

SOCIAL MEDIA POLICY



Policy Group: Data Protection, Security, and Information

Effective: January 2024

Approved: Hannah Marshall, Chief Technology Officer

Responsible Officer: Zena Bain, IT Security Officer

Next Renew Date: January 2025

Ref no: 5.2.5



GUIDANCE

Vision

Transform lives through learning

Values



PASSIONATE - We are passionate about inspiring young people, adults and our Purple People to be their best and we take pride in creating a positive learning environment to fulfil their potential.



UNSTOPPABLE - We are unstoppable in our quest for the pursuit of excellence. We are dedicated and resilient to develop ourselves and our learners.



RIGHT - We treat each other with respect and strive to do the right thing through insight, inclusion, honesty, growth and trustworthiness.



PARTNERSHIPS - We support the people surrounding us in our everyday lives, building effective partnerships with businesses, learners and all stakeholders where we can pass on our knowledge and skills to help them meet their goals.



LEARNERS - Learners are at the centre of everything we do and we are driven to provide life-changing and life-long learning for them.



EMPOWERED - We encourage our Purple People to be independent and autonomous to maximise their goals surpassing their barriers and targets. Feel it, believe it, live it.

Tone of voice

Our tone of voice takes its direct influence from our core values. We are passionate about people and learners and are driven to get the best out of everyone by understanding them. We are caring and supportive, as well as being determined and striving for growth. We talk with purpose and enthusiasm in a way that connects and empowers people.

Innovation is at the heart of Learning Curve Group and we're always thinking about what's next!

SUMMARY CHANGES

Date	Page	Details of Amendments
Jan 24	All	New Policy

INTRODUCTION

Learning Curve Group (LCG) is one of the largest national training providers in the UK, providing education and training nationally. All companies within the LCG family uphold the same company Vision, Mission and Core Values and follow our group policies and procedures.

Company	UKPRN	Registration Number
Learning Curve Group Limited	10008935	05233487
Profound Services Limited	10022358	05969610
Northern Care Training Limited	10013515	05256533
Acorn Training Consultants Limited	10000108	03182459
London Hairdressing Apprenticeship Academy Limited	10035171	07710651
Antrec Limited	10043333	07873541
APCYMRU LIMITED (MPCT)	10000311	07873541
The White Rose School of Beauty and Complementary Therapies Limited	10007484	03172520

Applies to

This policy applies to all employees, contractors, learners, and associates of Learning Curve Group. This policy is to work alongside other IT policies to ensure the safety of Learning Curve Group business accounts.

Reason for policy

This policy is to ensure that users understand their responsibilities and the appropriate use of Learning Curve Group Information regarding Social Media use. Understanding this will help to protect themselves and Learning Curve Group's information and reputation. It is intended to promote a legal, safe, and secure working environment for all Learning Curve Group employees, contractors, learners, associates, and business partners.

The purpose of this policy is to explain how Learning Curve Group employees should use social media and sets out the standards of behaviour expected from employees, customers and third parties. It will be published on Learning Curve Group's public web pages as well as promoted and discussed internally with staff.

This policy and procedure do not form part of your terms and conditions of employment and can be changed at any time as we deem appropriate.

POLICY

Our social media policy provides a framework for using social media. Social media is a place where people exchange information, opinions, and experiences to learn, develop and access services. It has become a powerful and useful tool for helping customers navigate each service we provide.

Social media is being used by Learning Curve Group and its audiences in both a business and personal capacity.

Table of Responsibilities

Job Role / Title	Responsibilities
Director of Marketing	Final authorisation and responsibility of LCG brand
Head of Department – Brand and Communications	Authorisation and checking of brand compliance
Head of Department – Marketing Operations	Authorisation and responsibility of LCG Marketing Operations
Marketing Team	Creation of and complying with LCG branding

Principles

Learning Curve Group aims to offer an efficient, high standard of service and maintain transparency in our customer service and with our learners, employees, associates, and business partners.

- We expect employees to act carefully and responsibly to protect our company's image and reputation.
- Employees should follow Learning Curve Group's Data Protection Policy. This policy forms part of the mandatory training for all employees.
- All employees are expected to display courtesy and respect to our learners and each other.
- It is recognised under and in terms of the Human Rights Act 1998, Schedule 1, Part 1, Article 8 that:
 - everyone has the right to respect for their private and family life, home, and correspondence.
 - there shall be no interference by a public authority with the exercise of this right except such as is in accordance with the law and is necessary in a democratic society in the interests of national security, public safety, or the economic well-being of the country, for the prevention of disorder or crime, for the protection of health or morals, or for the protection of the rights and freedoms of others.

Employees using social media for business

Guidance for all employees in the following departments who use social media for business. This policy should be read alongside Learning Curve Group's, Data Protection, and IT Acceptable Use policies, which are particularly relevant to employees using social media.

Users must not:

- Create or transmit material that might be defamatory or incur liability for the company.

- Staff using social media for business purposes will be given clear guidance on what this means. (Please refer to the Online Engagement Guidelines)
- Post messages, status updates or links to material or content that is inappropriate.
- Inappropriate content includes pornography, racial or religious slurs, gender-specific comments, information encouraging criminal skills or terrorism, or materials relating to cults, gambling, or illegal drugs.
- This definition of inappropriate content or material also covers any text, images or other media that could reasonably offend someone based on race, age, sex, religious or political belief, national origin, disability, sexual orientation, or any other characteristic protected by law.
- Use social media for any illegal or criminal activities.
- Send offensive or harassing material to others via social media.
- Broadcast unsolicited views on social, political, religious, or other non-business-related matters.
- Use social media for advertising or endorsement purposes.
- Send or post messages or material that could damage Learning Curve Group's image or reputation.
- Discuss colleagues, customers, or suppliers without their approval.
- Post, upload, forward or link spam, junk email, chain emails and messages.

Using Learning Curve Group official accounts on social media

In general, employees must only post updates, messages or otherwise use these accounts in line with the company's objectives. For instance, employees may use Learning Curve Group social media accounts to:

- Respond to customer enquiries and requests for help.
- Share blog posts, articles and other content created by the company.
- Share insightful articles, videos, media, and other content relevant to the business, but created by others.
- Provide users with an insight into what happens within the company.
- Post job opportunities, articles, and information about Learning Curve Group as an employer on Social Media channels.
- Support new product launches and other initiatives.
- Publish government announcements.

Some employees represent our company by handling social media accounts or posting on Learning Curve Group's behalf. We expect them to act carefully and responsibly to protect Learning Curve Group's security, image, and reputation, and in conjunction with the [Learning Curve Group Brand Guidelines](#)

Users must:

- Be respectful, polite, and patient, when engaging in conversations on Learning Curve Group's behalf.
- Not speak on matters outside their field of expertise.
- Not post discriminatory, offensive, or libellous content and commentary.
- Remove offensive content as quickly as possible.
- Correct any misleading or false content as quickly as possible.

Only people who have been authorised to use the company's social networking accounts may do so. Authorisation would only be granted by Learning Curve Group's Marketing team; specifically Head of Department/Director of Division. It is allocated when social media tasks form a core part of the role of the employee. Allowing only designated people to use these accounts ensure the company's social media presence is consistent and cohesive.

- Employees must not make any kind of personal attack or tasteless or offensive remarks to individuals or groups.
- Employees who have been contacted by journalists via social media must refer such enquiries to [Press Enquiries](#) .

New social media accounts must not be created in the company's name unless authorised by Learning Curve Group's Marketing team; specifically Head of Department/Director of Division. The company operates its social media policy presence in line with a strategy that focuses on the most appropriate social networks, in keeping with our business, given available resource. There should be no more accounts than those outlined in the strategy to avoid confusion. Learning Curve Group's Marketing team should be the only people to create new social media accounts on behalf of the business in any capacity and should hold all log in details for all accounts that represent the business. Periodic audits will be carried out to ensure no unauthorised accounts have been established in the name of Learning Curve Group or any of its brands, this includes the use of Learning Curve Group's name or trademarks in any capacity.

Learning Curve Group's Data Protection Policy and Privacy Notice sets out how students' personal information is processed and used by the company. This statement is provided to all students completing their Enrolment and is also on Learning Curve Group's web site. Part of these Terms and Conditions allows Learning Curve Group to use personal information for the purposes of processing their personal data.

Employees' use of personal social media

Whilst Learning Curve Group staff have a right to a private life and freedom of expression, all employees must avoid making any comment on their personal social media accounts which is likely to harm the security or reputation of the Company.

Learning Curve Group allows employees to access their personal accounts at work, during lunch and break periods. We expect them to act responsibly and ensure their productivity is not affected as using personal social media excessively while at work can reduce efficiency and concentration.

Additionally, where an employee's personal social media profiles identify their association with Learning Curve Group, care must be taken when posting content whilst on Company business, travelling out of hours or socialising on business-related events or trips.

Monitoring use of social media

Learning Curve Group IT and internet resources – including computers, mobiles, and internet connections are provided for legitimate business use. Learning Curve Group will therefore monitor how social networks are used and accessed through these resources. As set out in the IT Acceptable Use policy.

- Any such monitoring or examination will only be carried out by an authorised member of Learning Curve Group IT staff.

Customer use of Learning Curve Group Social Media channels

We are committed to protecting and respecting our customers' privacy. By using our social media channels, they agree to our Social Media Policy, which is published on Learning Curve Group customer facing websites.

Learning Curve Group has a duty of care towards our staff, and this includes their interactions with customers on our social media channels.

The social media channels of Learning Curve Group are intended as a source of information for the public, and as a place for the public to ask questions about Learning Curve Group. We strive to offer useful information about our products and services, and to provide interesting and useful content for current and past students, parents and anyone interested in learning more about us.

To keep this environment open and friendly, we have established the following guidelines:

All users of Learning Curve Group's social media pages (see appendix for full list) agree to comply with the channels' Terms of Service, which they sign up to upon registration on that channel. Additionally, the opinions and content posted to our page by other users does not necessarily reflect the opinions of Learning Curve Group.

Any commentary posted should be relevant and respectful to Learning Curve Group and its community. We reserve the right to remove any content that we deem unacceptable, and to block and report any customer who repeatedly violates these terms.

Unacceptable activity includes, but is not limited to:

- Making comments which Learning Curve Group deem abusive, offensive, obscene, vulgar, or violent.
- Abusing, threatening, stalking, harassing, or in any way attacking, other users on the platforms.
- Posting any content that is offensive or derogatory toward others regarding race/ethnicity, religion, gender, nationality, or political beliefs.
- Using any language or content that is disruptive, repetitive, misleading, deceptive, unlawful, or fraudulent.
- Trolling.
- Commercial solicitation.
- Uploading or attaching files that contain viruses, corrupted files, or any other similar software or programs that may damage the operation or compromise the security of computers and networks.
- Violations of intellectual property rights.

We encourage all customers to take an active role in protecting their personal privacy. Publicly posting information about their student account information can increase the risk of online predators and phishing scams. Learning Curve Group will never ask for information about personal details in an email, text, or unsolicited social media message. Please report any suspected phishing attempt to the IT Operations Team at support@aspirets.com.

Compliance

- All users and customers must comply with the social media platform's Terms of Use as well as this policy.
- Any employee found to have violated this policy will be subject to disciplinary action, up to and including termination of employment.
- Learning Curve Group employees should never befriend or chat to learners on their own personal social media sites. Employees should always use professional language when writing, phoning, emailing, or using company social media sites to communicate with learners.
- We will remove, block, report or ban any user or customer who:
 - encourages others to post unacceptable content.
 - uses offensive images as their profile picture or has an offensive username.
- All data relating to social networks written, sent, or received through Learning Curve Group systems is part of official company records. The company can be legally compelled to show information to law enforcement agencies or other parties.
- Examples of non-conformity with the Employee Social Media Policy includes but is not limited to:
 - Disregarding job responsibilities and deadlines to use social media.
 - Disclosing confidential or proprietary information through personal or business accounts.
 - Directing offensive comments towards other members of the online community.
 - Representing the business in ways that do not align with its brand guidelines which can bring the company into disrepute.
- Not adhering to the social media usage guidelines.
- Employees must not interact with customers in a business capacity using their personal social media accounts unless authorised by the Director of Marketing and Communications.

POLICY REVIEW

This policy will be reviewed at least annually or when the risk environment changes enough to warrant a change to this policy.

DEFINITIONS

Policy definitions:

- "Social media" refers to a variety of online communities e.g., blogs, social networks, chat rooms and forums. This policy covers all of these.
- "User" refers to employees within Learning Curve Group who use social media in a professional or personal capacity, as well as the public audiences of these channels.
- "Customer" refers to a public follower of Learning Curve Group's channels, either as a potential student, student, or any other interested audience member.

RELATED POLICIES/PROCEDURES/LINKS/DOCUMENTS

1.1 Disciplinary Process

2.8.4 Keeping Learners Safe in Practice Procedure

5.1 Data Protection Policy

5.2 IT Acceptable Use Policy