**St Mary of the Angels Social Media Policy**

*“Recognising and celebrating the presence of Christ in one another”.*



***Mission Statement***

***Recognising and celebrating the presence of Christ in one another.***

*At St. Mary of the Angels:*

* *we aim to follow Jesus through the teaching of the Gospels and inspire each other to be Christ-like;*
* *we all work as a big team to encourage everyone to be the best that they can be, at work and at play;*
* *we create a safe, positive, fair environment where all feel respected and valued.*

Reviewed April 2022

**St Mary the Angels is committed to safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share this commitment**

# **INTRODUCTION**

* 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.
  2. While recognising the benefits of these media for new opportunities for communication, this policy sets out the principles that St Mary of the Angels School staff and contractors are expected to follow when using social media.
  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 are safeguarded.
  4. Staff members must be conscious at all times of the need to keep their personal and professional lives separate.

# **SCOPE**

* 1. This policy applies to St Mary of the Angels’ School Governing Body, all teaching and other staff, whether or not employed directly by the school, external contractors providing services on behalf of the school, 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. 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).
  3. This policy applies to personal web space such as social networking sites (for example *Facebook*, blogs, microblogs 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.

# **LEGAL FRAMEWORK**

* 1. St Mary of the Angels School is committed to ensuring that all staff members provide confidential 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
     + General Data Protection Regulation 2019
  2. Confidential information includes, but is not limited to:
     + Person-identifiable information, e.g. pupil and employee records
     + Information divulged in the expectation of confidentiality
     + School 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. 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.
  4. St Mary of the Angels 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 the school liable to the injured party.

# **RELATED POLICIES**

* 1. This policy should be read in conjunction with the following school policies:
* Code of Conduct
* Online Safety Policy
* Acceptable Use policies
* ICT Code of Conduct
* Data Protection
* Photographic images of Children

# **PRINCIPLES – BE PROFESSIONAL, RESPONSIBLE AND RESPECTFUL**

* 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 and your personal interests.
  2. You must not engage in activities involving social media which might bring the school into disrepute.
  3. You must not represent your personal views as those of the school on any social medium.
  4. You must not discuss personal information about pupils, St Mary the Angels School staff and other professionals you interact with, as part of your job on social media.
  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, or the school.
  6. You must be accurate, fair and transparent when creating or altering online sources of information on behalf of the school.

# **PERSONAL USE OF SOCIAL MEDIA**

* 1. Staff members must not identify themselves as employees of St Mary the Angels School or service providers for the school in their personal web space. This is to prevent information on these sites from being linked with the school and to safeguard the privacy of staff members, particularly those involved in providing sensitive frontline services.
  2. Staff members must not have contact through any personal social medium with any pupil, whether from the school or any other school, unless the pupils are family members.
  3. St Mary of the Angels 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.
  4. 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.
  5. 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. Staff members must decline ‘friend requests’ from pupils they receive in their personal social media accounts and report this to the DSL (Designated safeguarding leader) in school at the earliest opportunity. 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.
  7. On leaving St Mary of the Angels School’s service, staff members must not contact the school’s 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.
  8. 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 web space.
  9. Photographs, videos or any other types of image of pupils and their families, or images depicting staff members wearing school uniforms or clothing with school logos, or images, identifying sensitive school premises, must not be published on personal web space.
  10. School or 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.
  11. Staff members must not edit, open, or 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.
  12. St Mary of the Angels school corporate, service or team logos or brands must not be used or published on personal web space.
  13. 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. Occasional use of ICT facilities for personal reasons during a designated break is acceptable - all such uses must be consistent with the school’s Staff Code of Conduct, the Online safety Policy, Acceptable Use Policy and the law.
  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.
  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.

# **USING SOCIAL MEDIA ON BEHALF OF ST MARY THE ANGELS SCHOOL**

* 1. Staff members can only use sites approved by the school for communication with the school community
  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.
  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.
  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.

# **MONITORING OF INTERNET USE**

* 1. St Mary of the Angels School monitors usage of its internet and email services without prior notification or authorisation from users.
  2. Users of the school official email and internet services should have no expectation of privacy in anything they create, store, send or receive using the school’s ICT system.

# **BREACHES OF THE POLICY**

* 1. Any breach of this policy may lead to disciplinary action being taken against the staff member/s involved in line with the school’s Disciplinary Policy and Procedure.
  2. A breach of this policy leading to breaches of confidentiality, or defamation or damage to the reputation of the school or any illegal acts or acts that render the school liable to third parties may result in disciplinary action or dismissal.
  3. Contracted providers of St Mary of the Angels School must inform the relevant school 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. Any action against breaches should be according to contractors’ internal disciplinary procedures.

# **APPENDIX A: Requirements for creating social media sites or posts on behalf of St Mary of the Angels School**

## CREATION OF SITES

## 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, account or post, 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.

## 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 Data Controller.

## 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.

## Line 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. The minimum amount of staff able to access the schools social media sites and maintain them is 3 members of staff.

## The accounts created must not be allowed to become dormant. 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.

## 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.

## APPROVAL FOR CREATION OF OR PARTICIPATION IN WEBSPACE

* 1. St Mary of the Angels School social media sites can be created only by, or on behalf of, the school. Site administrators and moderators must be school employees or other authorised people, such as our IT providers..
  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 staff member’s line manager e.g. the headteacher and the school’s Data Controller.
  3. Approval for participating, on behalf of the school, on sites created by third parties must be obtained from the staff member’s line manager and the school’s Data Controller.
  4. Content contributed to own or third-party hosted sites must be discussed with and approved by the staff member’s line manager and the school’s Data Controller.
  5. The school’s Data Protection Officer must be consulted about the purpose of the proposed site and its content. In addition, the DPO’s approval must be obtained for the use of the school logo and brand.
  6. Staff must complete the Social Media Site Creation Approval Form (Appendix B) and forward it to the school’s Data Controller before site creation.
  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 Head teacher (or appropriate manager).

## CONTENT OF WEBSPACE

* 1. St Mary of the Angels School 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 standards of professional conduct and service.
  2. Staff members must not disclose information, make commitments or engage in activities on behalf of the school without authorisation.
  3. Information provided must be worthwhile and accurate; remember what is published on the site will reflect on the school’s image, reputation and services.
  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.
  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.
  6. Permission must be sought from the relevant people before citing or referencing their work or referencing service providers, partners or other agencies.
  7. School 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.
  8. Staff members participating in the school hosted or other approved sites must identify who they are. They must disclose their positions within the school on these sites.
  9. Staff members must never give out their personal information such as home contact details or home email addresses on these sites.
  10. Personal opinions should not be expressed on official sites.

## CONTRIBUTORS AND MODERATION OF CONTENT

* 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.
  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.
  3. The content and postings in tabs linked to details about the school, on hosted sites must be moderated. Moderation is the responsibility of the team that sets up or initiates the site - at least 3 people.
  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.
  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.
  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.
  7. Administrators must not allow any outsiders to become friends of the site and limit the site to known people only; in the case of adults, those who have undergone appropriate security checks.
  8. Any proposal to use social media to advertise for contributors to sites must be approved by the school’s Data Controller.
  9. Approval must also be obtained from the school’s DPO to make an external organisation a ‘friend’ of the site.

# **APPENDIX B: escclogoSocial Media Site Creation Approval Form**

**Use of social media on behalf of St Mary of the Angels School must be approved prior to setting up sites.**

Please complete this form and forward it to the school’s **Data Controller**.

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **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 \_\_\_ School (provide age range)  School staff  Pupils’ family members  Pupils from other schools (provide names of schools)  External organisations  Members of the public  Others; please provide details | | | | |
| **PROPOSED CONTRIBUTORS TO THE SITE**  **Please tick all that apply.** | | | | |
| Pupils of \_\_\_ School (provide age range)  \_\_\_School staff  Pupils’ family members  Pupils from other schools (provide names of schools)  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? | | \_\_\_\_ School  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).** | | | | |
| **Line Manager**  **I approve the aims and content of the proposed site.** | | | Name |  |
| Signature |  |
| Date |  |
| **Data Protection Officer**  **I approve the aims and content of the proposed site and the use of school brand and logo.** | | | Name |  |
| Signature |  |
| Date |  |