



## **Social Media & Digital Communications Policy**

### **Best Practice and Acceptable Use**

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## 1. Introduction & Policy Statement

- 1.1. This policy sets out to identify and articulate the RAD's approach to social media and digital communications and offers guidelines for both business and personal use of these platforms by RAD employees 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 and students** to refer to.
- 1.2. Visual media (photographs and videos) forms an integral part of social media and digital communication and is therefore 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 and Procedures, which outlines how visual media should be procured, presented and protected in a way that is in line with RAD's standing as a leading dance education and training organization, 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.<sup>1</sup>
- 2.2 Digital communications is the term used to describe any communication over the internet or using mobile and new technology to effectively communicate with stakeholders.

## 3. Purpose

3.1 The RAD recognises that a **child is anyone under the age of 18**. As per the RAD's Policy and Procedures on Safeguarding Children and Vulnerable Adults, this policy also considers vulnerable adults in relation to issues of consent and social media.

3.2 The purpose of this policy is:

3.2.1 To share best practice for responsible use of social media with RAD's internal and, where relevant, external stakeholders eg parents, partners, patrons

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<sup>1</sup> Chartered Institute of Public Relations (CIPR) definition of Social Media, December 2013.

and agencies.

3.2.2 To outline relevant legislation and internal policies and procedures relating to publishing content online and via social media platforms.

3.2.3 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.

3.2.4 RAD Registered Teachers will be advised to refer to this policy and to incorporate its principles on safe practice into their own online usage and internal policies.

3.2.5 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 will be produced and published in the members' area of the website in order to offer support and guidance to our membership.

### **3.3 The Benefits of Digital Communications & Social Media**

3.3.1 The digital world via the Internet, social media and associated technologies have revolutionised the way in which organisations can communicate, connect and engage with their audiences. It is now possible to personalise mass communications, reach more people faster than ever before with relevant, targeted information; audiences can respond, 'like', 'retweet', question or add value to our original communication, in an instant.

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

3.3.3 The potential benefits to the RAD include:

- Raise the Academy's profile, including supporting the achievement of wider press and PR campaign 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
- Support recruitment and retention of:
  - Members
  - RAD Dance School customers and other Training department activities

- Higher Education students
- CPD customers
- Support the commercial objectives of the Academy, including RAD Enterprises and ticket sales (for e.g. the Genée International Ballet Competition, Step LIVE! etc)
- Sharing the RAD's key messages, mission, vision and values creatively and dynamically
- Increase participation in the RAD's portfolio of regional, national and international events
- Create a sense of a worldwide RAD community
- Deliver RAD events online via live tweeting/blogging, live streaming or virtual launches
- Support fundraising efforts highlighting our marketing reach to potential sponsors
- Build relationships with other arts organisations (with the goal of reciprocal marketing support)
- Demonstrate the RAD's links with the professional dance industry
- Drive traffic to further information sources (corporate website, box offices, RADE website, etc.)

### **3.4 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:

- 3.4.1 Reputational
- 3.4.2 Legal
- 3.4.3 Safeguarding
- 3.4.4 Financial

**3.5** All RAD employees, as well as FoE 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. (See 4, *Legal Considerations*).

## **4. Legal Considerations**

**4.1** This section will outline and address important aspects of the legal, regulatory and advisory domains affecting communications in a digital context.

**4.2** As digital and social media usage develops, the legal and regulatory frameworks

affecting the social space are also evolving. There is an increased clarification of previously untried or untested areas of practice. The updating and tightening of statutory regulations and development of guidelines from a diverse range of industry bodies is currently taking place.

**4.3** While social media is often perceived as a unique and different environment, many of the legal considerations associated with more conventional print and broadcast media remain relevant. In the absence of strong and specific legislation relating to social media, English law has tended to use established areas as a starting point in cases to date. This section details the legal considerations to take into account when working with social media:

- 4.3.1 Intellectual Property (Creative Commons, copyright and trade marks)
- 4.3.2 Law of Confidence
- 4.3.3 Defamation
- 4.3.4 Consumer Protection from Unfair Trading Regulation (2008)
- 4.3.5 Data Protection (1998) and General Data Protection Regulation (2018)
- 4.3.6 Privacy (Human Rights 1998).

#### **4.4 Intellectual Property (IP)**

The use of visual and audio assets Intellectual Property (IP) describes ownership of an intellectual 'product' which may have commercial value. There are four main areas to consider:

4.4.1 **Creative Commons**<sup>2</sup>: As social media is built upon interaction, information and content sharing, specific protocols have been developed to facilitate and encourage the widespread and free distribution of content providing certain conditions are met (i.e. crediting the source or the author). This protocol is called Creative Commons and social media best practice suggests practitioners should strongly consider distributing and using Creative Commons licensed content where possible and appropriate.

4.4.2 **Copyright**: Copyright covers a range of content (i.e. literature, music, art, choreography, etc.) and includes audio and visual media like photographs and film/video content. Copyright is automatic and does not need to be registered – unlike trademarks, for example.

4.4.2.1 The copyright owner has certain economic and moral rights – for example, the right to be credited as the creator of the material and the right to be financially rewarded if another party uses the material.

4.4.2.2 In most cases, the copyright owner needs to give permission for the material to be used, although there are exceptions to this. The concept of fair use in copyright law allows for certain

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<sup>2</sup> Creative Commons is a non-profit organisation that assists authors and creators who want to voluntarily share their work, by providing free copyright licenses and tools, so that others may take full & legal advantage of the Internet's wealth of science, knowledge and culture [www.creativecommons.org.uk](http://www.creativecommons.org.uk)

actions; for example, there is provision for quoting from publicly available material if the source is cited, its use can be justified and only the necessary amount is included.

4.4.2.3 'Rights managed' (RM) as well as 'royalty free' (RF) assets can be found on stock photography websites such as:

- Getty Images
- iStock
- Corbis Images

4.4.3 **Trademarks:** Trademarks include logos, slogans and words are 'signs' used to distinguish products or services of one company from another. A trademark owner has the right to prevent unauthorised use of that trademark.

4.4.3.1 The RAD has a number of registered and unregistered trademarks; information about these can be found at:  
[www.rad.org.uk/governance](http://www.rad.org.uk/governance)

4.4.4 **Designs:** Rights relate to the way a product looks – its shape, colour and patterns. Designs can be protected in a similar way to copyright, or can be registered. Owners of design rights have similar rights to trademark owners and permission to use or reproduce a design should be sought from the owner before publishing or sharing on digital or social media platforms.

4.5 The Law of Confidence in the UK is an important right and it's recognised by the courts and in the world of Intellectual Property. The law requires that a duty of confidentiality is established – this could be in the form of a written contract, for example an employment or business contract. However, the absence of a written document does not necessarily mean a duty of confidentiality does not exist.

4.5.1 Practical examples of circumstances where disclosure / confidentiality laws could be applied include:

4.5.1.1 Announcing a new client account before all details have been finalised

4.5.1.2 Posting financial information or reports for your own or a client's company

4.5.1.3 Revealing information about a competitor

4.5.1.4 Revealing information that is not in the public domain

4.6 Defamation is the act of making a statement about a person or company that is considered to harm reputation, for example by lowering others' estimation of a person or organisation (i.e. RAD or its members) or by causing them to lose their rank or professional standing.

4.6.1 If the defamatory statement is written down (in print or online) it is known as *libel*.

- 4.6.2 If it is spoken, it is known as *slander*. There are exceptions to this – for example, posting a defamatory statement online or recording it on a podcast would both be examples of libel.
- 4.6.3 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.
- 4.6.4 Action can also be taken against a person or organisation (RAD) for repeating or linking to libelous information from another source.
- 4.6.5 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**.
- 4.6.6 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**.
- 4.6.7 Retweeting, re-posting or linking to defamatory content previously shared by others **does not** exempt an individual or organisation (RAD) from the law.

#### **4.7 Consumer Protection from Unfair Trading Regulations (2008) and 2014 Amendments**

The Consumer Protection from Unfair Trading Regulations sets out how commercial practices (applicable to the RAD via our commercial branch) can be unfair through misleading or aggressive practices, and lists 31 specific practices that are banned.

4.7.1 This regulation does not specifically relate to social media; however any practice used online which is deemed unfair, misleading or aggressive will fall under these rules.

#### **4.8 Data Protection**

Some social media campaigns may ask RAD members, students, customers or the general public to provide personal data (for example, a competition which asks members to register through a website such as [www.rad.org.uk](http://www.rad.org.uk)). In cases such as these, it is important to be aware that UK data protection laws state that all visitors to websites must be made aware of how their details are being used, how they will be stored and who will have access to them. The RAD [Data Protection Policy and Procedures](#) sets out the RAD’s responsibilities with regards to Data Protection. In addition, website users can read our Policy Statement at <http://www.rad.org.uk/cookies-and-privacy>

4.8.1 It is important to note that, as far as consent and data use is concerned, these will

be effectively covered by the terms and conditions and privacy notices of each of these social media channels. This means that both you and your social media audience agree to the terms of the tools you use. GDPR will also require them to have an accountable EU representative that can be held to account for the GDPR compliance of the organisation within Europe.

4.8.2 Any personal information an individual provides on their personal profile/page, will be managed by the social media channel. For example, a social media 'name' is a personal identifier. This is significant because if an individual voluntarily decides to make that public, then that is their decision with full understanding and expectation that it will be seen by others<sup>3</sup>.

4.8.3 Due care and attention must be taken when advertising on social media to ensure that you are adhering to Data Protection legislation. If you have any queries about this, please get in touch with the Marketing and Communications Department.

## 4.9 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. More information about seeking permission to create and share visual media on social media can be found in section 2 of the Visual Media Policy.

## 5. Regulatory Considerations

### 5.1 Advertising Standards Authority's (ASA) Code of Practice

As of the 1 March 2011, the Advertising Standards Authority (ASA) extended its digital remit to cover marketing communications on companies' own websites and in other third party space under their control (i.e. social media platforms such as Facebook and Twitter). This extension empowers the ASA to apply the UK Code of Non-broadcast Advertising, Sales Promotion and Direct Marketing (the Committee of Advertising Practice CAP Code<sup>4</sup>) to digital communications and marketing.

5.1.1 **Websites:** All content on RAD UK based websites ([www.rad.org.uk](http://www.rad.org.uk) / [www.radenterprises.co.uk](http://www.radenterprises.co.uk)) or on RAD social media platforms must be "legal, decent and honest". All claims must be qualified and any statistical data must be properly referenced. This does also apply to all RAD Registered Teachers with their own websites and social media channels.

5.2 **Press releases:** Press releases, however, are excluded from the CAP Code. The distinction lies in the labelling of the document and the fact that it is intended primarily for journalists and bloggers and not consumers.

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<sup>3</sup> Further information available here: <https://oursocialtimes.com/social-media-and-gdpr-is-your-brand-ready/>

<sup>4</sup> Advice and further information about digital remit can be found on the CAP website [www.cap.org.uk](http://www.cap.org.uk)

**5.3 Search Engine Optimisation (SEO):** Natural search results that turn up via a Google search are excluded from the CAP Code. However, paid-for advertisement (i.e. Facebook adverts, or pay per click advertising) are a form of advertising and fall within the remit of the code.

**5.4 Social media conversations:** User generated content falls within the new remit only if it is adopted and used proactively within an organisation's own marketing communications, on its own website or in other non-paid for space online under the organisation's control.

For example comments about the RAD's products or services on the RAD Facebook page or RAD Twitter or Instagram account by members as part of a natural conversation, don't fall under a code, but if the RAD used those quotes to promote a particular product or service on the home page or via social media channels, then they would fall under the ASA's authority.

**5.5 Film:** Promotional films such as promotional teaser clips or content aimed at selling a product are covered by the code, but editorial film content intended to communicate an opinion (such as a New Year address to the members from the Chief Executive) are not.

## 6 Industry Advice and Guidelines

**6.1 IAB and ISBA Guidelines on Paid Promotion in Social Media (2011/2014)** The Internet Advertising Bureau's (IAB) Social Media Council and ISBA, the Voice of British Advertisers, created unenforced guidelines designed to offer advertisers with practical advice for using social media with a view to enhancing organisational transparency and securing greater trust from consumers.

6.1.1 These guidelines apply to any circumstance where "a payment has been made in order for someone to editorially promote a brand, product or service within social media". For example, if the RAD allowed third parties to advertise on the corporate Facebook page, or if the RAD paid a magazine to include editorial in their publication.

6.1.2 Where this is the case, the IAB and ISBA require that three clear steps are followed to ensure transparent and ethical practice:

6.1.2.1 Ensure that the author or publisher of the promotion discloses that it is a 'paid for' piece of content

6.1.2.2 Ensure that authors adhere to the appropriate terms and conditions of the social media platform or website that they are using in relation to promoting a product or service

6.1.2.3 Ensure that the content of the promotion adheres to the principles of the CAP Code (see 5.1 above).

- 6.1.2.4 It is recommended that you also refer to any guidelines provided by the social media channel, with regard to advertising regulations, and rules surrounding paying a third party to share content on your behalf.

## **7 Security Considerations**

**7.1** 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:

- 7.1.1 keeping up to date with evolving regulations and the terms and conditions of the social media platforms we are using
- 7.1.2 managing social media and digital data throughout its life-cycle from initiation through, usage, storage, transfer, archiving and deletion
- 7.1.3 ensuring that sensitive personal data is not misused.

### **7.2 Passwords**

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

- 7.2.1 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)
- 7.2.2 passwords should be a minimum of 8 characters and contain both lower and upper case letters, numbers and symbols; are kept securely and changed every quarter.

## **8 Social Media Measurement**

Social media platforms are always evolving at a rapid pace and so there are currently no universally accepted or industry standard social media measurement metrics. However, the RAD has put in place a measurement model to determine the value of social media activity in terms of reach, engagement, action or conversion and the measurable impact on the business.

## **9 Safeguarding guidelines within a digital context**

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

All RAD employees 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.

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

- 9.1.1 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).
- 9.1.2 Ensure that your language within any social media post 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.
- 9.1.3 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.
- 9.1.4 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.**
- 9.1.5 Ensure that all visual media published in a digital space does not 'identify' a child or vulnerable adult (i.e. name badges with clearly displayed full names or other details (school name, locations) which may make children more vulnerable to grooming). Further information regarding labelling and crediting images is included in Section 10 of the Visual Media Policy.
- 9.1.7 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.
- 9.1.8 Never encourage children to join RAD social media platforms if they are younger than the legal age to do so: for the majority of platforms this is 13.

## **9.2 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.**

## **10. 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.

## **11 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. 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. [Facebook](#), [LinkedIn](#), [Twitter](#) 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).

### **11.1 Business context: guidelines for social media use for authorised employees.**

11.1.1 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 or 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.

- 11.1.2 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.
- 11.1.3 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.
- 11.1.3 The Marketing and Communications team at RAD headquarters must be granted access to all official RAD pages. This may mean sharing login and passwords for Twitter, or making a member of the team an admin on all RAD Facebook pages.
- 11.1.4 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 vulnerable adults.
- 11.1.5 Authorised RAD bloggers, micro-bloggers and social networkers can still be held **personally accountable** for posts, and should always follow these set of guidelines:
- 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 which 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 (including visual media) ensure that express **written permission** has been sought in advance and/or do not disclose anything that affects their right to privacy.
- No communication should disparage RAD competitors.

## 11.2 Treatment of celebrities

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 postings and views on this site are my own and don't necessarily represent RAD's positions, strategies or opinions". This approach should also be adopted if, on such platforms (in your profile or postings), you refer to yourself as an employee of the Royal Academy of Dance. You should also inform your Line Manager of this activity.
- 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 a vulnerable adult 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.

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

### **13. 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 case of Faculty of Education students.

### **14. Review of policy**

This policy will be reviewed annually and amended in line with both internal policies 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) as well as Executive Board before being brought to the Global Membership and Marketing sub-Committee and the Board of Trustees for final approval.

### **15. 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'.

## 16. Further Information

### **RAD Policies**

- Policy and Procedures on Safeguarding Children and Vulnerable Adults
- Data Protection Policy & Procedures
- Equality & Diversity Policy
- Dignity & Respect Policy
- Employee Disciplinary Procedure
- Examiner Code of Conduct (including Disciplinary Procedure)
- Visual Media Policy and Procedures

### **Legislation**

- [Unfair Commercial Practices Directive](#)
- [Consumer Protection from Unfair Trading Regulation 2008](#)

## Further reference

- Advertising Standards Authority
- ASA website Guided Tour: New Media
- <http://www.asa.org.uk/asa/about/Guided+Tours/New+media/Welcome.htm>
- [Blogs in Plain English](#)
- [The Good Blogging Guide for Education](#)

## Useful websites for advice and information

- **The UK Council on Child Internet Safety**  
[www.dcsf.gov.uk/ukccis](http://www.dcsf.gov.uk/ukccis)
- **Childnet International**  
[www.childnet.com](http://www.childnet.com)
- **Safenetwork**  
[www.safenetwork.org.uk](http://www.safenetwork.org.uk)
- **Child Exploitation and Online Protection Centre (CEOP):** CEOP is a police agency with powers to investigate concerns about grooming or sexual abuse of young people online. Professionals and young people can report concerns to CEOP via the 'ReportAbuse' button on their website.  
[www.ceop.gov.uk](http://www.ceop.gov.uk)
- **Internet Watch Foundation (IWF):** You can report obscene and illegal internet content to the IWF and they will work with Internet Service Providers to ensure it is removed or blocked. [www.iwf.org.uk](http://www.iwf.org.uk)

## APPENDIX

**The RAD maintains a published list of Senior Safeguarding Officer and Designated Safeguarding Officers.**

### Senior Safeguarding Officers

Director of Examinations  
T: +44 (0)20 326 8088

Primary responsibility for Safeguarding within departments: Examinations, Strategic Fundraising & Development, Human Resources and Global Membership Services and Marketing.

Director of Education and Training

T: +44 (0)20 326 8059

Primary responsibility for Safeguarding within departments: Faculty of Education, Training, Including Dance School, Music, Finance, Library, Benesh Step Into Dance and IT.