

Social Networking Policy

Ysgol Glan y Môr Pwllheli



Signed on behalf of the Chair of Governors: *D Paredur Williams*

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This policy has been based on a South West Grid for Learning (SWGfL) template and further developed, re-worded and adopted for the consideration of Gwynedd schools with support from the Legal Department

Introduced November 2017

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1. Background

Social media (e.g. Facebook, Twitter, LinkedIn) is a broad term for any kind of online platform which enables people to directly interact with each other.

The school recognises the numerous benefits and opportunities which a social media presence offers. Staff, parents/carers and pupils/students are actively encouraged to find creative ways to use social media. However, there are some risks associated with social media use, especially around the issues of safeguarding, bullying and personal reputation. This policy aims to encourage the safe use of social media by the school, its staff, parents, carers and children.

1.1 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.

- 1.2 **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.
- 1.3 **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.
- 1.4 Personal communications which do not refer to or impact upon the school are outside the scope of this policy.
- 1.5 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.

2. Roles & Responsibilities

2.1 Management Team

- 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.
- Receive completed applications for Social Media accounts
- Approve account creation
- School Administrator

- Create the account following SLT approval
- Store account details, including passwords securely
- Be involved in monitoring and contributing to the account

2.2 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

3. Process for creating new accounts

The school community is encouraged to consider if a social media account will help them in their work, e.g. a local history Twitter account, or a “Friends of the school” Facebook page. Anyone wishing to create such an account must present a business case to the School Management Team (SMT) which covers the following points:-

- The aim of the account
- The intended audience
- How the account will be promoted
- Who will run the account (at least two staff members should be named)
- Will the account be open or private/closed

Following consideration by the SMT an application will be approved or rejected. In all cases, the SLT must be satisfied that anyone running a social media account on behalf of the school has read and understood this policy and received appropriate training. This also applies to anyone who is not directly employed by the school, including volunteers or parents.

4. Monitoring

School accounts must be monitored regularly and frequently. Any comments, queries or complaints made through those accounts must receive prompt attention in line with school expectations even if the response is only to acknowledge receipt. Regular monitoring and intervention is essential in case a situation arises where bullying or any other inappropriate behaviour arises on a school social media account.

5. 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 bring this to the immediate attention of a member of the SMT and only respond following advice.

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.

6. 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.

7. 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 bring this to the immediate attention of the SMT.

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.

8. 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)

9. Use of images

School use of images can be assumed to be acceptable, providing the following guidelines are strictly adhered to:

- Permission to use any photos or video recordings should be sought in line with the school's digital and video images policy. If anyone, for any reason, asks not to be filmed or photographed then their wishes should be respected.
- Under no circumstances should staff share or upload student pictures online other than via school owned social media accounts
- Staff should exercise their professional judgement about whether an image is appropriate to share on school social media accounts. Students should be appropriately dressed, not be

subject to ridicule and must not be on any school list of children whose images must not be published.

10. Personal use

10.1 Staff

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.

Where excessive personal use of social media in school is suspected, and considered to be interfering with relevant duties, disciplinary action may be taken.

The school permits reasonable and appropriate access to private social media sites. Staff, however, should not access social media sites or leave these running in the background during working time, for personal use, on any devices within their control.

10.2 Pupil/Students

Staff are not permitted to follow or engage with current 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

10.3 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 school website.

Parents/Carers are encouraged to comment or post appropriately about the school. In the event of any offensive or inappropriate comments being made, a member of the SMT will ask the parent/carer to remove the post and invite them to discuss the issues in person. If necessary, parents will be referred to the school's complaints procedures.

11. Monitoring posts about the school

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 process. (Appendix 4)

STAFF: 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;
- When setting up your profile online consider whether it is appropriate and prudent for you to include a photograph, or provide occupation, employer or work location details;
- Check your settings regularly and test your privacy;
- Keep an eye on your digital footprint;
- Do not under any circumstances accept friend requests from a person you believe could conflict with your employment;
- 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.

Be aware that other users may access your profile and if they find the information and/or images it contains offensive, make a complaint about you your employer.

You can take action if you find yourself the target of complaints or abuse on social networking sites. Most sites will include mechanisms to report abusive activity and provide support for users who are subject to abuse by others.

SCHOOL: Managing school social media accounts

The Do's:

- Check with a senior manager 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, and
- 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, and
- Don't use social media to air internal grievances.

Inappropriate Use of Social Media as regards school staff and pupils If directly related to the school.

The governing body need to ensure:

that they have adopted and up-dated several policies linked to 'Internet safety' and policies on 'Unsuitable behaviour towards

school staff' and 'Handling Complaints' to jointly refer to with the Social Networks policy

Disseminate all the policies to parents, staff and school governors

INAPPROPRIATE USE OF SOCIAL MEDIA - INTERNAL PROTOCOL FOR STAFF

This Protocol sets out the procedure the school must follow in the event of inappropriate or illegal comments / posts being made on social media in connection with the school. Furthermore, it contains a checklist for staff in relation to their personal and professional use of social media.

What constitutes inappropriate comments / posts? In accordance with the School Social Media Policy, inappropriate comments are those which are directly or indirectly related to the School which have the effect of negatively impacting the School, its staff, governors and /or pupils.

When inappropriate use is suspected or reports are made: When inappropriate use of social media is suspected or reports are made e.g. by parents, the following steps should be taken:

Step 1:

Obtain 'screen-shots' of the comments / posts, along with the date and time when they were made and URL address.

You can assure the person making the report that they will remain anonymous.

It is extremely important that no attempt is made to take revenge or comment / post in response to the incident, or contact the author of the comments at this stage.

Step 2:

Report the matter, along with a copy of the evidence (step 1) to the Head Teacher.

Step 3:

The Head Teacher must then decide the appropriate course of action depending on the nature of the comments / posts:

Police Involvement: the Head Teacher must inform the Police and await further instructions from them if the content of the post / comments is of an illegal nature (e.g. contains threats of assault or a racially motivated offence). The Head Teacher must also inform the Council's Health and Safety Unit if there are any concerns in relation to staff or pupil safety. The School may also wish to consider to use their rights to exclude the individual from School grounds (if this is appropriate in the circumstances).

Internal procedure: If Police action is not deemed necessary or if the Police advise, the matter should be dealt with internally by following the procedure set out below.

Internal Procedure

1. Contacting the author

The Head Teacher should invite the author of the comments to a meeting at the School in order to discuss the matter. This invitation can be made in person, by telephone or by letter (records should be kept of any communication which took place verbally). A template letter is attached to this Protocol at **Annex A**.

Where there are health and safety risks involved, the Head Teacher may decide to discuss the matter in writing with the author.

Where the comments / posts were made directly against the Head Teacher and it is felt that it would not be appropriate for the Head Teacher to attempt to resolve the matter, it should be dealt with by the Deputy Head Teacher, or if there is no such position within the School, the Chair of the Governing Body.

2. The Meeting

2.1 Preliminaries:

Before meeting the individual concerned, the Head Teacher is expected to gather all the evidence and cross-reference it against the School's policies, highlighting the concerns and underlying rationale.

A witness who is also a minute taker should attend the meeting.

2.2 During the meeting:

The Head Teacher is required to note the expectations regarding a successful meeting as well as how it is held from the outset.

It should be explained that inappropriate use of social networks can have a detrimental impact on the School as well as on the pupils' education, through not allowing the school to directly address any problems/concerns through the grievance procedure.

The point should be made that there is nothing wholly confidential when using Social Media as even private comments can be shared.

The individual should be made aware of the law, through quoting the following:

Section 1 Defamation Act 2013: An individual is guilty of an offence where he/she publishes a statement that causes, or is likely to cause, serious harm to the reputation of the Claimant.

Section 1 Malicious Communications Act 1988: An individual is guilty of an offence if he sends to another person: A letter, electronic communication or article of any description which conveys a message which is indecent, grossly offensive, a threat or information which is false and known or believed to be false by the sender...and causes distress or anxiety to the recipient.

Ask the individual to delete the comments following the meeting (a time-limit can be given in order to establish the individual's compliance as soon as possible).

Note (if relevant) that the member of staff affected will directly contact his/her union to receive their advice and support to consider taking further action (which include legal action) unless the comments are immediately deleted.

The individual should be invited to discuss any of his/her concerns regarding the School. The individual should receive a copy of the School's complaints procedure for further consideration.

2.3 Behaviour

If the individual does not comply with the expectation to courteously discuss the case, the Head Teacher is required to remind him that he is expected to behave courteously whilst on the school premises. If there is non-compliance, the Head Teacher is expected to bring the meeting to an end and ask the individual to leave. If the individual is unwilling to leave, the police should be summoned immediately.

2.4 After the meeting

Summarized minutes of the main points for discussion and what was agreed on as well as any expected action will be shared with the individual following the meeting.

3. The Letter

If it is decided, for health and safety reasons that it is not appropriate to invite the individual to the School for discussion, a letter should be sent instead.

The letter should contain the same information as would be given in a meeting. The letter should note the School's dissatisfaction with the incident, refer to the relevant background papers and invite the individual to delete the comments / posts within a certain time-limit. It is advised that the letter should be sent via Recorded Delivery to ensure that the letter is received and to avoid any dispute by the individual at a later point. A template letter is attached to this Protocol at Annex B.

4. Further Action

If the meeting was unsuccessful, or that the individual has failed to remove the comments / posts made within the time-limit given, the next option available is to report the comments to the website administrators. In order to do this, you will need the URL address, date(s) and time(s) of the comment(s) and refer to the websites' terms of use and specify which ones have been breached. This process may take a few weeks, depending on the website itself. It is suggested that the school uses its own account to report the matter, as opposed to using a staff members' personal account.

5. Legal Action

If all other options have been exhausted, and the comments continue to be a cause for concern for individual members of staff, the option of last resort would be to take legal action. Any legal measure would have to be taken by the staff member with a recognised union's support and guidance. Due to legal constraints, the Local Education Authority cannot take any legal action against other individuals on behalf of a member of staff. Any legal representation would have to be sought in a personal capacity. However, the LEA solicitor may be able to provide initial guidance.

Checklist for Staff in Managing 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;
- When setting up your profile online consider whether it is appropriate and prudent for you to include a photograph, or provide occupation, employer or work location details;
- Check your settings regularly and test your privacy;
- Keep an eye on your digital footprint;
- Do not under any circumstances accept friend requests from a person you believe could conflict with your employment;
- 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;
- Be aware that other users may access your profile and if they find the information and/or images it contains offensive, make a complaint about you your employer.

TEMPLATE LETTER (INVITATION TO MEET WITH HEAD TEACHER)

Dear Parent,

It has come to my attention that inappropriate comments have been made on ***** website by yourself in relation the school and /or pupils / staff. Comments such as these are contrary to the school's social media policy, which was circulated to all parents on *****.

I am therefore inviting you to meet with me at the school on *****, to discuss this matter further, resolve any issues / concerns you may have and agree a way forward.

If the above date /time is not convenient for you, please contact the school on ***** to arrange an alternative date or time. If you do not attend this meeting, I will have no option but to take further action in relation to these comments.

Yours sincerely,

TEMPLATE LETTER (STEP 1 LETTER IF OPTION OF MEETING IS NOT APPROPRIATE OR IF PARENT FAILS TO TURN UP FOR THE ARRANGED MEETING)

Dear Parent,

It has been brought to my attention that inappropriate comments have been made on ***** website by yourself in relation the school and /or pupils / staff. A copy of the these comments are enclosed [COPY OF SCREEN-SHOT IF INFORMER OR ACCOUNT HOLDER'S IDENTITY CAN BE KEPT ANONYMOUS] with this letter for ease of reference, and I specifically refer to the following comment(s) made:

[INSERT THE RELEVANT EXTRACTS WITH DATE AND TIME THEY WERE MADE]

Comments such as these are contrary to the school's social media policy, which was circulated to all parents on *****, and which is also enclosed with this letter. Inappropriate comments in relation to the school / pupils / staff [ADAPT AS APPROPRIATE] on social media can have a detrimental impact on the school as well as on pupils' education by not allowing the school to directly address any problems / concerns you may have through the appropriate channels.

Furthermore, anyone who posts inappropriate comments about schools / staff / pupils could face legal action when their comments harms reputations or causes distress to individuals.

In light of the above, and in accordance with the school policy, I therefore request that you delete the comments referred to above by 6pm on [ENSURE THAT THE DATE / TIME PROPOSED ARE REALISTIC I.E. ALLOW 48HOURS AFTER POSTING).

If you fail to remove the comments, further action will have to be taken by the school and legal advice will be sought. [IF RELEVANT] Please note that the member(s) of staff affected will also directly contact his/her/their union to receive their advice and support and consider taking further action (which includes legal action) if you fail to remove the comments.

In relation to the issues / concerns which you refer to in your comments, I would strongly encourage you to use the school's complaints procedure so that this matter can be formally considered and resolved in an appropriate manner. I enclose the school's complaints procedure leaflet for your information and consideration.

I hope this matter can be brought to a swift conclusion, and that we can work together to resolve any concerns you may have.