



# Social Media Policy

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**Statement of intent**

The Community Inclusive Trust understands that social media is a growing part of life. We have a responsibility to safeguard our pupils against potential dangers when accessing the internet at school, and to educate our pupils about how to protect themselves online when outside of school.

We are committed to:

- Encouraging the responsible use of social media by all staff, parents and pupils in support of the school's mission, values and objectives.
- Protecting our pupils from the dangers of social media.
- Preventing and avoiding damage to the reputation of the school and the Trust through irresponsible use of social media.
- Protecting our staff from cyberbullying and potentially career damaging behaviour.

## **1. Legal Framework**

This policy has due regard to all relevant legislation and statutory guidance including, but not limited to, the following:

- DfE (2023) 'Data protection in schools'
- The UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- Computer Misuse Act 1990, amended by the Police and Justice Act 2006
- Freedom of Information Act 2000
- Safeguarding Vulnerable Groups Act 2006
- Equality Act 2010
- DfE (2023) 'Keeping children safe in education 2023'

This policy operates in conjunction with the following Trust policies:

- Acceptable use of the Internet and IT Systems Policy
- Data Protection Policy
- Code of Conduct – Staff
- Code of Conduct – Parent & Carer
- Complaints Policy
- Allegations of Abuse Against Staff Policy
- Low-level Concerns Policy
- Photography Policy
- Safeguarding Statement
- Disciplinary Policy

This policy operates in conjunction with the following School policies:

- E-Safety/Online Safety Policy
- Behaviour Policy
- Anti-bullying Policy
- Safeguarding & Child Protection Policy

## **2. Roles and responsibilities**

The Executive Leadership Team (ELT) will be responsible for:

- Reviewing this policy on an annual basis.
- Ensuring their own knowledge of social media and online safety issues is up to date.
- Ensuring that this policy, as written, does not discriminate on any grounds, including against any of the protected characteristics, as outlined in the Equality Act 2010.

The ELT and Local School Board will be responsible for:

- Ensuring this policy is implemented by schools and the central team at the Support Hub.
- Ensuring the DSL's remit covers online safety.
- Ensuring their own knowledge of social media and online safety issues is up to date.
- Ensuring all staff undergo safeguarding and child protection training, including online safety, at induction.

Within the Support Hub, ELT will be responsible for:

- The overall implementation of this policy and ensuring that all staff are aware of their responsibilities in relation to social media use.
- Promoting safer working practices and standards with regards to the use of social media.
- Establishing clear expectations of behaviour for social media use.
- In conjunction with the Trust Board, handling complaints regarding this policy and its provisions in line with the Trust's Complaints Policy.
- Implementing appropriate sanctions and disciplinary methods where there is a breach of this policy.
- Taking steps to minimise the amount of misplaced or malicious allegations in relation to social media use.
- Working alongside the DPO and IT technicians to ensure appropriate security measures are implemented and compliance with UK GDPR and other data protection legislation.

Within schools the Headteacher will be responsible for:

- Monitoring and reviewing all school-run social media accounts and reporting where necessary to the Head of Communications and Fundraising.
- The overall implementation of this policy and ensuring that all staff, parents and pupils are aware of their responsibilities in relation to social media use.
- Promoting safer working practices and standards with regards to the use of social media.
- Establishing clear expectations of behaviour for social media use.
- In conjunction with the Local School Board, handling complaints regarding this policy and its provisions in line with the Trust's Complaints Policy.
- Implementing appropriate sanctions and disciplinary methods where there is a breach of this policy.
- Taking steps to minimise the amount of misplaced or malicious allegations in relation to social media use.
- Working alongside the DPO and IT technicians to ensure appropriate security measures are implemented and compliance with UK GDPR and other data protection legislation.

Designated Safeguarding Lead's (DSL's) will be responsible for:

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- Their school's approach to online safety.
- Dealing with concerns about social media use that are safeguarding concerns.

Staff members working within schools will be responsible for:

- Adhering to the principles outlined in this policy and the Acceptable use of the Internet and IT Systems Policy.
- Ensuring pupils adhere to the principles outlined in this policy and that it is implemented fairly and consistently in the classroom.
- Reporting any social media misuse by staff, pupils or parents to the Headteacher immediately.
- Attending any training on social media use offered by the Trust.

Staff members working within the Support Hub will be responsible for:

- Adhering to the principles outlined in this policy and the Acceptable use of the Internet and IT Systems Policy.
- Reporting any social media misuse by staff, pupils or parents to ELT immediately.
- Attending any training on social media use offered by the Trust.

Parents will be responsible for:

- Adhering to the principles outlined in this policy and the Code of Conduct for Parents & Carers.
- Taking appropriate responsibility for their use of social media and the influence on their children at home.
- Promoting safe social media behaviour for both them and their children.
- Attending meetings held by the school regarding social media use wherever possible.

Pupils will be responsible for:

- Adhering to the principles outlined in this policy.
- Ensuring they understand how to use social media appropriately and stay safe online.
- Seeking help from school staff if they are concerned about something they or a peer have experienced on social media.
- Reporting incidents and concerns relating to social media in line with the procedures within this policy.
- Demonstrating the same high standards of behaviour as expected within the school.

The Head of Communications & Fundraising will be responsible for:

- Monitoring and reviewing all school-run and Trust social media accounts and reporting where necessary to the Headteacher, LSB, ELT, Trust Board (as well as mitigations and actions).
- Approving staff members, alongside the Headteacher, to have admin access to a school's social media platforms.
- Providing technical support in the development and implementation of school social media accounts.
- Consulting with staff on the purpose of a new social media account and the content published.
- Maintaining a log of inappropriate comments or abuse relating to schools or the Trust.

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- Handling inappropriate comments or abuse posted on the school's or the Trust's social media accounts.
- Ensuring passwords for the Trust and school's social media accounts are stored securely and centrally.

The IT Strategic Lead will be responsible for:

- Implementing appropriate security measures as directed by the Head of Communications & Fundraising and the Headteacher.
- Ensuring that the Trust and school's filtering and monitoring systems are updated as appropriate.

### **3. The Trust and School social media accounts**

Social media accounts will only be created with permission from the Head of Communications & Fundraising, following approval from the Headteacher. A Trust or school-based social media account will be entirely separate from any personal social media accounts held by staff members and will be linked to an official CIT email account.

When setting up a social media account, consideration will be given to the following:

- The purpose of the account.
- Whether the overall investment will achieve the aim of the account.
- The level of interactive engagement with the site.
- Whether pupils, staff, parents or members of the public will be able to contribute content to the account.
- How much time and effort staff members are willing to commit to the account.
- How the success of the account will be evaluated.

Headteachers and the Head of Communications & Fundraising will be responsible for authorising members of staff to have admin access to school social media accounts. Only people authorised will be allowed to post on school accounts.

Passwords for the Trust and school's social media accounts are stored securely and centrally. The passwords are only shared with people authorised by the Head of Communications & Fundraising and the Headteacher. If a password is updated/change, the Head of Communications & Fundraising must be informed.

All posts made to social media accounts will not breach copyright, data protection or freedom of information legislation.

The social media accounts will comply with the platform's rules. The Head of Communications & Fundraising will ensure anyone with authorisation to post on the school's social media accounts are provided with training on the platform and the rules around what can be posted.

The Trust social media accounts will be moderated by the Head of Communications & Fundraising or another designated member of staff. School social media accounts will be moderated by the Headteacher, Head of Communications & Fundraising and/or another designated member of staff.

### **Staff Conduct**

Only staff with authorisation from the Head of Communications & Fundraising and the Headteacher will post on Trust or school accounts, and they will adhere to the terms of this policy.

Staff will only post content that meets the Trust or school's social media objectives, including the following (this list is not exhaustive):

- Reminders about upcoming events.
- Good news regarding the school's performance, attainment or reputation.
- Good news regarding the achievements of staff and pupils.
- Information that parents should be aware of, e.g., school closure.

Staff will ensure that their posts meet the following criteria:

- The post does not risk bringing the school or the Trust into disrepute.
- The post only expresses neutral opinions and does not include any personal views.
- The post uses appropriate language.
- The post is sensitive towards those who will read it and uses particularly neutral and sensitive language when discussing something that may be controversial to some.
- The post does not contain any wording or content that could be construed as offensive.
- The post does not take a side in any political debate or express political opinions.
- The post does not contain any illegal or unlawful content.

#### **4. Staff use of personal social media**

Staff will not be prohibited from having personal social media accounts; however, it is important that staff protect their professional reputation by ensuring they use personal social media accounts in an appropriate manner.

Staff will be required to adhere to the following guidelines when using personal social media accounts:

- Staff members will not access personal social media platforms during school/working hours where it impacts negatively on them fulfilling their responsibilities relating to work.
- Staff will not 'friend', 'follow' or otherwise contact pupils through their personal social media accounts unless their own child, a relative or close friend of their family (it is the staff members responsibility to inform their appropriate Safeguarding Lead by email if this is the case).
- Staff will be strongly advised to not 'friend' or 'follow' parents on their personal accounts.
- Staff members will ensure the necessary privacy controls are applied to personal accounts.
- Staff will ensure it is clear that views posted on personal accounts are personal and are not those of school's or the Trust.
- Staff will not post any content online that is reputationally damaging to school's or the Trust, its staff or pupils, or other members of their school community.
- Staff members will not post any information which could identify a pupil (unless their own child, a relative or close friend of their family, and the appropriate Safeguarding Lead is aware of this relationship), this includes any images, videos and personal information.



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Breaches of this policy by members of staff will be taken seriously, and in the event of illegal, defamatory or discriminatory content, could lead to prosecution, disciplinary action or dismissal. Members of staff will be aware that if their out-of-work activity brings school's or the Trust into disrepute, disciplinary action can be taken.

Attempts to bully, coerce or manipulate members of the Trust communities via social media by members of staff will be dealt with as a disciplinary matter.

### **5. Parent social media use**

Parents are able to comment on or respond to information shared via social media sites; however, parents should do so in a way which does not damage the reputation of school's or the Trust.

Parents will be asked not to share any personal details of pupils when commenting on school social media sites, nor post comments concerning other pupils or staff members.

Breaches of this policy will be taken seriously, and in the event of illegal, defamatory or discriminatory content could lead to prosecution.

### **6. Pupil social media use**

Pupils will not access social media during lesson time unless it is part of a curriculum activity. Pupils will not be permitted to use the school's WiFi network to access any social media platforms unless prior permission has been sought from the Headteacher, and an ICT technician has ensured appropriate network security measures are applied.

Pupils will not attempt to 'friend', 'follow' or otherwise contact members of staff through their personal social media accounts. Where a pupil attempts to 'friend' or 'follow' a staff member on their personal account, it will be reported to the headteacher.

Pupils will not post any content online which is damaging to the school or any of its staff or pupils. Pupils will not post anonymously or under an alias to evade the guidance given in this policy.

Pupils are instructed and encouraged not to sign up to any social media platforms that have an age restriction above the pupil's age.

If inappropriate content is accessed online on school premises, this will be reported to a member of staff.

Breaches of this policy will be taken seriously and managed in line with the school's Behaviour Policy.

### **7. Data protection principles**

The school will obtain consent from pupils and parents when a child joins the school. This will confirm whether consent is given for posting images and videos of a pupil on social media platforms. **The consent will be valid for the entire time the child attends the school.** Consent provided for the use of images and videos only applies to school and Trust accounts.

When a pupil reaches the age of 18, they will be assessed by the school. If they have the competence to understand what they are consenting to, the school will obtain consent directly

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from that pupil; otherwise, consent is obtained from whoever holds parental responsibility for the pupil.

A record of consent is maintained, which details the pupils for whom consent has been provided.

Parents and pupils can withdraw or amend their consent at any time. To do so, parents and pupils must contact the school office in writing or by email. Where parents or pupils withdraw or amend their consent, it will not affect the processing of any images or videos prior to when consent was withdrawn or amended. Processing will cease in line with parents' and pupils' requirements following this. Wherever it is reasonably practicable to do so, the school will take measures to remove any posts before consent was withdrawn or amended, such as removing an image from a social media site.

Only Trust-owned devices will be used to take images and videos of the school community, which have been pre-approved for use.

When posting images and videos of pupils (where permission is not in place for an individual pupil within an image), the school's and the Trust will apply data minimisation techniques, such as pseudonymisation (blurring a photograph), to reduce the risk of a pupil being identified. The schools and the Trust will not post pupils' personal details on social media platforms and pupils' full names will never be used alongside any videos or images in which they are present.

Before posting on social media, staff will:

- Refer to the consent record log to ensure consent has been received for that pupil and for the exact processing activities required.
- Ensure that there is no additional identifying information relating to a pupil.

Any breaches of the data protection principles will be handled in accordance with the Data Protection Policy.

### **8. Safeguarding**

Any disclosures made by pupils to staff about online abuse, harassment or exploitation, whether they are the victim or disclosing on behalf of another child, will be handled in line with the School's Safeguarding & Child Protection Policy.

Concerns regarding a staff member's online behaviour will be reported to the Headteacher or ELT dependent on the appropriate line management, who will decide on the best course of action in line with the relevant policies, e.g., the Staff Code of Conduct, Allegations of Abuse Against Staff Policy, and Disciplinary Policy. If the concern is about the Headteacher, it will be reported to the Director of HR.

Concerns regarding a pupil's online behaviour will be reported to the DSL, who will investigate any concerns with relevant staff members, e.g., the Headteacher, and manage concerns in accordance with relevant policies depending on their nature, e.g., Behaviour Policy and Safeguarding Policy.

Where there is a concern that illegal activity has taken place, the Headteacher or ELT will contact the police.

## **9. Blocked content**

In accordance with the school's E-Safety/Online Policy, IT will install firewalls on the school's network to prevent access to certain websites. The following social media websites are not accessible on the school's network (unless specific permission has been granted):

- X
- Facebook
- Instagram
- Tik Tok

The IT Strategic Lead retains the right to monitor staff and pupil access to websites when using the school's network and on school-owned devices.

Inappropriate content accessed on the school's computers will be reported to the Trust's IT provider so that the site can be blocked. Requests may be made to access erroneously blocked content by emailing a request to the Trusts IT provider.

## **10. Cyberbullying**

Any reports of cyberbullying on social media platforms by pupils will be handled in accordance with the school's Behaviour Policy.

Cyberbullying against pupils or staff is not tolerated under any circumstances. Incidents of cyberbullying are dealt with quickly and effectively wherever they occur. Allegations of cyberbullying from staff members will be handled in accordance with the Allegations of Abuse Against Staff Policy.

## **11. Training**

The Trust recognises that early intervention can protect pupils who may be at risk of cyberbullying or negative social media behaviour.

Pupils will be educated about online safety and appropriate social media use on a termly basis through a variety of mediums, including assemblies, PSHE lessons and cross-curricular links. Pupils will be provided with material to reinforce their knowledge.

Training for all pupils, staff and parents will be refreshed considering any significant incidents or changes.

## **12. Monitoring and review**

This policy will be reviewed on an annual basis by the Head of Communications & Fundraising and ratified by ELT.

The next scheduled review date for this policy is November 2024.

Any changes made to this policy will be communicated to all staff, pupils and parents.