ROYAL ACADEMY OF DANCE

Social media and digital communications policy

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- **1.** Introduction & policy statement
 - 1.1. This policy sets out guidelines for both business and personal use of these platforms by RAD employees, regional and national directors and admins (including freelancers and Trustees) and Faculty of Education students. Often, business and personal engagement on social media platforms can overlap; this policy seeks to set out clear guidelines for RAD employees (including national directors) and Faculty of Education (FoE) students.
 - 1.2. Visual media (photographs and videos) form an integral part of social media and digital communication and is referenced within this policy however; the treatment of such content is not the focus of this policy. RAD employees/students should refer to the RAD's Visual Media Policy, which outlines how visual media should be produced, presented and protected in a way that is in line with RAD's standing as a leading dance education and training organisation, including for use on social media and digital communications
 - 1.3. Given the fast pace of change in digital media and the RAD's commitment to best practice, this policy will be reviewed annually and updated and developed as required to ensure that the guidelines are not simply a snapshot of best practice at any particular point in time, but a resource providing relevant and up to date guidance.
- 2. Definition of social media & digital communications
 - 2.1. Social media is the term commonly given to Internet/web and mobile-based channels and tools that allow users to interact with each other and share opinions and content. As the name implies, social media involves the building of communities or networks and encouraging participation and engagement.
 - 2.2. Digital communications is the term used to describe any communication over the internet or using mobile and new technology to communicate effectively with stakeholders.
- **3.** Purpose
 - 3.1. The RAD recognises that a **child is anyone under the age of 18.** As per the RAD's safeguarding policy, this policy also considers adults at risk in relation to issues of consent and social media.

The purpose of this policy is:

- 3.1.1. To provide best practice for personal and professional use of social media. The RAD actively engages and uses Facebook (including the regional and national pages), Instagram, YouTube, TikTok and LinkedIn. We are no longer active on X/Twitter as of 2023 and only use the platform for monitoring purposes.
- 3.1.2. To provide practical guidelines for RAD's national directors, managers, representatives and regional managers to adhere to when setting up, maintaining and monitoring RAD social media accounts.
- 3.1.3. RAD Registered Teachers may be advised to refer to this policy and to incorporate its principles on safe practice into their own online usage and internal policies.
- 3.1.4. The RAD cannot and does not take responsibility for the business practices of its members other than what is stated in the Code of Professional Practice for teachers registered with the RAD; a factsheet with guidelines is available in the members' area of the website in order to offer support and guidance to our membership.
- 3.1.5. The RAD does not take responsibility for any private community groups or host discussion forums. Currently we are not affiliated with any of these groups so are not able to moderate them.

The RAD staff members who use RAD social media and **are permitted to** post content on RAD's social media channels are:

- Lead Social Media Executive. This person has access to all RAD social media channels and regional/national Facebook/Instagram pages. They have full business control of the RAD Meta account.
- Digital Content Assistant. This person has access to all RAD social media channels and regional/national Facebook/Instagram pages.
- Press and Communications Manager. This person has access to all RAD social media channels and regional/national Facebook/Instagram pages. They have full business control of the RAD Meta account.

RAD regional managers and national directors have access to regional/national Facebook and Instagram pages, and are frequently in dialogue with the communications team who offer support and advice.

3.2. The benefits of digital communications & social media

The RAD has a strong online presence via its corporate website and corporate social media accounts including, but not limited to, Facebook, YouTube, TikTok, LinkedIn and Instagram. They grow steadily and consistently.

The objectives of the RAD's social media use are to:

- Raise the RAD's profile and support commercial objectives
- Communicate directly with our online audience in a friendly and approachable manner
- Improve customer service and support by "listening" to our members & customers, responding to them directly and immediately, and analysing feedback in order to improve RAD initiatives, projects and events
- Sharing the RAD's key messages, mission, vision and values creatively and dynamically
- Create a sense of a worldwide RAD community
- Deliver RAD events online
- Build relationships with other arts organisations /reciprocal marketing
- Demonstrate the RAD's links with the professional dance industry
- Drive traffic to further information sources (corporate website, box

offices, RADE website, etc.)

3.3. Potential Risks

As well as the potential benefits there are potential risks involved in utilising digital and social media channels. The risks largely fall into four areas:

- Reputational
- Legal
- Safeguarding
- Financial
- 3.3.1 All RAD employees, including freelancers, as well as Faculty of Education students & trainees are expected to read, understand and adhere to the best practice guidelines laid out in this policy to avoid exposing themselves as individuals or the RAD to risk.
- 3.3.2 The RAD may be held responsible for something an employee has written or said if it is on behalf of the RAD, or on an RAD-

sanctioned space including a Facebook group, blog, tweet or website.

- 3.3.3 Action can also be taken against a person or organisation (RAD) for repeating or linking to libelous information from another source.
- 3.3.4 Check carefully before quoting or linking to statements from other online sources – always consider whether a statement can be proved before publishing or sharing it – in English law, **the onus is on the person making the statement to establish its truth**.
- 3.3.5 Speculating or adding the term 'allegedly' to digital or social media content that links to or repeats defamatory information **does not exempt it from the law**.
- 3.3.6 Retweeting, re-posting or linking to defamatory content previously shared by others **does not** exempt an individual or organisation (RAD) from the law.

4. Privacy

The legal concept of privacy in the UK is complex as there is no one privacy law. However, the Human Rights Act (1998) incorporates the right to privacy for both individuals and companies. The law of confidence is bound with the right to privacy, and many legal cases centering around the right to a private life focus on breaches of confidentiality. Therefore, it is advisable to seek permission from colleagues, members or any individual before disclosing information or content about them (including visual media) on a blog, website or social media platform.

5. Security considerations

The RAD takes a proactive approach to addressing security risks associated with digital communications. In conjunction with other RAD policies (Privacy, Data Protection and Safeguarding), we are committed to:

- Keeping up to date with evolving regulations and the terms and conditions of the social media platforms we are using
- Managing social media and digital data throughout its life-cycle from initiation through, usage, storage, transfer, archiving and deletion
- All content is approved by Lead Social Media Executive and, in some cases when the content is high profile, the Press and Communications Manager and Director of Marketing and Communications

- Ensuring that sensitive personal data is not misused
- Utilising a social media monitoring platform Meltwater and management platform Sprout to manage account security; potential crises; and monitoring all third-party content for the use of any offensive behaviour or language that could compromise the RAD brand.

5.2 Passwords

The RAD is vigilant about the security of its websites and social media platforms; choosing strong passwords and keeping them secure.

It is good practice to create unique log-in details for each person with administration rights to any digital platform (i.e. website, blog or social media)

6. Safeguarding guidelines within a digital context

The RAD is committed to safeguarding children and vulnerable adults and has strong <u>Policy and Procedures on Safeguarding Children and</u> <u>Vulnerable Adults</u> in place. The use of digital platforms and social media in particular can make children particularly vulnerable to 'grooming' (see glossary).

All RAD employees, Trustees and freelancers should understand these risks, as well as being clear on acceptable boundaries between personal and professional so as not to put themselves, a child, or the organization, at risk.

These general principles for **RAD employees and students** have been devised in line with safeguarding principles and procedures:

- If at any time, you have concerns about any social media content on any RAD digital platform or a third party platform connected to the RAD, you should inform your line manager, Senior Safeguarding Officer or Designated Safeguarding Officer (Appendix)
- If managing a social media page on behalf of the RAD, ensure that your language within any social media channel or digital communication cannot be misconstrued and does not suggest in any way that you are trying to develop a personal relationship with a child, young person or vulnerable adult
- Do NOT use your own device to photograph film or communicate with a child, young person or vulnerable adult. You will be expected to use RAD's equipment for all legitimate work purposes

- Do not post or share any visual media of children or vulnerable adults unless written consent has been given by a parent/guardian or carer. Only include further personal information (name, age, school) etc if you have written permission and a compelling reason to do so
- Do NOT use ANY digital and social media accounts to send personal messages to children, young people and vulnerable adults or to write indiscrete or inappropriate posts about any child or vulnerable adult that you have come into contact with during the course of your employ
- Never encourage children to join any social media platforms if they are younger than the legal age to do so: for the majority of platforms this is 13.

7. Reporting a digital safeguarding concern

If any RAD employee, freelancer or FoE student has a concern relating to an inappropriate image, posting or e-mail, they have a responsibility to report this concern to a Senior Safeguarding or Designated Officer. See the Appendix and refer to the RAD's Policy & Procedures for Safeguarding Young People & Vulnerable Adults.

If you have any concerns at all, record and pass the information over as soon as possible and no later than **24 hours** to the named person.

If you are concerned that a child, young person or vulnerable adult may be in danger contact the Police for assistance on 999 or 112 from mobiles in Europe.

8. RAD's 'Prevent' responsibilities and social media/ digital communications

Under the Counter-Terrorism and Security Act 2015 the Royal Academy of Dance, as an Alternative Provider of higher education is required to 'have due regard to the need to prevent people from being drawn into terrorism'. As such the Royal Academy of Dance has a Prevent Policy which relates to all Academy staff employed by the Faculty of Education and to those students enrolled on higher education programmes of study through the validation agreement with the degree-awarding body. As a matter of good practice, all staff employed at the Academy should have due regard for the Prevent Duty and the RAD's associated policy and procedures.

As referenced in the Prevent Policy, it is unacceptable for any RAD IT networks to be used in any way that supports, promotes or facilitates

terrorism. This also extends to personal social media pages and digital communications that references the Royal Academy of Dance. Any such behaviour should be immediately reported to either the Director of Education and Training if it relates to students or to the relevant line director if the issue relates to RAD members of staff, who will be able to provide immediate advice and support.

As also outlined in the Prevent Policy, if any misuse of the Royal Academy of Dance's branding on social media accounts is discovered then action will be taken in accordance with the terms and conditions outlined in this policy.

9. Best practice for professional and personal use of social media

This section has been developed for the mutual protection of the reputation of the RAD and its employees, including freelancers and Trustees. It sets out best practice and clear guidelines that all employees are expected to adhere to when utilising social media platforms in a **professional as well as personal context**.

If RAD employees currently use any form of social media (i.e. <u>Facebook</u>, Instagram, <u>LinkedIn</u>,X, <u>Tiktok</u> or similar sites), either for business or for personal use, they should be aware of the potential consequences of making comments publicly (see below) related to the RAD, even if the RAD's name is not used directly, for example: "the place where I work..." or "today in the office", etc.

"Public" or "publicly" is defined as anything which can be accessed by others, even if this is in a "closed" or "private" online group (i.e. closed or by invitation only Facebook groups).

It is worth being aware that even if you do not state where you work on your social media account, it's possible someone could still find this information out by doing a simple google search.

10. Business context: guidelines for social media use for employees

10.1.1. RAD employees are expected to communicate professionally at all times, regardless of the channel of communication. Do not let the more informal nature of social media mislead you into treating it differently than any other form of professional communication. The RAD's Employee Handbook, Dignity & Respect Policy, Examiner Conduct Guidelines, the Code of Behaviour and the Policy and Procedures on Safeguarding Children and Vulnerable Adults provide guidance on expected behaviours.

- 10.1.2. This policy is an RAD corporate policy to which all employees are expected to abide and it is a condition of employment or engagement that employees abide by the rules, regulations and policies made by the RAD and which are referred to in the Employee Handbook (employees) or Terms and Conditions (freelance and casual workers). Acceptance of employment or engagement signifies an agreement to abide by this policy. Any failure to comply with the policy may be considered a disciplinary matter and will be dealt with in accordance with the appropriate disciplinary procedure, which may lead to dismissal or termination of studies in case of FoE students.
- 10.1.3. Official RAD social media accounts, pages or groups should be set up in consultation with and with the approval of the Director of Marketing & Communications. Any unauthorised accounts could make both the employee(s) concerned and the RAD vulnerable to legal and regulatory action.
- 10.1.4. The Marketing and Communications team at RAD headquarters must be granted access to all official RAD pages, including admin rights.
- 10.1.5. The RAD's intention is not to adopt an unnecessarily restrictive approach, but simply to ensure that all published content on social media and digital platforms is appropriate, consistent, and adheres to relevant legislation to guard against risk to individual RAD employees, the RAD or children and adults at risk.
- 10.1.6. Do not use the RAD name or brand to endorse or promote any product, opinion, religion or similar belief, cause or political party or candidate.

Equally, while we encourage and support employees in their involvement with registered charities where possible and appropriate, care should be taken not to use the RAD to endorse any charity which itself promotes any particular opinion, religion or similar belief, cause or political party or candidate.

- **Do not create fake blogs** or posts, falsely represent oneself as a member or customer, or falsely advertise on any social media site. This directly contravenes the *Consumer Protection from Unfair Trading Regulation law*.
- **Respect copyright** and trademarks, fair use and disclosure laws (i.e. when sourcing visual media to share, these should be clear of copyright, or copyright needs to be formally agreed by its holder).

- **Respect your audience**. Respect the privacy of others and do not use racial or sexual slurs, obscenities, indecent or pornographic content or write about topics that could be considered inflammatory, such as politics or religion. *Your posts should comply with the terms of the RAD's Equality and Diversity Policy* as well as this policy.
- When publishing or posting content about an individual ensure that express **written permission** has been sought in advance and/or do not disclose anything that affects their right to privacy
- Don't break any confidentiality regarding finances or data, or announce news before RAD has
- Staff are welcome to add our handles to their bios if they wish to, and we hope you would feel proud to. But it's also ok if you don't want to. It should be clear that you're an employee if you're discussing anything related to RAD. Remember: if your name and face are visible, people will figure it out if they're determined enough.
- No communication should disparage RAD competitors.

11. Responding to issues and crises

There are times when the RAD will have to response to communications crises from official RAD accounts. In this instance only members of the RAD's Marketing and Communications team will be authorised to make public facing comments, as well as selected senior members of staff. For staff with personal social media accounts it is important to remember the following:

- Don't comment on developing press stories relating to RAD
- Don't jump in if see you can help people having customer service problems, we're monitoring our accounts daily and have an approach for managing this
- Don't try and respond to upset customers

If you require more information on issues and crises please contact the marketing team <u>marketing@rad.org.uk</u> and they will be able to share our Crisis Communications Framework with you. This highlights the guidance/protocols when a communications crisis emerges.

The RAD occasionally hosts celebrities at its headquarters and at hired venues in the UK and around the world. We respect their right to privacy and therefore, regardless of the marketing and/or commercial opportunities we do not divulge information about them or their whereabouts, without express consent or agreement. Verbal consent is acceptable; however please check with the RAD press team (Marketing and Communications department) before posting anything if you are uncertain.

12. Personal context for RAD employees: guidelines for social media use

- 12.1. If you own/publish a blog or engage with social media outside the official RAD social networks and websites and this platform(s) is openly accessible to the public and has something to do with the work you do at the RAD, or subjects closely associated with the RAD, you must use a disclaimer such as: "The opinions expressed on this site are solely my own".
- 12.2. No communication openly accessible to the public (this includes closed/secret Facebook groups or private accounts) should disparage the RAD, any RAD employee or officer, partners, associates or any other stakeholder.
- 12.3. No communication openly accessible to the public (this includes closed/secret groups or private accounts) should contain any information, or potential information, that can identify a child, young person or an adult at risk attending any RAD classes, examinations or RAD events.
- 12.4. No communication, without the express written permission of the RAD, should contain RAD logos or trademarks and should respect copyright, fair use, financial disclosure and other applicable laws and regulations.
- 12.5. Ensure that your personal blogging, micro-blogging or social networking activities do not interfere with your work commitments and that personal use is kept within break times, pre and post working hours, whether using the RAD's IT systems or not.
- 12.6. RAD employees should ensure that they have read the Conditions of use of the Internet as stated in the *RAD Employee Handbook* as well as this policy before posting or sharing anything.
- 12.7. VIPs/Celebrities: we understand that meeting a celebrity can be exciting; however, VIPs should be approached politely if photos are sought after. They should also always be asked if they authorise the image to be posted online.
- 12.8. If you receive any distressing or abusive comments or messages on social media that are related to RAD, please contact the communications team who will be able to assist you.

Please note: RAD reserves the right to remove or edit any post on an RAD website or social network that is deemed to be in contravention of this policy. Unauthorised social media accounts may also be closed or deleted.

13. Equality and diversity on social media

Images convey an organisation's values and its intended or desired audience. As a world leader in dance education and training, it is essential that the RAD uses images on its website and social media that show a diverse range of peoples. All RAD employees should ensure their imagery reflects this.

Images should include people from diverse and intersectional backgrounds of race, age, gender, ethnicity, physical and neurodiversity, social upbringing, and different countries, cultures and religions.

13.1. User generated content on social media

User-generated content (UGC) is a key strategy on our social media channels, ensuring we share our RAD community with the world. When selecting and reposting UGC, it is fundamental that all RAD employees select diverse bodies where possible. Please revert to 13. Equality and diversity on social media for further guidance.

14. Disciplinary procedure

Alleged breaches of this policy will be taken seriously and, where appropriate disciplinary action will be taken against employees found to be acting or have acted in contravention of the policy. Disciplinary action could lead to dismissal or termination of their studies in the case of Faculty of Education students.

15. Review of policy

This policy will be reviewed annually and amended in line with both internal polices and legislation and or best practice. It will be reviewed by the Director of Marketing & Communications in liaison with relevant committees (Safeguarding and Information Management).

16. Glossary of Terms

• **Blogs** are often websites with dated items of content in reverse chronological order, self-published by bloggers. Items – sometimes

called posts or blogs - may have keyword tags associated with them, are usually available as feeds, and often allow comments.

- **Content** is used here to describe text, pictures, video and any other material that is published on the Internet.
- **RAD employees** means UK and international permanent and fixed term employees, freelance and contract workers, including teachers (which includes Step into Dance teachers) examiners, pianists, mentors, practical teaching supervisors, tutors and sessional lecturers. It also means casual workers such as course attendants, examination attendants, chaperones and other assistants, as well as Trustees, Sub-Committee members, Regional Advisory Committee members, International Advisors and Council members".
- A **post** is an item on a blog or forum.
- **Profiles** are the information that you provide about yourself when signing up for a social networking site. As well as a picture and basic information, this may include your personal and business interests, a "blurb" about yourself, and tags to help people search for like-minded people.
- **RAD authorised bloggers** are those employees or officers that have been invited to write or blog in an official capacity on behalf of the RAD for the advancement of the RAD and or its business.
- Social media is a term for the tools and platforms people use to publish, converse and share content online. The tools include blogs, wikis, podcasts, and sites to network, share photos/videos and bookmarks.
- Social networking sites are online places where users can create a profile for themselves and then socialise with others using a range of social media tools including blogs, video, images, tagging, lists of friends, forums and messaging.
- **Public** any content accessible to the general public.
- **Prevent** relates to the RAD's requirement under the Counter-Terrorism and Security Act 2015. As an Alternative Provider of higher education, the RAD is required to 'have due regard to the need to prevent people from being drawn into terrorism'.

17. Further information

RAD Policies

- Code of Conduct for members and Code of Professional Practice
- Equality Diversity & Inclusion Strategy
- Safeguarding Policy and Procedures

Useful websites for advice and information

- The UK Council on Child Internet Safety: <u>www.dcsf.gov.uk/ukccis</u>
- Childnet International: <u>www.childnet.com</u>
- NSPCC: <u>https://learning.nspcc.org.uk/safeguarding-child-protection</u>

APPENDIX

If you have a safeguarding concern please contact: Leiana Foster, Safeguarding Manager on <u>Ifostr@rad.org.uk</u>