

Communications and Image Use Policy

(encompassing phone, instant messaging, email, internet, social media and image use)

WE ENJOY LEARNING LTD (WELL) is committed to professional and courteous communication between staff, students and parents/carers, and to their safety and privacy on and offline.

While recognising the benefits of telecommunications, internet and social media for opportunities of communication and marketing, this policy is in place to encourage responsible use by and minimisation of risks to WELL, its staff, students and parents using electronic devices such as landline and mobile phones and computers, before, during and after WELL's courses. Electronic contact may include but is not limited to voice communication, text communication, instant messaging, email, social networking sites, blogs, photos and videos. It should be read in conjunction with WELL's other policies, particularly those on Safeguarding (Child Protection), Equality and Diversity, and Privacy.

Staff are not permitted to have any type of electronic contact with students before, during or after the course, other than for strictly administrative and professional purposes related to WELL's courses. This includes email, text, immediate messaging, social networking sites or apps, such as Facebook or Instagram, or any type of video messaging, such as Zoom. Contact includes initiating or accepting a friend or contact request even if no messages are sent. Staff cannot follow students on Instagram or other social media sites.

Phone and Instant Messaging (IM) Services

It will occasionally be necessary for WELL staff to contact students with updates to the course timetable or during excursions. Staff should use a designated WELL's mobile phone to do this. If this phone is unavailable for any reason, then staff may use their personal mobile, but must ensure that students' numbers are deleted from their phone's contact list and call history at the end of the course.

Staff should ensure that any instant messages are clearly phrased to avoid potential ambiguity of meaning. Staff should only use IM services which may be easily scrutinised and exported in case of query eg WhatsApp.

Staff, students and parents/carers are expected to abide by the WELL's Image Use policy (see below) when taking photographs or videos on their phones.

Email

WELL is committed to professional and courteous communication.

Staff should use their WELL's email address when communicating with students or their parents/carers. If this is not possible (eg for visiting tutors not on the permanent staff, etc) then enquiry@weenjoylearning.co.uk should be copied into all email communication. Staff should never send messages from another individual's email address, unless authorised to do so.

WELL staff, students and parents/carers should not send abusive, defamatory, discriminatory, harassing, obscene, pornographic, racist or otherwise inappropriate emails. Nor should they send or forward emails they would not want a third party to read, or chain mail, junk mail, gossip or unnecessary trivia.

It should be remembered that emails can be used in legal proceedings and that even emails which have been deleted are capable of being retrieved.

Internet use

Staff and students are strictly prohibited from accessing, either on WELL systems or their own 3G or 4G networks, any site which is deemed inappropriate, offensive, in bad taste, immoral or illegal. Such sites include, but are not limited to, those which are racist, sexist, pornographic, homophobic, or are deemed to promote violence or extremist views which contradict core British values (in accordance with the government's Prevent strategy).

Staff must be aware that students will have their own 3G/4G networks which may not have the same protection. While recognising that it is impossible to control what a device with a 3G/4G network accesses, it is nonetheless the responsibility of all staff to be alert and ensure, as far as humanly possible, that students are protected from inappropriate material on the internet, and do not access any websites which may be prohibited by this policy.

Social Media

WELL may use various forms of social media for both marketing and communications. They may also be affected by the personal use of social media by others.

This policy applies to personal web space such as social networking sites (eg Facebook, Instagram, SnapChat), Twitter, chatrooms, forums, podcasts, open access online encyclopaedias (eg Wikipedia), content sharing sites (eg flickr, YouTube), and all other social networking sites, dating apps, internet postings and blogs. The principles set out in this policy must be followed irrespective of the medium.

Users should:

- Be responsible and respectful at all times.
- Be conscious of the need to keep their personal and professional lives separate without conflict of interests.



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- Not reveal personal information about other staff or students on any social media.
- Not publish photographs, videos or any other types of image of students, their parents/carers or WELL staff members on personal or public web space without prior permission.
- Not use social media to abuse or defame staff or students.
- Not engage in any social media activity which might bring WELL into disrepute
- Not represent their personal views as those of WELL on any social media.
- Not use the WELL logo, brand or typeface on any personal web space or on any online or offline medium without the prior consent of WELL.
- Set the privacy levels of their personal sites as highly as they can, and opt out of public listings on social networking sites to protect their own privacy.
- Keep passwords confidential and change them often.

Students should not have contact through any personal social medium with any member of WELL staff, other than those mediums approved by WELL's Senior Management. If students or their parents/carers wish to communicate with staff, they should only do so through official WELL sites created for this purpose, using a method which provides for the exporting of the conversation history (such as WhatsApp) to ensure the safety of both staff and students. At the end of a staff member's term of employment, WELL will revoke their access to social media accounts.

WELL accepts that some sites may be used for professional purposes to highlight a personal profile with summarised details (eg LinkedIn). In such cases care should be taken to maintain an up-to-date profile and a high level of presentation if WELL is listed.

Where WELL feels that a social network site has been used inappropriately (eg making allegations against or posting of negative or offensive comments about WELL's courses, staff or students) it will usually discuss the matter with the individual concerned to try and resolve the matter and to ask that the relevant information be removed from the social networking site in question.

If the individual refuses to do this and continues to use social networking sites in a manner WELL considers inappropriate, WELL will consider taking the following action:

- Taking legal advice and/or legal action where the information posted is defamatory in anyway or if the circumstance warrants this.
- Setting out the WELL's concerns to the individual in writing, giving them a warning and requesting that the material in question is removed.
- Contacting the police where it is felt appropriate – eg if it considers crime (such as harassment) has been committed; or in cases where the posting has a racial or homophobic element, is considered to be grossly obscene or is threatening violence.
- Taking other legal action against the individual.

- (In the case of staff) Disciplinary action up to and including dismissal.

Image Policy (Official use of Images/Videos of Students)

This policy seeks to ensure that images and videos taken within and by WELL are taken and held legally and the required thought is given to safeguarding all members of the community.

This policy applies to all staff including teachers, support staff, external contractors, visitors, volunteers and other individuals who work for or provide services on behalf of WELL (collectively referred to as 'staff' in this policy) as well as students and parents/carers.

This policy must be read in conjunction with other relevant WELL policies including, but not limited to; safeguarding (child protection), privacy and communications.

This policy applies to all images, including still and video content taken by WELL.

All images taken by WELL will be used in a manner respectful of the Data Protection Principles. This means that images will be processed:

- fairly, lawfully and in a transparent manner
- for specified, explicit and legitimate purposes
- in a way that is adequate, relevant and limited to what is necessary
- to ensure they are accurate and up to date
- for no longer than is necessary
- in a manner that ensures appropriate security

WELL management team supported by the Designated Safeguarding Lead, Ardis Wang, are responsible for ensuring the acceptable, safe use and storage of all camera technology and images within WELL. This includes the management, implementation, monitoring and review of the Image Use Policy.

Parental consent

On admission to WELL's courses, written permission from parents/carers will always be obtained before images/videos of students are taken, used or published by WELL.

A record of all consent details will be kept securely on file by WELL where students' images are used for publicity purposes (such as brochures or flyers), until the image is no longer in use. Should permission be withdrawn by parents/carers at any time, then the record will be updated accordingly.

Safety of images and videos

Staff will receive information regarding the safe and appropriate use of images as part of their data protection and safeguarding training.

Images will not be kept for longer than is to be considered necessary. A designated member of staff will ensure that all photographs are permanently wiped from memory cards, computer hard and portable drives or other relevant devices once the images will no longer be of use.

WELL reserves the right to view any images taken and/or to withdraw or modify a member of staffs' authorisation to take or make images at any time.

WELL will ensure that images are always held in accordance with the General Data Protection Regulations (GDPR) and the Data Protection Act (2018), and suitable child protection requirements, if necessary, are in place.

Photographs will be disposed of securely should they no longer be required. Copies will not to be taken of any images without relevant authority and consent from WELL Management and the parent/carer.

Publication and sharing of images and videos

Images or videos that include students will be selected carefully for use, for example only using images of students who are suitably dressed.

Students' full names will not be used without permission on the website or other publication, for example flyers, social media channels, in association with photographs or videos.

WELL will not include any personal addresses, emails, telephone numbers, fax numbers on video, on the website, in a prospectus, flyer or in other printed publications.

Safe Practice when taking images and videos

Careful consideration is given before involving vulnerable children when taking photos or recordings, who may be unable to question why or how activities are taking place.

Images will not be taken of any student against their wishes. A student's right not to be photographed is to be respected.

Photography is not permitted in sensitive areas such as changing rooms, toilets, swimming areas etc.

Use of photos and videos of children by others:

Use of photos and videos by parents/carers



Parents/carers are permitted to take photographs or video footage of events for private use only. Content should not be shared on social media.

Parents and carers who are using photographic equipment must be mindful of others, including health and safety concerns, when making and taking images.

The opportunity for parents/carers to take photographs and make videos can be reserved by WELL on health and safety grounds.

Parents/Carers are only permitted to take or make recordings within designated areas of the Courses. Photography is not permitted in sensitive areas such as changing room, toiletsetc.

Parents may contact WELL to discuss any concerns regarding the use of images.

Use of photos and videos by students

WELL will discuss and agree age appropriate acceptable use rules with students regarding the appropriate use of cameras, such as places students cannot take photographs or videos (eg toilets etc).

The use of students' mobile phones and cameras is covered in WELL's communications policy (see above).

Members of staff will role model positive behaviour to the students by encouraging them to ask permission before they take any photos.

Use of images of students by the media

Where a press photographer is to be invited to celebrate an event, every effort will be made to ensure that the newspaper's, or other relevant media, requirements can be met. A limited amount of personal information (such as first names only) may be published along with images and videos.

Every effort will be made to ensure the press abide by any specific guidelines should they be requested. No responsibility or liability however can be claimed for situations beyond reasonable control, and where we may be considered to have acted in good faith.

Use of external photographers (this may include volunteers such as staff or parents)

External photographers who are engaged to record any events will be prepared to work according to the terms of WELL's communications and image use policy.



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Photographers will sign an agreement which ensures compliance with GDPR and the Data Protection Act.

Images taken by external photographers will only be used for a specific purpose, subject to parental consent.

Photographers will not have unsupervised access to students.

The above Communications and Image Use policies will be reviewed by WELL at least annually.

WELL, October 2021

Do you have any question for us? Please email enquiry@weenjoylearning.co.uk