

# Wootton Academy Trust



## Social Media Policy

- a) This policy applies to all schools managed by Wootton Academy Trust
- b) This policy was adopted by Wootton Academy Trust in December 2012
- c) This policy was reviewed by Wootton Academy Trust in December 2012

## CONTENTS

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### CLAUSE

1.	Policy statement .....	1
2.	Who is covered by the policy? .....	1
3.	Scope and purpose of the policy .....	1
4.	Personnel responsible for implementing the policy .....	2
5.	Compliance with related policies and agreements .....	2
6.	Personal use of social media .....	3
7.	Monitoring .....	4
8.	[Business use of social media .....	4
9.	[Recruitment .....	5
10.	Responsible use of social media .....	5
11.	Monitoring and review of this policy .....	7

## **1. POLICY STATEMENT**

- 1.1 We recognise that the internet provides unique opportunities to participate in interactive discussions and share information on particular topics using a wide variety of social media, such as Facebook, Twitter, blogs and wikis. However, employees' use of social media can pose risks to our confidential and proprietary information, and reputation, and can jeopardise our compliance with legal obligations.
- 1.2 To minimise these risks, to avoid loss of productivity and to ensure that our IT resources and communications systems are used only for appropriate purposes, we expect all employees to adhere to this policy.
- 1.3 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 social media is used responsibly so that the confidentiality of pupils, staff and volunteers, ensure the reputation of Wootton Academy Trust is safeguarded.
- 1.4 Staff members must be conscious at all times of the need to keep their personal and professional lives separate.
- 1.5 This policy does not form part of any employee's contract of employment and it may be amended at any time.

## **2. WHO IS COVERED BY THE POLICY?**

- 2.1 This policy covers all individuals working at all levels and grades, including senior managers, officers, directors, employees, consultants, contractors, trainees, homeworkers, part-time and fixed-term employees, casual and agency staff and volunteers (collectively referred to as **staff** in this policy).
- 2.2 Third parties who have access to our electronic communication systems and equipment are also required to comply with this policy.

## **3. SCOPE AND PURPOSE OF THE POLICY**

- 3.1 This policy deals with the use of all forms of social media, including Facebook, LinkedIn, Twitter, Wikipedia, all other social networking sites, and all other internet postings, including blogs. 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 therefore be followed irrespective of the medium.
- 3.2 It applies to the use of social media for both business and personal purposes, whether during office hours or otherwise. The policy applies regardless of

whether the social media is accessed using our IT facilities and equipment or equipment belonging to members of staff.

- 3.3 Breach of this policy may result in disciplinary action up to and including dismissal. Disciplinary action may be taken regardless of whether the breach is committed during working hours, and regardless of whether our equipment or facilities are used for the purpose of committing the breach. Any member of staff suspected of committing a breach of this policy will be required to co-operate with our investigation, which may involve handing over relevant passwords and login details.
- 3.4 Staff may be required to remove internet postings which are deemed to constitute a breach of this policy. Failure to comply with such a request may in itself result in disciplinary action.

#### **4. PERSONNEL RESPONSIBLE FOR IMPLEMENTING THE POLICY**

- 4.1 The Board of Directors of Wootton Academy Trust has overall responsibility for the effective operation of this policy, but has delegated day-to-day responsibility for its operation to the Principal. Responsibility for monitoring and reviewing the operation of this policy and making recommendations for change to minimise risks also lies with the Principal.
- 4.2 All managers have a specific responsibility for operating within the boundaries of this policy, ensuring that all staff, understand the standards of behaviour expected of them and taking action when behaviour falls below its requirements. (Managers will be given training in order to do this.)
- 4.3 All staff are responsible for the success of this policy and should ensure that they take the time to read and understand it. Any misuse of social media should be reported to the Principal or a member of the Senior Leadership of the establishment. Questions regarding the content or application of this policy should be directed to the Principal.

#### **5. COMPLIANCE WITH RELATED POLICIES AND AGREEMENTS**

- 5.1 Social media should never be used in a way that breaches any of our other policies. If an internet post would breach any of our policies in another forum, it will also breach them in an online forum. For example, employees are prohibited from using social media to:
- (a) breach our obligations with respect to the rules of relevant regulatory bodies;
  - (b) breach any obligations they may have relating to confidentiality;
  - (c) breach our Disciplinary Policies ;

- (d) defame or disparage Wootton Academy Trust or its affiliates, customers, clients, business partners, suppliers, vendors or other stakeholders;
  - (e) harass or bully other staff in any way **OR** breach our Anti-Bullying Policy and/or our Dignity at Work Policy;
  - (f) unlawfully discriminate against other staff or third parties **OR** breach our Equal Opportunities Policy;
  - (g) breach our Acceptable use of ICT Policy (for example, never disclose personal information about a colleague online);
  - (h) breach any other laws or ethical standards (for example, never use social media in a false or misleading way, such as by claiming to be someone other than yourself or by making misleading statements).
- 5.2 Staff should never provide references for other individuals on social or professional networking sites, as such references, positive and negative, can be attributed to Wootton Academy Trust and create legal liability for both the author of the reference and the Trust.
- 5.3 Employees who breach any of the above policies will be subject to disciplinary action up to and including termination of employment.
- 5.4 Staff members should inform the Principal immediately if a breach of policy is discovered or suspected. This is to ensure appropriate action can be taken to protect confidential information and limit the damage to the reputation of Wootton Academy Trust.

## **6. PERSONAL USE OF SOCIAL MEDIA**

- 6.1 We do not permit the use of social media for personal use from our computers, networks, other IT sources and communication systems. Circulating or posting commercial, personal, religious or political solicitations, or promotion of outside organisations unrelated to Wootton Academy Trust business are also prohibited.
- 6.2 Staff members must not have contact through any personal social medium with any pupil from Wootton Academy Trust, unless the pupils are family members.
- 6.3 On leaving Wootton Academy Trust's service, staff members must not contact its 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 until they are no longer considered a pupil
- 6.4 Caution is advised when inviting work colleagues to be 'friends' in personal social media sites as it may blur the line between work and social life. It is

also strongly advised that privacy levels on personal sites are set as strictly as they can be to protect personal privacy.

## **7. MONITORING**

7.1 The contents of our IT resources and communications systems are our property. Therefore, staff should have no expectation of privacy in any message, files, data, document, facsimile, telephone conversation, social media post conversation or message, or any other kind of information or communications transmitted to, received or printed from, or stored or recorded on our electronic information and communications systems.

7.2 We reserve the right to monitor, intercept and review, without further notice, staff activities using our IT resources and communications systems, including but not limited to social media postings and activities, to ensure that our rules are being complied with and for legitimate business purposes and you consent to such monitoring by Wootton Academy Trust your use of such resources and systems. This might include, without limitation, the monitoring, interception, accessing, recording, disclosing, inspecting, reviewing, retrieving and printing of transactions, messages, communications, postings, log-ins, recordings and other uses of the systems as well as keystroke capturing and other network monitoring technologies.

7.3 We may store copies of such data or communications for a period of time after they are created, and may delete such copies from time to time without notice.

7.4 Do not use our IT resources and communications systems for any matter that you wish to be kept private or confidential from Wootton Academy Trust.

## **8. BUSINESS USE OF SOCIAL MEDIA**

8.1 If your duties require you to speak on behalf of Wootton Academy Trust in a social media environment, you must still seek approval via the social media site creation Approval form (Appendix A). You may be required to undergo training before you do so and impose certain requirements and restrictions with regard to your activities.

8.2 Likewise, if you are contacted for comments about Wootton Academy Trust for publication anywhere, including in any social media outlet, direct the inquiry to the Principal and do not respond without written approval.

8.3 There must be a strong pedagogical or business reason for creating official school social media sites to communicate with pupils or others. Sites created must not breach the terms and conditions of the social media service providers, particularly with regard to minimum age requirements.

8.4 The use of social media for business purposes is subject to the remainder of this policy.

## **9. RECRUITMENT**

We may use internet searches to perform due diligence on candidates in the course of recruitment. Where we do this, we will act in accordance with our data protection and equal opportunities obligations.

## **10. RESPONSIBLE USE OF SOCIAL MEDIA**

10.1 The following sections of the policy provide staff with common-sense guidelines and recommendations for using social media responsibly and safely.

10.2 Protecting our reputation:

- (a) Staff must not post disparaging or defamatory statements about:
  - (i) Wootton Academy Trust
  - (ii) our students ;
  - (iii) suppliers and vendors; and
  - (iv) other affiliates and stakeholders,

but staff should also avoid social media communications that might be misconstrued in a way that could damage our reputation, even indirectly.

- (b) Staff should make it clear in social media postings that they are speaking on their own behalf. Write in the first person and use a personal e-mail address when communicating via social media.
- (c) Staff are personally responsible for what they communicate in social media. Remember that what you publish might be available to be read by the masses (including Wootton Academy Trust itself, future employers and social acquaintances) for a long time. Keep this in mind before you post content.
- (d) If you disclose your affiliation as an employee of Wootton Academy Trust, you must also state that your views do not represent those of your employer. For example, you could state, "the views in this posting do not represent the views of my employer". You should also ensure that your profile and any content you post are consistent with the professional image you present to clients and colleagues.
- (e) Avoid posting comments about sensitive school-related topics. Even if you make it clear that your views on such topics do not represent those of Wootton Academy Trust, your comments could still damage our reputation.

- (f) Information that staff members have access to as part of their employment, including personal information about pupils, and their family members and colleagues, must not be discussed. Photographs, videos and images identifying Wootton Academy Trust must not be published on personal social media.
- (g) Staff members must not edit open online encyclopaedias such as Wikipedia in a personal capacity at work. This is because the source will be recorded as the school's IP address, therefore appearing as though it comes from Wootton Academy Trust itself.
- (h) If you are uncertain or concerned about the appropriateness of any statement or posting, refrain from making the communication until you discuss it with your Line Manager.
- (i) If you see content in social media that disparages or reflects poorly on Wootton Academy Trust or our stakeholders, you should contact your Line Manager or refer to the Whistle Blowing Policy and follow its guidance. All staff are responsible for protecting our reputation.

#### 10.3 Respecting intellectual property and confidential information:

- (a) Staff should not do anything to jeopardise our reputation or other confidential information and intellectual property through the use of social media.
- (b) In addition, staff should avoid misappropriating or infringing the intellectual property of other companies and individuals, which can create liability for Wootton Academy Trust, as well as the individual author.
- (c) Do not use our logos, brand names, slogans or other trademarks, or post any of our confidential or proprietary information without prior written permission.
- (d) To protect yourself and Wootton Academy Trust against liability for copyright infringement, where appropriate, reference sources of particular information you post or upload and cite them accurately. If you have any questions about whether a particular post or upload might violate anyone's copyright or trademark, ask the Finance Director who will check with our legal advisers before making the communication.

#### 10.4 Respecting colleagues, clients, partners and suppliers:

- (a) Do not post anything that your colleagues or our customers, clients, business partners, suppliers, vendors or other stakeholders would find offensive, including discriminatory comments, insults or obscenity.
- (b) Do not post anything related to your colleagues or our customers, clients, business partners, suppliers, vendors or other stakeholders without their written permission.



**11. MONITORING AND REVIEW OF THIS POLICY**

- 11.1 The Principal and the Academy Board of Directors shall be responsible for reviewing this policy each year or as deemed appropriate to ensure that it meets legal requirements and reflects best practice. It is particularly important that this policy is reviewed regularly due to the fast moving nature of technology.
- 11.2 The Principal has responsibility for ensuring that any person who may be involved with administration or investigations carried out under this policy receives regular and appropriate training to assist them with these duties.
- 11.3 Staff are invited to comment on this policy and suggest ways in which it might be improved by contacting the Finance Director.

# APPENDIX A

## Requirements for creating social media sites on behalf of Wootton Academy Trust

### 11.4 A.1 CREATION OF SITES

11.5 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 Wootton Academy Trust.

11.6 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.

11.7 A.1.3 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 Principal or other senior position holder.

11.8 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.

11.9 A.1.5 The Principal of relevant 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.

11.10 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 school's brand and image.

11.11 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 school or the County Council. 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 your Communications Manager (or appropriate manager).

#### 11.12 **A.3 APPROVAL FOR CREATION OF OR PARTICIPATION IN WEBSITE**

- 11.13 A.3.1 Wootton Academy Trust social media sites can be created only by or on behalf of the school. Site administrators and moderators must be Wootton Academy Trust employees or other authorised people.
- 11.14 A.3.2 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 Principal or other nominated senior staff member.
- 11.15 A.3.3 Approval for participating, on behalf of Wootton Academy Trust, on sites created by third parties must be obtained from the Principal or other nominated senior staff
- 11.16 A.3.4 Content contributed to own or third-party hosted sites must be discussed with and approved by the staff member's line manager or other appropriate nominated senior manager.

- 11.17 A.3.5 The school's Principal or other nominated senior manager must be consulted about the purpose of the proposed site and its content. In addition, approval must be obtained for the use of the school logo and brand.
- 11.18 A.3.6 Staff must complete the Social Media Site Creation Approval Form (Appendix B) and forward it to the school's Principal or other nominated Senior Manager (i.e. Deputy Head or Finance Director) 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 Principal or other nominated senior manager immediately. Staff members must not communicate with the media without the advice or approval of the Principal or other nominated senior manager

#### **A.4 CONTENT OF WEBSITE**

**A.4.1** Wootton Academy Trust -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 or County Council standards of professional conduct and service.

A.4.2 Staff members must not disclose information, make commitments or engage in activities on behalf of Wootton Academy Trust 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 Wootton Academy Trust -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.

A.4.8 Staff members participating in Wootton Academy Trust -hosted or other approved sites must identify who they are. They must disclose their positions within the school 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 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.

A.5.3 The content and postings in Wootton Academy Trust -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. Their comments must be reviewed regularly and any that do not comply with the Wootton Academy Trust 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 school's Principal or other nominated senior manager.

A.5.9 Approval must also be obtained from the school's Principal or other nominated senior manager to make an external organisation a 'friend' of the site.

## APPENDIX B

### Wootton Academy Trust Social Media Site Creation Approval Form

Use of social media on behalf of Wootton Academy Trust must be approved prior to setting up sites.

Please complete this form and forward it to the school's Principal

#### 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 insert school name (provide age range)
- Insert school name 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 insert school name (provide age range)
- Insert school name staff
- Pupils' family members
- Pupils from other schools (provide names of schools)
- External organisations
- Members of the public
- Others; please provide details

**ADMINISTRATION 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?	<input type="checkbox"/> Insert school name <input type="checkbox"/> 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).

<b><u>Line Manager</u></b> I approve the aims and content of the proposed site.	Name	
	Signature	
	Date	
<b><u>Other Senior Manager</u></b> I approve the aims and content of the proposed site and the use of school brand and logo.	Name	
	Signature	
	Date	
<b><u>Principal</u></b>	Name	
	Signature	
	Date	