

WOLFRETON ACADEMY and SIXTH FORM COLLEGE

Policy Document SOCIAL MEDIA POLICY

Written in July 2019 by:	
Assistant Headteacher – Personal Development and Safeguarding	
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Reviewed	
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1. Introduction

Wolfreton School and Sixth Form College understands that social media is a growing part of life outside of academy. We have a responsibility to safeguard our young people against potential dangers when accessing the internet within the academy, and to educate our young people about how to protect themselves online when outside of academy.

We are committed to:

- Encouraging the responsible use of social media by all staff, parents, carers and young people in support of the academy's mission, values and goals.
- Protecting our young people from the dangers of social media.
- Preventing and avoiding damage to the reputation of the academy through irresponsible use of social media.
- Protecting our staff from cyber bullying and potentially career damaging behaviour.
- Providing e-safety information for parents and carers.

2. Legal framework

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

- The General Data Protection Regulation (GDPR)
- DfE (2018) 'Data protection: a tool kit for schools'
- The Data Protection Act 2018

2.2 This policy will be implemented in accordance with the following academy policies and documents:

- Social Media Accounts Policy
- ICT Acceptable Use Agreement – Staff
- E-Safety Policy
- Data Protection Policy
- TCAT Code of Conduct

- Complaints Procedures Policy
- Anti-Bullying Policy

3. Roles and responsibilities

3.1 The Assistant Headteacher – Personal Development and Safeguarding (DSL) is responsible for:

- The overall implementation of this policy and ensuring that all staff, parents and young people 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.
- Ensuring that this policy, as written, does not discriminate on any grounds, including, but not limited to: ethnicity/national origin, culture, religion, gender, disability or sexual orientation.
- In conjunction with the Local Governing Body, handling complaints regarding this policy and its provisions in line with the Trust's Complaints Policy.
- Taking steps to minimise the amount of misplaced or malicious allegations in relation to social media use.
- Working alongside the Data Protection Officer (DPO) and IT department to ensure appropriate security measures are implemented and compliance with the GDPR.
- Acting as Investigating Officer to advise the headteacher where there may be the need to implement appropriate sanctions and disciplinary methods in the case of a breach of this policy.

3.2 Staff members are responsible for:

- Adhering to the principles outlined in this policy and the ICT Acceptable Use Policy – Staff.
- Ensuring young people 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, young people or parents to the AHT – Personal Development and Safeguarding (DSL) immediately.
- Attending any training on social media use offered by the academy.

3.3 Parents and carers are responsible for:

- Supporting the principles outlined in this policy.
- Taking appropriate responsibility for and promoting safe and responsible use of social media behaviour for both themselves and their children.

3.4 Young people are responsible for:

- Adhering to the principles outlined in this policy and the Student Code of Conduct - GREAT.
- Ensuring they understand how to use social media appropriately and stay safe online.

4. Definitions

4.1 For the purpose of this policy, the academy defines “**social media**” as any online platform that offers real-time interaction between the user and other individuals or groups including, but not limited to, the following:

- Blogs
- Collaborative spaces, such as Facebook, LinkedIn, Google+
- Media-sharing sites, such as YouTube, Instagram, Snapchat, Pinterest, Periscope, Vimeo
- ‘Micro-blogging’ applications, such as Twitter, Tumblr
- Online discussion forums, such as netmums.com

4.2 For the purpose of this policy, “**cyber bullying**” is defined as any social media or communication technology intentionally used to bully an individual or group, including the posting or sharing of messages, images or videos.

4.3 For the purpose of this policy, “**members of the academy community**” are defined as any teacher, member of support staff, person, parent of a person, governor or ex-person.

5. Data protection principles

5.1 The academy will obtain consent from young people and parents at the beginning of each academic year using the Images and Videos Parental Consent Form, which will confirm whether or not consent is given for posting images and videos of a person on social media platforms. The consent will be valid for the entire academic year.

5.2 A record of consent is maintained throughout the academic year, which details the young people for whom consent has been provided. The DPO is responsible for ensuring this consent record remains up-to-date.

5.3 For the purpose of section 5.1, where a person is assessed by the academy to have the competence to understand what they are consenting to, the academy will obtain consent directly from that person; otherwise, consent is obtained from whoever holds parental responsibility for the child.

5.4 Parents and young people are able to withdraw or amend their consent at any time. To do so, parents and young people must inform the academy in writing.

5.5 Consent can be provided for certain principles only, for example only images of a person are permitted to be posted, and not videos. This will be made explicitly clear on the consent form provided.

5.6 Where parents or young people 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 young people’ requirements following this.

5.7 In line with section 5.5, wherever it is reasonably practicable to do so, the academy will take measures to remove any posts before consent was withdrawn or amended, such as removing an image from a social media site.

5.8 The academy will only post images and videos of young people for whom consent has been received.

- 5.9 Only academy-owned devices will be used to take images and videos of the academy community, which have been pre-approved by the Operations Manager and IT department for use.
- 5.10 When posting images and videos of young people, the academy will apply data minimisation techniques, such as pseudonymisation (blurring a photograph), to reduce the risk of a person being identified.
- 5.11 The academy will not post young people' personal details on social media platforms other than reference to first name, should appropriate consent be received.
- 5.12 Young people' full names will never be used alongside any videos or images in which they are present.
- 5.13 Only appropriate images and videos of young people will be posted in which they are suitably dressed, i.e. it would not be suitable to display an image of a person in swimwear.
- 5.14 When posting on social media, the academy will use group or class images or videos with general labels, e.g. 'sports day'.
- 5.15 Before posting on social media, staff will:
- Refer to the consent record log to ensure consent has been received for that person and for the exact processing activities required.
 - Ensure that there is no additional identifying information relating to a person.
- 5.16 Any breaches of the data protection principles will be handled in accordance with the academy's Data Protection Policy.
- 5.17 Consent provided for the use of images and videos only applies to academy accounts – staff, young people and parents are not permitted to post any imagery or videos on personal accounts.

6. Social media use – staff

Academy accounts

- 6.1 Academy social media passwords are held in the academy by the Operations Manager – these are not shared with any unauthorised young people, including young people, unless otherwise permitted by the headteacher. The Operations Manager may delegate responsibility for an account to a named member of staff within the academy; all account leaders will adhere to this policy in running the agreed account.
- 6.2 Staff will ensure any posts are positive in nature and relevant to young people, the work of staff, the academy or any achievements.
- 6.3 Staff will ensure the Operations Manager, or in the case of a delegated account, the account leader, has checked the content before anything is posted on social media.
- 6.4 If staff wish for reminders to be posted for parents, e.g. returning slips for a academy trip, staff will seek permission from the Operations Manager before anything is posted.
- 6.5 Staff will adhere to the data protection principles outlined in section 5 of this policy at all times.

- 6.6 Staff will not post any content online which is damaging to the academy or any of its staff or young people.
- 6.7 If inappropriate content is accessed online, a report form will be completed and passed on to the Senior ICT Officer or a member of the IT department who will inform the Assistant Headteacher – Personal Development and Safeguarding (DSL) and the Operations Manager. The IT department, under the direction of the Operations Manager and Assistant Headteacher – Personal Development and Safeguarding, retains the right to monitor staff members' internet usage in line with the Data Protection Policy.

Personal accounts

- 6.8 Staff members will not access social media platforms during lesson times.
- 6.9 Staff members will not use any academy-owned mobile devices to access personal accounts, unless it is beneficial to the material being taught, prior permission will be sought from the Assistant Headteacher – Personal Development and Safeguarding (DSL).
- 6.10 Staff members are permitted to use social media during break times and PPA.
- 6.11 Staff are not permitted to use the academy's WiFi network to access personal accounts, unless otherwise permitted by the Assistant Headteacher – Personal Development and Safeguarding (DSL), and once the Operations Manager has ensured the necessary network security controls are applied.
- 6.12 Staff will avoid using social media in front of young people.
- 6.13 Staff will not "friend" or otherwise contact young people or parents through their personal social media accounts.
- 6.14 If young people or parents attempt to "friend" a staff member they will report this to the Assistant Headteacher – Personal Development and Safeguarding (DSL).
- 6.15 Staff members will not provide their home address, phone number, mobile number, social networking details or email addresses to young people or parents – any contact with young people or parents will be done through authorised academy contact channels.
- 6.16 Staff members will ensure the necessary privacy controls are applied to personal accounts.
- 6.17 Staff members will avoid identifying themselves as an employee of Wolfreton School and Sixth Form College on their personal social media accounts.
- 6.18 No staff member will post any content online that is damaging to the academy or any of its staff or young people.
- 6.19 Where staff members use social media in a personal capacity, they will ensure it is clear that views are personal and are not that of Wolfreton School and Sixth Form College.
- 6.20 Staff members will not post any information which could identify a person, class or the academy – this includes any images, videos and personal information.

- 6.21 Staff will not take any posts, images or videos from social media that belong to the academy for their own personal use.
- 6.22 Staff members will not post anonymously or under an alias to evade the guidance given in this policy.
- 6.23 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.
- 6.24 Members of staff will be aware that if their out-of-work activity brings the academy into disrepute, disciplinary action will be taken.
- 6.25 Members of staff will regularly check their online presence for negative content via search engines.
- 6.26 Attempts to bully, coerce or manipulate members of the academy community via social media by members of staff will be dealt with as a disciplinary matter.
- 6.27 Members of staff will not leave a computer or other device logged in when away from their desk.
- 6.28 Staff members will use their academy email address for academy business and personal email address for their private correspondence; the two should not be mixed.

7. Social media use – young people and parents

- 7.1 Young people will not access social media during lesson time, unless it is part of a curriculum activity.
- 7.2 Young people and parents will not attempt to “friend” or otherwise contact members of staff through their personal social media accounts. Young people and parents are only permitted to be affiliates of academy social media accounts.
- 7.3 Where a person or parent attempts to “friend” a staff member on their personal account, it will be reported to the Assistant Headteacher – Personal Development and Safeguarding (DSL).
- 7.4 Young people and parents will not post anonymously or under an alias to evade the guidance given in this policy.
- 7.5 Young people and parents will not post any content online which is damaging to the academy or any of its staff or young people.
- 7.6 Young people are instructed not to sign up to any social media sites that have an age restriction above the person’s age.
- 7.7 If inappropriate content is accessed online on academy premises, it will be reported to a Pastoral Manager, Head of House or the Assistant Headteacher – Personal Development and Safeguarding (DSL).

- 7.8 Young people are not permitted to use the academy's WiFi network to access any social media platforms unless prior permission has been sought from the Assistant Headteacher – Personal Development and Safeguarding (DSL), and the Operations Manager has ensured appropriate network security measures are applied.
- 7.9 Parents are not permitted to use the academy's WiFi network to access any social media platforms on personal devices. Social media access on academy-owned devices may be permitted in line with 7.8.
- 7.10 Breaches of this policy will be taken seriously, and in the event of illegal, defamatory or discriminatory content could lead to prosecution, or exclusion.

8. Blocked content

- 8.1 In accordance with the academy's Data Protection Policy the IT department installs firewalls on the academy's network to prevent access to certain websites. The following social media websites are not accessible on the academy's network:
- Twitter
 - Facebook
 - Instagram
- 8.2 Attempts made to circumvent the network's firewalls will result in a ban from using academy computing equipment, other than with close supervision.
- 8.3 Inappropriate content accessed on the academy's computers will be reported to the Senior ICT officer so that the site can be blocked.
- 8.4 The Operations Manager retains the right to monitor staff and person access to websites when using the academy's network and on academy-owned devices.
- 8.5 Requests may be made to access erroneously blocked content by submitting a blocked content access form (Appendix 1) to the Operations Manager, which will be approved by the Assistant Headteacher – Personal Development and Safeguarding (DSL).

9. Cyber bullying

- 9.1 Cyber bullying incidents are taken seriously at Wolfreton School and Sixth Form College. Any reports of cyber bullying on social media platforms by young people will be handled in accordance with the Anti-Bullying Policy.
- 9.2 Allegations of cyber bullying from staff members will be handled in accordance with the Code of Conduct Policy and Disciplinary Policy.

- 9.3 Staff members will not respond or retaliate to cyber bullying incidents. Incidents will be reported as inappropriate, and support will be sought from the Assistant Headteacher – Personal Development and Safeguarding (DSL) and/or Headteacher.
- 9.4 Evidence from the incident will be saved, including screen prints of messages or web pages, and the time and date of the incident.
- 9.5 Where the perpetrator is a current person or colleague, most incidents can be handled through the academy's own disciplinary procedures.
- 9.6 Where the perpetrator is an adult, in nearly all cases, a member of the SLT will invite the victim to a meeting to address their concerns. Where appropriate, the perpetrator will be asked to remove the offensive content.
- 9.7 If the perpetrator refuses to comply, it is up to the academy to decide what to do next. This could include contacting the internet service provider in question through their reporting mechanisms, if the offensive content breaches their terms and conditions.
- 9.8 If the material is threatening, abusive, sexist, of a sexual nature or constitutes a hate crime, the academy will consider whether the police should be contacted.
- 9.9 As part of the academy's ongoing commitment to the prevention of cyber bullying, regular education and discussion about e-safety will take place as part of computing and PSHE.

10. Training

- 10.1. At Wolfreton School and Sixth Form College, we recognise that early intervention can protect young people who may be at risk of cyber bullying or negative social media behaviour. As such, teachers will receive training in identifying potentially at-risk young people.
- 10.2. Teachers and support staff will receive training on the Social Media Policy as part of their new starter induction.
- 10.3. Teachers and support staff will receive annual and ongoing briefings as part of their development.
- 10.4. Young people will be educated about e-safety and appropriate social media use on a termly basis through a variety of mediums, including: assemblies, PSHE lessons and cross-curricular links.
- 10.5. Young people will be provided with material to reinforce their knowledge, such as our E-Safety Leaflet for Young people.
- 10.6. E-safety and social media information will be shared with parents on an annual basis and provided with links to relevant resources.
- 10.7. Information shared with all young people, staff and parents will be refreshed in light of any significant incidents or changes.

11. Monitoring and review

- 11.1 This policy will be reviewed every two years by the Headteacher, in conjunction with the Assistant Headteacher – Personal Development and Safeguarding (DSL) and the Operations Manager (DPO).
- 11.2 Any changes made to this policy will be communicated to all staff, young people and parents.

Appendix 1: Blocked content access request form

Requester	
Staff name:	
Date:	
Full URL:	
Site content:	
Reasons for access:	
Identified risks and control measures:	
Authoriser	
Approved?	✓ / X
Reasons:	
Staff name:	
Date:	
Signature:	

Appendix 2: Inappropriate content report form

Staff name (submitting report):	
Name of individual accessing inappropriate content (if known):	
Date:	
Full URL(s):	
Nature of inappropriate content:	
To be completed by the Operations Manager	
Action taken:	
Staff name:	
Date:	
Signature:	