SOCIAL MEDIA
Policy & Procedure

This policy has been approved by the Board of Trustees with reference to the academy's Equality Policy. The aims of the Equality Policy are to ensure that Plume Academy meets the needs of all, taking account of gender, gender identity, ethnicity, culture, religion, language, sexual orientation, age, ability, disability and social circumstances. It is important that in this academy we meet the diverse needs of students to ensure inclusion for all and that all students are prepared for full participation in a multi-ethnic society.

Responsibility: Director of Human Resources

Updated: July 2022

Approved by Trustees: July 2022

Date for review: July 2024

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1 INTRODUCTION

1.1 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*.

1.2 While recognising the benefits of these media for new opportunities for personal communication, this policy sets out the principles that Plume Academy Trust staff are expected to follow when using social media.

1.3 It is crucial that students, parents and carers, and the public at large have confidence in the academy'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 students and other staff and the reputation of the academy are safeguarded.

2 SCOPE

2.1 This policy applies to all Trustees of Plume Academy Trust, all teaching and support staff employed directly by the Trust, external contractors providing services on behalf of the Trust, trainee teachers, volunteers and other individuals who work for or provide services on behalf of the Trust. These individuals are collectively referred to as 'staff members' in this policy. Plume Academy Trust is referred to as 'the academy'.

2.2 This policy covers personal use of social media as well as the use of social media for official academy purposes, including sites hosted and maintained on behalf of the academy (see sections 4, 5 & 6 and Appendices A and B).

2.3 This policy applies to personal webspace such as social networking sites (for example *Facebook*, *MySpace*), 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.

3 LEGAL FRAMEWORK

3.1 The academy is committed to ensuring that all staff members provide confidential services that meet the highest standards. All individuals working on behalf of the academy 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 ☐ the Data Protection Act 1998.

3.2   Confidential information includes, but is not limited to:

- person-identifiable information, e.g. student and employee records protected by the Data Protection Act 1998
- information divulged in the expectation of confidentiality
- academy business or corporate records containing organisationally or publicly sensitive information
- any commercially sensitive information such as information relating to commercial proposals or current negotiations
- politically sensitive information.

3.3   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
- Copyright, Designs and Patents Act 1988.

3.4   The academy 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 cyberbullying or discrimination on the grounds of race, sex, disability, etc. or who defame a third party while at work may render the academy liable to the injured party.

4   PRINCIPLES – BE PROFESSIONAL, RESPONSIBLE AND RESPECTFUL

4.1   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 academy and your personal interests.

4.2   You must not engage in activities involving social media which might bring the academy into disrepute.

4.3   You must not represent your personal views as those of the academy on any social medium.

4.4 You must not discuss personal information about students, academy staff and other professionals you interact with as part of your job on social media.

4.5   You must not use social media and the internet in any way to attack, insult, abuse or defame students, their family members, colleagues, other professionals, other organisations or the academy.

4.6   You must be accurate, fair and transparent when creating or altering online sources of information on behalf of the academy.

5 PERSONAL USE OF SOCIAL MEDIA

5.1   Staff members must not identify themselves as employees of the academy or service providers for the academy in their personal webspace. This is to prevent information on these sites from being linked with the academy and to safeguard the privacy of staff members, particularly those involved in providing sensitive frontline services.

5.2   Staff members must not have contact through any personal social medium with any student from the academy unless the students are family members.

5.3   The academy does not expect staff members to discontinue contact with their family members via personal social media once the academy 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.

5.4   Staff members must not 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 objectivity.

5.5   If staff members wish to communicate with students through social media sites or to enable students to keep in touch with one another, they can only do so with the approval of the academy and through official academy sites created according to the requirements specified in section 7 and Appendix A.

5.6   Staff members must decline 'friend requests' from students they receive in their personal social media accounts. Instead, if they receive such requests from students who are not family members, they must discuss these in general terms in class and signpost students to become 'friends' of the official academy site.

5.6.1 On leaving the academy's service, staff members must not contact the academy's students by means of personal social media sites. Similarly, staff members must not contact students from their former schools by means of personal social media.

5.7   Information staff members have access to as part of their employment, including personal information about students and their family members, colleagues, and other parties and academy corporate information must not be discussed on their personal webspace.

5.8   Photographs, videos or any other types of images of students and their families or images depicting staff members wearing academy uniforms or clothing with academy logos or images identifying sensitive academy premises must not be published on personal webspace.

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

5.10 Staff members must not edit open 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.

5.11 The academy's corporate logos must not be used or published on personal webspace.

5.12 The academy does not permit personal use of social media while at work. 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 academy's time.

5.13 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.

5.14 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.

6 USING SOCIAL MEDIA ON BEHALF OF PLUME ACADEMY TRUST

6.1 Staff members can only use official academy sites for communicating with students or to enable students to communicate with one another.

6.2 There must be a strong pedagogical or business reason for creating official academy sites to communicate with students or others. Staff must not create sites for trivial reasons which could expose the academy to unwelcome publicity or cause reputational damage.

6.3 Official academy 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.

6.4 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.

7 MONITORING OF INTERNET USE

7.1 The academy monitors usage of its internet and email services without prior notification or authorisation from users.

7.2 Users of academy email and internet services should have no expectation of privacy in anything they create, store, send or receive using academy ICT systems. Please refer to the 'Acceptable User Agreement'.

8 BREACHES OF THE POLICY

8.1 Any breach of this policy may lead to disciplinary action being taken against the staff member/s involved in line with the academy's Disciplinary Policy and Procedure.

8.2   A breach of this policy leading to breaches of confidentiality, or defamation or damage to the reputation of the academy or any illegal acts or acts that render the academy liable to third parties may result in disciplinary action or dismissal. You may be required to remove any social media content that we consider to constitute a breach of this policy. Failure to comply with such a request may in itself result in disciplinary action.

8.2.1   Contracted providers of the academy's services must inform the relevant academy 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 academy. Any action against breaches should be according to contractors' internal disciplinary procedures.

APPENDIX A Requirements for creating social media sites on behalf of the academy

A.1   CREATION OF SITES

A.1.1   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 Plume Academy.

A.1.2   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 outcome.

A.1.3   The proposed audience and level of interactive engagement with the site, for example whether students, academy staff or members of the public will be able to contribute content to the site, must be discussed with the Executive Principal.

A.1.4   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.

A.1.5   The Executive Principal will 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.

A.1.6   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 academy's brand and image.

A.1.7   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.

A.2   CHILDREN AND YOUNG PEOPLE

A.2.1   When creating social media sites for children and young people 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.

A.2.2   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 cyberbullying.

A.2.3   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.

A.2.4   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)

A.2.5   Staff members must also ensure that the webspace 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.

A.2.6   Care must be taken to ensure that content is suitable for the target age group and contributors or 'friends' to the site are vetted.

A.2.7   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 academy. 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 Executive Principal.

A.3   APPROVAL FOR CREATION OF OR PARTICIPATION IN WEBSPACE

A.3.1   The academy's social media sites can be created only by or on behalf of the academy. Site administrators and moderators must be academy employees or other authorised people.

A.3.2   Approval for creation of sites for work purposes, whether hosted by the academy or hosted by a third party such as a social networking site, must be obtained from the Executive Principal.

A.3.3   Approval for participating, on behalf of the academy, on sites created by third parties must be obtained from the Executive Principal.

A.3.4   Content contributed to own or third-party hosted sites must be discussed with and approved by the Executive Principal.

A.3.5   The Executive Principal must be consulted about the purpose of the proposed site and its content. In addition, the Executive Principal's approval must be obtained for any use of the academy's logo and brand.

A.3.6   Staff must complete the Social Media Site Creation Approval Form (Appendix B) and forward it to the Executive Principal before site creation.

A.3.7 Be aware that the content or site may attract media attention. All media enquiries must be forwarded to the Executive Principal immediately. Staff members must not communicate with the media without the advice or approval of the Executive Principal.

A.4 CONTENT OF WEBSPACE

A.4.1 All academy 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 academy standards of professional conduct and service.

A.4.2 Staff members must not disclose information, make commitments or engage in activities on behalf of the academy without authorisation.

A.4.3 Information provided must be worthwhile and accurate; remember what is published on the site will reflect on the academy's image, reputation and services.

A.4.4 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.

A.4.5 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.

A.4.6 Permission must be sought from the relevant people before citing or referencing their work or referencing service providers, partners or other agencies.

A.4.7 The academy hosted sites must always include the academy logo to ensure transparency and confidence in the site. The logo should, where possible, link back to the relevant page on the academy website.

A.4.8 Staff members participating in academy hosted or other approved sites must identify who they are. They must disclose their positions within the academy on these sites.

A.4.9 Staff members must never give out their personal information such as home contact details or home email addresses on these sites.

A.4.10 Personal opinions should not be expressed on official sites.

A.5 CONTRIBUTORS AND MODERATION OF CONTENT

A.5.1 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.

A.5.2 Sites created for and contributed to by students must have the strongest privacy settings to prevent breaches of confidentiality. Students and other participants in sites must not be able to be identified.

A.5.3 The content and postings in academy hosted sites must be moderated. Moderation is the responsibility of the team that sets up or initiates the site.

A.5.4 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.

A.5.5 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.

A.5.6 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.

A.5.7 Individuals wishing to be 'friends' on a site must be checked carefully before they are approved. The acceptance of 'friend' requests must be limited to known people only, and in the case of adults, those who have undergone appropriate security checks. Their comments must be reviewed regularly and any that do not comply with the House Rules must not be posted or removed.

A.5.8 Any proposal to use social media to advertise for contributors to sites must be approved by the Executive Principal.

A.5.9 Approval must also be obtained from the Executive Principal to make an external organisation a 'friend' of the site.

APPENDIX B Academy Social Media Site Creation Approval Form

Use of social media on behalf of the academy must be approved prior to setting up sites. Please complete this form and forward it to the Executive Principal.

TEAM DETAILS	
Faculty	
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)

  o   Students of the academy (provide age range) o
Academy staff o Academy Trustees o Students'
family members
  o   Students from other schools (provide names of
schools) o External organisations o Members of the
public o Others; please provide details

PROPOSED CONTRIBUTORS TO THE SITE
(Please tick all that apply)

  o   Students of the academy (provide age range) o
Academy staff o Academy Trustees o Students'
family members
  o   Students from other schools (provide names of
schools) o External organisations o Members of the
public o Others; please provide details

ADMINISTRATION OF THE SITE	
Names of administrators (the site must have at least two approved administrators)	
Names of moderators (the site must have at least two approved moderators)	
Who will vet external contributors?	
Who will host the site?	o The academy o 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 Executive Principal.

Line Manager **I approve the aims and content of the proposed site.**	Name
Signature	
Date	
Social Media Co-ordinator **I approve the aims and content of the proposed site.**	Name
Signature	
Date	

Executive Principal **I approve the aims and content of the proposed site and the use of academy brand and logo.**	Name
Signature	
Date	