The Oak Tree Federation



Social Media Policy

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1 INTRODUCTION

1.1 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 encyclopaedias such as *Wikipedia*.

1.2 While recognising the benefits of these media for new opportunities for communication, this policy sets out the principles that Laughton Community Primary School and Firle Church of England School staff and contractors are expected to follow when using social media.

1.3 It is crucial that pupils, parents and the public at large have confidence in the school's decisions and services. The principles set out in this policy are designed to ensure that staff members use social media responsibly so that confidentiality of pupils and other staff and the reputation of the school and East Sussex County Council are safeguarded.

1.4 Staff members must be conscious at all times of the need to keep their personal and professional lives separate.

2 SCOPE

2.1 This policy applies to The Oak Tree Federation governing body, all teaching and other staff, whether employed by the County Council or employed directly by the school, external contractors providing services on behalf of the school or the County Council, teacher trainees and other trainees, volunteers and other individuals who work for or provide services on behalf of the school. These individuals are collectively referred to as 'staff members' in this policy.

2.2 This policy covers personal use of social media as well as the use of social media for official school purposes, including sites hosted and maintained on behalf of the school (see sections 5, 6, 7 and Appendices A and B).

2.3 This policy applies to personal webspace such as social networking sites (for example *Facebook*, *MySpace*), blogs, mircoblogs such as *Twitter*, chatrooms, forums, podcasts, open access online encyclopaedias such as *Wikipedia,* social bookmarking sites such as *del.icio.us* and content sharing sites such as *flickr* 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.

3 LEGAL FRAMEWORK

3.1 The Oak Tree Federation is committed to ensuring that all staff members provide confidential services that meet the highest standards. All individuals working on behalf of the schools 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 1998.

3.2 Confidential information includes, but is not limited to:

- Person-identifiable information, e.g. pupil and employee records protected by the Data Protection Act 2018
- Information divulged in the expectation of confidentiality
- School or County Council 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.

3.3 Staff members 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.

3.4 The Oak Tree Federation and the County Council could be held vicariously responsible for acts of their employees in the course of their employment. For example, staff members 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 Oak Tree Federation or the County Council liable to the injured party.

4 RELATED POLICIES

4.1 This policy should be read in conjunction with the following school and County Council policies:

- East Sussex County Council Code of Conduct for Employees

5 PRINCIPLES – *BE PROFESSIONAL, RESPONSIBLE AND RESPECTFUL*

5.1 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 County Council and your personal interests.

5.2 You must not engage in activities involving social media which might bring The Oak Tree Federation or the County Council into disrepute.

5.3 You must not represent your personal views as those of The Oak Tree Federation or the County Council on any social medium.

5.4 You must not discuss personal information about pupils, The Oak Tree Federation or County Council staff and other professionals you interact with as part of your job on social media.

5.5 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, The Oak Tree Federation or the County Council.

5.6 You must be accurate, fair and transparent when creating or altering online sources of information on behalf of The Oak Tree Federation or the County Council.

6 PERSONAL USE OF SOCIAL MEDIA

6.1 Staff members must not identify themselves as employees of The Oak Tree Federation Schools or County Council or service providers for the school or County Council in their personal webspace. This is to prevent information on these sites from being linked with the school and the County Council and to safeguard the privacy of staff members, particularly those involved in providing sensitive frontline services.

6.2.1 Staff members must not have contact through any personal social medium with any pupil, whether from The Oak Tree Federation or any other school, unless the pupils are family members.

6.2.2 The Oak Tree Federation does not expect staff members to discontinue contact with their family members via personal social media once the school starts providing services for them. However, any information staff members 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.

6.3 Staff members 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.

6.4 If staff members 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 school and through official school sites created according to the requirements specified in section 7 and Appendix A.

6.5 Staff members 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 school site.

6.5.1 On leaving The Oak Tree Federation School's service, staff members must not contact The Oak Tree Federation Schools pupils by means of personal social media sites. Similarly, staff members must not contact pupils from their former schools by means of personal social media.

6.8 Information staff members have access to as part of their employment, including personal information about pupils and their family members, colleagues, County

Council staff and other parties and school or County Council corporate information must not be discussed on their personal webspace.

6.9 Photographs, videos or any other types of image of pupils and their families or images depicting staff members wearing school or County Council uniforms or clothing with school or County Council logos or images identifying sensitive school or County Council premises (eg care homes, secure units) must not be published on personal webspace.

6.10 School or County Council email addresses and other official contact details must not be used for setting up personal social media accounts or to communicate through such media.

6.11 Staff members must not edit open access online encyclopaedias such as *Wikipedia* in a personal capacity at work. This is because the source of the correction will be recorded as the employer's IP address and the intervention will, therefore, appear as if it comes from the employer itself.

6.12 The Oak Tree Federation Schools or County Council corporate, service or team logos or brands must not be used or published on personal webspace.

6.13.1 The Oak Tree Federation only permits limited personal use of social media while at work. Access to social media sites for personal reasons is not allowed between 8:45am and 4.00 pm. There is a daily quota of 30 minutes to access these sites outside these hours. However, staff members are expected to devote their contracted hours of work to their professional duties and, in practice, personal use of the internet should not be on the school's time.

6.14 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 or it might be just too embarrassing if too much personal information is known in the work place.

6.15 Staff members 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 members 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.

7 USING SOCIAL MEDIA ON BEHALF OF THE OAK TREE FEDERATION SCHOOLS

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

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

7.3 Official school 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.

7.4 Staff members 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.

8 MONITORING OF INTERNET USE

8.1 The Oak Tree Federation Schools monitor usage of internet and email services without prior notification or authorisation from users.

8.2 Users of The Oak Tree Federation Schools email and internet services should have no expectation of privacy in anything they create, store, send or receive using the school's ICT system.

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 Oak Tree Federation Schools or County Council Disciplinary Policy and Procedure.

9.2 A breach of this policy leading to breaches of confidentiality, or defamation or damage to the reputation of The Oak Tree Federation or the County Council or any illegal acts or acts that render The Oak Tree Federation or the County Council liable to third parties may result in disciplinary action or dismissal.

9.4 Contracted providers of The Oak Tree Federation Schools or County Council services must inform the relevant school or County Council officer 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 school and the County Council. Any action against breaches should be according to contractors' internal disciplinary procedures.

APPENDIX A

Requirements for creating social media sites on behalf of The Oak Tree Federation Schools

A.1 CREATION OF SITES

A.1.1 Staff members 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 Oak Tree Federation Schools.

A.1.2 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.

A.1.3 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 school's Executive headteacher or, in her absence, the Head of Schools

A.1.4 Staff members 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.

A.1.5 The Executive headteacher of relevant managers must take overall responsibility to ensure that enough resources are provided to keep the site refreshed and relevant. It is important that enough staff members are trained and are able to maintain and moderate a site in case of staff absences or turnover.

A.1.6 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 school's brand and image.

A.1.7 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.

A.2 CHILDREN AND YOUNG PEOPLE

A.2.1 When creating social media sites for children and young people and communicating with them using such sites, staff members must at all times be conscious of their responsibilities; staff must always act in the best interests of children and young people.

A.2.2 When creating sites for children and young people, staff members 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.

A.2.3 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.

A.2.4 Staff members must ensure that the sites they create or contribute to for work purposes conform to the *Good Practice Guidance for the Providers of Social Networking and Other User Interactive Services* (Home Office Task Force on Child Protection on the Internet, 2008)

A.2.5 Staff members 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 members must also consider the ramifications and possibilities of children under the minimum age gaining access to the site.

A.2.6 Care must be taken to ensure that content is suitable for the target age group and contributors or 'friends' to the site are vetted.

A.2.7 Careful thought must be given to the profile of young people when considering creating sites for them. For example, the internet may not be the best medium to communicate with vulnerable young people (or indeed any age group) receiving confidential and sensitive services from the school or the County Council. It may not be possible to maintain confidentiality, particularly on third-party-hosted sites such as social networking sites, where privacy settings may not be strong enough to prevent breaches of confidentiality, however inadvertent. If in doubt, you must seek advice from your Communications Manager (or appropriate manager).

A.3 APPROVAL FOR CREATION OF OR PARTICIPATION IN WEBSPACE

A.3.1 The Oak Tree Federation Schools social media sites can be created only by or on behalf of the school. Site administrators and moderators must be The Oak Tree Federation Schools employees or other authorised people.

A.3.2 Approval for creation of sites for work purposes, whether hosted by the school or hosted by a third party such as a social networking site, must be obtained from the Executive headteacher.

A.3.3 Approval for participating, on behalf of The Oak Tree Federation Schools on sites created by third parties must be obtained from the Executive headteacher.

A.3.4 Content contributed to own or third-party hosted sites must be discussed with and approved by the Executive headteacher

A.3.5 The school's Executive headteacher must be consulted about the purpose of the proposed site and its content. In addition, the Executive headteacher's approval must be obtained for the use of the school logo and brand.

A.3.6 Staff must complete the Social Media Site Creation Approval Form (Appendix B) and forward it to the school's headteacher before site creation.

A.3.7 Be aware that the content or site may attract media attention. All media enquiries must be forwarded to the head teacher immediately. Staff members must not communicate with the media without the advice or approval of the Executive headteacher.

A.4 CONTENT OF WEBSPACE

A.4.1 The Oak Tree Federation Schools hosted sites must have clearly expressed and publicised Terms of Use and House Rules. Third-party hosted sites used for work purposes must have Terms of Use and House Rules that conform to the school or County Council standards of professional conduct and service.

A.4.2 Staff members must not disclose information, make commitments or engage in activities on behalf of The Oak Tree Federation Schools or the County Council without authorisation.

A.4.3 Information provided must be worthwhile and accurate; remember what is published on the site will reflect on the school's or County Council's image, reputation and services.

A.4.4 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.

A.4.5 Staff members must respect their audience and be sensitive in the tone of language used and when discussing topics that others may find controversial or objectionable.

A.4.6 Permission must be sought from the relevant people before citing or referencing their work or referencing service providers, partners or other agencies.

A.4.7 The Oak Tree Federation Schools -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.

A.4.8 Staff members participating in The Oak Tree Federation Schools hosted or other approved sites must identify who they are. They must disclose their positions within the school on these sites.

A.4.9 Staff members must never give out their personal information such as home contact details or home email addresses on these sites.

A.4.10 Personal opinions should not be expressed on official sites.

A.5 CONTRIBUTORS AND MODERATION OF CONTENT

A.5.1 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.

A.5.2 Sites created for and contributed to by pupils must have the strongest privacy settings to prevent breaches of confidentiality. Pupils and other participants in sites must not be able to be identified.

A.5.3 The content and postings in The Oak Tree Federation Schools hosted sites must be moderated. Moderation is the responsibility of the team that sets up or initiates the site.

A.5.4 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 and House Rules. It is important that there are

enough approved moderators to provide cover during leave and absences so that the site continues to be moderated.

A.5.5 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.

A.5.6 Behaviour likely to cause extreme offence, for example racist or homophobic insults, or likely to put a young person or adult at risk of harm must never be tolerated. Such comments must never be posted or removed immediately and appropriate authorities, for example the Police or Child Exploitation and Online Protection Centre (CEOP), informed in the case of illegal content or behaviour.

A.5.7 Individuals wishing to be 'friends' on a site must be checked carefully before they are approved. Usually, only people known to the school may be friends of the site and, in the case of adults, they should also have undergone appropriate security checks. Their comments must be reviewed regularly and any that do not comply with the House Rules must not be posted or removed.

A.5.8 Any proposal to use social media to advertise for contributors to sites must be approved by the school's Executive headteacher.

A.5.9 Approval must also be obtained from the school's Executive headteacher to make an external organisation a 'friend' of the site.

APPENDIX B

The Oak Tree Federation

Social Media Site Creation Approval Form

Use of social media on behalf of The Oak Tree Federation Schools must be approved prior to setting up sites.

Please complete this form and forward it to the school's Executive headteacher

TEAM DETAILS	
Department	
Name of author of site	
Author's line manager	
PURPOSE OF SETTING UP SOCIAL MEDIA SITE **(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 proposed content of the site?	

PROPOSED AUDIENCE OF THE SITE
Please tick all that apply.

- ☐ Pupils of The Oak Tree Federation Schools age 7 - 11
- ☐ The Oak Tree Federation Schools staff
- ☐ Pupils' family members
- ☐ Pupils from other schools in the cluster group
- ☐ External organisations
- ☐ Members of the public
- ☐ Others; please provide details

PROPOSED CONTRIBUTORS TO THE SITE
Please tick all that apply.

- ☐ Pupils of The Oak Tree Federation Schools age 7 - 11
- ☐ The Oak Tree Federation Schools staff
- ☐ Pupils' family members
- ☐ Pupils from other schools in the cluster group
- ☐ External organisations
- ☐ Members of the public
- ☐ Others; please provide details

ADMINSTRATION OF THE SITE	
Names of administrators (the site must have at least 2 approved administrators)	
Names of moderators (the site must have at least 2 approved moderators)	
Who will vet external contributors?	
Who will host the site?	☐ Pupils of The Oak Tree Federation Schools ☐ Third party; please give host name
Proposed date of going live	
Proposed date for site closure	
How do you propose to advertise for external contributors?	
If contributors include children or adults with learning disabilities how do you propose to inform and obtain consent of parents or responsible adults?	
What security measures will you take to prevent unwanted or unsuitable individuals from contributing or becoming 'friends' of the site?	

APPROVAL

(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).

Executive Headteacher	Name	
	Signature	
	Date	