



# THE STAR MULTI ACADEMY TRUST

## SOCIAL MEDIA POLICY

Approved by the Trust Board	23 March 2021
Review Date	March 2023

## **Contents**

1. Introduction
2. Purpose and scope
3. Legal framework
4. Using social media on behalf of the school
5. Personal use of social media
6. Monitoring use of the internet
7. Disciplinary action for breach of policy
8. Other policies and procedures

## 1. Introduction

1.1 Social media can be defined as interaction between people which involves the creation, sharing, and exchange of information and ideas by means of electronic technology, which may include virtual communities and networks.

1.2 Social media is largely dependent on mobile and web-based technologies to create interactive platforms through which individuals (and/or communities) are enabled to share, discuss and/or modify user-generated content.

1.3 Social media technology can constitute multiple forms including (but not limited to) internet forums and discussion rooms, weblogs, social blogs, microblogs, podcasts, photographic imagery and bookmarking in addition to social networks. Relevant technologies may include blogging, picture sharing, music-sharing, crowdsourcing and instant messaging (but are not confined to these examples) and social networks may involve the coordinated use of more than one (or even several) of these activities in concert.

1.4 It is vital that students, parents and the public at large have confidence in the Trust and individual member school's activities and services, and the principles set out in this policy are designed to ensure that staff members, including contractors and volunteers, are encouraged to use social media responsibly and professionally in order that the confidentiality of students and staff, as well as the broader reputation of the Trust, is safeguarded.

## 2. Purpose and scope

2.1 This policy is applicable to all staff, trainees, external contractors, agency workers, volunteers and other individuals who work for, or may provide services on behalf of, the Trust. These individuals are collectively referred to hereinafter as staff members.

2.2 Staff members must always be conscious of the requirement to keep their personal and professional lives separate.

2.3 It is recognised that staff members may be required to use social media for the purposes of teaching and learning and that this may constitute a significant part of their professional duties. Nonetheless, such use of social media should in every circumstance be compliant with the guidelines set out in this policy.

2.4 This policy covers use of social media for personal purposes, as well as for official school purposes. The definition of official school purposes includes all internet facilities (such as websites, forums, blogs etc) hosted by, and/or maintained on behalf of, the Trust and its individual member schools.

2.5 This policy is applicable to all social networking sites (such as Twitter, Facebook, LinkedIn, etc) and also includes chat rooms, forums, podcasts, blogs, texting, online encyclopaedias with open access (such as Wikipedia) and content sharing sites such as YouTube etc. It is simply not possible to provide a definitive list of such sites and the assumption should always be that any social media site (whether or not specifically named in the policy) falls within the scope of this policy.

2.6 Equally, it is freely acknowledged that information technology advances at a rate which is liable to outstrip the ability of policies such as this to keep pace with developments. Accordingly, it is therefore impossible to ensure that adequate reference is made to such future technologies and/or circumstances (whether such developments be

electronic or otherwise) as may emerge in the future due to the evolution of social media. For the avoidance of doubt, the general principles set out in this policy must at all times be followed irrespective of the precise nature of the relevant technology or media involved.

### **3. Legal framework**

3.1 The Board of Trustees is committed to ensuring that all staff members provide confidential services that meet the highest standards.

3.2 All staff members working on behalf of the Trust are bound by relevant legislation, including a legal duty of confidence, and must at all times observe their responsibility to both other members of staff and to students by protecting, and keeping confidential, any knowledge to which they may gain privileged access during the course of their work.

3.3 Disclosure of confidential information on, or via, social media is likely to be a breach of a number of laws and professional codes of conduct, including:

- the Human Rights Act 1998
- the Health and Safety at Work Act 1974
- the Data Protection Act 2018
- the General Data Protection Regulation (GDPR)
- the common law duty of confidentiality

3.4 Confidential information includes, but is not limited to, person-identifiable information, such as student and employee records which are afforded full protection under GDPR and the Data Protection Act.

3.5 Staff members should also be aware that other laws relating to libel, defamation, harassment and copyright may apply to information posted on social media. Such laws include (but may not be limited to):

- the Libel Act 1843
- the Defamation Acts 1952 and 1996
- the Copyright, Designs and Patents Act 1988
- the Criminal Justice and Public Order Act 1994
- the Protection from Harassment Act 1997
- the Malicious Communications Act 1998
- the Communications Act 2003

3.6 In certain circumstances the Trust 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 Trust (as well as themselves personally) liable to civil (legal) action from the injured party.

#### **4. Using social media on behalf of the Trust or an individual member school**

4.1 Staff members can only use officially approved channels or sites for either communicating with students or in order to enable students to communicate with one another.

4.2 There must be a strong pedagogical or business reason for creating an official school site through which students or others may communicate. Staff must not create sites for trivial reasons as this could potentially expose the Trust to unwelcome publicity or reputational damage and should seek appropriate authorisation in all cases.

4.3 Any sites thus created must not breach the terms and conditions of social media service providers, particularly in respect of minimum age requirements. Careful consideration must be given to the level of engagement of contributors – for example whether users will be able to upload images or add their own text or comments.

4.4 Any sites created for, and/or contributed to by, students must have the strongest privacy settings to prevent breaches of confidentiality. It must not be possible to identify students and other participants using such sites. Staff members must at all times act in the best interests of the Trust's students when creating, or participating in, or contributing content to, social media sites.

4.5 When using social media for educational purposes, the following practices must be observed:

- (a) Staff should set up a distinct and dedicated social media site or account for educational purposes. This should be entirely separate from any personal social media accounts held by that member of staff, and ideally should be linked to an official school email account;
- (b) The URL and identity of the site should be notified to the appropriate school or Trust leader before any account is activated;
- (c) The current password or login details for all social media accounts must be provided to the above who will retain a record of such information;
- (d) The content of any Trust or individual member school sanctioned social media site should be solely professional and should reflect well on the Trust;
- (e) Staff must ensure that the Trust/school has parent/carer consent to use, post or publish a photograph or video image of any student featured;
- (f) Staff must ensure that they do not identify a student using their full name. Only first/forenames or initials may be used without express parent/carer permission;
- (g) Care must be taken that any links to external sites from the account are appropriate and safe;
- (h) Any inappropriate comments on or abuse of Trust/individual member school sanctioned social media should immediately be removed and reported to a member of the appropriate Leadership Team;

(i) Staff should not engage with any direct messaging of students through social media where the message is not public;

(j) Staff should not seek to view/link up with /view student accounts. For example, in the case of Twitter, staff should not “follow back” those who follow, share or like Trust/School comments/posts.

## 5. Personal use of social media

5.1 The Trust recognises that staff members are fully entitled to make use of social media in a personal capacity away from the school. Staff members must, however, be aware that they can potentially cause damage to the reputation of the organisation if they are identified as being employees of, or as having professional links to, the Trust or an individual member school.

5.2 Staff members must therefore ensure that if they engage with social media they must do so sensibly and responsibly. They must be confident that any content, comment or opinion expressed through their personal use of social media will not adversely affect, nor be found damaging to, the reputation or credibility of the Trust, nor otherwise violate any of the Trust’s policies.

5.3 Staff should be made aware, in the event that they access any personal web-based email accounts via their school network, that these may be subject to the Trust’s internet protocol which could include monitoring and surveillance (in which context the following section on monitoring internet use should be noted).

5.4 With the rise in identity theft and fraud, staff members may wish to consider the amount of personal information that they feel appropriate to display or reveal on their personal profile. Staff should always keep their passwords secret and take all necessary measures to protect access to accounts.

5.5 If staff members make any reference (whether this be on a personal internet site or a social networking site, including any form of interactive media) to their employment by, or other relationship with, the Trust or an individual member school they should inform the headteacher accordingly.

5.6 Staff members must avoid bringing the Trust, an individual member school or its staff into disrepute and must not use any online (or equivalent) facility to attack or abuse colleagues or students. If staff members discuss their work on social media in relation to their personal life, they must take care to include on their profile appropriate text to the effect that “the views I express here are mine alone and do not necessarily reflect the views of my employer”.

5.7 Staff members must keep their professional and personal lives separate and should never put themselves in a position where there is a conflict between their personal interests and their relationship with the Trust. Individuals should remember that by making use of social media they are effectively placing information within the public domain and cannot be reliant on the belief that supposedly ‘private’ comments or viewpoints will not gain a wider currency or exposure.

5.8 When using social media, staff members must not:

- engage in activities which might bring the Trust or an individual member school into disrepute
- represent their own personal views as being those of the Trust or an individual school

- divulge or discuss any personal information about our students or staff or any other persons with whom they interact as part of their job
- use the internet in any way to attack, insult, abuse or defame students (or their family members), colleagues, other professionals/organisations or the Trust itself
- do anything that could be considered discriminatory against, or be interpreted as bullying or harassment of, any individual, for instance by making offensive or derogatory comments in relation to any protected characteristic (as defined within the Trust's Managing Allegations Against Staff and Resolving Issues at Work Policies), neither should they promote links to any such content elsewhere
- be inaccurate, unfair or less than transparent when creating or altering online sources of information on behalf of, or in any way relating to, the academy.

5.9 Staff members are allowed limited access to social media websites (from their own mobile devices or from the Trust's computers and/or devices) for personal use. Access to social media sites for personal reasons is only permitted during lunch breaks and outside contracted working hours. Staff members are expected to devote their contracted hours of work exclusively to their professional duties.

5.10 Staff members must not:

- identify themselves online and/or on social media as employees of the Trust or an individual member school – this is in order to safeguard the privacy of colleagues and students and to prevent information on these sites from being linked with the Trust.
- use a school or Trust email address when registering on such websites
- have contact through any personal social medium with any student, whether from our Trust or any other school (unless the student is a family member)
- use information obtained in the course of their employment for personal gain nor pass any such information on to others who may use it in such a way
- have any contact with students' family members through personal social media if that contact is likely to constitute a conflict of interest or call into question their own professional objectivity or integrity

5.11 Teachers' Standards 2012 Part 2 - Personal and Professional Conduct, reads as follows:

*A teacher is expected to demonstrate consistently high standards of personal and professional conduct. Teachers uphold public trust in the profession and maintain high standards of ethics and behaviour, within and outside school.*

The Trust expects that all members of staff (not just teachers) will adhere consistently to this particular standard.

5.12 Staff members must decline any 'friend requests' that they may receive from students (other than family members) in relation to their personal social media sites or accounts. Equally, they must not suggest that students should become 'friends' on their own personal social media accounts. Should they receive any such requests from

students who are not family members, they should advise students why these requests are inappropriate and refer them appropriately to their school safeguarding lead.

5.13 On leaving the Trust's service, staff members must not contact the Trust's pupils by means of personal social media sites. Similarly, staff members must not contact pupils from schools where they have previously worked by means of personal social media.

5.14 Staff members who have access to information as part of their employment by, or relationship with, the Trust, including personal information about pupils and their family members, colleagues and/or other parties, must not discuss such information on their personal social media sites or accounts.

5.15 No photographs, videos or any other images of the Trust or school premises, or of students or their families, or depictions of staff members wearing school uniform or school logos may be placed online on any form of personal social media site.

5.16 Trust and school email addresses and other official contact details must not be used either for setting up personal social media accounts or for the facilitation of communication through such media.

5.17 Staff members must not edit open access online encyclopaedias (such as Wikipedia etc) in a personal capacity at work, since 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 Trust/school itself.

5.18 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 in order to safeguard their own privacy.

5.19 Staff members should always keep their passwords confidential, should change them often and should at all times be vigilant about what may or may not legitimately be posted online, and should be aware that it is not safe to reveal home addresses, telephone numbers or other personal information.

## **6. Monitoring use of the internet**

6.1 The Trust reserves the right to monitor staff members' internet usage whilst they are on Trust premises or using Trust owned ICT devices. Access to particular social media websites may be withdrawn in any case of misuse.

6.2 Users of email and internet services should have no expectation of privacy in anything they create, store, send or receive using the Trust's ICT system.

## **7. Disciplinary action for breach of policy**

7.1 Any breach of this policy may lead to disciplinary action being taken against the staff member involved in line with the Trust's disciplinary policy. Examples of such breaches include (but are not limited to) the following:

- misuse of the internet
- usage which is outside the limits of personal use during the working day
- having students as 'friends'

- breach of confidentiality
- any behaviour which is considered to constitute bullying or harassment
- any behaviour which is considered to be:
  - ◆ defamatory; or
  - ◆ discriminatory; or
  - ◆ intimidatory
- any behaviour which is considered to cause damage to the reputation of the Trust or an individual member school
- any illegal acts
- any acts which render the Trust liable to action from third parties

7.2 Disciplinary action can be instigated if any employee is using social media inappropriately, irrespective of whether this is at work or in the employee's own time at home. Disciplinary action will be taken against any employee who is responsible for posting an inappropriate social media entry (for instance on twitter or facebook) if it impacts negatively upon the Trust (for example by causing likely reputational damage) regardless of whether it was posted at work or at home.

7.3 Staff members must immediately notify the headteacher (or other appropriate senior leader) of any apparent breaches of this policy in order that appropriate action can be taken to protect confidential information and limit any potential damage to the reputation of the Trust.

7.4 Serious breaches of this policy may constitute gross misconduct which may potentially lead to summary dismissal.

## **8. Other policies and procedures**

8.1 This policy will be supported by the following policies:

Managing Allegations Against Staff

Disciplinary Policy

School E–safety Policy

School ICT Policies

Staff Code of Conduct

Resolving Issues at Work Policy