

HR4: Social Media and External Communication Policy



Version Control	Date	Author	Description of Change	Links to ECSNR 2011 and WA 2012: Links to NQS: QA4 QA6 QA7 Related Forms: 1-F2 Photographic and Media Consent Form Related Processes: 6.2.12 Manage Code of Conduct 6.2.10 Manage Social Media Use 8.7.11 Respond to Media
1.0	Jan 2014	AEG	New policy / procedure	
1.1	April 2015	AEG	Minor amendments	
2.0	July 2015	AEG	Minor amendments	
2.1	May 2016	AEG	Revision	
5.17	May 2017	AEG	Revision	
3.18	Mar 2018	AEG	Merge with ext. comm. procedure	
4.19	Apr 2019	AEG	Online posting guidelines	
6.20	June 2020	AEG	Scheduled review	
7.21	July 2021	AEG	Scheduled review	
7.22	July 2022	AEG	Scheduled review	
2.23	Feb 2023	AEG	Update	
11.23	Nov 2023	AEG	Added fundraising and charity events	
12.23	Dec 2023	AEG	Added RACI table and reference	

Responsible	Head of Publicity and Engagement		
Accountable 1	Chief Operating Officer	Accountable 2	Nominated Supervisor
Consulted	Director of Marketing, Head of P&E, Policy Committee		
Informed	All staff, students, volunteers		

Policy Objective

The objective of this policy is to guide Affinity Education Group employees, contractors and representatives in their use of social media and communication with external parties to protect their interests and reputations as well as the interests and reputations of Affinity Education Group, its customers, partners and suppliers from the risks associated with participating in social media and communication with the public.

Affinity Education values the outstanding professionalism that is delivered to families and communities by our educators at our centres and our employees at the Centre Support Office. The professional and personal integrity of Affinity employees is critically important to maintaining the Affinity Way and how Affinity is viewed by families, communities and other external entities.

Communicating via social media, with the media or other external bodies informs the public of the work and policies of Affinity. In order to maintain our image and achieve strategic objectives, it is important that only clear and consistent messages are communicated by authorised people only.

This procedure applies to all employees, regardless of employment status, or persons carrying out work with, for or on behalf of Affinity. The steps outlined in this procedure explain expectations around contact and communication with the media and other external bodies.

This policy is intended to cover social media that develops in the future and will be reviewed to reflect changing technology.

Rationale

Affinity Education Group recognises the rapid growth of social media and the important role it plays as a tool for corporate and business management. Affinity Education Group also recognises that social media offers new opportunities to interact with customers and communities who share similar interests.

Definitions

Confidential information means any information in any form belonging to Affinity Education Group or otherwise relating to Affinity Education Group's operations, customers, partners or suppliers, which is not lawfully available publicly.

Social media means all online media which allows user participation and interaction. Common examples of social media include:

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- Social networking websites and mobile phone applications are websites that provide a virtual community in which people may communicate in a public forum (e.g. Facebook, Instagram, Twitter, MySpace, LinkedIn, bebo and friendster), social news websites (e.g. Reddit);
- Blogs, blogging platforms (e.g. Tumblr), micro-blogs and activity stream websites (e.g., Twitter), forums, chat rooms and discussion boards or groups;
- Video, photo and file sharing websites and phone applications (e.g. Flickr, YouTube, Instagram, Pinterest, TikTok, and Snapchat), vods (video on demand services), podcasting and livecasting;
- Mobile phone applications and instant messaging (e.g. WhatsApp, Signal, and Telegram);
- Online encyclopaedias (e.g. Wikipedia);
- Geo-spatial tagging (e.g. Foursquare);
- News websites that allow users to post comments in response to articles or blogs; and
- JAM – Affinity Education Group’s social online collaboration tool.
- StoryPark Manage – Affinity Educations Group’s social online tool to stay connected to families.

Official spokesperson

Only the official spokesperson is authorised to make statements on Affinity’s behalf.

Chief Executive Officer

The Chief Executive Officer (CEO) is the official spokesperson for Affinity on all issues unless the CEO explicitly delegates this duty to an approved person.

Media

For the purpose of this procedure, media is considered as any person or entity representing a communication outlet, either actual or online, used to store or deliver information. This may include, but is not limited to, reporters, journalists or other representatives from newspapers, magazines, online news sites, television or radio or news stations, or social media bloggers.

Photographic and Media Consent

Prior to taking, displaying, posting or distributing any photo, video, audio or other information, consent must be sought in writing via the Photographic and Media Consent Form. This includes consent for educators, families, visitors, AEG representatives and children.

1.0 Scope of Policy

This policy applies to all Affinity Education Group employees and contractors and they must comply with it. This policy applies within and outside of work hours even if Affinity Education Group employees and contractors are using social media with their personal equipment. Accordingly, conduct outside of work hours may breach this policy. Audit and other compliance measures may be instigated from time to time to ensure compliance with this policy.

2.0 Personal Use of Social Media

Affinity Education Group acknowledges its employees and contractors use social media for personal purposes outside of their work for Affinity Education Group. However, inappropriate use of social media by Affinity Education Group employees and contractors has the potential to cause damage to Affinity Education Group, as well as its employees, contractors, customers, partners and suppliers.

When using social media for personal, non work-related purposes, employees and contractors of Affinity Education Group:

- must not make statements, representations or announcements for, on behalf of, Affinity Education Group, its management, employees, contractors, customers, partners or suppliers without express prior authorisation.
- must act in a responsible and professional manner and in the best interests of Affinity Education Group at all times.
- must not disclose, post or share any:
 - confidential information, without prior authorisation;
 - material that violates the privacy of another party; and
 - personal or sensitive information belonging to another person;
- must not display material which is obscene, threatening or discriminatory toward another person or entity, including Affinity Education Group or any of its employees, contractors, customers, partners, suppliers or competitors.
- must not display material which is defamatory or disparaging of, or capable of bringing into disrepute, Affinity Education Group, its employees, contractors, customers, partners, suppliers or competitors.
- must not communicate any material which is intended to or could possibly cause insult, offence, intimidation or humiliation to Affinity Education Group or its employees, contractors, customers, partners, or suppliers.



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- must not communicate any material which could adversely affect the image, viability or profitability of Affinity Education Group, or its partners or suppliers.
- must not act unlawfully, in breach of any Affinity Education Group policies (including without limitation the Affinity Education Group Privacy Policy), or in breach of their contract of employment or engagement (as applicable).
- must not be involved in any communications that contains material, information or images that would be considered inappropriate, offensive or unreasonable to another person.

Personal use of social media will not occur during paid working hours.

3.0 Work-related Use of Social Media

As part of the work an employee or contractor undertakes for Affinity Education Group, he or she may be required to discuss Affinity Education Group and related business issues using social media, for example:

- Maintaining a profile page for Affinity Education Group on social media such as LinkedIn;
- Posting comments on networking sites, forums, message boards or other internet sites for and on behalf of Affinity Education Group; and
- Writing or contributing to a blog and/or commenting on other blog posts for and on behalf of Affinity Education Group.
- Providing photos and updates to families using StoryPark.

When using social media for work-related purposes, employees and contractors of Affinity Education Group:

- must comply with the requirements for Personal Use of Social Media set out in section 2.0 above in respect of their work-related social media use.
- must ensure that all information communicated is factually correct.
- must comply with any terms or conditions or similar obligations for using a social media service.
- must not impersonate someone or misrepresent or attempt to misrepresent their identity or online credentials.

Employees who are authorised to represent Affinity Education Group and related businesses via social media will be required to act in accordance with our business's social media engagement protocols, particularly with regards to management of complaints on our public social media pages. A brief summary of this document can be found in appendix 1.0.

3.1 Managing Centre Facebook, Instagram Pages, Website and AEG Branding

All guidelines as identified in 3.0 above, apply to the management and utilisation of the Centre Facebook and Instagram Pages.

Centre Managers and others authorised to contribute to Centre Facebook and Instagram pages must ensure all information and images are appropriate and permission is sought. Ensure all educators and families have consented to having their photos and information and their children's photo and information shared by way of a completed *Photographic and Media Consent Form*. Only authorised employees are permitted to post or make changes to the AEG website. Any suggestions for change should be directed to the marketing department in the first instance. The creation or use of AEG branded materials is not permitted without prior written approval.

In order to maintain professionalism and integrity, ensure all information is proof-read for accuracy and spelling and grammar prior to posting. Please refer to the appendix of the policy.

3.2 Engagement with JAM

JAM is Affinity's online social collaboration tool used to share information, images, achievements and events cross the AEG network including within Centres and Centre Support Office. It is highly encouraged that all employees engage on JAM. Whilst Centres and employees may be named and identified in groups and posts, consideration must still be given to the guidelines identified in 3.0 above. Also refer to the appendix of this policy.

3.3 Utilisation of Storypark

Families must consent to their child being included in Storypark and have the right to choose the extent of their child's exposure and inclusion. All employees utilising Storypark must be familiar with the level of family consent and abide by this.

When documenting learning, and posting stories and images, consideration must be given to the nature of the information and, in turn, which families/children are tagged in the posts. Positive or community stories, with consideration to prior consent, may be shared widely. Stories containing sensitive information or information about specific behaviours or learning must only be shared with relevant parties. Please refer to the appendix in the 1-P1 Pedagogy and Practice Procedure.



4.0 Questions about Social Media Use

Any Affinity Education Group employee or contractor who has a question or concern about this policy or what he or she is required to do to comply with it, should ask his or her manager or a representative of People and Culture.

5.0 Interaction with the media

5.1 Initiating contact with the media

Employees, or other persons working or acting on behalf of Affinity, are not to initiate contact with the media unless authorised to do so by the Chief Executive Officer (CEO).

5.2 Responding to the media

If a centre is likely to attract media interest, key messages and a potential media statement will be prepared. If the CEO intends to publicly speak on a centre issue he/she will, where practical, advise the Board before undertaking the interview or issuing a statement.

Any requests for interviews or information from members of the media, even if they state it is 'off the record', must be directed to the CEO, or their delegate. This will ensure any information shared publicly is accurate and consistent. Employees or other persons working or acting on behalf of Affinity, must not respond to any request for information without CEO approval.

If media arrive on site, employees or others are not obligated to respond to their questions. Politely advise that they are not authorised to respond and direct them to the CEO office.

Confirm the identity of all persons on the phone prior to sharing information. If the caller is from the media, direct them to the CEO office.

5.3 Media releases

Any media release, or joint release, mentioning Affinity or its centres must be approved by the CEO and presented with relevant logos as per branding guidelines.

5.4 Public information and events

Where issues of significant public interest or Affinity business are to be discussed in a public forum, the CEO must be informed at least one week prior to the event. The CEO must be advised in advance of the likelihood of contentious issues being raised in the public forum. Examples may include court cases, criticism of an issue, complaints or conflict between stakeholders. In the instance of unexpected media attention or where an employee or other persons acting on behalf of Affinity has made comment; the CEO must be advised as soon as possible after the event.

5.5 Charity and Fundraising initiatives

Centres will participate in charity and fundraising initiatives which are officially supported by the AEG community (e.g. Pyjama Day, The Smith Family, Endangered Species Day). The Marketing Team also provide links and resources to encourage centres to participate in other nationally recognised and respected Australian charity initiatives which directly relate to or support children in their first five years (e.g. Red Nose Day, Day for Daniel, White Balloon Day).

In line with Affinity values of Being Completely Connected and Going Above and Beyond, centres may wish to create, participate in or promote local charities or fundraising initiatives. If a centre wishes to create or participate in a local charity or fundraising initiative, and intends to promote this in their centres and on their centre social media account (e.g. sharing a GoFundMe link to raise funds for medical treatment for a child), permission must be sought first from the Head of Publicity and Engagement, and copying the Area Manager and Marketing Team.

The subject line of the email must clearly state 'Permission request for Charity/ Fundraising Event'. The content of the email must include:

- Name of the charity or fundraising event
- Reason for participation such as local community need, related to an enrolled child, related to a current employee, other important and relevant cause
- Details about how you want to be involved
- Risks to safety or reputational damage
- Link to centre's Facebook page
- Confirmation that you have read the Social Media and External Communication Policy (this policy)

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Permission may be granted if:

- The Area Manager and Head of Publicity and Engagement agree there is zero risk of negative reputational damage or negative feedback from families or employees to the centre or AEG as a result of supporting the charity or cause.
- The charity or cause will directly benefit an enrolled child or current employee of AEG or local community.
- The enrolled child is attending regularly or is doing so when they are able.
- The current employee is working at the centre and is not on a PIP (Performance Improvement Plan), being investigated by HR for any reason and is considered a model employee by the Centre Manager and Area Manager.
- The charity or cause is related to one or more of the following:
 - A genuine and urgent medical need arising from an unplanned medical situation
 - A genuine and urgent personal crisis e.g. natural disaster or circumstances
- The charity or cause does not in any way contravene AEG's Social Media and External Communication Policy.
- Involvement in the charity or cause will not distract or detract the centre community from their core purpose of providing safe, high quality early education and care.

Once permission has been granted by the Head of Publicity and Engagement, the Centre Manager is the only person authorised to share a charity or cause on their centre social media account. The commentary regarding the charity or cause should make it clear there is no obligation on enrolled families or employees to support the cause. Use Affinity Values when writing promotional messages and keep in mind Delivering Outstanding Professionalism.

Example of sharing a GoFundMe link for an enrolled child:

Hi families, we hope you are well. Our centre deeply values our relationships with our families, and it has really saddened us to learn of the situation facing little Madeline. Her family asked us to kindly share the details of their situation with our centre community, and we feel it is appropriate to do so.

Here is the link. _____

Our team is making a contribution and also sharing messages of support. We respect the rights of each family in regard to whether you do the same. If you have any questions, please feel free to speak with me. Thank you.

Withdrawal of permission

The Centre Manager should keep the Head of Publicity and Engagement, Area Manager and Marketing Team updated weekly as they participate in or promote the cause. At any time, permission for the Centre to continue involvement in the charity or cause may be ended at the discretion of Affinity Education Group. Any continued personal employee promotion in the charity or cause should not contravene the AEG Social Media and External Communication Policy.

6.0 Disclosure

The CEO must be advised of events that have occurred that could potentially attract media attention, as soon as possible. The Crisis Response Team will be notified and will manage the communications.

7.0 External Communication

Communication with external bodies, which may include but is not limited to, families, community agencies, government departments, schools, suppliers or contractors or other early childhood services, must be done so with care and professionalism.

Employees, or persons working or acting on behalf of Affinity and its centres, must present policies and business decisions positively and promote Affinity's vision and values respectfully. Consideration must be given to appropriate content and the manner in which information is shared verbally.

Written information such as emails, letters, newsletters, Storypark and Facebook posts and centre notices, must be checked for appropriate content and accurate spelling and grammar prior to release.

8.0 Variations to this Policy

Affinity Education Group may change this policy at any time, in particular, to take account of changes, and the effect of changes, in laws.

9.0 Breach of this Policy

Any breach of this policy may result in disciplinary action including (for employees) termination of employment or (for contractors) termination or non-renewal of contractual arrangements. Affinity Education Group may direct the removal of any social media posts that are in breach of this policy.

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Any Affinity Education Group employee or contractor who becomes aware of any actual or possible instance of non-compliance with this policy should immediately report it to his or her manager or a representative of People and Culture.

Responsible = those who are responsible for carrying out the task

Accountable level 1 = the owner and person accountable for the sign off or approval of a task

Accountable level 2 = the person who is accountable for the task being carried out

Consulted = the person to be consulted with and whose input, opinions and feedback are crucial to the task

Informed = the person who should be informed and made aware of the task and any updates

Policy Written by: Fiona Young	Position: Policy, Training and Development Manager	Date: Nov 2023
Approved by: Chief Operating Officer	Approved Date: Nov 2023	Next review date: Nov 2024

Statement

I acknowledge that I have read and understand this policy. I agree to comply with the requirements of this policy. I understand that if I do not do so, I may be subject to disciplinary action, including termination of my employment or contract with Affinity Education Group. I understand that if I have any questions or concerns about this policy or what I am required to do to comply with it, I should ask my manager or a representative of People and Culture.

Name:

Sign:

Date

APPENDIX

JAM is a great way to share, reflect and seek feedback on your practice and to promote your centre events and its people. Facebook and other social media sites are effective in promoting your centre to current and prospective families and the wider community. To ensure best practice and outstanding professionalism is always portrayed, this document outlines Affinity's guidelines and expectations when posting online. For Storypark specific guidelines, please refer to 1-P1 Pedagogy and Practice Procedure.

	Guidelines or Expectations
Professionalism	<ul style="list-style-type: none"> Each post you make on JAM, Facebook and other social media sites is a direct reflection of you, your centre and of Affinity. Ensure the language used including spelling and grammar as well as content and photos are professional. This also applies to comments and responses to the post or other posts. Read and re-read your post or have someone else proof-read your post prior to posting. Offensive or defamatory comments about people, places or other organisations is never acceptable from an individual or centre account or from a private account.
Permission	<ul style="list-style-type: none"> Be sure that each person (child, staff member, family member, visitor) in photos, videos, audio or other information being posted have signed the 1-F2 Photographic and Media Consent form to grant permission to take and share photos and other media.
Best practice and compliance with policy	<ul style="list-style-type: none"> Ensure content and photos promote practices that are compliant with legislation, company policy and best practice. Examples to consider: <ul style="list-style-type: none"> Ensuring children and/or educators are wearing hats during outdoor experiences Ensuring objects (e.g. pallets, pot plants, tyres) are not attached to or stacked near fences which could allow children to climb up or over Ensuring outdoor equipment has mats underneath Ensuring children are eating from bowls or plates and not directly off tables or floor mats Ensuring children are not given bottles in cots/bed and have their dummy chains and/or amber beads removed Ensuring babies are not propped up on pillows with bottles Ensuring babies and children have clean faces and are dressed respectfully e.g. not photographed just in a nappy Ensuring all resources or equipment are clean and in good repair Ensuring general cleanliness and appealing presentation of environments Ensuring age/stage appropriate resources and experiences are evident Ensuring dress code procedures are being adhered to Always check what is occurring in the background of photos as well the focus of the photo.



	<p>Please note: These practices should not be occurring in centres but photographing and posting the fact highlights non-compliance at your centre.</p>
Educational relevance	<ul style="list-style-type: none">• Be sure there is a purpose to the post. Whether sharing a learning opportunity for children, a centre promotional idea or other professional practice, all posts should have a clear purpose or outcome linked to learning frameworks or NQS.• Posts can be used as evidence of professional development and reflection or evidence of community engagement and input.• Be sure Storypark is used as the primary method of documenting and communicating children’s learning.