



# STEP ACADEMY TRUST

## Social Media Policy

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This policy is to be read in conjunction with our Safeguarding Policies:

*Child Protection; Safeguarding; Anti-Bullying; Behaviour; Behaviour and Exclusion; Code of Conduct for staff; Programming and Computing, ICT Acceptable Use Policy*

## **Introduction**

The internet provides a range of social media tools that allow users to interact with one another, for example: from rediscovering friends on social networking sites such as Facebook to keeping up with other people's lives on Twitter and maintaining pages on internet encyclopaedia's such as Wikipedia.

Whilst recognising the benefits of these media for new opportunities for communication, this policy sets out the principles that STEP Academy staff and contractors are expected to follow when using social media.

It is crucial that pupils, parents and the public at large have confidence in the academies decisions and services. The principles set out in this policy are designed to ensure that staff use social media responsibly so that confidentiality of pupils and other staff and the reputation of the Academy and STEP Academy Trust are safeguarded.

Members of staff must be conscious at all times of the need to keep their personal and professional lives separate.

## **Scope**

This policy applies to each Academy, Board of Trustees, Strategic Governing body, all teaching and other staff, whether employed by the Academy or external contractors providing services on behalf of the Academy, teacher trainees and other trainees, volunteers and other individuals who work for or provide services on behalf of the Academy. These individuals are collectively referred to as 'staff' in this policy.

This policy covers personal use of social media as well as the use of social media for official Academy purposes; including sites hosted and maintained on behalf of the Academy.

This policy applies to personal webspace such as social networking sites (for example Facebook, MySpace), blogs, microblogs such as Twitter, chatrooms, forums, podcasts, open access online encyclopedia's such as Wikipedia, social bookmarking sites such as del.icio.us and content sharing sites such as Flickr, Instagram and YouTube. The internet is a fast moving technology and it is impossible to cover all circumstances or emerging media - the principles set out in this policy must be followed irrespective of the medium.

## **Legal Framework**

STEP Academy Trust is committed to ensuring that all staff provide confidential services that meet the highest standards. All individuals working for the Trust 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:

- Human Rights Act 1998;
- Data Protection Act 1998.

Confidential information includes, but is not limited to:

- Person-identifiable information, e.g. pupil and employee records protected by the Data Protection Act 1998;
- Information divulged in the expectation of confidentiality;

- Academy business or corporate 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.

STEP Academy Trust could be held vicariously responsible for acts of their employees in the course of their employment. For example, staff who harass co-workers online or who engage in cyberbullying or discrimination on the grounds of race, sex, disability, etc. or who defame a third party while at work may render the Academy liable to the injured party.

### **Principles**

You must be conscious 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 or STEP Academy Trust and your personal interests.

You must not engage in activities involving social media which might bring the Academy or STEP Academy Trust into disrepute.

You must not represent your personal views as those of the Academy on any social medium.

You must not discuss personal information about pupils or Academy staff and other professionals you interact with as part of your job on social media.

You must not use social media and the internet in any way to attack, insult, abuse or defame pupils, their family members, colleagues, other professionals, other organisations.

You must be accurate, fair and transparent when creating or altering online sources of information on behalf of the Academy.

### **Personal Use of Social Media – Staff**

Members of staff must not have contact through any personal social medium with any current pupil or passed pupil currently in the education system whether from a STEP Academy or any other school, unless the pupils are family members.

The Academy does not expect staff to discontinue contact with their family members via personal social media once the Academy starts providing services for them. However, any information staff obtain in the course of their employment must not be used for personal gain nor be passed on to others who may use it in such a way.

Staff must not have any contact with pupils' family members through personal social media if that contact is likely to constitute a conflict of interest or call into question their objectivity.

If staff wish to communicate with pupils through social media sites or to enable pupils to keep in touch with one another, they can only do so with the approval of the Academy and through official Academy sites created according to the requirements specified.

Staff must decline 'friend requests' from pupils they receive in their personal social media accounts. Instead, if they receive such requests from pupils who are not family members, they must discuss these in general terms in class and signpost pupils to become 'friends' of the official Academy site.

Photographs, videos or any other types of image of pupils and their families or images depicting staff wearing uniforms or clothing with Academy logos or images identifying an Academy or premises must not be published on a personal webpage.

Staff are strongly advised to ensure that they set the privacy levels of their personal sites as strictly as they can and to opt out of public listings on social networking sites to protect their own privacy. Staff should keep their passwords confidential, change them often and be careful about what is posted online; it is not safe to reveal home addresses, telephone numbers and other personal information. It is a good idea to use a separate email address just for social networking so that any other contact details are not given away.

Staff should review their social media history and should delete any inappropriate historic posts or pictures which could damage their professional reputation

Staff should review their social network accounts, particularly the content and privacy settings in place.

Even if a member of staff does not specifically name the School on social media, it is likely that some viewers will know who they are employed by and as such communications still have the potential to bring the organisation into disrepute.

Staff are allowed to say that they work for the School, which recognises that it is natural for its staff to sometimes want to discuss their work on social media. However, the employee's online profile (for example, the name of a blog or a Twitter name) must not contain the School's name.

If staff do discuss their work on social media (for example, giving opinions on their specialism or the education sector), they must include on their profile a statement along the following lines: "The views I express here are mine alone and do not necessarily reflect the views of my employer."

Photographs of pupils must not be uploaded or shared by employee's through social media

Any communications that employees make in a personal capacity through social media must not:

- have the potential to bring the School into disrepute, for example:
  - by criticising or arguing with parents, colleagues or rivals;
  - by making defamatory comments about individuals or other organisations or groups; or
  - by posting images that are inappropriate or links to inappropriate content;
- breach confidentiality, for example:
  - by sharing confidential information about an individual (such as a colleague or pupils) or the School; or
  - by discussing the School's internal workings (such as future plans that have not been communicated to the public, parents or pupils);

- breach copyright, for example:
  - by using someone else's images or written content without permission;
  - by failing to give acknowledgement where permission has been given to reproduce something; or
  
- do anything that could be considered discriminatory, bullying or harassment of an individual or group, for example:
  - by making offensive or derogatory comments relating to sex, gender reassignment, race (including nationality), disability, sexual orientation, religion or belief or age;
  - by using social media to bully or criticise another individual (such as an employee of the organisation); or
  - by posting images that are discriminatory or offensive, or links to such content.

Staff have a responsibility to report to report any breach or abuse of this policy to the Headteacher.

### **Personal use of Social Media - Pupils**

No pupil under 13 should be accessing social networking sites. This is the guidance from both Facebook and MSN. There is a mechanism on Facebook where pupils can be reported via the Help screen.

No pupil may access social networking sites during the school working day unless specifically setup by the Academy for educational purposes and are monitored accordingly.

Any pupil's with mobile phones must hand them into the office at the beginning of the school day, the Internet capability must be switched off.

Where a disclosure of bullying is made, schools now have the duty to investigate and protect, even where the bullying originates outside the school.

Once a disclosure is made, investigation will have to involve the families. This should be dealt with under STEP's Anti Bullying Policy.

If parent / carers refuse to engage and bullying continues, it can be referred to the police as harassment

This guidance can also apply to text and mobile phone cyber bullying.

### **Personal use of Social Media - Parents**

STEP Academy Trust recognise that many parents and other family members will have social networking accounts which they might use to discuss/share views about school issues with friends and acquaintances.

However it is not the way to raise concerns or complaints as STEP Academies will not respond to the issues raised on social networking sites. If there are any serious allegations being made/concerns being raised, social media or internet sites should not be used to name individuals and make abusive comments.

Although social networking sites may appear the quickest and easiest way to express frustrations

or concerns about the Academy and those associated with it, it is rarely appropriate to do so. Other channels such as a private and confidential discussion with the Teacher, Headteacher, a Governor, or using the formal complaints process are much better suited to this.

We considers the following examples to be inappropriate uses of social networking sites. (This list is non-exhaustive and intended to provide examples only):

- Naming children or posting any comments about children who attend the Academy;
- Making an allegation about staff or anyone else connected with the Academy/Trust;
- Making any post that could be deemed to be cyber bullying;
- Making complaints about the Academy/Trust; or the staff at the Academy/Trust;
- Making defamatory statements about the Academy/Trust or the staff at the Academy/Trust;
- Posting negative or offensive comments about staff or any other individual connected to the Academy/Trust.
- Posting racist comments
- Posting comments which threaten violence
- Parents should also ensure that their children are not using social networking sites in an inappropriate manner. It is expected that parents/carers explain to their children what is acceptable to post online. Parents/carers are also expected to monitor their children's online activity, including in relation to their use of social media.

### **Using Social Media on behalf of the Academy**

Staff can only use official Academy sites for communicating with pupils or to enable pupils to communicate with one another.

There must be a strong pedagogical or business reason for creating official Academy sites to communicate with pupils or others. Staff must not create sites for trivial reasons which could expose the Academy/Trust to unwelcome publicity or cause reputational damage.

Official Academy sites must be created only according to the requirements specified in Appendix A of this Policy. Sites created must not breach the terms and conditions of social media service providers, particularly with regard to minimum age requirements.

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

All Social media created by the Academy will be monitored and moderated and reserves the right to remove any posting or content.

Here are a few polite DOs and DON'Ts in order to use this resource correctly. Please do the following:

- Use good judgment - Regardless of your privacy settings, assume that all of the information you have shared on any social network is public information;
- Be respectful - You cannot see a smile or understand nuances of speech on social media. Please keep the tone of discussion positive and respectful;
- Be responsible and ethical;
- Correct any mistakes - Be sure to correct any mistake you make immediately, and make it clear what you've done to fix it;
- Confidential information - If it seems confidential, it probably is. Online "conversations" are

- never private;
- Private and personal information - Always respect the privacy of the school community members;
- Images – Photos taken at Academy events may be used by the Academy to highlight activities. Photos need to be approved by the Head Teacher first as there may be some children whose parents haven't given permission for their child's photo to be used publicly. Any requests to remove images of your child will be complied with immediately. Any photos used by the Academy will not include our pupils' names;
- Other sites - Link to other sites may provide useful and interesting content. Do not blindly repost a link without looking at the content first you never know what could be there!
- Advertise - Adverts in relation to private businesses or social enterprises, even if related to fundraising schemes, posted without the express written permission of the Academy will be removed. Do not repost links of this kind.

Posts will be removed if they:

- are personal attacks (posts deemed libelous, profane, defamatory, disparaging, hateful, harassing, threatening, or obscene);
- break the law;
- are fraudulent, deceptive or misleading;
- are advertising a product, business, literature or event not directly related to the academies own activities.

### **Monitoring of Internet use**

All Academies monitor usage of its internet and email services.

### **Breach of the Policy**

Any breach of this policy may lead to disciplinary action being taken against the staff member/s involved in line with STEP Academy Policy.

A breach of this policy leading to breaches of confidentiality, or defamation or damage to the reputation of Academy may result in disciplinary action or dismissal of staff or legal action against parents or pupils.

Contracted providers of the Academy services must inform the Academy immediately of any breaches of this policy so that appropriate action can be taken to protect confidential information and limit the damage to the reputation of the Academy and. Any action against breaches should be according to contractors' internal disciplinary procedures.

## **APPENDIX A**

### **Requirements for creating social media sites on behalf STEP Academy Trust**

#### **CREATION OF SITES**

Staff participating in social media for work purposes are expected to demonstrate the same high standards of behaviour as when using other media or giving public presentations on behalf of the Academy/Trust.

Prior to creating a site, careful consideration must be given to the purposes for using social media and whether the overall investment is likely to be worthwhile for achieving the proposed pedagogical outcome.

The proposed audience and level of interactive engagement with the site, for example whether pupils, school staff or members of the public will be able to contribute content to the site, must be discussed with the Academy's Headteacher.

Staff must consider how much time and effort they are willing to commit to the proposed site. They should be aware that maintaining a site is not a one-off task, but involves a considerable time commitment.

Head Teachers must take overall responsibility to ensure that enough resources are provided to keep the site refreshed and relevant. It is important that enough staff are trained and are able to maintain and moderate a site in case of staff absences or turnover.

There must be a careful exit strategy and a clear plan from the outset about how long the site will last. It must not be neglected, creating a potential risk to the Academy's brand and image.

Consideration must also be given to how the success of the site will be evaluated to assess whether the site has achieved the proposed objectives.

#### **CHILDREN AND YOUNG PEOPLE**

When creating social media sites for children and young people and communicating with them using such sites, staff must at all times be conscious of their responsibilities; staff must always act in the best interests of children and young people.

When creating sites for children and young people, staff must be alert to the risks to which young people can be exposed. Young people's technical knowledge may far exceed their social skills and awareness – they may post sensitive personal information about themselves, treat online 'friends' as real friends, be targets for 'grooming' or become victims of cyberbullying.

If children and young people disclose information or display behaviour or are exposed to information or behaviour on these sites that raises safeguarding or other concerns, appropriate authorities must be informed immediately. Failure to do so could expose vulnerable young people to risk of harm.

Staff must also ensure that the webspace they create on third party sites comply with the site owner's minimum age requirements (this is often set at 13 years). Staff must also consider the ramifications and possibilities of children under the minimum age gaining access to the site.

Care must be taken to ensure that content is suitable for the target age group and contributors or 'friends' to the site are vetted.

### **APPROVAL FOR CREATION OF OR PARTICIPATION IN WEBSITE**

Social media sites can be created only by or on behalf of the Academy. Site administrators and moderators must be Academy employees or other authorised people.

Approval for creation of sites for work purposes, whether hosted by the Academy or hosted by a third party such as a social networking site, must be obtained from the Academy's Head Teacher. Approval for participating, on behalf of STEP Academy Trust, on sites created by third parties must be obtained from the Academy's Head Teacher.

Content contributed to own or third-party hosted sites must be discussed with and approved by the Academy's Head Teacher.

The Academy's Head Teacher must be consulted about the purpose of the proposed site and its content. In addition, the Head Teacher's approval must be obtained for the use of the Academy logo and brand.

Staff must complete the Social Media Site Creation Approval Form (Appendix B) and forward it to the Academy's Head Teacher before site creation.

Be aware that the content or site may attract media attention. All media enquiries must be forwarded to the Academy's Business Manager/Head Teacher immediately. Staff must not communicate with the media without the advice or approval of the Business Manager/Head Teacher.

### **CONTENT OF WEBSITE**

Academy hosted sites must have clearly expressed and publicised Terms of Use and House Rules.

Staff must not disclose information, make commitments or engage in activities on behalf of the Academy's or the STEP Academy Trust without authorisation.

Information provided must be worthwhile and accurate; remember what is published on the site will reflect on the Academy's or STEP Academy Trust's image, reputation and services.

Stay within the law and be aware that child protection, privacy, data protection, libel, defamation, harassment and copyright law may apply to the content of social media.

Academy hosted sites must always include the school logo or brand to ensure transparency and confidence in the site. The logo should, where possible, link back to the relevant page on the school website.

Staff must never give out their personal information such as home contact details or home email addresses on these sites.

Personal opinions should not be expressed on official sites.

## **CONTRIBUTORS AND MODERATION OF CONTENT**

Careful consideration must be given to the level of engagement of contributors – for example whether users will be able to add their own text or comments or upload images.

The content and postings any STEP Academy Trust hosted site must be moderated. Moderation is the responsibility of the team that sets up or initiates the site.

The team must designate at least two approved Administrators whose role it is to review and moderate the content, including not posting or removal of comments which breach the Terms of Use. It is important that there are enough approved moderators to provide cover during leave and absences so that the site continues to be moderated.

For third-party-hosted sites such as social networking sites used for work purposes, the responsibility for protection and intervention lies first with the host site itself. However, different sites may have different models of intervention and it is ultimately the responsibility of the staff member creating the site to plan for and implement additional intervention, for example in the case of content raising child safeguarding concerns or comments likely to cause offence.

Individuals wishing to be ‘friends’ on a site must be checked carefully before they are approved. Their comments must be reviewed regularly and any that do not comply with the House Rules must be removed.

## APPENDIX B

### Academy Social Media Site Creation Approval Form

Use of social media on behalf of \_\_\_\_\_ Academy must be approved prior to setting up sites.

Please complete this form and forward it to the Academy's Head teacher

<b>TEAM DETAILS</b>	
Department	
Name of author of site	
Author's line manager	
<b>PURPOSE</b>	Please describe why you want to set up this site and the content of the site
What are the aims you propose to achieve by setting up this site?  What is the propose content of this site?	
<b>PROPOSED AUDIENCES</b>	Who are the proposed audiences of the site? (please tick all that apply)
	<input type="checkbox"/> Pupils of STEP Academy Trust (age range) <input type="checkbox"/> Academy staff <input type="checkbox"/> Pupils' family members <input type="checkbox"/> Pupils from other academies (please provide names of Academies) <input type="checkbox"/> External organisations <input type="checkbox"/> Members of the public <input type="checkbox"/> Others; please provide details

<b>PROPOSED CONTRIBUTORS</b>	Who are the proposed contributors to the site? (please tick all that apply)
If contributors include children or adults with learning disabilities how do you propose to inform and obtain consent of parents or responsible adults?	<input type="checkbox"/> Pupils of the Academy (provide age range) <input type="checkbox"/> Academy staff <input type="checkbox"/> Pupils' family members <input type="checkbox"/> Pupils from other academies (provide names of schools) <input type="checkbox"/> External organisations
What security measures will you take to prevent unwanted or unsuitable individuals from contributing or becoming 'friends' of the site?	<input type="checkbox"/> Members of the public <input type="checkbox"/> Others; please provide details
<b>ADMINISTRATION OF THE SITE</b>	
<b>APPROVAL</b> Names of administrators (the site must have at least 2 approved administrators)	Approval from relevant people must be obtained before the site can be created. The relevant managers must read this form and complete the information below before final approval can be given by the headteacher.
Names of moderators (the site must have at least 2 approved moderators)	Name: Signature: Date:
Who will vet external contributors?	
Proposed date of going live	
<b>Business Manager</b> I approve the aims and content of the proposed site and the use of the school brand and logo.	Name: Signature: Date:
Proposed date for site closure	
How do you propose to advertise for external contributors?	
<b>Headteacher</b>	Name: Signature: Date: