



## **SOCIAL MEDIA POLICY**

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Discussed with senior management and Blackpool safeguarding lead

AGREED WITH GOVERNORS

DATE: - June 2019

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TO BE REVIEWED YEARLY (NEXT REVIEW June 2020)

## **Introduction**

This policy applies to all School staff regardless of their employment status. It is to be read in conjunction with the School's Electronic Communications Policy. This policy does not form part of the terms and conditions of employee's employment with the School and is not intended to have contractual effect. It does however set out the School's current practices and required standards of conduct and all staff are required to comply with its contents. Breach of the provisions of this policy will be treated as a disciplinary offence which may result in disciplinary action up to and including summary dismissal in accordance with the School's Disciplinary Policy and Procedure.

This Policy may be amended from time to time and staff will be notified of any changes no later than one month from the date those changes are intended to take effect.

## **Purpose of this Policy**

The School recognises that the internet provides unique opportunities to participate in interactive discussions and share information on particular topics using a wide variety of social media, such as Facebook, twitter, blogs and wikis. However, staff use of social media can pose risks to the school's confidential and proprietary information, its reputation, and it can jeopardise our compliance with our legal obligations.

To minimise these risks, to avoid loss of productivity and to ensure that our IT resources and communications systems are used only for appropriate work related purposes, all School staff are required to comply with the provisions in this policy.

## **Who is covered by this policy?**

This policy covers all individuals working at all levels and grades within the School, including senior managers, officers, governors, employees, consultants, contractors, trainees, homeworkers, part-time and fixed-term employees, casual and agency staff and volunteers (collectively referred to as Staff in this policy).

Third parties who have access to our electronic communication systems and equipment are also required to comply with this policy.

## **Legal framework**

The school is committed to ensuring that all staff provide confidential services that meet the highest standards. All individuals working on behalf of the school are bound by a legal duty of confidence and other laws to protect the confidential information they have access to during the course of their work. Disclosure of confidential information on social media is likely to be a breach of a number of laws and professional codes of conduct, including:

- the Human Rights Act 1998
- Common law duty of confidentiality, and
- the Data Protection Act 2018 (DPA)
- The General Data Protection Regulation 2018 (GDPR).

Confidential information includes, but is not limited to:

- Person-identifiable information, e.g. student and employee records protected by the DPA and GDPR
- Information divulged in the expectation of confidentiality
- School records containing organisationally or publicly sensitive information
- Any commercially sensitive information such as information relating to commercial proposals or current negotiations, and
- Politically sensitive information.

Staff should also be aware that other laws relating to libel, defamation, harassment and copyright may apply to information posted on social media, including:

- Libel Act 1843
- Defamation Acts 1952 and 1996
- Protection from Harassment Act 1997
- Criminal Justice and Public Order Act 1994
- Malicious Communications Act 1998
- Communications Act 2003, and
- Copyright, Designs and Patents Act 1988.

### **Scope and Purpose of this Policy**

This policy deals with the use of all forms of social media including Facebook, LinkedIn, Twitter, Wikipedia, all other social networking sites, and all other internet postings, including blogs.

**It applies to the use of social media for both work and personal purposes, whether during work hours or otherwise. The policy applies regardless of whether the social media is accessed using our IT facilities and equipment or equipment belonging to members of staff.**

Breach of this policy may result in disciplinary action up to and including dismissal.

Disciplinary action may be taken regardless of whether the breach is committed during working hours, and regardless of whether the School's equipment or facilities are used for the purpose of committing the breach. Any member of staff suspected of committing a breach of this policy will be required to cooperate with our investigation, which may involve handing over relevant passwords and login details.

Staff may be required to remove internet postings which are deemed to constitute a breach of this policy. Failure to comply with such a request may in itself result in disciplinary action.

### **Personnel responsible for implementing the policy**

The Board of Governors have overall responsibility for the effective operation of this policy, but has delegated day-to-day responsibility for its operation to the Head Teacher.

Responsibility for monitoring and reviewing the operation of this policy and making recommendations for change to minimise risks also lies with the Head Teacher.

All senior School staff have a specific responsibility for operating within the boundaries of this policy, ensuring that all staff understand the standards of behaviour expected of them and taking action when behaviour falls below its requirements.

All School staff are responsible for the success of this policy and should ensure that they take the time to read and understand it. Any misuse of social media should be reported to the Head Teacher in the first instance. Questions regarding the content or application of this policy should be directed by email to the Headteacher.

### **Compliance with related policies and agreements**

Social media should never be used in a way that breaches any of our other policies. If an internet post would breach any of our policies in another forum, it will also breach them in an online forum. For example, employees are prohibited from using social media to:

- breach our Electronic information and communications systems policy;
- breach our obligations with respect to the rules of relevant regulatory bodies;

- breach any obligations they may have relating to confidentiality;
- breach our Disciplinary Rules;
- defame or disparage the School, its Staff, its pupils or parents, its affiliates, partners, suppliers, vendors or other stakeholders;
- harass or bully other staff in any way or breach our Anti-harassment and bullying policy;
- unlawfully discriminate against other staff or third parties or breach our Equal opportunities policy; • breach our Data protection policy (for example, never disclose personal information about a colleague online);
- breach any other laws or ethical standards (for example, never use social media in a false or misleading way, such as by claiming to be someone other than yourself or by making misleading statements).

Staff should never provide references for other individuals on social or professional networking sites, as such references, positive and negative, can be attributed to the School and create legal liability for both the author of the reference and the organisation.

Staff who breach any of the above policies will be subject to disciplinary action up to and including termination of employment.

### **Personal use of social media**

Personal use of social media is never permitted during working time or by means of our computers, networks and other IT resources and communications systems.

### **Monitoring**

The contents of our IT resources and communications systems are the School's property. Therefore, staff should have no expectation of privacy in any message, files, data, document, facsimile, telephone conversation, social media post conversation or message, or any other kind of information or communications transmitted to, received or printed from, or stored or recorded on our electronic information and communications systems.

The School reserves the right to monitor, intercept and review, without further notice, staff activities using our IT resources and communications systems, including but not limited to social media postings and activities, to ensure that our rules are being complied with and for legitimate business purposes and you consent to such monitoring by your acknowledgement of this policy and your use of such resources and systems. This might include, without limitation, the monitoring, interception, accessing, recording, disclosing, inspecting,

reviewing, retrieving and printing of transactions, messages, communications, postings, log-ins, recordings and other uses of the systems as well as keystroke capturing and other network monitoring technologies.

The School may store copies of such data or communications for a period of time after they are created, and may delete such copies from time to time without notice.

All Staff are advised not to use our IT resources and communications systems for any matter that he or she wishes to be kept private or confidential from the School.

### **Educational or Extra Curricular Use of Social Media**

If your duties require you to speak on behalf of the School in a social media environment, you must still seek express, written approval for such communication from the Head Teacher in advance who may require you to undergo training before you do so and impose certain requirements and restrictions with regard to your activities.

Likewise, if you are contacted for comments about the School for publication anywhere, including in any social media outlet, you must direct the inquiry to the Head Teacher and must not respond without advanced written approval.

**Recruitment** The School may use internet searches to perform pre-employment checks on candidates in the course of recruitment. Where the School does this, it will act in accordance with its data protection and equal opportunities obligations.

### **Principles for the use of social media on behalf of the school**

The administrators and moderators of any school social media accounts must be employees of the school and acting on the authorisation of the Head Teacher.

Staff must act in the best interests of children and young people when creating, participating in or contributing content to social media sites.

In addition, you must:

- Be aware at all times of the need to keep your personal and professional lives separate. You should not put yourself in a position where there is a conflict between your work for the school and your personal interests.
- Be accurate, fair and transparent when creating or altering online sources of information on behalf of the school.
- Not engage in activities involving social media that might bring the school into disrepute or represent your views as those of the school.
- Not discuss on social media personal information about students, the school staff or other professionals you interact with as part of your job.
- Not use social media to attack, insult, abuse or defame students, their families, colleagues, other professionals, other organisations or the school.
- Consider the copyright of the content you are sharing and, where necessary, seek permission from the copyright holder before sharing.
- Ensure that your use of social media does not infringe upon relevant data protection laws, or breach confidentiality.
- Any contact via social media should be reported to the Head Teacher for advice - you must not respond to any posts or messages.
- Not use school social media accounts on any personal device (including tablets and mobile phones).
- Not post tweets with student names (neither first name nor surname).
- Any incidences of inappropriate behaviour, information posting, phishing or suspected malware should be reported immediately to the school Management team.

### **Personal use of social media**

In order to safeguard your reputation and the reputation of the school, you are required to follow these guidelines in your personal use of social media.

- **Staff should not form on-line 'friendships' or enter into communication with parents or the parents partners/carers and pupils as this could lead to professional relationships being compromised.**
- **It is reasonable for a member of staff to request to continue a connection with a parent/carer/relative of a child in school, on their social media platform, if it is established that this is a longstanding relationship. On this occasion, the member of staff will seek advice from the Head teacher and use their professional judgement.**

- You must decline 'friend requests' from students that you receive to your personal social media accounts. If you receive requests from students who are not family members, you should discuss these in general terms in class and encourage students to become 'friends' of the official school site.
- Information that you have access to as part of your employment, including personal information about students and their family members, must not be discussed on your personal social media.
- Photographs, videos or any other types of images of students and their families must not be published on your personal social media.
- School email addresses must not be used for setting up personal social media accounts or to communicate through such media.
- Staff with children and/ or family members attending the school should not impede their professional role through the use of social media and should consider the suitability of statuses and media uploads.
- Staff must ensure their social media profile settings are set to private and 'friends only' to prevent public searches being made on themselves and potentially the school name. This is also to prevent students of the school from being able to 'tag' staff in media such as photos and videos.
- Staff must not 'tag' or 'check-in' to the school or 'tag' media to the school as these can be viewed by the public with the potential to cross professional boundaries.
- Any complaints about work should be resolved by speaking directly to your respective managers, rather than by posting complaints on the Internet through any method of social media. If any complaints or criticism of the school or other members of staff is posted on any method of social media, any comment that may be defamatory or damaging to the school or any other employees should be avoided. REMEMBER - Disciplinary action can be taken for this activity.
- The school will in its sole discretion review the social networking activities of any member of its staff. This policy applies even if the social networking activity of any member of staff is anonymous or under a pseudonym. If such networking activity is engaged in, members of staff should be aware that in appropriate circumstances the school will take steps to determine the identity of the individual concerned.
- The school may request in its sole and absolute discretion that any member of staff should temporarily confine their respective social networking activities to matters unrelated to the school if the school determines that it is necessary or advisable to ensure compliance with regulations or other laws.

### **Guidance for your own privacy and safety**

- You are advised to set the privacy levels of your personal accounts as strictly as you can and opt out of public listings on social networking sites.
- You should keep your passwords confidential and change them frequently.



- You should be careful about what you post online; it is not advisable to reveal home addresses, telephone numbers and other personal information.
- On-line friendships and communication with former pupils should be strongly discouraged particularly if the pupils are under the age of 18 years.
- *(In some cases employees in schools/services are related to parents/carers and/or pupils or may have formed on-line friendships with them prior to them becoming parents/carers and/or pupils of the school/service. In these cases employees should be advised that the nature of such relationships has changed and that they need to be aware of the risks of continuing with this method of contact. They should be advised that such contact is contradictory to this Policy and as such they are potentially placing themselves at risk of formal action being taken under the school's Disciplinary*

Staff should also avoid social media communications that might be misconstrued in a way that could damage the School's reputation, even indirectly.

If Staff are using social media, they should make it clear in any social media postings that they are speaking on their own behalf. Write in the first person and use a personal rather than School e-mail address when communicating via social media.

Staff are personally responsible for what they communicate in social media. Staff should remember that what they publish might be available to be read by the masses (including the School itself, future employers and social acquaintances) for a long time. Staff should keep this in mind before they post content.

If Staff disclose whether directly or indirectly their affiliation to the School as a member of Staff whether past, current or prospective, they must also state that their views do not represent those of the School.

Staff must ensure that their profile and any content posted are consistent with the professional image they are required to present to colleagues, pupils and parents.

Staff must avoid posting comments about confidential or sensitive School related topics. Even if Staff make it clear that their views on such topics do not represent those of the School, such comments could still damage the School's reputation and incur potential liability.

If a member of Staff is uncertain or concerned about the appropriateness of any statement or posting, he or she should refrain from making the communication until he or she has discussed it with the Head Teacher.

If a member of Staff sees content in social media that disparages or reflects poorly on the School, its Staff, pupils, parents, service providers or stakeholders, he or she is required to report this in the first instance to the Head Teacher without unreasonable delay. All staff are responsible for protecting the School's reputation.

### **Respecting intellectual property and confidential information:**

Staff should not do anything to jeopardise School confidential information and intellectual property through the use of social media.

In addition, Staff should avoid misappropriating or infringing the intellectual property of other School's, organisations, companies and individuals, which can create liability for the School, as well as the individual author.

Staff must not use the School's logos, brand names, slogans or other trademarks, or post any of our confidential or proprietary information without express prior written permission from the Head Teacher.

To protect yourself and the School against liability for copyright infringement, where appropriate, reference sources of particular information you post or upload and cite them accurately. If you have any questions about whether a particular post or upload might violate anyone's copyright or trademark, ask the Head Teacher in the first instance before making the communication.

Respecting colleagues, pupils, parents, clients, service providers and stakeholders Staff must not post anything that their colleagues, the School's past, current or prospective pupils, parents, service providers or stakeholders may find offensive, including discriminatory comments, insults or obscenity.

Staff must not post anything related to colleagues, the School's past, current or prospective pupils, parents, service providers or stakeholders without their advanced written permission.

### **Monitoring and review of this policy**

The Board of Governors has responsibility for approving any amendments prior to implementation.

The Head Teacher has responsibility for ensuring that any person who may be involved with administration or investigations carried out under this policy receives regular and appropriate to assist them with these duties.

This policy should be read in conjunction with other relevant school policies, procedures and Codes of Conduct including:

- Internet Safety Policy
- Staff Professional Code of Conduct
- Disciplinary Procedure
- Child Protection and Safeguarding Policy and Procedures
- Prevent Policy

- GDPR & Data Protection Policy