

Instill Education Social Media Policy

1. About this policy

This policy is in place to minimise the risks to our business through use of social media.

This policy deals with the use of all forms of social media, including Facebook, LinkedIn, Twitter, Google+, Wikipedia, Whisper, Instagram, Vine, Tumblr and all other social media platforms, internet postings and blogs. It applies to use of social media for business purposes as well as personal use that may affect our business in any way.

This policy does not form part of any employee's contract of employment and we may amend it at any time.

2. Personnel responsible for implementing the policy

Digital marketing executives from each brand within Instill Education have specific responsibility for managing their entire brand presence online and should always be consulted with any proposals concerning company social media channels, blogs and websites. In particular, no new social media accounts may be created, or use of brand names and logos online, without prior consultation and approval from digital marketing managers relevant to the brand in question. Managers have a specific responsibility for operating within the boundaries of this policy, ensuring that all staff understand the standards of behaviour expected of them and taking action when behaviour falls below its requirements. Managers will be given training in order to do this.

All staff are responsible for the success of this policy and should ensure that they take the time to read and understand it. Any misuse of social media should be reported to a manager. Questions regarding the content or application of this policy should be directed to your line manager.

3. Compliance with related policies and agreements

Social media should never be used in a way that breaches any of our 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:

- 3.1.1 breach our Information and Communications Systems Policy;
- 3.1.2 breach our obligations with respect to the rules of relevant regulatory bodies;
- 3.1.3 breach any obligations contained in those policies relating to confidentiality;
- 3.1.4 breach our Disciplinary Policy or procedures;
- 3.1.5 breach our Anti-harassment and Bullying Policy;
- 3.1.6 unlawfully discriminate against other staff, students or third parties

3.1.7 breach our Data Protection Policy (for example, never disclose personal information about a colleague or student online); or

3.1.8 breach any other laws or regulatory requirements.

Staff who breach any of the above policies will be subject to disciplinary action up to and including termination of employment.

4. Personal use of social media

Occasional personal use of social media during working hours is permitted so long as it does not involve unprofessional or inappropriate content, does not interfere with your employment responsibilities or productivity and complies with this policy.

5. Prohibited use

You must avoid making any social media communications that could damage our business interests or reputation, even indirectly.

You must not use social media to defame or disparage us, our staff, our students or any third party; to harass, bully or unlawfully discriminate against staff, our students or third parties; to make false or misleading statements; or to impersonate colleagues, students or third parties.

You must not express opinions on our behalf via social media, unless expressly authorised to do so by your manager. You may be required to undergo training in order to obtain such authorisation.

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

Any misuse of social media should be reported to your line manager.

6. Business use of social media

Digital marketing executives are responsible for online external communications and engaging with their respective communities, and operate freely under guidelines agreed with their managers, who are ultimately responsible for what is published. If it is not part of your normal duties to speak on behalf of the organisation in a social media environment, you must seek approval for such communication from digital marketing representatives for your brand and your manager, who may require you to undergo training before you do so and impose certain requirements and restrictions with regard to your activities.

Likewise, if you are contacted for comments about the organisation for publication anywhere, including in any social media outlet, direct the enquiry to a digital marketing representative.

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

7. Guidelines for responsible use of personal social media

In any personal social media accounts you may use that are not affiliated with the company, it should be clear that you are speaking on your own behalf.

Pay particular attention to any social media posts that are fully public and that bear your name, which could be connected to your affiliation with the company, and be aware that you are personally responsible for such communications published on the internet for anyone to see.

If you disclose your affiliation with us on your profile or in any social media postings, it must be clear that your views do not represent those of your employer (unless you are authorised to speak on our behalf as set out above). You should also ensure that any publicly accessible profile and any publicly accessible content you post are consistent with the professional image you present to clients, colleagues and students.

If you are uncertain or concerned about the appropriateness of any statement or posting, refrain from posting it until you have discussed it with your manager.

If you see social media content that disparages or reflects poorly on us, you should contact the digital marketing representatives for your brand and your manager.

8. Monitoring

We reserve 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.

For further information, please refer to our Information and Communications Systems Policy.

9. Recruitment

We may use internet searches to perform due diligence on candidates in the course of recruitment. Where we do this, we will act in accordance with our data protection and equal opportunities obligations.

10. Breach of this policy

Breach of this policy may result in disciplinary action up to and including dismissal. Any member of staff suspected of committing a breach of this policy will be required to co-operate with our investigation, which may involve handing over relevant login details.

You may be required to remove any social media content that we consider to constitute a breach of this policy. Failure to comply with such a request may in itself result in disciplinary action.

Updated and reviewed January 2022

To be reviewed January 2023