



# Social Media Policy

Date of issue	Feb 2019	Review period	2 years
Date of next review	Feb 2021	Author	L Pippin/N Burrell
Type of policy	Non - Statutory	Approval	

## Statement of intent

1. Legal framework
2. Roles and responsibilities
3. General social media rules
4. Data protection
5. Creating accounts on behalf of the school
6. Content published on behalf of the school
7. Parental interaction with school social media
8. Monitoring and moderation
9. Breaches of the policy
10. Monitoring and review

## Appendix

- a) Social Media Site Creation Approval Form
- b) Social Media Consent Form

## **Statement of intent**

The internet allows for a range of social media platforms that create a vast amount of opportunities, including allowing schools to develop communication systems and to interact with the public.

While Boldon School recognises the benefits that this can hold, we are aware of the problems that can incur when using social media.

This policy sets out the principles that students, staff, parents and contractors are expected to follow when using social media both on behalf of the school and about the school.

This policy has been created with the following aims:

- Social media is used responsibly
- Relevant legislation is complied with
- The confidentiality and data protection of all members of the school community
- The school community is aware of the correct way to use social media
- The reputation of the school is not affected by the use of social media
- Parents and the public have confidence in school decisions and services
- Staff members' personal and professional lives are kept separate

## 1. Legal framework

1.1. This policy will have due regard to legislation, including, but not limited to, the following:

- The Data Protection Act 2018
- The General Data Protection Regulation 2018
- The Safeguarding Vulnerable Groups Act 2006
- The Freedom of Information Act 2000
- The Computer Misuse Act 1990, amended by the Police and Justice Act 2006

1.2. This policy also has due regard to non-statutory guidance including, but not limited to, the following:

- HM Government (2015) 'Information sharing'

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

- Protection of Children Act 1978
- Defamation Act 2013
- Protection from Harassment Act 1997
- Malicious Communications Act 1988
- Communications Act 2003
- Copyright, Designs and Patents Act 1988
- Human Rights Act 1998

1.4. This policy should be read in conjunction with the following school policies:

- E-safety Policy
- Anti-Bullying Policy
- Child Protection and Safeguarding Policy
- Data Protection Policy

## 2. Roles and responsibilities

**2.1.** The designated staff member(s) from the ICT department will be responsible for:

- Monitoring and reviewing all school-run social media accounts.
- Consulting with staff on the purpose of the social media account and the content published.
- Handling inappropriate comments or abuse posted on the school's social media accounts, or regarding the school.
- Ensuring that enough resources are provided to keep the content of the social media accounts up-to-date and relevant.

2.2. The Headteacher is responsible for holding a meeting with any individuals who are seen to be in breach of this policy.

2.3. The administration team will be responsible for:

- Obtaining consent from individuals who the school wishes to post content about.

2.4. Members of staff are responsible for:

- Not engaging in activities involving social media which might bring the school into disrepute.
- Not representing their personal views as those of the school on any social medium.
- Acting in the best interests of students when creating, participating in or contributing to social media sites.
- Demonstrating the same high standards of behaviour as expected within the school.
- Only using official school social media sites for communicating with students, parents, or to enable students or parents to communicate. Social media sites may be used in other ways, e.g. advertising a job vacancy; however, this will be approved by the Headteacher.

### **3. General social media rules**

- 3.1. Staff members' personal information, or students' personal information, will not be discussed on social media.
- 3.2. Authors will be accurate, fair and transparent when creating or altering online sources of information.
- 3.3. Social media will not be used as a platform to attack, insult, abuse or defame students, their family members, colleagues or other professionals.
- 3.4. All content expressed on school social media accounts will not breach copyright, data protection or freedom of information legislation.
- 3.5. Staff will need to liaise with the ICT Teacher in charge to receive relevant training and information.

### **4. Data protection**

- 4.1. The school will ensure that data that is to be used on social media, i.e. image's, is obtained and processed in line the Data Protection Act 2018 and the school's Data Protection Policy.
- 4.2. Unless another lawful basis is being used, the school will not post content without the express consent of individuals.

- 4.3. Students will be asked to provide their own consent, where appropriate.
- 4.4. A record of consent is maintained throughout the academic year, which details the students for whom consent has been provided. The administration team is responsible for ensuring this consent record remains up-to-date.
- 4.5. The DPO and students' parents will assess whether a student is capable of providing their own consent for content to be published on social media, e.g. images.
- 4.6. Parents and students are able to withdraw or amend their consent at any time. To do so, parents and students must inform the school in writing.
- 4.7. Where parents or students withdraw or amend their consent, it will not affect the processing of any images or videos prior to when consent was withdrawn or amended. Processing will cease in line with parents' and students' requirements following this.
- 4.8. Before posting on social media, staff will:
- Refer to the consent record log to ensure consent has been received for that student and for the exact processing activities required.
  - Ensure that there is no additional identifying information relating to a student.
- 4.9. The school will only use first names when posting images, so that individuals are not easily identifiable.
- 4.10. The school's social media privacy settings will be set so that only certain people can see the content.
- 4.11. The school will ensure that all processing information in relation to social media is included on privacy notices.
- 4.12. If an individual wishes for the school to remove an image on social media in which they appear, the school will oblige.
- 4.13. As well as seeking consent beforehand, the school will ensure the details of any personal data that is shared on social media will be outlined in a privacy notice.

## **5. Creating accounts on behalf of the school**

- 5.1. The school social media sites will only be created and monitored by designated staff members.
- 5.2. There will be a strong pedagogical or business reason for the creation of social media accounts on behalf of the school; official school profiles and accounts will not be created for trivial reasons.

5.3. A school social media account will be entirely separate from any personal social media accounts held by staff members and will be linked to an official school email account.

5.4. Consideration will be given to the following aspects:

- The purpose for using social media
- Whether the overall investment will achieve the pedagogical aim
- The level of interactive engagement with the site
- Whether students, staff, parents or members of the public will be able to contribute content to the account
- How much time and effort are staff members willing to commit to the proposed site
- A clear plan which outlines aspects such as how long the site will last
- How the success of the site will be evaluated

5.5. Approval for participating, on behalf of the school, on sites created by third parties will be obtained from the Headteacher via the

## **6. Content published on behalf of the school**

6.1. All content and information provided on social media accounts will be worthwhile and accurate.

6.2. Staff will only post information on school social media accounts where it is deemed beneficial and necessary.

6.3. Staff members will not disclose information, make commitments or engage in activities on behalf of the school without authorisation from the Headteacher/designated staff member responsible for Social Media.

6.4. All staff will be made aware of the relevant child protection, privacy, data protection, libel, defamation, harassment and copyright law that may apply to the content.

6.5. Staff members will respect their audience and be sensitive in the tone of language used when discussing topics that others may find controversial or objectionable.

6.6. Consideration will be given to the type of language that is used in order to ensure it is appropriate for the audience, e.g. swearing and innuendos are highly inappropriate on school sites.

6.7. Personal opinions will not be expressed on any school media accounts.

6.8. School account profiles will always include the school logo or brand to ensure transparency and confidence in the site.

- 6.9. The school logo will, where possible, link back to the relevant page on the school website.
- 6.10. Any content that is contributed to staff members' own or third-party hosted sites will be discussed with, and approved by, the designated staff member responsible for Social Media.
- 6.11. The designated staff member responsible for Social Media will take overall responsibility to ensure that enough resources are provided to keep the content of the site up-to-date and relevant.
- 6.12. Images and videos of students will not be published without written consent from a parent/guardian, or the student when appropriate.
- 6.13. Content will not identify any student by their full name or allow any identifying information to be published without the written consent of a parent/guardian, or the student when appropriate.
- 6.14. Where a student is assessed by the school to have the competence to understand what they are consenting to, the school will obtain consent directly from that student; otherwise, consent is obtained from whoever holds parental responsibility for the child.
- 6.15. Consideration will be given to the level of engagement of contributors.
- Measures will be in place to monitor content uploaded by users.
  - Permission will be sought from the relevant people before citing or referencing their work.

## **7. Parental interaction with school social media**

- 7.1. Parents are able to comment on or respond to information shared via social media sites; however, parents must do so in a way which does not damage the reputation of the school.
- 7.2. Parents will not share any photos or personal details of students when commenting on the school social media sites.
- 7.3. Parents will not post comments concerning other students or staff members on the school social media sites.

## **8. Monitoring and moderation**

- 8.1. All content is moderated and reviewed.
- 8.2. Moderation of social media content is the responsibility of the individual or team that initiated the account.



- 8.3. In case of absence or turnover, other members of staff will be adequately trained and prepared to maintain and moderate the social media accounts.
- 8.4. Sites created for, and contributed to, by students will have the strongest privacy settings to prevent breaches of confidentiality.
- 8.5. Students and other young participants on school social media accounts will not be able to be identified.
- 8.6. Members of staff will disclose their positions within the school on social media accounts and profiles. They will never give out their personal information, such as home contact details or email addresses, on these sites.
- 8.7. Inappropriate comments or abuse about the school are to be immediately removed, and reported to the designated staff member responsible for Social Media. Such comments will never be posted on behalf of the school.
- 8.8. In the case of illegal content or behaviour, the designated staff member responsible for Social Media will immediately inform the appropriate authorities, such as the police and the Child Exploitation and Online Protection Centre.
- 8.9. Any media enquiries will be forwarded to the Headteacher immediately.
- 8.10. Staff members will not communicate with the media without the advice or approval of the Headteacher.
- 8.11. Care will be taken to ensure that any links to external sites from the account are appropriate and safe.
- 8.12. Any proposal to use social media to advertise the school, or a third party, will be approved by the designated staff member responsible for Social Media.
- 8.13. Approval will be obtained from the school's designated staff member responsible for Social Media to mention an external organisation in content or make them a 'friend' or 'follower'.
- 8.14. Individuals wishing to be 'friends' on the school's social media platforms will be vetted and approved by the designated staff member responsible for Social Media before being accepted.

## **9. Breaches of the policy**

- 9.1. Any breach of this policy may lead to disciplinary action being taken against the staff member(s) involved, in line with the school's Disciplinary Policy and Procedure.
- 9.2. Breaches of confidentiality, defamation or damage to the reputation of the school may result in disciplinary action or dismissal.

- 9.3. The school will inform the LA immediately of any breaches of the policy, so that appropriate action can be taken.
- 9.4. Any action that is taken against breaches of this policy will be according to the relevant disciplinary procedures.
- 9.5. Data breaches may be reported to the ICO, if there is a risk of the data adversely affecting individuals' rights and freedoms.
- 9.6. The DPO will be responsible for handling any breaches.

## **10. Monitoring and review**

- 10.1. This policy will be reviewed on a regular basis by the designated staff member responsible for Social Media in conjunction with the Headteacher; any changes made to the policy will be communicated to all members of staff and parents, where necessary.

**All members of staff are required to familiarise themselves with this policy as part of their induction programme.**