



## Advertising and Marketing Policy

### 1. Purpose

This policy sets out how Trust Education markets its services and vacancies, including the use of external agencies, social media and job boards. Its aims are to ensure that all marketing:

- Complies with the REC Code of Professional Practice and relevant UK law
- Is accurate, honest and not misleading
- Reflects Trust Education's values and safeguarding responsibilities
- Protects the rights and privacy of candidates, clients and children
- Promotes equality, diversity and inclusion (EDI)

This policy should be read alongside our:

- Data Protection / Privacy Policy
- Safeguarding & Safer Recruitment Policy
- Social Media Policy (if separate)
- Complaints Policy

### 2. Scope

This policy applies to:

- All Trust Education employees, contractors and consultants
- Any external marketing or social media agencies acting on our behalf
- All marketing and advertising activity, including but not limited to:
- Social media campaigns and posts on LinkedIn, X (Twitter), Facebook, and any other social platforms we may use in future
- Job adverts placed on Reed, CV Library, Indeed, Totaljobs, our own website, and any additional job boards or digital channels
- Email marketing, newsletters and remarketing campaigns
- Printed materials, events, and sponsorship activity that promote Trust Education or our roles

### 3. Legal, Regulatory and Professional Framework

All marketing and advertising undertaken by or on behalf of Trust Education must comply with:

- REC Code of Professional Practice
- Employment Agencies Act 1973 and associated Conduct Regulations (where applicable)
- UK GDPR and Data Protection Act 2018

- UK Code of Non-broadcast Advertising, Sales Promotion and Direct Marketing (CAP Code) and ASA guidance – including rules that adverts must be legal, decent, honest, truthful and clearly identifiable as marketing communications
- Equality Act 2010 – no discrimination, direct or indirect, on the basis of protected characteristics
- Safeguarding legislation and statutory guidance applicable to education and work with children (e.g. Keeping Children Safe in Education and safer recruitment principles)

Where Trust Education is a member of the REC, this policy is intended to support compliance with REC audits and assessments.

#### **4. Responsibilities**

##### **4.1 Senior Management**

- Approve this policy and any substantive changes
- Ensure sufficient resources and oversight to implement the policy
- Take responsibility for serious or repeated breaches

##### **4.2 Marketing Lead / Manager**

- Own day-to-day implementation of this policy
- Approve all major campaigns, new channels, and key messaging
- Manage relationships and contracts with external marketing agencies
- Ensure campaigns are compliant with REC, CAP/ASA and data protection requirements

##### **4.3 Recruitment Consultants and Other Staff**

- Provide accurate vacancy information for adverts
- Use only approved templates and messaging
- Refrain from posting unapproved or informal job adverts on personal accounts
- Immediately flag any errors or complaints regarding marketing content

##### **4.4 External Marketing / Social Media Agencies**

All external agencies engaged by Trust Education must:

- Sign a written agreement requiring compliance with this policy, UK law and REC principles
- Follow all brand, safeguarding and data protection requirements provided by Trust Education
- Submit proposed campaigns, copy and creative for approval before publication where required
- Notify Trust Education promptly of any complaints, errors or potential breaches

#### **5. Brand and Messaging Standards**

All Trust Education marketing must:

- Clearly identify Trust Education as the recruiting agency where we are the advertiser
- Be accurate, honest and not misleading
- Use professional, respectful language appropriate to the education sector
- Reflect our commitment to safeguarding, EDI, and high standards in recruitment
- Avoid exaggerated claims, unsubstantiated promises, or misleading salary or benefit indications

We must never:

- Advertise fictitious or non-existent vacancies for the purpose of CV harvesting
- Misrepresent a role, pay, location, working pattern or requirements
- Copy another organisation's content or creative without permission
- Guarantee work, suggest guaranteed hours, or create unrealistic expectations about the availability or regularity of assignments – supply work is subject to demand and must always be described accurately
- Make unverified or exaggerated claims about Trust Education's standing in the market unless such statements are supported by credible, up-to-date evidence

## 6. Use of Marketing Channels

### 6.1 Social Media (LinkedIn, X, Facebook and Others)

Social media is used to:

- Promote genuine live vacancies and talent pools
- Share sector insights, news and helpful resources for teachers and schools
- Support Trust Education's brand and reputation
- Engage with education professionals in a professional and respectful way

Key rules:

a) Business vs personal accounts

- All official marketing must be posted via Trust Education corporate accounts or authorised agency accounts
- Staff may share or repost Trust Education content from personal accounts but must not publish new job adverts that appear to be official Trust Education posts without approval

b) Professional conduct

- No discriminatory, offensive, political, or inflammatory content
- No arguments or hostile exchanges with users; concerns and complaints are to be handled through formal channels
- No personal commentary that could compromise Trust Education's neutrality or professionalism

c) Safeguarding and imagery

Images or videos featuring children or young people must only be used where:

- Appropriate written consent has been obtained from the school, parent or guardian, and
- Use aligns with the school's safeguarding and image-use policies
- We do not "friend", "follow" or privately message pupils or under-18s in a business capacity

Furthermore, Images or videos taken inside a school or classroom setting must not be used if they reveal the identity of the school, its location, its logo, or any identifiable staff members, unless the school has given explicit written consent and the content aligns with their safeguarding and image-use policies.

d) Job posts

- All job posts must meet the minimum standards in Section 7
- Where character limits apply (e.g. X), a link to a full advert with all key information must be provided

e) Targeted advertising

- When using paid or targeted ads, we must take reasonable steps to avoid discriminatory outcomes and ensure audiences are not unlawfully excluded (for example by age, gender, or other protected characteristics without lawful justification)

## 6.2 Job Boards (Reed, CV Library, Indeed, Totaljobs, Others)

We advertise roles on:

- Reed
- CV Library
- Indeed
- Totaljobs
- Trust Education's own website
- Other general or specialist education job boards as required

Key rules:

- We must comply with each platform's terms of use, content standards, and data protection rules
- Adverts must never be duplicated in a way that artificially boosts visibility or misleads candidates
- Expired roles must be removed or clearly marked as closed as soon as reasonably practical
- Reviews and candidate feedback on external sites must be handled professionally and, where appropriate, used to improve our service

## 6.3 Trust Education Website

- All marketing content and job adverts on our website must be reviewed for accuracy and compliance
- Our website must contain an accessible Privacy Notice, Cookie Notice, and clear information on how candidates and clients can contact us or make a complaint

## 7. Job Advert Standards

Every job advert, regardless of channel, must:

a) Describe a genuine opportunity

- Only real, current or clearly flagged pipeline roles may be advertised
- If a role is part of a generic talent pool or "always hiring" campaign, this must be stated

b) Clearly identify the nature of the role

- Job title, broad location, type of school or setting, subject or phase where applicable
- Whether the role is permanent, fixed-term, temporary, supply, full-time or part-time

- c) Provide accurate, non-misleading pay information
  - Salary or pay range should be realistic, not inflated
  - If pay is depending on experience or subject to agency worker regulations, this should be explained or linked where appropriate
- d) State who is advertising the role
  - Where Trust Education is advertising on behalf of a client, adverts must make clear that we are a recruitment agency representing that role
- e) Comply with equality and discrimination laws
  - No wording that directly or indirectly discriminates based on protected characteristics (age, disability, gender reassignment, marriage or civil partnership, pregnancy or maternity, race, religion or belief, sex, sexual orientation)
  - Requirements must be objectively justified and genuinely required for the role (for example “must be a practising Catholic” only where there is a genuine occupational requirement)
- f) Reflect safeguarding expectations
  - Clearly state that roles working with children are subject to safeguarding checks, including enhanced DBS and reference checks in line with safer recruitment practices
- g) Respect confidentiality
  - Do not name client schools unless agreed, or where it is already public and suitable to do so
  - Never include candidates’ names, identifying details, or confidential client information in job adverts

All consultants and external agencies must use approved job advert templates where provided

## **8. Data Protection and Privacy in Marketing**

All marketing activity must comply with UK GDPR and the Data Protection Act 2018. Key points:

- Personal data used for marketing (for example email campaigns or retargeting) must have a clear lawful basis (such as consent or legitimate interests) and be documented
- Candidates must be informed, in privacy notices, how their data will be used for marketing and can opt out of non-essential marketing at any time
- Mailing lists must be kept up-to-date, and unsubscribe requests honoured without undue delay
- Tracking technologies (such as cookies and pixels) used for remarketing must be disclosed with appropriate consent and controls in line with our Cookie Policy
- Personal data may be shared with external agencies only under a suitable data processing agreement that sets out roles, safeguards and retention periods

## **9. Safeguarding and Reputational Risk**

As an education agency, safeguarding and reputation are central to all marketing decisions

- Marketing content must never trivialise or make light of child protection issues or school safety
- We must not share stories, case studies or testimonials that could inadvertently identify vulnerable individuals unless fully anonymised or with explicit written consent
- Where a marketing decision may pose a safeguarding concern or reputational risk, staff must escalate to senior management before proceeding

## **10. Working with External Marketing and Social Media Agencies**

When Trust Education engages an external agency to manage or support marketing (for example social campaigns on LinkedIn, X and Facebook):

**a) Contractual requirements**

- The contract must:
- Bind the agency to comply with this policy, UK law, REC Code principles, CAP and ASA rules, and applicable platform policies
- Include confidentiality and data protection clauses (data processor obligations where relevant)
- Set expectations around approvals, reporting, and incident management

**b) Access and account management**

- Agencies may be given delegated access to corporate social accounts; passwords must be managed securely and changed if the relationship ends
- Agencies must not set up unofficial pages or accounts in Trust Education's name without written consent

**c) Approval of content**

- For new campaigns, new channels, or sensitive topics, content must be pre-approved by Trust Education's designated approver (for example the Marketing Lead or a Director)
- Routine scheduled posts may be pre-approved in batches where clearly aligned with this policy

**d) Monitoring and reporting**

- Agencies must provide regular reports on campaign performance, key metrics and any complaints or adverse feedback
- Any potential breach (for example an advert challenged by a regulator, school, candidate or platform) must be reported to Trust Education immediately

## **11. Monitoring, Audit and Record Keeping**

- Trust Education will periodically review a sample of adverts and campaigns across all channels to ensure compliance
- Records should be kept (where feasible) of:
- Campaign briefs
- Final advert text and imagery
- Approval emails or notes
- Targeting parameters for paid campaigns
- Compliance with this policy may form part of internal audits, REC audits and management reviews

## 12. Training and Awareness

All new staff involved in recruitment, sales or marketing receive an induction covering:

- This Advertising and Marketing Policy
- REC Code principles, CAP and ASA basics and EDI
- Safeguarding and safer recruitment messaging
- Data protection and consent in marketing
- Refresher training will be provided periodically, especially when regulations or REC guidance change

## 13. Complaints and Breaches

Complaints about Trust Education's advertising or marketing may be raised by:

- Candidates
- Clients
- Members of the public
- Regulators (such as ASA, REC, Employment Agency Standards)

All complaints must be:

- Logged and acknowledged in line with our Complaints Policy
- Investigated promptly, with corrective action taken where needed
- Escalated to senior management where serious or repeated concerns arise

Examples of breaches include (but are not limited to):

- Advertising non-existent vacancies
- Publishing misleading information about roles, pay or conditions
- Using discriminatory language in adverts
- Misuse of candidate data for marketing
- Inappropriate use of images featuring children or identifiable individuals

Consequences may include:

- Immediate removal or correction of the offending content
- Additional training and closer supervision
- Disciplinary action, up to and including termination of employment or contract
- Ending relationships with external agencies who fail to comply
- Reporting to REC, ASA or other regulators where required

## 14. Review

This policy will be reviewed at least annually, and sooner if:

- REC, CAP or ASA, or legal requirements change
- New marketing channels or techniques are introduced (for example new social platforms or AI tools)
- There are significant complaints, regulatory findings or audit outcomes related to marketing

The updated version will be communicated to all staff and relevant external partners