

MORE HOUSE SCHOOL

SOCIAL MEDIA POLICY

Social Media Policy

Rationale

Social media is a broad term for any kind of online platform which enables people and businesses to directly interact with each other and their followers. More House School recognises the numerous benefits and opportunities which a social media presence offers. However, there are some risks associated with social media use, especially around the issues of safeguarding and professional reputation.

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 are safeguarded.

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

This policy:

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

Broad guidelines

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.

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 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.

The internet is a fast moving technology and it is impossible to cover all circumstances or emerging media - the principles set out in this policy must be followed irrespective of the medium.

Legal Framework

More House School is committed to ensuring that all staff members provide services that meet the highest standards. All individuals working on behalf of the school 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
- GDPR 2018

Confidential information includes, but is not limited to:

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

Users must ensure that their use of social media does not infringe upon relevant data protection laws, or breach confidentiality.

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

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.

More House School 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 cyber-bullying or discrimination on the grounds of race, sex, disability, etc. or who defame a third party while at work may render More House School liable to the injured party.

Roles and Responsibilities

Headmaster

- 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.

Administrator / Moderator

- Create the account following approval from the Headmaster.
- Use only a school email account.
- 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.

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- Regularly monitoring, updating and managing content they have posted via school accounts.
- Adding an appropriate disclaimer to personal accounts when naming the school.

Principles

- Staff must be conscious at all times of the need to keep their personal and professional lives separate. Staff should not put themselves in a position where there is a conflict between their work for the school and their personal interests.
- Staff must not engage in activities involving social media, which might bring More House School into disrepute.
- Staff must not represent their personal views as those of More House School on any social medium.
- Staff must not discuss personal information about pupils, school staff and other professionals they interact with as part of their job on social media.
- Staff 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, or More House School.
- Staff must be accurate, fair and transparent when creating or altering online sources of information on behalf of More House School.

Personal use of social media

Staff members are not permitted to follow or engage with current or prior pupils of the school on any personal social media network (child under the age of 18), unless the pupils are family members.

More House School 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.

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.

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 Headmaster and through official school sites created according to the requirements specified in this policy.

Staff members must decline 'friend requests' from pupils and parents of pupils they receive in their personal social media accounts. 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.

On leaving the school's service, staff members must not contact More House School 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.

Information staff members have access to as part of their employment, including personal information about pupils and their family members, colleagues, and other parties and school corporate information must not be discussed on their personal social media accounts.

Photographs, videos or any other types of image of pupils, unless family members, or images depicting staff members wearing clothing with school logos or images identifying school accommodation must not be published on personal social media accounts.

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

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

The school's corporate, service or team logos or brands must not be used or published on personal digital space.

More House School only permits limited personal use of social media while at work. Access to social media sites for personal reasons is not allowed during contact times.

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.

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.

Using social media which represents More House School

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

There must be a strong pedagogical or business reason for creating official 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.

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

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.

Creating social media sites on behalf of More House School

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 School.

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 or pastoral outcome.

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

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.

The site-owner 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.

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

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neglected, creating a potential risk to the school's brand and image.

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

Pupil consideration

When creating social media sites for pupils 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.

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 cyber-bullying.

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

Staff 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)

Staff members must also ensure that the digital space 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.

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

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. 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 the Headmaster.

Approval for creation or participation

More House School's social media sites can be created only by or on behalf of the school. Site administrators and moderators must be More House School employees or other authorised people.

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 Headmaster.

Content contributed to own or third-party hosted sites must be discussed with the Headmaster.

The Headmaster must be consulted about the purpose of the proposed site and its content. In addition, Headmaster approval must be obtained for the use of the school logo and branding.

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

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Anyone wishing to create such an account must request it in writing to the Headmaster by emailing him with the following details:

- 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)
- Whether the account be open or private/closed

Following consideration by the Headmaster an application will be approved or rejected. In all cases, the Headmaster 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.

Content

- More House School hosted sites must have clearly expressed and publicised Terms of Use. Third-party hosted sites used for work purposes must have Terms of Use that conform to the school's standards of professional conduct and service.
- Staff members must not disclose information, make commitments or engage in activities on behalf of More House School without authorisation.
- Information provided must be worthwhile and accurate; remember what is published on the site will reflect on the School's image, reputation and services.
- Stay within the law and be aware that child protection, privacy, data protection, libel, defamation, harassment and copyright law may apply to the content of social media.
- Staff members must respect their audience and be sensitive in the tone of language used when discussing topics that others may find controversial or objectionable.
- The tone of content published on social media should also 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)
- Permission must be sought from the relevant people before citing or referencing their work or referencing service providers, partners or other agencies.
- More House School hosted sites must always include the school logo or branding to ensure transparency and confidence in the site. The logo should, where possible, link back to the relevant page on the school website.
- Staff members participating in More House School hosted or other approved sites must identify who they are. They must disclose their positions within the school on these sites.
- Staff members must never give out their personal information such as home contact details or home email addresses on these sites.
- Personal opinions must not be expressed on official sites.

Contributors and moderation of content

- Careful consideration must be given to the level of engagement of contributors – for example whether users will be able to add their own text or comments or upload images.
- 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.
- The content and postings in More House School hosted sites must be moderated. Moderation is the responsibility of the department that sets up or initiates the site.
- The department must designate at least two approved Administrators whose role it is to review and moderate

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the content, including not posting or removing comments which breach the terms of acceptable use. It is important that there are enough approved moderators to provide cover during leave and absences so that the site continues to be moderated.

Monitoring and Behaviour

- Accounts must be monitored frequently (preferably 7 days a week, including during holidays). Any comments, queries or complaints made through those accounts must be responded to within 48 hours (or on the next working day if received at a weekend) 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.
- 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.
- 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.
- 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 the Headmaster.
- Behaviour 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.
- The monitoring of social media by staff while at work may be permitted, in line with school policies.
- Individuals wishing to be 'friends' on a site must be checked carefully before they are approved. Their comments must be reviewed regularly and any that do not comply with minimum expectations of decency and appropriacy must not be posted or removed.
- Approval must also be obtained from the Headmaster to make an external organisation a 'friend' of the site.

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 schools Safe Use of Technology 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 pupil pictures online other than via school owned social media accounts.
- Staff should exercise their professional judgment about whether an image is appropriate to share on school social media accounts. Pupils 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. The 'Images of Children' policy must be read in conjunction with this policy.
- If a member of staff inadvertently takes a compromising picture, which could be misconstrued or misused, they must delete it immediately.

Handling abuse

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- 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.

Monitoring of internet use

- More House School monitors usage of its internet and email services without prior notification or authorisation from users.
- Users of More House School's email and internet services should have no expectation of privacy in anything they create, store, send or receive using the school's IT system.

Breaches of the policy

- Any breach of this policy may lead to disciplinary action being taken against the staff member/s involved in line with More House School's disciplinary procedures.
- A breach of this policy leading to breaches of confidentiality, or defamation or damage to the reputation of More House School or any illegal acts or acts that render More House School liable to third parties may result in disciplinary action or dismissal.
- Where conduct is considered illegal, the school will report the matter to the police and other relevant external agencies.
- Contracted providers of services must inform the School 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. Any action against breaches should be according to contractors' internal disciplinary procedures.

Monitoring posts about More House School

- As part of active social media engagement, it is considered good practice to pro-actively monitor the Internet for public postings about the More House School.
- The school should effectively respond to social media comments made by others according to a defined policy or process.

Conclusion

The Dos

- Check with the Headmaster 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

- Do not make comments, post content or link to materials that will bring the school into disrepute
- Do not publish confidential or commercially sensitive material
- Do not breach copyright, data protection or other relevant legislation
- Consider the appropriateness of content for any audience of school accounts, and do not link to, embed or add potentially inappropriate content

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- Do not post derogatory, defamatory, offensive, harassing or discriminatory content
- Do not use social media to air internal grievances