reputation, either directly or indirectly.
- 6.2 You must not use social media to defame or disparage Norland, its staff or any third party; to harass or bully other Norlanders, NQNs, students or staff or other third parties; to make false or misleading statements; or to impersonate other Norlanders, NQNs, students, staff or other third parties.
- 6.3 You must not express opinions on Norland's behalf via social media.
- 6.4 You must not post comments about sensitive business-related topics, such as Norland's performance, or do anything to jeopardise Norland's trade secrets, confidential information



and/or intellectual property. You must not include Norland's logos or other trademarks in any social media posting or in your profile on any social media.

6.5 Norland considers the following examples to be an inexhaustive list of inappropriate uses of social networking sites:

- Making allegations or complaints about Norland staff, students, NQNs, Norlanders, placements, children, families, clients of Norland or cyber bullying;
- Posting or sharing negative or offensive comments about Norland staff, students, NQNs, Norlanders, placements, children, families, clients of Norland;
- Posting or sharing offensive comments, videos or images;
- Posting or sharing comments which threaten violence;
- Posting or sharing extremist and/or terrorist-related materials; and
- Posting anything that contravenes the Norland Code of Professional Responsibilities.

6.6 Any concerns about the misuse of social media should be reported to the Head of Marketing, Student Recruitment and Brand or the Head of Careers and Consultancy.

## **7. BUSINESS USE OF SOCIAL MEDIA**

7.1 If you are contacted for comments about Norland for publication anywhere, including in any social media outlet, direct the enquiry to the Marketing team ([marketing@norland.ac.uk](mailto:marketing@norland.ac.uk)) and do not respond without written approval.

7.2 The use of social media for business purposes is subject to the remainder of this policy.

## **8. GUIDELINES FOR RESPONSIBLE USE OF SOCIAL MEDIA**

8.1 You should draw a clear line between your professional and personal life on social media, either by ensuring your personal accounts are suitably professional (including all images and videos) or by ensuring that personal accounts are locked down using the highest privacy settings.

8.2 Norland accepts that some sites may be used for professional purposes, such as LinkedIn. You should ensure that care is taken to maintain an up-to-date profile and a high level of professional presentation.

8.3 You should make it clear in social media postings, or on your profile, that you are speaking on your own behalf. Write in the first person and use a personal email address.

8.4 You are strongly advised to ensure that you set the highest privacy levels in relation to your personal social media accounts (including your profile picture), to opt out of public listings to



protect your own privacy, and that you do not share your private accounts with professional contacts such as employers.

- 8.5 Be respectful to others and consider your obligations of professionalism, integrity and confidentiality when making any statement on social media and be aware that you are personally responsible for all communications which will be published on the internet for anyone to see.
- 8.6 If you disclose your affiliation with Norland on your profile or in any social media postings, you must state that your views do not represent those of Norland. You should also ensure that your profile and any content you post are consistent with the professional image you present to staff, students, NQNs, Norlanders, placements, children, families, clients of Norland, and the wider Norland community.
- 8.7 If you are uncertain or concerned about the appropriateness of any statement or posting, refrain from posting it.
- 8.8 While in employment, you may be asked to share images or videos of a child in your care on social media. In this case:
- You should only store and publish images or videos with the explicit prior written consent of the child's parent or carer (see Appendix A).
  - You should ensure that producing such content never supersedes the child's care, safety, health and wellbeing.
  - You should ensure that content is respectful of the child's and family's right to privacy and confidentiality.
  - You should avoid sharing frequent (daily) images and videos that identify a child by using photography editing software to respectfully cover their face or other identifying features prior to publication or use more secure, private platforms for sharing regular and identifiable content with the child's wider family and friends.
  - You should ensure that any images or videos are respectful to the child (for example, do not depict the child naked, in a nappy or underwear, or upset).
  - You should only update or share content when it is safe to do so and with the permission of the child's parent or carer to use the device for this purpose.
  - You should ensure that any images or videos are deleted (or safely stored) as agreed and outlined in the written permission granted by the child's parent or carer.
- 8.9 Occasional personal use of social media during working hours is permitted so long as it does not affect the care and safety of any child in your care, is done so with the permission of your employer, does not interfere with your employment responsibilities or productivity, does not involve unprofessional or inappropriate content and complies with this policy.



- 8.10 If you see social media content that disparages or reflects poorly on Norland, you should contact the Head of Marketing, Student Recruitment and Brand or the Head of Careers and Consultancy.

## **9. RECORD KEEPING**

- 9.1 The records created in accordance with this policy may contain personal data. Norland has a privacy notice which explains how it will use personal data about Norlanders. The privacy notice is published on Norland's website.
- 9.2 All records created in accordance with this policy are managed in accordance with the Norland policies that apply to the retention and destruction of records.

## **10. BREACH OF THIS POLICY**

- 10.1 Suspected breaches of this policy will result in a Cause for Action being raised and investigated, and may result in disciplinary action up to and including expulsion from Norland.
- 10.2 However, Norland will deal with concerns raised in a professional and appropriate manner and understands that Norlanders may not always realise when they have used social networking sites inappropriately. Therefore, as a first step, Norland will usually discuss the matter with the relevant party to try and resolve the matter informally, and to ask that the relevant information be removed from the social networking site in question.
- 10.3 Any Norlander suspected of committing a breach of this policy will be required to co-operate with any Norland investigation, which may involve removing any social media content that Norland considers to constitute a breach of this policy. Failure to comply with such requests may in itself result in disciplinary action up to and including expulsion from Norland.
- 10.4 Norland may also consider taking further action against any Norlander who breaches this policy, such as reporting the matter to the police where Norland feels it is appropriate, taking legal advice and/or action in respect of any defamatory remarks, and taking such other legal action as may be appropriate in the circumstances.

## **11. GUIDELINES FOR SAFE SOCIAL MEDIA USAGE**

<http://www.childline.org.uk/explore/onlinesafety/pages/socialnetworking.aspx>

[http://www.getsafeonline.org/social-networking/social-networking-sites/#.Uq7\\_0IPs084](http://www.getsafeonline.org/social-networking/social-networking-sites/#.Uq7_0IPs084)



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## APPENDIX A: Consent form for photographs and videos

Name and address of parent/carer

Dear [parent/carer]

I would like to sometimes take photographs and videos for the purpose of work related to the care and education of the child/children. The photographs and videos would be used to provide you with updates throughout the day, and for monitoring of the child's/children's learning and development. In addition to taking photographs and videos for the purposes described above, I would like to take photographs and videos for my own use and/or development, and I would also like to ask for your consent to do this.

I would appreciate if you could read, amend as you wish and sign the form below, providing me with the appropriate permission to use these images. Of course, you do not have to give permission if you do not want to. The images and personal data collected on this form will be used in accordance with the Norland Code of Professional Responsibilities and stored securely in accordance with the UK Data Protection Act 2018 and the UK General Data Protection Regulations (UK GDPR).

Yours sincerely

[Name of Norland Nanny/Newly Qualified Nanny]

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Please can you tick each box below that applies:

1. I give you permission to retain photographs and videos as a keepsake.
2. I give you permission to take photographs and videos for the purpose of work related to the care and education of the child/children. I understand that the photographs and videos will be used to provide me with updates throughout the day, and for monitoring of the child's/children's learning and development.
3. I give you permission to use photographs and videos as part of your own learning so that you can improve and develop your skills. The photographs and videos may be shared with academic staff as appropriate.
4. I give you permission to show photographs and videos to potential and future employers as evidence of the work you have done.
5. I give you permission to publish photographs and videos on your professional private/public [delete as appropriate] social media account on [social media platform] in line with our agreement that [please detail the agreement made regarding types of photos, frequency of publication, safe storage/deletion etc].
6. I give you permission to use photographs and videos [please complete – set out any further examples].

I understand that I can withdraw my consent at any time, requesting for a specific photograph or video, or all photographs and videos, not to be used, and if this occurs you agree to cease using such photographs and/or videos with immediate effect.





I understand that photographs and videos published on public social media platforms could be viewed and used throughout the world in digital and print media formats including but not limited to websites, social media and in media coverage, in their original format or altered in any way.

**Name of Norland Nanny/Newly Qualified Nanny:** \_\_\_\_\_

**Name of parent/carer:** \_\_\_\_\_

**Signature of parent/carer:** \_\_\_\_\_

**Date:** \_\_\_\_\_