



*The*  
**Development**  
*Manager Ltd.*

## **Social Media Policy**

The Development Manager (TDM) understands that social media is a growing part of life outside of work. We have a responsibility to safeguard our learners against potential dangers when accessing the internet at TDM, and to educate our learners about how to protect themselves online when outside of TDM.

We are committed to:

- Encouraging the responsible use of social media by all staff and learners in support of TDM's mission, values and objectives.
- Protecting our learners from the dangers of social media.
- Preventing and avoiding damage to the reputation of the organisation through irresponsible use of social media.
- Protecting our staff from cyberbullying and potentially career damaging behaviour.

## Contents

Legal Framework .....	3
Roles and Responsibilities .....	3
Definitions .....	4
Data Protection Principles .....	5
Staff Social Media Use .....	5
Learner Social Media Use .....	7
Online Safety .....	8
Monitoring and Blocked Content .....	8
Cyberbullying .....	8
Training .....	8
Document Management .....	9
Appendix 1 .....	11
Appendix 2 .....	12
Appendix 3 .....	13

## Legal Framework

This policy has due regard to all relevant legislation and statutory guidance including, but not limited to, the following:

- The UK General Data Protection Regulation (UK GDPR)
- The Data Protection Act 2018
- The Computer Misuse Act 1990, amended by the Police and Justice Act 2006
- The Freedom of Information Act 2000
- The Safeguarding Vulnerable Groups Act 2006
- Equality Act 2010
- Online Safety Act 2023
- DfE 'Meeting digital and technology standards in schools and colleges' (2023)
- DfE 'Keeping children safe in education 2025'

This policy operates in conjunction with the following TDM policies:

- Acceptable Use Policy
- Data Protection Policy
- Anti-Bullying and Harassment Policy-Working with Learners and Employers
- Behaviour Policy - Code of Practice
- Staff ICT and Electronic Devices Policy
- Complaints Policy and Procedure
- Social Media Policy
- Anti-Bullying and Harassment Policy for TDM Staff
- Confidentiality Policy
- Cyber Security Policy
- Safeguarding Policy
- Disciplinary Policy and Procedure

## Roles and Responsibilities

The Operations Director is responsible for:

- The overall implementation of this policy and ensuring that all staff and learners are aware of their responsibilities in relation to social media use.
- Promoting safer working practices and standards with regards to the use of social media.
- Establishing clear expectations of behaviour for social media use.
- Ensuring that this policy, as written, does not discriminate on any grounds, including against any of the protected characteristics, as outlined in the Equality Act 2010.
- In conjunction with the governing board, handling complaints regarding this policy and its provisions in line with the organisation's Complaints Procedures Policy.
- Implementing appropriate sanctions and disciplinary methods where there is a breach of this policy.
- Taking steps to minimise the amount of misplaced or malicious allegations in relation to social media use.
- Working alongside the Data Protection Lead (DPL) to ensure appropriate security measures are implemented and compliance with UK GDPR.
- Ensuring the Designated Safeguarding Lead's remit covers online safety.

The Business Operations Manager is responsible for:

- Reviewing this policy on an annual basis.
- Ensuring their own knowledge of online safety issues is up-to-date.
- Ensuring all staff undergo safeguarding and child protection training, including online safety, at induction.

Staff members are responsible for:

- Adhering to the principles outlined in this policy and the Acceptable Use Policy and Staff ICT and Electronic Devices Policy.
- Ensuring learners adhere to the principles outlined in this policy and that it is implemented fairly and consistently in the classroom.
- Reporting any social media misuse by staff or learners to the Business Operations Manager immediately.
- Attending any training on social media use offered by TDM.
- Staff must not generate or share AI-created images, videos, or text representing learners, staff, or employer partners without explicit consent and approval from the Marketing Team.

Learners are responsible for:

- Adhering to the principles outlined in this policy and the Anti-Bullying and Harassment Policy- Working with Learners and Employers and Behaviour Policy - Code of Practice.
- Ensuring they understand how to use social media appropriately and stay safe online.
- Seeking help from TDM staff if they are concerned about something they or a peer have experienced online.
- Reporting online safety incidents and concerns in line with the procedures within this policy.
- Demonstrating the same high standards of behaviour as expected within TDM.

The Marketing Team is responsible for:

- Monitoring and reviewing all TDM-run social media accounts.
- Vetting and approving individuals who wish to be 'friends' or 'followers' on TDM's social media platforms.
- Consulting with staff on the purpose of the social media account and the content published.
- Maintaining a log of inappropriate comments or abuse relating to TDM.
- Handling inappropriate comments or abuse posted on TDM's social media accounts, or regarding TDM.
- Creating a terms of use agreement, which all content published must be in accordance with.
- Ensuring that enough resources are provided to keep the content of the social media accounts up-to-date and relevant.

The Business Support Team is responsible for:

- Providing technical support in the development and implementation of TDM's social media accounts.
- Implementing appropriate security measures as directed by the Business Operations Manager or Operations Director.
- Ensuring that TDM's filtering and monitoring systems are updated as appropriate.

## Definitions

For the purpose of this policy, TDM defines "**social media**" as any online platform that offers real-time interaction between the user and other individuals or groups including, but not limited to, the following:

- Blogs
- Online discussion forums, such as NetMums
- Collaborative spaces, such as Facebook and LinkedIn
- Media-sharing devices, such as YouTube
- 'Micro-blogging' applications, such as Twitter

For the purpose of this policy, "**cyberbullying**" is defined as any social media or communication technology intentionally used to bully an individual or group, including the posting or sharing of messages, images or videos.

For the purpose of this policy, "**members of the TDM community**" are defined as any employee, learner, employer partner, governor or ex-learner (or ex-employer partner).

## Data Protection Principles

TDM will obtain consent from learners prior to posting any learner details on social media by using the Social Media Consent Form (Appendix 4), which will confirm whether or not consent is given for posting images and videos of a learner on social media platforms. The consent will be valid for 12 months after the learner has completed/had their last day on programme. After such time no new posts including the learner will be added on social media (however, previous posts will remain unless consent is withdrawn). Consent provided for the use of images and videos will apply to all TDM social media accounts and staff LinkedIn accounts (such as a coach posting an image with a learner on LinkedIn to welcome them to their programme). Staff and learners are not permitted to post any imagery or videos on personal accounts (outside of LinkedIn – and only then with consent).

A record of consent is kept on the learner file maintained throughout their programme. The DPL is responsible for ensuring this consent record remains up-to-date and social media posts/marketing only use details of those learners who have provided consent.

Learners are able to withdraw or amend their consent at any time. To do so, learners must inform TDM in writing. Where learners withdraw or amend their consent, it will not affect the processing of any images or videos prior to when consent was withdrawn or amended. Processing will cease in line with learners' requirements following this. Wherever it is reasonably practicable to do so, TDM will take measures to remove any posts before consent was withdrawn or amended, such as removing an image from a social media site.

Consent can be provided for certain principles only, for example only images of a learner are permitted to be posted, and not videos. This will be made explicitly clear on the consent form provided. TDM will only post images and videos of learners for whom consent has been received.

Only TDM-owned devices will be used to take images and videos of the TDM community, which have been pre-approved by the Business Operations Manager for use. Only appropriate images and videos of learners will be posted in which they are suitably dressed, i.e. it would not be suitable to display an image of a learner in swimwear.

When posting on social media, TDM may use group or class images or videos with general labels, e.g. 'graduation'.

When posting images and videos of learners, TDM will not post learners' personal details (other than their name and workplace) on social media platforms.

Before posting on social media, staff will:

- Refer to the consent form in the learner file to ensure consent has been received for that learner and for the exact processing activities required.
- Ensure that there is no additional identifying information relating to a learner, other than their name (and workplace if appropriate).

Any breaches of the data protection principles will be handled in accordance with TDM's Data Protection Policy.

## Staff Social Media Use

### TDM Accounts

TDM's social media sites will only be created and monitored by the Marketing Team and other designated staff members. There will be a strong pedagogical or business reason for the creation of social media accounts on behalf of TDM; official TDM profiles and accounts will not be created for trivial reasons.

If members of staff wish to create a new social media account, they will complete the Social Media Site Creation Approval Form (Appendix 3) and return it to the Engagement Manager, who will approve it with the Business Operations Manager and then create the account on the behalf of the requesting

individuals. The Marketing Team will be consulted about the purpose of the proposed site and its content.

A TDM social media account will be entirely separate from any personal social media accounts held by staff members and will be linked to an official TDM email account.

Consideration will be given to the following aspects:

- The purpose for using social media
- Whether the overall investment will achieve the pedagogical aim
- The level of interactive engagement with the site
- Whether learners, staff, employers or members of the public will be able to contribute content to the account
- How much time and effort staff members are willing to commit to the proposed site
- A clear plan which outlines aspects such as how long the site will last
- How the success of the site will be evaluated

TDM social media passwords are kept in password manager – these are not shared with any unauthorised persons, including learners, unless otherwise permitted by the Engagement Manager. Staff will adhere to the data protection principles outlined in this policy, the Data Protection Policy and Confidentiality Policy at all times.

Staff will ensure any posts are positive in nature and relevant to learners, employers, the work of staff, the organisation or any achievements. Staff will not post any content online which is damaging to TDM or any of its staff, learners or employer partners.

All content expressed on TDM social media accounts will not breach copyright, data protection or freedom of information legislation.

Staff will ensure the Marketing Team has checked the content before anything is posted on social media.

If inappropriate content is accessed online, an Inappropriate Content Report Form (Appendix 2) will be completed and passed on to the Business Operations Manager. The Business Operations Manager retains the right to monitor staff members' internet usage in line with the Staff ICT and Electronic Devices Policy.

TDM's social media accounts will comply with site rules at all times, particularly with regards to the minimum age limit for use of the site. It will be noted that each networking site has their own rules which must be followed – the Marketing Team will induct staff to each new social media platform, providing them with the relevant training and information.

### **Personal Accounts**

Staff members will not access social media platforms during work time, but they are permitted to use social media during break times. Staff will avoid using social media in front of learners. This is with the exception of LinkedIn, which is a professional social media/networking platform.

Staff members will not use any TDM-owned equipment to access personal accounts, unless it is beneficial to the material being taught or is required for a particular task – prior permission will be sought from the Business Operations Manager. Staff are not permitted to use the TDM WiFi network to access personal accounts, unless otherwise permitted by the Business Operations Manager, and once they have ensured the necessary network security controls are applied.

Staff will not 'friend', 'follow' or otherwise contact learners through their personal social media accounts. If learners attempt to 'friend' or 'follow' a staff member, they will report this to the Business Operations Manager. This is with the exception of LinkedIn, which is a professional social media/networking platform.

Staff members will not provide their home address, phone number, mobile number, social networking details or personal email addresses to learners – any contact with learners will be done through

authorised TDM contact channels. Staff members will use their TDM email address and mobile number for TDM business and personal email address and mobile number for their private correspondence; the two should not be mixed.

Staff members will ensure the necessary privacy controls are applied to personal accounts and will avoid identifying themselves as an employee of TDM on their personal social media accounts (with the exception of LinkedIn). Where staff members use social media in a personal capacity, they will ensure it is clear that views are personal and are not those of TDM.

No staff member will post any content online that is damaging to TDM or any of its staff, learners or employers. Staff members will not post any information which could identify a learner or TDM – this includes any images, videos and personal information. The exception to this is posting on LinkedIn, so long as the learner's permission is sought and granted beforehand. Staff will not take any posts, images or videos from social media that belong to TDM for their own personal use. Staff members will not post anonymously or under an alias to evade the guidance given in this policy.

Breaches of this policy by members of staff will be taken seriously, and in the event of illegal, defamatory or discriminatory content, could lead to prosecution, disciplinary action or dismissal. Members of staff will be aware that if their out-of-work activity brings TDM into disrepute, disciplinary action will be taken.

Attempts to harass, bully, coerce or manipulate members of the TDM community via social media by members of staff will be dealt with as a disciplinary matter.

Social media will not be used as a platform to attack, insult, abuse or defame learners, their employers, colleagues or other professionals.

Staff members' personal information will not be discussed on social media. This is with the exception of LinkedIn, which is a professional social media/networking platform.

When using LinkedIn, staff must ensure no private messaging with learners takes place regarding personal matters; communication must remain professional and programme-related.

This includes, but is not limited to, platforms such as LinkedIn, Facebook, Instagram, X (Twitter), TikTok, Threads, Discord, WhatsApp, and any emerging platform that enables digital communication.

## **Learner Social Media Use**

Learners will not access social media during coaching/training time, unless it is part of a curriculum activity. Learners are not permitted to use the TDM WiFi network to access any social media platforms unless prior permission has been sought from the Business Operations Manager and appropriate network security measures are applied.

Learners will not attempt to 'friend', 'follow' or otherwise contact members of staff through their personal social media accounts (with the exception of LinkedIn, where learners are able to 'connect' with staff members in a professional capacity). Learners are only permitted to be affiliates of TDM social media accounts. Where a learners attempt to "friend" or 'follow' a staff member on their personal account, it will be reported to the Business Operations Manager.

Learners will not post any content online which is damaging to TDM or any of its staff, learners or employer partners. Learners will not post anonymously or under an alias to evade the guidance given in this policy.

If inappropriate content is accessed online on TDM premises, it will be reported to the Business Operations Manager.

Breaches of this policy will be taken seriously, and in the event of illegal, defamatory or discriminatory content, could lead to the removal of the learner from their programme of study.

## **Online Safety**

Any disclosures made by learners to staff about online abuse, harassment or exploitation, whether they are the victim or disclosing on behalf of another child, will be handled in line with the Safeguarding Policy.

Concerns regarding a staff member's online behaviour will be reported to the Business Operations Manager, who will decide on the best course of action in line with the relevant policies, e.g. the Anti-Bullying and Harassment Policy for TDM Staff, and Disciplinary Policy and Procedures.

Concerns regarding a learner's online behaviour will be reported to the DSL, who will investigate any concerns with relevant staff members, e.g. the Business Operations Manager, and manage concerns in accordance with relevant policies depending on their nature, e.g. the Behaviour Policy - Code of Practice and Safeguarding Policy.

Where there is a concern that illegal activity has taken place, the Business Operations Manager will contact the police. TDM will avoid unnecessarily criminalising learners, e.g. calling the police, where criminal behaviour is thought to be inadvertent and as a result of ignorance or normal developmental curiosity, e.g. a learner has taken and distributed indecent imagery of themselves. The DSL will decide in which cases this response is appropriate and will manage such cases in line with the Safeguarding Policy.

## **Monitoring and Blocked Content**

The Business Operations Manager will install firewalls on TDM's network to prevent access to certain websites.

Attempts made to circumvent the network's firewalls will result in a ban from using TDM computing equipment, other than with close supervision.

The Business Operations Manager retains the right to monitor staff and learner access to websites when using the TDM network or on TDM-owned devices.

Inappropriate content accessed on TDM's computers will be reported to the Business Operations Manager so that the site can be blocked. Requests may be made to access erroneously blocked content by submitting a blocked content access form to the Business Operations Manager.

Filtering and monitoring arrangements will take account of the Prevent Duty to safeguard learners from radicalisation and extremist content.

## **Cyberbullying**

Cyberbullying incidents are taken seriously at TDM. Any reports of cyberbullying on social media platforms by learners will be handled in accordance with the Anti-Bullying and Harassment Policy-Working with Learners and Employers.

Cyberbullying against learners or staff is not tolerated under any circumstances. Incidents of cyberbullying are dealt with quickly and effectively wherever they occur in line with the Anti-Bullying and Harassment Policy-Working with Learners and Employers and Anti-Bullying and Harassment Policy for TDM Staff. Allegations of cyberbullying from staff members will be handled in accordance with the Disciplinary Policy and Procedure.


## **Training**

TDM recognises that early intervention can protect learners who may be at risk of cyberbullying or negative social media behaviour. As such, staff will receive training on social media as part of their new starter induction.

Learners will be educated about online safety and appropriate social media use as part of their apprenticeship.

Training for all learners and staff will be refreshed in light of any significant incidents or changes.

## Document Management

Document Name and Reference	Social Media Policy-TDMPP042
Classification	Internal and External
Policy Ownership	This policy is owned by all staff at TDM
Policy lead originator and point of contact in relation to its content:	Elizabeth Hoyos-Operations Director
TDM policy and procedure approval	Elizabeth Hoyos-Operations Director
Signature	
Date	12/02/2024

Version Control					
Issue Date	Revision Number*	Revision Date*	Revision Changes*	Initials	Next revision Date
17/3/17	n/a	n/a	First issue	Sara Marrett	
17/3/17	1	15/05/19	Reviewed no changes	EK	
17/3/17	1	04/08/23	Updated formatting	AR	
12/02/24	2	12/02/24	New policy created	AR	January 2025
12/02/24	2	12/12/24	Added 'harass' to: 'Attempts to harass, bully, coerce or manipulate members of the TDM community via social media by members of staff will be dealt with as a disciplinary matter.'	AR	January 2025

12/02/24	2	20/02/25	Update: Legal Framework and Personal Accounts	JB	February 2026
12/02/24	2	19/12/25	Updated the reference to the Keeping Children Safe in Education report to 2025.	AR	February 2026
12/02/24	3	12/03/26	<ul style="list-style-type: none"> <li>• Update Legal Framework</li> <li>• Added a section on Personal Accounts about social media types</li> <li>• Added a section in Monitoring &amp; Blocked Content</li> <li>• Added about AI generated content</li> </ul>	JB	March 2027

\*Significant changes or reviewed

## Appendix 1

### Blocked Content Access Request Form

Requester	
Staff name:	
Date:	
Full URL:	
Site content:	
Reasons for access:	
Identified risks and control measures:	
Authoriser	
Approved?	<input type="checkbox"/> / X
Reasons:	
Staff name:	
Date:	
Signature:	

Once completed, please send this form to the Business Operations Manager

## Appendix 2

### Inappropriate Content Report Form

<b>Staff name (submitting report):</b>	
<b>Name of individual accessing inappropriate content (if known):</b>	
<b>Date:</b>	
<b>Full URL(s):</b>	
<b>Nature of inappropriate content:</b>	
<b>To be completed by Business Operations Manager</b>	
<b>Action taken:</b>	
<b>Staff name:</b>	
<b>Date:</b>	
<b>Signature:</b>	

## Appendix 3

### Social Media Site Creation Approval Form

Use of social media on behalf of TDM must be approved by the Engagement Manager prior to setting up sites. Please complete this form and return it to the Engagement Manager.

Team details		
Department:		
Moderator of site:		
Purpose of using social media		
Please describe why you want to set up this site and the content of the site		
What are your aims and what do you hope to achieve by setting up this site?		
What is the proposed content of the site?		
Proposed audience of the site		
<input type="radio"/> Learners	<input type="radio"/> TDM staff	<input type="radio"/> TDM employer partners
<input type="radio"/> External organisations	<input type="radio"/> Members of the public	
<input type="radio"/> Other (please give details)		
Proposed contributors to the site		
<input type="radio"/> Learners	<input type="radio"/> TDM staff	<input type="radio"/> TDM employer partners
<input type="radio"/> External organisations	<input type="radio"/> Members of the public	
<input type="radio"/> Other (please give details)		
Administration of the site		
Names of administrators (the site must have at least two approved administrators):		
Who will vet external contributors? (Please state name and job role)		
Who will host the site?		
Proposed date of going live:		

How do you propose to advertise for contributors?		
If contributors include learners, how do you propose to inform and obtain their consent?		
What security measures will you take to prevent unwanted or unsuitable individuals from contributing or becoming 'friends' and 'followers' etc. of the site?		
<b>Approval</b>		
<b>Approval from relevant people must be obtained before the site can be created. The relevant managers must read this form and complete the information below before final approval can be given by the headteacher.</b>		
<b>Engagement Manager</b>  <b>I approve the aims and content of the proposed site and the use of the TDM brand and logo.</b>	Name:	
	Signature:	
	Date:	
<b>Business Operations Manager</b>  <b>I approve the aims and content of the proposed site and the use of the TDM brand and logo.</b>	Name:	
	Signature:	
	Date:	

## Appendix 4

### Social Media Consent Form

This consent form provides information pertaining to how TDM wishes to use personal data on social media, details the terms under which TDM will use this data and requests consent for TDM to use your personal data on social media.

<b>Name of Learner:</b>	
<b>Employer Organisation:</b>	

#### Why do we need your consent?

TDM requests your consent to use images and videos of you for a variety of different purposes.

Without your consent, TDM will not use images, videos, names or other forms of personal data on social media. Similarly, if there are only certain conditions under which you would like images and videos of yourself to be used, TDM will abide by the conditions you outline in this form.

#### Why will we be using personal data on social media?

TDM wants to use certain types of data on social media to promote the positive and inclusive ethos of the organisation – we aim to celebrate our learners’ and organisation’s achievements and social media allows us to do this.

Where TDM uses images of learners, the name of the learner(s) may be disclosed alongside any images/videos unless TDM is told not to include that information by the learner.

With your consent, TDM may use personal data on social media, the TDM website, in TDM flyers and other printed publications, such as a newsletter.

#### Who will be able to see the data once it’s on social media?

Anyone who is connected to, searches for, or follows TDM (or anyone who has reposted/shared the post).

#### What are the conditions of use?

- This consent form is valid for 12 months after the learner has completed/had their last day on programme.
- It is the responsibility of the learner to inform TDM, in writing, if consent needs to be withdrawn or amended.
- TDM will not include personal emails, postal addresses, or telephone or fax numbers on images or videos on social media.
- TDM may post pictures of work created by learners on social media.
- TDM may use group or class images or videos with general labels, e.g. ‘graduation’.
- TDM will only use images and videos of learners who are suitably dressed, i.e. it would not be suitable to display an image of a learner in swimwear.
- TDM will not post any sensitive data, such as details of SEND, without express and additional consent.

#### Providing your consent

Please read the following conditions thoroughly and provide your consent as appropriate by ticking either ‘Yes’ or ‘No’ for each criteria.

TDM will **only** post personal data on social media for the conditions that you provide consent for.

<b>I provide consent to:</b>	<b>Yes</b>	<b>No</b>
Using images of me on TDM's social media accounts and website.		
Using videos of me on TDM's social media accounts and website.		
Using images of me on TDM's social media accounts, including the following: <ul style="list-style-type: none"> <li>● X (Twitter)</li> <li>● Facebook</li> <li>● Instagram</li> <li>● LinkedIn</li> </ul>		
Using videos of me on TDM's social media accounts, including the following: <ul style="list-style-type: none"> <li>● X (Twitter)</li> <li>● Facebook</li> <li>● Instagram</li> <li>● LinkedIn</li> </ul>		
Using my first name on social media (and last name if tagged on LinkedIn).		
Using images of me in other collateral (such as newsletters, publications and flyers).		

### **Refreshing your consent**

This form is valid for 12 months after you have completed/had your last day on programme. After such time no new posts including you will be added on social media (however, previous posts will remain unless consent is withdrawn).

Consent will also be refreshed where any changes to circumstances occur – this can include, but is not limited to, the following:

- New requirements for consent, e.g. an additional social media account will be used to share learner images and videos
- Changes to a learner's circumstances, e.g. safeguarding requirements mean a learner's image cannot be used
- Changes to consent, e.g. amending the provisions for which consent has been provided for

Where you would like to amend the provisions for which consent has been provided, you must submit your request in writing to the Business Operations Manager. A new form will be supplied to you to amend your consent accordingly and provide a signature.

### **Withdrawing your consent**

You have the right to withdraw your consent at any time. Withdrawing your consent will not affect the legality of processing personal data that was shared prior to withdrawal; however, TDM will make every effort to remove posts about the learner where possible, e.g. images of the learner on social media will be removed.

If you would like to withdraw your consent, you must submit your request in writing to the Business Operations Manager.

### **Declaration**

I, \_\_\_\_\_ (name of learner), understand:

- Why my consent is required.
- The reasons why TDM uses my personal data on social media.
- Who will be able to view my personal data once posted.
- The conditions under which TDM uses my personal data on social media.

- I have provided my consent above as appropriate, and TDM will act in accordance with my requirements.
- I will be required to re-provide consent where any circumstances change.
- I can amend or withdraw my consent at any time and must do so in writing to the Business Operations Manager.

Name of learner: \_\_\_\_\_

Signature: \_\_\_\_\_

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

If you have any questions regarding this form, or would like to see copy of our full Social Media Policy, please do not hesitate to contact the Business Operations Manager by emailing [Jon.barrett@tdm.co.uk](mailto:Jon.barrett@tdm.co.uk) or calling 0333 101 0040 Extension 007.