

This policy and procedure has been produced by One Education's HR and People service.

Document Control	
Title	Social Media Policy and Guidance
Date	September 2021
Supersedes	Social Media section in the 2019 Code of Conduct Policy
Amendments	To take into account advice issued by the Department for Education (DfE) including Keeping Children Safe in Education (September 2019)
Related Policies/Guidance	Safeguarding Policy, Recruitment Policy, ICT and IT Acceptable Use Policies, Code of Conduct, Disciplinary Policy, Bullying and Harassment Policy, Data Protection Policy and Equality Policy, Whistle Blowing Policy. All staff have an Every.education log in to access all CLIC Trust and School Policies.
Review	Every 2 years
Author	HR and People, One Education Ltd
Date adopted	Awaiting Sign off by the Board of Trustees

Equality Statement: - Under the public sector equality duty (PSED), all schools/academies must have due regard to the need to eliminate discrimination, harassment and victimisation and any other conduct prohibited by the Equality Act 2010; to advance equality of opportunity between those who share a relevant protected characteristic and those who do not share it and to foster good relations across all protected characteristics. This means schools/academies must take into account equality considerations when policies are being developed, adopted and implemented. The One Education HR and People team regularly reviews all policies and procedures which are recommended to schools/academies to ensure compliance with education and employment legislation including the Equality Act 2010. Consultation with schools/academies is an important part of this review process. Headteachers, Principals and Governing Bodies are asked to contact the HR and People team via the HROne Helpline if they believe there are any negative equality impacts in their school/academy in relation to the application of this policy/procedure. Schools should also contact HR and People team if they need to access this policy in a different format.

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1 Introduction

- 1.1. This policy and guidance document recognises that new technologies are an integral and growing part of everyday life and that they make an important contribution to teaching and learning opportunities in school. This policy also recognises that in the light of the rapid evolution of social networking technologies, the Trust requires a robust policy framework so that all adults working in the Trust are aware of the Trust's expectations and the rules they are expected to follow when using social media both inside and outside of the school environment.
- 1.2. This policy is designed to ensure that all adults use social media responsibly in order to safeguard the schools in the Trust, pupils, staff, Governors and members of the wider school community. It is crucial that children are safeguarded and that parents, pupils and the public at large have confidence in the school's decisions and services. Responsible use of social media will ensure that the confidentiality and privacy of pupils and members of staff are maintained and that the reputation and integrity of the school and Trust are protected.
- 1.3. This policy should be read in conjunction with other relevant Trust and School policies in particular, the Trust's ***Safeguarding Policy, Recruitment Policy, ICT and IT Acceptable Use Policies, Code of Conduct, Disciplinary Policy, Bullying and Harassment Policy, Data Protection Policy and Equality Policy.***
- 1.4. This policy takes into account the provisions of the DfE's statutory guidance Keeping Children Safe in Education 2019, the non-statutory guidance on Safer Working Practices with Children and Vulnerable Young Adults (May 2019), the non-statutory guidance on the Prevent Duty (April 2019), and the Briefing Note to schools on "How

Social Media is used to encourage travel to Syria and Iraq". It also takes into account the Government's statutory guidance issued under s29 of the Counter -Terrorism and Security Act 2015 (June 2015).

2 Scope and definitions

- 2.1 This policy applies to all employees in the Trust and those who provide services for or on behalf of the Trust and its schools. This includes trainee teachers and any other trainees, apprentices, self-employed staff, agency staff, external consultants and volunteers. This policy also applies to the Trust's governors and trustees.
- 2.2 This policy covers the **personal** use of social media as well as the use of social media for **school purposes** (whether official or not), including the use of websites hosted and maintained on behalf of the schools. It covers communication through web based and telecommunication interactions, and includes the use of computers, tablets, phones, digital cameras, videos, web-cams and other hand-held devices.
- 2.3 This policy covers the use of social media as defined in paragraph 3 of this policy and also personal blogs and any posts made on other people's blogs and to all on line forums and notice boards. The guidance, rules and principles set out in this policy must be followed irrespective of the social media platform or medium.

2.4 In this policy, the following definitions apply:

- **social media** - means any type of interactive online media that allows parties to communicate instantly with each other or to share data in a public forum. Social media includes but is not limited to, online social forums such as Twitter, Facebook and LinkedIn and also covers blogs, chat rooms, forums, podcasts and video-image-sharing websites such as YouTube, Flickr, Reddit, Instagram, Snapchat, WhatsApp, Pinterest and Tumblr. The internet is a fast-moving technology and it is impossible to cover all examples of emerging social media in this policy.
- **adults/adults working in the Trust** - means all members of staff and those who work on a self-employed basis. It also includes trainee teachers, other trainees and apprentices, volunteers, agency staff, external consultants and school governors/trustees.
- **information** - means all types of information including but not limited to, facts, data, comments, audio, video, photographs, images, texts, e-mails, instant messages and any other form of online interaction.
- **inappropriate information** - means information as defined above which any reasonable person would consider to be unsuitable or that brings into question the professional integrity of the adult, given their position within the school.
- **the school and the wider school community** – means the school, its pupils, all adults working in school (as defined above) parents/carers of pupils, former pupils, *where applicable and* any other person or body directly or indirectly connected with the ***schools and the Trust***.

3 Key Principles

- 3.1 Safeguarding and promoting the welfare of children is everyone's responsibility.
- 3.2 Adults have an important role to play in equipping the school's pupils to stay safe online, both in school and outside of school. Adults therefore need to be aware of the risks associated with the use of social media and in particular about the provision and sharing of information in the social media arena.
- 3.3 Adults must not, whether deliberately or inadvertently and whether in their working time or in their personal time, provide, publish or share inappropriate information on or via any social media platform or medium about themselves, the school and the wider school community.
- 3.4 Adults are accountable for and must take responsibility for all information published or shared by them on social media websites and for any views expressed by them on any such sites, whether in their working time or in their personal time and which may come into the public domain. Adults should be aware that their use of social media and any information published by them may be monitored by the Headteacher, members of the senior leadership team and/or members of the Trust's Board and the schools'

Governing Body. By using the school's IT resources and facilities adults give the school consent to monitor their activities.

3.5 All adults who provide, publish or share information which causes harm or distress or which has the potential to cause harm or distress or to cause reputational damage to the school, Trust and the wider school community will be dealt with as appropriate by the Headteacher in accordance with the relevant school policy/procedure. This may include action being taken under the school's Safeguarding Policy (which could lead to a referral to the Local Authority and/or the police) and it could also lead to disciplinary action being taken under the Trust's Disciplinary Policy which, in serious cases may lead to dismissal without notice.

3.6 The principles which underpin this policy are:

- adults are responsible for their own actions and behaviour and must avoid any conduct which would lead any reasonable person to question their motivation and intentions;
- adults must be conscious at all times of the need to keep their personal and professional lives separate; adults must not put themselves in a position where there is a conflict between their work and personal interests;
- adults must work and be seen to work, in an open and transparent way;
- adults must continually monitor and review their own practices in terms of the continually evolving world of social networking and social media and ensure that they consistently follow the rules, principles and guidance contained in this policy.

4 Rules and Responsibilities

4.1 The Governing Body, Headteacher and Senior Leaders will:

- ensure that all adults working in the Trust and its schools are familiar with this policy and any related policies;
- take all reasonable steps to enable adults working with children to work safely and responsibly and to support safer working practice in general with regard to the use of the internet and other communication technologies;
- ensure appropriate filters and monitoring systems are in place;
- take all reasonable steps to assist adults to monitor their own practices and standards with regard to the use of the internet and other communication technologies;
- set clear rules in relation to the expected standards of behaviour relevant to social networking for educational, personal, or recreational use;
- give a clear message that unlawful or unsafe behaviour or practice is unacceptable and that where appropriate, disciplinary, legal and/or other action will be taken;

- ensure that all concerns raised in relation to the accessing of social media or social networking sites are investigated promptly and appropriately;
- ensure procedures are in place to handle allegations against any adult;
- take all reasonable steps to minimise the risk of misplaced or malicious allegations being made against all adults working in the Trust and its schools;
- take all reasonable steps to prevent adults working in school abusing or misusing their position of trust.

4.2 Adults working in the Trust and its schools must:

- ensure they are familiar with the contents of this policy;
- adhere to and apply the rules, guidance and principles in this policy in all aspects of their work and in their personal time;
- act in accordance with their duties and responsibilities under this policy and the statutory/ non-statutory advice and guidance referred to;
- raise any concerns or queries in connection with this policy with the Headteacher;
- notify the headteacher of any inappropriate posts on social media forums by a colleague, parent or pupil which has the potential to bring the school and Trust into disrepute;
- attend any training provided or facilitated by or the school in relation to the use of the internet or any other communication technologies;
- never, in any circumstances, abuse or misuse their position of trust.

5 Safer social networking practice

- 5.1 Adults must be aware of the risks and dangers of revealing personal information on social networking sites. Disclosing personal information on social networking sites may compromise an adult's personal safety and security and it also increases the potential for pupils, their families or friends having access to adults outside of the school environment. Personal information as defined by the General Data Protection Regulations (2018) is considered as any information about an individual that would identify them, and includes information such as a home address, home and mobile telephone numbers and details relating to place of work.
- 5.2 Adults, particularly those new to the school setting, must review their social networking sites when they join the Trust and should ensure that they have the appropriate privacy settings in place to ensure that information available publicly about them is appropriate and accurate. This should include reviewing any photographs or images that may cause embarrassment to them and/or to the school and the wider school community.
- 5.3 It is the adult's responsibility to ensure they are familiar with the Trust's IT policies including the school's Acceptable Use policy and to seek school guidance should they be unsure about privacy settings, on-line activity and/or information sharing on their personal social media accounts.

- 5.4 It is the adult's responsibility to ensure all their social media accounts are reviewed regularly and that the appropriate privacy settings remain in place to ensure their information is not open to the public domain.

6 Responsibilities when using social media

- 6.1 Adults must take responsibility for their personal telephones and any personal electronic devices and must keep their personal telephone numbers, login details, passwords, pin details and personal email addresses private and secure.
- 6.2 Where there is a need to contact pupils or parents the school's email address and/or telephone should be used. Adults must not use their personal telephones or email accounts for these purposes.
- 6.3 Adults must understand who is allowed to view the content on their social media pages of any websites they use and how to restrict access to certain groups of people. Appropriate privacy settings are vital.
- 6.4 Adults must not request, or respond to a request for any personal information from or about a pupil at the school.
- 6.5 Adults must not engage in conversations about pupils with their parents or carers or with any other person by any form of social networking or social media unless they have the express permission of the Headteacher to do so.
- 6.6 Adults must only use the official school website for communicating with pupils or to enable pupils to communicate with each other using authorised and previously agreed protocols. Any communications with pupils (including by email, telephone or text communications) outside of agreed protocols will be treated as a very serious conduct matter and may lead to disciplinary action being taken under the Trust's Disciplinary Policy which, in serious cases may lead to dismissal without notice. It may also lead to a criminal investigation.
- 6.7 Adults must never connect to or have any contact with a pupil at the school on any social networking site. The only exceptions to this rule are where the pupil is a member of the adult's family provided agreed protocols are followed and the family relationship has been identified to and acknowledged by the Headteacher.
- 6.8 In cases where a pupil is a family member, adults must be aware that if the family relationship has not been identified and acknowledged by the school, contact through social networking or social media will be a breach of this policy (and therefore will be treated as a serious conduct issue). Adults must be clear that such contact could also be misconstrued as being part of a grooming process. Since family relationships can be easily identified and recognised, adults must notify the Headteacher of any family

relationship with a pupil so that the position can be formally acknowledged, discussed and recorded.

- 6.9 Adults must never use or access the social networking sites or social networking pages of pupils at the school unless the pupil is a member of the adult's family and the family relationship has been acknowledged and discussed in advance with the Headteacher.
- 6.10 Adults must be cautious about any form of social networking contact with former pupils, parents/carers of pupils, particularly where siblings or other relatives continue to attend the school or may attend the school in future.
- 6.11 Adults must be mindful at all times of the boundaries between their work and personal life in accordance with the Key Principles detailed in this policy, and in the Guidance for Safer Working Practices for Adults who work with Children and Young People in Education 2019.
- 6.12 Adults must also be cautious when inviting work colleagues to be friends on social networking sites. Social networking sites can blur the boundaries between work and personal lives and it may be difficult to maintain professional relationships.
- 6.13 Adults must not use social media and the internet in any way to attack, insult, criticise, abuse or defame pupils, family members of pupils, colleagues, the Headteacher, governors, the school in general and the wider school community. Adults must always show respect to others when using social media.
- 6.14 Adults must never post derogatory remarks or offensive comments on-line or engage in on-line activities which may bring them or the school, the Trust and the wider school community into disrepute or which could be interpreted as reflecting negatively on their professionalism.
- 6.15 Adults must not represent their personal views on any social media forum as being in any way linked to the school or the Trust or being the views of the school or the Trust
- 6.16 Photographs, videos or any other types of images of pupils and their families or images depicting staff members or where the school can be identified must not be published on social media.
- 6.17 Where social networking and other web-based sites have fields in the user profile relating to job title or information, all adults should not put any information onto the site which could identify the school or their role at the school (particularly teachers and teaching assistants where pupils maybe identifiable). In some circumstances the provision of such information could damage the reputation of the school and/or the relevant profession.
- 6.18 Teachers must at all times be mindful of the Teachers' Standards applicable to their profession and act in accordance with those standards. The Teacher Standards make clear that a teacher must uphold public trust in the profession and maintain high

standards of ethics and behaviour both within and outside of school, by ensuring that personal beliefs are not expressed in ways which exploit pupils' vulnerability or might lead them to break the law. Any breach of the Teacher Standards will be considered a matter of misconduct and may lead to disciplinary action being taken under the Trust's Disciplinary Policy which, in serious cases may lead to dismissal without notice.

- 6.19 Adults must devote the whole of their time and attention to their duties during working hours. Personal use of the internet is not permitted during working hours and it is strongly recommended that 3G/4G access is switched off during working hours. Exceptions to this must be agreed by a member of the school leadership team (SLT) and reviewed daily. Any breach of this provision will be regarded as a conduct matter and disciplinary action taken as appropriate.

Mobile phones and social media sites can be use during school hours in the staff room during the lunchtime period.

- 6.20 Confidentiality issues must be considered at all times in relation to social networking and the use of social media. All employees are bound by a common law duty of fidelity. There are also other laws which protect the school's and Trust's confidential information which adults working in school and Trust may have access to during the course of their work. Confidential information includes but is not limited to person identifiable information, for example pupil and employee records, information protected by the Data Protection Act 2018 and the General Data Protection Regulations (GDPR) 2018 and information provided by the school in the expectation of confidence including information about the school, pupils and the families of pupils, the school's and Trust's staffing or business plans, and any other commercially or politically sensitive information.

- 6.21 Adults must ensure that they do not provide, publish share or otherwise disclose any confidential information about themselves or about the school and the wider school community in breach of their duty of fidelity or in breach of other laws relating to confidentiality and privacy including the Human Rights Act 1998, the Data Protection Act 2018 and the General Data Protection Regulations (GDPR) 2018.

- 6.22 Adults must ensure they understand their obligations under the Equality Act 2010 and under the Trust's Equality Policy. Breaches of the Equality Act 2010 or the Trust's Equality Policy through the use of social networking or social media will be considered a serious conduct matter which may lead to disciplinary action being taken under the school's Disciplinary Policy which, in serious cases may lead to dismissal without notice. Adults should also be aware that they could be held personally liable for their own discriminatory actions under the Equality Act 2010. If, for example an adult were to harass a co-worker online or engage in a discriminatory act in relation to one of the protected characteristics under the Equality Act 2010, this may result in legal action being taken against them.

- 6.23 Adults should also be aware that there are other laws relating to libel, defamation, harassment and copyright which may apply to information, published or posted by them on social media and which could lead to legal action being taken against them.

In addition, this will be considered as a serious conduct matter and may lead to disciplinary action being taken in line with the school's Disciplinary Policy, which may lead to dismissal without notice.

- 6.24 All concerns about communications, social contact or social media/social networking issues must be raised with the Headteacher immediately.

7 Access to inappropriate images

- 7.1 There are no circumstances which justify adults possessing or sharing indecent images of children whether in working time or in an adult's personal time. Adults who access and/or possess links to such material or websites will be viewed as a significant and potential threat of harm to children or vulnerable adults. Appropriate action will be taken against the adult concerned in these circumstances which, for the avoidance of doubt, could include action under the school's Safeguarding Policy (which could lead to police and Local Authority involvement) and disciplinary action under the Trust's Disciplinary Policy (which could result in dismissal without notice on the grounds of gross misconduct). Where indecent images of children are found by any adult, the Headteacher must be informed immediately.
- 7.2 Adults must not use equipment belonging to the school or Trust to access pornography or adult or explicit material of any kind. Personal equipment containing these images or links to them must not be brought into school. If any adult uses school or Trust equipment or personal equipment in school to access pornography or links to it, this will raise serious concerns about the suitability of the adult concerned to work with children. This will lead to an investigation under the Trust's Disciplinary Policy and may lead to disciplinary action and any other action considered appropriate in the circumstances.
- 7.3 Adults must ensure that pupils are not exposed to any inappropriate information, images or web links. The Trust and its Schools will endeavour to ensure that internet equipment used by pupils has the appropriate controls with regards to access. Any concerns or potential issues identified by any adult must be reported immediately to the Headteacher.
- 7.4 Where any form of unsuitable material is found, which may not be illegal but which could or does raise concerns about an adult working in school, the Headteacher should be informed immediately. The Headteacher may take HR or legal advice on the appropriate way forward.

8 School social media websites

- 8.1 There must be a strong pedagogical or business reason for creating an official school social media/social networking website including professional WhatsApp groups or other social networking groups, and websites to communicate with pupils and parents/carers. Adults must not create websites or groups for reasons which could expose the school and Trust to unwelcome publicity or which could cause reputational

damage to the school and Trust. The matter must have been discussed, authorised and agreed with the Headteacher in advance of any school website (or the Executive Head in the case of the Trust website) including social media websites and social networking groups, being created. The use of these forums must be reviewed and maintained regularly to ensure contact is in accordance with the agreed protocol.

- 8.2 Adults must at all times act in the best interests of the school and the pupils when creating, participating in or contributing to the content of any website created on behalf of the school or Trust.

9 Cyberbullying and Trolling

- 9.1 **“Cyberbullying”** can be defined as “the use of modern communication technologies to embarrass, humiliate, threaten or intimidate an individual in the attempt to gain power and control over them.’
- 9.2 If cyberbullying takes place, adults should keep records of the abuse, texts, e-mails, website or instant messages and should not delete the said texts, e-mails or messages. Adults are advised to take screen prints or ‘screenshots’ of messages or web pages and to be careful to record the time, date and location of the site.
- 9.3 **Trolling”** can be defined as “circumstances where a person sows’ discord on-line starting arguments or upsetting people by posting inflammatory, insulting or threatening messages with the deliberate intent of provoking an emotional response;’
- 9.4 If trolling occurs, adults are advised to take screen prints or ‘screenshots’ of messages and should not delete any evidence of trolling.
- 9.5 Adults must report all incidents of cyberbullying and/or trolling to the Headteacher. Any such incidents will be taken very seriously. Adults who have been subjected to cyberbullying or trolling may wish to seek the support of their trade union or professional association representative.

10 The Prevent Duty

- 10.1 Schools have a vital role to play in equipping children and young people to stay safe online, both in and outside school and also in protecting pupils from the risks of extremism and radicalisation. Section 26 of the Counter-Terrorism and Security Act 2015 places a duty on specified authorities, (including schools) in the exercise of their functions, to have due regard to the need to prevent people from being drawn into terrorism (the Prevent Duty).
- 10.2 Terrorist organisations, such as ISIS, are attempting to radicalise and recruit young people through extensive use of social media and the internet. As with any other online risks of harm, every adult in the Trust and its schools (teachers and teaching assistants

in particular) must be aware of the risks posed by the online activity of extremist and terrorist groups.

- 10.3 The Government has issued statutory guidance in relation to the Prevent Duty (June 2015). In addition, to assist schools and to help recipients understand the implications of the duty, the DfE has also produced non-statutory advice (June 2015). Adults should familiarise themselves with the guidance and the advice, both of which are available in the school office/on the school website.
- 10.4 The statutory guidance makes clear the need for schools to ensure that children are safe from terrorist and extremist material when accessing the internet in schools. The school will ensure that suitable filtering is in place. Internet safety is integral to the school's ICT curriculum and the Trust will ensure it is embedded in the school curriculum. In addition to advice on internet safety provided by the school, further general advice and resources for schools on internet safety are available on the UK Safer Internet Centre website
- 10.5 Keeping children safe from risks posed by terrorist exploitation of social media should be approached by adults in school in the same way as safeguarding children from any other form of online abuse. The DfE has produced a briefing note aimed mainly at Headteachers, teachers and safeguarding leads in schools detailing how social media platforms are being used in particular to encourage travel to Syria and Iraq. All adults in school (teachers and teaching assistants in particular), should familiarise themselves with the contents of the briefing note and must ensure that if they have any concerns, the school's normal safeguarding procedures are followed. The Briefing Note is available in the school office/on the school website.
- 10.6 For the avoidance of doubt, if any adult working in school has a concern that a particular pupil or group of pupils is at risk of radicalisation or terrorist exploitation, through social media or otherwise, they must immediately contact the Headteacher and follow the school's normal safeguarding procedures, including discussing the matter with the school's designated safeguarding lead and where deemed necessary, with children's social care at the Local Authority and the local police.

11 Breaches of Policy and Other Issues

- 11.1 Any breach of this policy and the duties, responsibilities, professional standards and legal obligations referred to will be regarded as a serious matter and action including disciplinary action in appropriate circumstances will be taken by the Headteacher (or the Governing Body). In serious cases involving employees this may lead to dismissal without notice on the grounds of gross misconduct.
- 11.2 Adults must be aware that any breach of this policy involving a breach of the laws, professional codes or other statutory provisions referred to in this policy may result in legal or other action being taken against them by a body or person other than the Trust.