

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, location sharing apps, and similar facilities.
- 1.2 Whilst recognising the benefits and opportunities that social media can bring, there is an inherent risk involved in its use as an instantaneous and far-reaching form 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 The Norland Code of Professional Responsibilities, particularly the standards outlined in:
 - Core Standard 1: Respect children's and families' right to privacy and confidentiality and act in the best interests of children at all times.
 - Clause 3.4: Be aware of the benefits and challenges of social media and draw a clear line between your professional and personal life.
 - Clause 4.6: Ensure professionalism, integrity and confidentiality when using social media.
 - Clause 4.7: Use social media responsibly, ensuring that any content on social media reflects the standards and values inherent within the Code, reflect positively on Norland and everyone associated with it, and pay particular attention to confidentiality and the rights of the family and children with whom you work.



2.2 Norlanders should carefully review any social media content prior to publication to ensure they are fully adhering to the requirements set out in this policy and the Norland 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, X, Wikipedia, Instagram, TikTok, Snapchat, Pinterest, Flickr, YouTube, Reddit, Bluesky, Life360, The Student Room, and all other social networking sites, chatrooms, apps, 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 applies 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 Admissions with the Head of Graduates: Placement, Employment and Alumni 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 Admissions with the Head of Graduates: Placement, Employment and Alumni 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 Admissions with the Head of Graduates: Placement, Employment and Alumni 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 Admissions or Head of Graduates: Placement, Employment and Alumni.

5. COMPLIANCE WITH RELATED POLICIES AND AGREEMENTS

- 5.1 Social media should never be used in a way that breaches any of Norland's regulations, contracts and policies. If an internet post would breach any of Norland's regulations, contracts and 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 regulations, contracts and policies
 - breach Norland's obligations with respect to the rules of relevant regulatory bodies;
 - breach any obligations contained in those policies relating to confidentiality;
 - breach the Norland Code of Professional Responsibilities;
 - harass or bully students, NQNs, other Norlanders or other third parties in any way;
 - breach any other laws or regulatory requirements.
- 5.2 Norlanders who breach any of the above 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 branding in any social media posting, website 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.
- Any concerns about the misuse of social media should be reported to the Head of Marketing, Student Recruitment and Admissions or the Head of Graduates: Placement, Employment and Alumni.

7. BUSINESS USE OF SOCIAL MEDIA

- 7.1 If you are contacted for content or comments that mention Norland, including your Norland status, for publication anywhere, including in any social media outlet, direct the enquiry to the Marketing team (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 USE

- 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. Remember that even with strict privacy settings, others can share your posts (for example, through screengrabs), so you may have no control over who sees them.
- 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, use social media responsibly and consider your obligations of professionalism, integrity and confidentiality when making any statement on social media. Be aware that posting anything online, even in private spaces, has the potential to become public even without your knowledge or consent. You are personally responsible for what you publish, and once online, it's very difficult to delete or control how widely material is shared.
- 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 share images or videos with the explicit prior written consent
 of the child's parent or carer (see Appendix A);
 - You should not post pictures or videos of charges on your personal social media accounts, unless you have the explicit prior written consent of the child's parent or carer;
 - 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 and other identifying features prior to publication;
 - You should avoid sharing images and videos or tagging specific locations that reveal the
 location or routine of a child including their home, school (including school uniform),
 nursery or other habitual settings, or holiday travel or accommodation information;
 - You should avoid using apps that share your location with unknown third parties or lack strong privacy protection and be mindful of how location data is collected and used. If you would like to use a location sharing app or are requested by your employers to do so, ensure you use a secure, private app that offers end-to-end encryption and



transparent privacy policies. You should discuss with your employers who can track your location using secure, private location sharing apps;

- You should use secure, private platforms for sharing regular and identifiable content with the child's wider family and friends as agreed and outlined in the written consent of the child's parent or carer;
- 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' and
- You should ensure that any images or videos are deleted (or securely 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 Admissions or the Head of Graduates: Placement, Employment and Alumni.

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. GUIDANCE FOR SAFE USE OF SOCIAL MEDIA

- Childline online safety guidance: http://www.childline.org.uk/explore/onlinesafety/pages/socialnetworking.aspx
- Get Safe Online social networking and social media guidance: https://www.getsafeonline.org/business/articles/social-networking-social-media
- Information Commissioner's Office online safety guidance: https://ico.org.uk/for-the-public/online/social-networking



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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 request your permission to take photographs and videos of your child/children as part of my professional responsibilities. These images and videos will be used for the following purposes:

- To provide you with updates throughout the day, supporting transparent communication about your child's care and development.
- To monitor and document your child's learning and development, in line with best practice and safeguarding standards.
- With your explicit consent, to support my own professional development, such as reflective practice, sharing examples with academic staff and/or to demonstrate my work to future employers.

Your and your child's privacy and confidentiality are of utmost importance. All images and personal data will be handled in accordance with the <u>Norland Code of Professional Responsibilities</u> and safely stored in compliance with the UK Data Protection Act 2018 and the UK General Data Protection Regulations (UK GDPR).

You are welcome to review, amend, or decline any aspect of this consent form. Granting permission is entirely voluntary, and you may withdraw your consent at any time. If you choose to withdraw consent, I will immediately cease using and sharing the relevant photographs or videos.

If you have any questions or concerns about how images or videos will be used, please do not hesitate to contact me. Thank you for your consideration and trust.

Yours sincerely

[Name of Norland Nanny/Newly Qualified Nanny]

Please can you tick each box below that applies:

1.	
	and education of the child/children. I understand that the photographs and videos will be used to
	provide me with updates throughout the day using [mutually agreed secure, private platform],
	and for monitoring of the child's/children's learning and development. \Box
2.	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. \square
3.	I give you permission to show photographs and videos to potential and future employers as
	evidence of the work you have done. \square
4.	I give you permission to retain photographs and videos as a keepsake. □



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]. \square		
6.	I give you permission to use photographs and videos [please complete – set out any further		
	examples]. 🗆		
I understand that I have the right to withdraw my consent at any time. If I decide that I no longer want a			
specific photo or video, or all photographs and videos, to be used, I will notify you in writing. Once I make this request, you will immediately stop using the specified photographs or videos and ensure they are			
deleted or securely stored in line with our agreement and data protection regulations.			
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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.			
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Name of Norland Nanny/Newly Qualified Nanny:			
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Name of child/children:			
Name of parent/carer:			
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