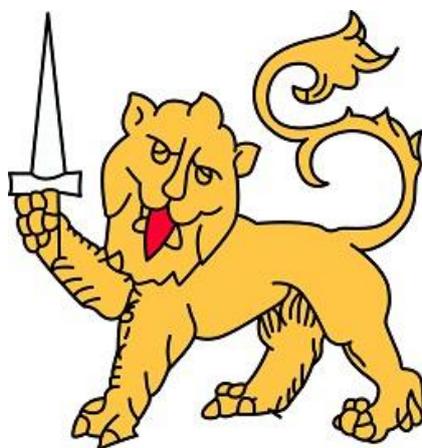


Federation Media Policy

Aylestone School federated with Broadlands Primary and Withington Primary



Approved by:

Federation Governors

Date: [Date]

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Introduction.

This policy is in place to minimise the risks to our federation, staff and students through use of social media. This policy also looks at how we handle data in the form of photography and video use of students.

This policy deals with the use of all forms of social media, including Facebook, LinkedIn, Twitter, Google+, Instagram, Whatsapp and Snapchat and all other social networking sites, internet postings, blogs and chat apps. It applies to use of social media for business purposes as well as personal use that may affect our school in any way.

This policy is written in conjunction with the E-safety document provided by Hereford Council. Please follow the link provided.

<http://www.withington.hereford.sch.uk/downloads/policies16/e-safety-policy.sept.2016.pdf>

Scope of Policy.

This policy covers all employees, officers, consultants, contractors, volunteers, casual workers, agency workers, students and parents.

This policy ensures the Governing Body maintains its duty to safeguard children, the reputation of the School and those who work for it and the wider community.

This policy does not form part of any employee's contract of employment and we may amend it at any time.

References to "students" throughout this policy shall mean students other than the staff member's own child or relation.

This policy is subject to the school's Codes of Conduct and Acceptable Use Agreements.

This policy:

- Applies to all staff and to all online communications which directly or indirectly, represent the school.
- Applies to such online communications posted at any time and from anywhere.
- Encourages the safe and responsible use of social media through training and education
- Defines the monitoring of public social media activity pertaining to the school

The school respects privacy and understands that staff and pupils/students may use social media forums in their private lives. However, personal communications likely to have a negative impact on professional standards and/or the school's reputation are within the scope of this policy.

Professional communications are those made through official channels, posted on a school account or using the school name. All professional communications are within the scope of this policy.

Personal communications are those made via a personal social media accounts. In all cases, where a personal account is used which associates itself with the school or impacts on the school, it must be made clear that the member of staff is not communicating on behalf of the school with an appropriate disclaimer. Such personal communications are within the scope of this policy.

Personal communications which do not refer to or impact upon the school are outside the scope of this policy.

Digital communications with pupils/students are also considered. Staff may use social media to communicate with learners via a school social media account for teaching and learning purposes but must consider whether this is appropriate and consider the potential implications.

Personnel responsible for implementing the policy

Our Head Teacher has overall responsibility for the effective operation of this policy in conjunction with the Federation Governors.

Roles & Responsibilities

SLT

- Facilitating training and guidance on Social Media use.
- Developing and implementing the Social Media policy
- Taking a lead role in investigating any reported incidents.
- Making an initial assessment when an incident is reported and involving appropriate staff and external agencies as required.
- Approve account creation

Administrator / Moderator

- Create the account following SLT approval
- Store account details, including passwords securely
- Be involved in monitoring and contributing to the account
- Control the process for managing an account after the lead staff member has left the organisation (closing or transferring)

Staff

- Know the contents of and ensure that any use of social media is carried out in line with this and other relevant policies
- Attending appropriate training
- Regularly monitoring, updating and managing content he/she has posted via school accounts
- Adding an appropriate disclaimer to personal accounts when naming the school

Responsibility for monitoring and reviewing the operation of this policy and making recommendations for change to minimise risks lies with the Headteacher who will review this policy annually to ensure that it meets legal requirements and reflects best practice.

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

All staff and students are responsible for the success of this policy and should ensure that they take the time to read and understand it. Questions regarding the content or application of this policy should be directed to the Data Protection Officer: Rebecca Kastania, Aylestone School, Broadlands House, Broadlands Lane, Hereford HR1 1HY.

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, you are prohibited from using social media to:

- breach our IT policies and procedures
- breach our Code of Conduct
- breach our Disciplinary Policy or procedures
- breach our Anti-bullying and Harassment Policy
- breach our Equal Opportunities Policy
- breach our Data Protection Policy (for example, never disclose personal information about a colleague or student online);
- breach any other laws or regulatory requirements.

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

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 organisation and create legal liability for both the author of the reference and the organisation.

Staff must make themselves aware of and act in accordance with their duties under the DfE statutory guidance Keeping Children Safe as these relate to:

- their own on-line activity
- the on-line activity of students and other colleagues and
- information of which they become aware on-line

Including their duties relating to Children Missing from Education, Child Sexual Exploitation, FGM and Preventing Radicalisation (Prevent).

Personal use of social media

Occasional personal use of social media during working hours is permitted so long as it does not involve unprofessional or inappropriate content, does not interfere with your employment responsibilities or productivity and complies with this policy.

You must avoid making any social media communications that could damage our business interests or reputation, even indirectly.

You must not use social media to defame or disparage us, our staff, students, parents/carers or any third party; to harass, bully or unlawfully discriminate against students, parents/carers, staff or third parties; to make false or misleading statements; or to impersonate colleagues or third parties.

You must not express opinions on our behalf via social media, unless expressly authorised to do so by your manager. You may be required to undergo training in order to obtain such authorisation.

You must not post comments about sensitive business-related topics, such as our performance, or do anything to jeopardise our trade secrets, confidential information and intellectual property.

You are strongly advised not accept students or their parent/carers as friends or use social media to send any personal messages to them directly or indirectly – personal communication could be considered inappropriate and unprofessional and may put you and/or your colleagues vulnerable to allegations.

You are strongly advised not to be friends (on or off line) with recent students (the potential for colleagues at the School to be compromised in terms of content and open to accusations makes the risk not worth taking) and colleagues at the School are also strongly advised not to be friends with students at other schools (on or off line) as this is likely to make them vulnerable to allegations and may be open to investigation by the School or police. Where a colleague is considering not following this advice, they are advised to discuss the matter, and the implications with the Headteacher or designated safeguarding lead.

You must not share any personal information with any student (including personal contact details, personal website addresses/social networking site details) and ensure good safeguarding practice.

Caution is advised when inviting work colleagues to be “friends” in personal social networking sites. Social networking sites blur the line between work and personal lives and it may be difficult to maintain professional relationships.

You must not post or share photographs of students under any circumstances;

Any misuse of social media should be reported to the Data Protection Officer.

Guidelines for responsible personal use of social media

You should make it clear in social media postings, or in your personal profile, that you are speaking on your own behalf. Write in the first person and use a personal e-mail address. Digital communications by staff must be professional and respectful at all times and in accordance with this policy. Staff will not use social media to infringe on the rights and privacy of others or make ill-considered comments or judgments about staff. School social media accounts must not be used for personal gain. Staff must ensure that confidentiality is maintained on social media even after they leave the employment of the school.

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 and your personal interests.

Be respectful to others when making any statement on social media and be aware that you are personally responsible for all communications which will be published on the internet for anyone to see.

You are consistent with the professional image you present to the School community and colleagues.

If you are uncertain or concerned about the appropriateness of any statement or posting, refrain from posting it until you have discussed it with your manager. All communication via social networking sites should be made with the awareness that anything said, shown or received could be made available, intentionally or otherwise, to an audience wider than that originally intended (social networking sites are public forums). You are strongly advised, in your own interests, to take steps to ensure as far as possible that their on-line personal data is not accessible to anybody who they do not want to have permission to access it. For example, you are strongly advised to check the security and privacy settings of any social networking site you subscribe to and set these to maximum and, where relevant, use strong passwords and change them regularly. For further information see the safer internet website <http://www.saferinternet.org.uk/> and the South West Grid for Learning Resources <http://www.swgfl.org.uk/Staying-Safe>

For further information about the safe, secure and proper use of social media and networking sites, please see <http://www.childnet.com/resources/socialnetworking-a-guide-for-teachers-and-professionals>

If you see social media content that disparages or reflects poorly on us, you should contact the Head of School or Principal.

Business use of social media

There are many legitimate uses of social media within the curriculum and to support student learning. For example, the School and many of the faculties and individual staff have “PCSA” Twitter accounts for the purposes of their employment. There are also many possibilities for using social media to enhance and develop students’ learning.

There must be a strong pedagogical or business reason for creating official school social media sites. Staff must not create sites unnecessarily or for trivial reasons which could expose the School to unwelcome publicity or cause reputational damage. As a guideline, we would expect accounts to be limited to one “faculty” account and one individual staff member account per social media provider.

Staff should remember that the greater the number of accounts the greater the risk to the School of those accounts being “hacked”.

When using social media for educational purposes, the following practices must be observed:

- Staff should set up a distinct and dedicated social media site or account for educational purposes. This should be entirely separate from any personal social media accounts held by that member of staff, and ideally should be linked to an official school email account
- The URL and identity of the site should be notified to the appropriate Central Leader or a member of the Leadership Team before any account is activated
- The current password or login details for all social media accounts must be provided to IT who will retain a record of such information
- The content of any school-sanctioned social media site should be solely professional and should reflect well on the School
- Staff must ensure that the School has parent/carer consent to use, post or publish a photograph or video image of the student. Please see paragraph 7 below in respect of parent/carer consent
- Staff must ensure that they do not identify a student using their full name. Only first/forenames or initials may be used
- Care must be taken that any links to external sites from the account are appropriate and safe
- Any inappropriate comments on or abuse of school-sanctioned social media should immediately be removed and reported to a member of the Leadership Team
- Staff should not engage with any direct messaging of students through social media where the message is not public
- Staff should not seek to view/link up with view student accounts. For example, in the case of Twitter, staff should not “follow back” those who follow, share or like School comments/posts.

The failure to follow the rules set out in the policy may give rise to disciplinary action.

The use of social media for business purposes is subject to the remainder of this policy.

Student/Parent Use of Social Media

Pupil/Students

- Staff are not permitted to follow or engage with current or prior pupils/students of the school on any personal social media network account.
- The school's education programme should enable the pupils/students to be safe and responsible users of social media.
- Pupils/students are encouraged to comment or post appropriately about the school. Any offensive or inappropriate comments will be resolved by the use of the school's behaviour policy

Parents/Carers

- If parents/carers have access to a school learning platform where posting or commenting is enabled, parents/carers will be informed about acceptable use.
- The school has an active parent/carer education programme which supports the safe and positive use of social media. This includes information on the website.
- Parents/Guardians are asked not to share or publish images on social media or elsewhere online, for safeguarding reasons
- Parents/Carers are encouraged to comment or post appropriately about the school. In the event of any offensive or inappropriate comments being made, the school will ask the parent/carer to

remove the post and invite them to discuss the issues in person. If necessary, refer parents to the school's complaints procedures.

Monitoring posts about the Federation

As part of active social media engagement, it is considered good practice to pro-actively monitor the Internet for public postings about the school.

The school should effectively respond to social media comments made by others according to a defined policy or process.

Behaviour

- The school requires that all users using social media adhere to the standard of behaviour as set out in this policy and other relevant policies.
- Digital communications by staff must be professional and respectful at all times and in accordance with this policy. Staff will not use social media to infringe on the rights and privacy of others or make ill-considered comments or judgments about staff. School social media accounts must not be used for personal gain. Staff must ensure that confidentiality is maintained on social media even after they leave the employment of the school.
- Users must declare who they are in social media posts or accounts. Anonymous posts are discouraged in relation to school activity.
- If a journalist makes contact about posts made using social media staff must follow the school media policy before responding.
- Unacceptable conduct, (e.g. defamatory, discriminatory, offensive, harassing content or a breach of data protection, confidentiality, copyright) will be considered extremely seriously by the school and will be reported as soon as possible to a relevant senior member of staff, and escalated where appropriate.
- The use of social media by staff while at work may be monitored, in line with school policies. The school permits reasonable and appropriate access to private social media sites. However, where excessive use is suspected, and considered to be interfering with relevant duties, disciplinary action may be taken
- The school will take appropriate action in the event of breaches of the social media policy. Where conduct is found to be unacceptable, the school will deal with the matter internally. Where conduct is considered illegal, the school will report the matter to the police and other relevant external agencies, and may take action according to the disciplinary policy.

Legal considerations

- Users of social media should consider the copyright of the content they are sharing and, where necessary, should seek permission from the copyright holder before sharing.
- Users must ensure that their use of social media does not infringe upon relevant data protection laws, or breach confidentiality.

Handling abuse

- When acting on behalf of the school, handle offensive comments swiftly and with sensitivity.
- If a conversation turns and becomes offensive or unacceptable, school users should block, report or delete other users or their comments/posts and should inform the audience exactly why the action was taken

- If you feel that you or someone else is subject to abuse by colleagues through use of a social networking site, then this action must be reported using the agreed school protocols.

Tone

The tone of content published on social media should be appropriate to the audience, whilst retaining appropriate levels of professional standards. Key words to consider when composing messages are:

- Engaging
- Conversational
- Informative
- Friendly (on certain platforms, e.g. Facebook)

Photography and video

Parents/carers will be asked to consent to taking and using photos and videos of pupils during school activities and events, using pupil's names in promotional material and other media including:

- the school prospectus
- the school website
- internal displays
- external advertising
- on trips and activity days
- the school newsletter.

We will not take or process pictures of any students without prior consent being taken, you may retract your consent at any time. If you wish to remove your consent please contact the Data Protection Officer (please see the 'personal responsible for implementing the policy' section of this report).

Parent/carer consent

Parents/carers are asked whether they consent to the School (and thereby its authorised staff) using photographs and video images of their child for school related purposes. This is taken via the Media consent form handed out to all students when the beginning of their schooling. You have the right to withdraw this consent at any time.

Taking and displaying images of pupils will require consent where the photo or video is not essential for the running of the school, and none of the other lawful bases can justify your use of the image. We will seek consent from you for the following:

- Take photographs for building passes, and store the images electronically alongside other data that would identify the child
- Photograph a small group of pupils in a lesson for use in the school prospectus
- Video parts of a PE lesson to put on the website to advertise the school's sports facilities to prospective parents
- Take photos of students to be put up in classroom displays
- Hire a photographer to take photographs of the whole school during an awards ceremony for a local newspaper
- Take photographs or videos of individuals, or groups of students, for any other promotional purposes

This is not an exhaustive list.

Age thresholds for parental consent

We can request consent from pupils themselves if they are aged **13 or over**. This is typically the age at which pupils are considered mature enough to be able to understand their own data and make decisions on how it is used. We will continue to seek parental consent regardless.

We must get parental consent for pupils **under 13**, or those not yet capable of understanding these points.

We will seek written parental consent to take photos of pupils **under 18** for promotional purposes.

School photographers must seek new consent to use the images differently. Although the photographer will officially own the photos they have taken, they will only be able to use these photos for the specific purposes that parents and/or pupils consented to at the time the photos were taken.

If the photographer wishes to subsequently use photos for purposes not initially consented to, they will need new parental and/or pupil consent. The school cannot give consent on the behalf of pupils/parents.

The Data Protection Officer retains a list of those parents/carers who have objected to or who have placed any restrictions or limitations on the use of images of their child. Staff should familiarise themselves with the names of the students on that list. It is a disciplinary offence to use, post or publish a photograph or video image of a student contrary to the instructions of their parent/carer.

When Consent is not needed

Where photos are required as part of curricular records, like in the Early Years Foundation Stage, or a video is an element of assessment in a course like drama or performing arts. Then the lawful basis of Public Task covers this area as the photos or videos are necessary to fulfil our function as a school

Photos and videos taken by parents, such as at sports days or school performances, are counted as being taken for 'personal use' and are therefore not covered by the GDPR. In this situation though, we ask parents not to share or publish images on social media or elsewhere online, for safeguarding reasons

This is based on ICO guidance on [taking photographs in schools](#). It refers to the Data Protection Act 1998 and is still relevant under GDPR

Monitoring

We reserve 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 use of such resources and systems.

Breach of this policy

Breach of this policy may result in disciplinary action up to and including dismissal. Any member of staff suspected of committing a breach of this policy will be required to co-operate with our investigation, which may involve handing over relevant passwords and login details.

You may be required to remove any social media content that we consider to constitute a breach of this policy. Failure to comply with such a request may in itself result in disciplinary action.

Breach of this policy by a student will be investigated by the Senior Leadership Team and could result in the exclusion of the pupil breaking the policy.

Appendix 1

Managing your personal use of Social Media:

- “Nothing” on social media is truly private
- Social media can blur the lines between your professional and private life. Don't use the school logo and/or branding on personal accounts
- Check your settings regularly and test your privacy
- Keep an eye on your digital footprint
- Keep your personal information private
- Regularly review your connections – keep them to those you want to be connected to
- When posting online consider; Scale, Audience and Permanency of what you post
- If you want to criticise, do it politely.
- Take control of your images – do you want to be tagged in an image? What would children or parents say about you if they could see your images?
- Know how to report a problem

Managing school social media accounts

The Do's

- Check with a senior leader before publishing content that may have controversial implications for the school
- Use a disclaimer when expressing personal views
- Make it clear who is posting content
- Use an appropriate and professional tone
- Be respectful to all parties
- Ensure you have permission to 'share' other peoples' materials and acknowledge the author
- Express opinions but do so in a balanced and measured manner
- Think before responding to comments and, when in doubt, get a second opinion
- Seek advice and report any mistakes using the school's reporting process
- Consider turning off tagging people in images where possible

The Don'ts

- Don't make comments, post content or link to materials that will bring the school into disrepute
- Don't publish confidential or commercially sensitive material
- Don't breach copyright, data protection or other relevant legislation
- Consider the appropriateness of content for any audience of school accounts, and don't link to, embed or add potentially inappropriate content
- Don't post derogatory, defamatory, offensive, harassing or discriminatory content
- Don't use social media to air internal grievances