

## Social Media Policy

### Procedure and Guidance

#### Introduction

It is the responsibility of the agency to ensure applicants and foster carers are suitable to work with children and young people; providing not only a high standard of care but setting an example as role models.

Social networking sites (such as Facebook, Twitter, Instagram, WhatsApp, Snapchat, Tumblr, internet forums and message boards etc.) are a popular way for adults and children to communicate and they provide an opportunity for users to share information with existing friends and also find new friends with shared interests.

The agency understands that some applicants and foster carers may wish to participate in social networking in their personal lives (this means family and friends and not anyone involved in the fostering task/role), however, they should also be aware of the potential risks involved in the use of this type of media and be mindful of the information they post and how it might be viewed when published, together with the potential impact on their reputation and by association the agency's. The agency has a responsibility to offer advice and guidance to protect applicants and foster carers from publishing anything that might reflect badly on them.

The agency and foster carers have a duty to safeguard children and young people in their care. Any applicant or foster carer associated with the agency is expected to behave appropriately and in ways that are consistent with the agency's values and policies.

#### Purpose

The agency has a responsibility to ensure that the children and young people in its care are protected from potential harm or abuse via the internet.

This policy seeks to protect the interests of applicants, foster carers, children and the agency. It applies to the use of all internet-based social networking sites of any kind on which users may publish either personal or work-related information.

## Process

### Applicants

Social media checks may be undertaken by the agency in relation to and applicant or foster carer. For applicants this will be done in line with the agency's Form F assessment policy, ensuring that social media is part of the applicant's safe caring policy. The consent form permits assessors to undertake checks on applicants using search engines, e.g. Google, Bing etc. The implications of internet use should be made explicit from the start of the assessment process. There is information in the public domain about how to configure appropriate privacy settings. Applicants should understand that they need to maintain their own confidentiality and that of any child who may be placed with them.

### Foster Cares

Social media checks will be undertaken as and when considered necessary and foster carers will be asked to allow agency staff to undertake checks via search engines, e.g. Google, Bing etc.

### Checking social media sites

Social media checks will be undertaken by either the assessor or supervising social worker who will enter the applicants or foster carers name into a search engine using their own staff company account. The checks for applicants will be undertaken during Stage 1 of the assessment process. Staff will not search using their personal profiles.

Checks will only reveal profiles, photos, videos and comments that are in the public domain and only when security settings have not been correctly set up by the applicant or foster carer. Applicants and foster carers will not be requested to provide any personal passwords as these are not publically available.

Any information revealed in such a check which is a cause for concern, will be discussed with the applicant or foster carer at the first available opportunity. Causes for concern might include any inappropriate material whether in video, photo or written form, including views and opinions, whether implicit or explicit, that are not conducive to the role of a foster carer working for the agency. The information might have been published by the applicant, foster carer or third party.

In all cases assessors and supervising social workers will have to consider the source of the material and make a judgement on how it should be interrogated and acted upon. If there is a cause for concern this will be shared with the senior operational management.

## Potential risks involved in the use of social media

Whilst most adults, children and young people recognise the need to keep safe and use the internet responsibly, there are a number of potential risks to bear in mind.

- Information posted on the internet is accessible everywhere and however private you think it may be, in the virtual world very little is completely private.
- Information might be disclosed whether inadvertently or intentionally, which could reveal information about a young person in care.
- Social media sites can also provide opportunities for the sexual exploitation and grooming of children and young people where gifts or rewards may lead to meeting a potential abuser offline.
- A young person in care may pass information to either family members or strangers through social media sites which might lead to them coming to harm.

## Good Practice

- Go online and check your security and confidentiality settings. Reset them if necessary.
- Consider the consequences before posting anything on social networking sites and the impression it may give of you to those who access the information.
- If you identify yourself as being associated with the agency you should only create content that is consistent with professional standards and within the agency's policies.
- You should be mindful to make clear that any views posted are your own and not those of the agency and make sure that any comments you make do not bring the agency into disrepute.
- Confidentiality – matters relating to the organisation and children in care should never be discussed or referred to on social networks.
- Social media sites should not be used to abuse or harass anyone or to post offensive or derogatory comments. Remember that you are personally responsible for any comments you post.
- Foster carers carefully consider adding children and young people as friends on their social media profile and before doing so discuss with their supervising social worker and the social worker for the children and young people.
- Adding a young person as a 'friend' means you can assess/monitor some of what they may post, but it also means they may access your information, which again could lead to difficulties such as a complaint if anyone posts anything inappropriate on your wall/page.
- In order to maintain appropriate professional boundaries employees of the agency should not be 'friends' with foster carers on social media websites, nor should foster carers have Looked After Children's family members as 'friends'. This also applies in the case of Short Breaks.

## Security

- It is advisable that anyone using social networking facilities do all they can to limit access to their posts and that maximum privacy settings are in place which are reviewed on a regular basis.
- Children and young people should be advised never to give out personal details or information which could identify them or their location.
- Information and photographs of a looked after child must never be posted on social media sites without the written consent of the placing Local Authority, birth parents and the child, if of an appropriate age. Once an image is on the internet it can be viewed and stored by other people within their friends' network.
- Carer's immediate family and friends, who will be aware of their role in fostering, should be advised of the dangers of publishing anything which could identify a fostered child.
- Carers who use social media sites should keep any contact information hidden and vet carefully any requests to become a friend.
- Carers must never identify a child in care, or an ex-child in care, and only discuss their role as a foster carer in a general way that does not identify children.
- Children and young people should be encouraged to report any inappropriate use or comments in confidence.

Any breaches of confidentiality or the publication of material that is a cause for concern may affect an applicant's assessment, or a carer's approval status and placements. The contents of this document should be considered in conjunction with all relevant Policies/Guidance in Foster Carer Handbook; For example the agency's e-safeguarding policy for advice and guidance to children and young people's use of social networking sites.

Due to the fact that technology is constantly changing it is impossible to cover all circumstances in this guidance. Individuals are expected to behave online with the same respect for others as they would in any other aspect of life.

## Legal considerations

- **The Human Rights Act 1998** gives a 'right to respect for private and family life, home and correspondence'. The provision is directly enforceable against public sector employers, and all courts must interpret other existing legislation in relation to the Human Rights Act. Case law suggests the employees have a reasonable expectation of privacy in the workplace.

- **The Regulation of Investigatory Powers Act 2000** covers the extent to which organisations can monitor or record communications at the point at which they enter or are being sent within the employer's telecommunications system. It applies to public and private communication networks. It gives the sender or recipient of a communication the right of action for damages against the employer for the unlawful interception of communications. These are two areas where monitoring is not unlawful:
  - ▶ Where the employer reasonably believes that the sender and intended recipient have consented to the interception;
  - ▶ Without consent, the employer may monitor in certain circumstances – for example, to prevent crime, protect the business or to comply with financial regulations.
- The Data Protection Act 1988 covers how information about employees and job applicants can be collected, handled and used. The Information Commissioner's Office has published an employment practices code – [Information Commissioner's Office: Quick guide to the employment practices code \(PDF, 225kb\)](#) – to help employers comply with the law.