

# Richmond Hill Primary Academy



## School Social Media Policy

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## **Statement of intent**

The internet allows for a range of social media platforms that create a vast amount of opportunities, including allowing schools to develop communication systems and to interact with the public.

While Richmond Hill Primary Academy recognises the benefits that this can hold, we are aware of the problems that can incur when using social media.

This policy sets out the principles that pupils, staff, parents and contractors are expected to follow when using social media both on behalf of the school and about the school.

This policy has been created with the following aims:

- Social media is used responsibly
- Relevant legislation is complied with
- The confidentiality and data protection of all members of the school community
- The school community is aware of the correct way to use social media
- The reputation of the school is not affected by the use of social media
- Parents and the public have confidence in school decisions and services
- Staff members' personal and professional lives are kept separate

## **1. Legal framework**

- 1.1. This policy will have due regard to legislation, including, but not limited to, the following:
  - The Data Protection Act 2018
  - The General Data Protection Regulation 2018
  - The Safeguarding Vulnerable Groups Act 2006
  - The Freedom of Information Act 2000
  - The Computer Misuse Act 1990, amended by the Police and Justice Act 2006
- 1.2. This policy also has due regard to non-statutory guidance including, but not limited to, the following:
  - HM Government (2015) 'Information sharing'
- 1.3. Staff members will also be aware that other laws relating to libel, defamation, harassment and copyright may apply to information posted on social media, including:
  - Protection of Children Act 1978
  - Defamation Act 2013
  - Protection from Harassment Act 1997
  - Malicious Communications Act 1988
  - Communications Act 2003
  - Copyright, Designs and Patents Act 1988
  - Human Rights Act 1998
- 1.4. This policy should be read in conjunction with the following school policies:
  - Acceptable Use Policy
  - E-safety Policy
  - Anti-Bullying Policy
  - Child Protection and Safeguarding Policy
  - Data Protection Policy
  - Social Media Agreement
  - Social Media Code of Conduct for Parents
  - Disciplinary Policy and Procedure

## **2. Roles and responsibilities**

- 2.1. The business manager will be responsible for:
  - Monitoring and reviewing all school-run social media accounts.
  - Vetting and approving individuals who wish to be 'friends' on the school's social media platforms.
  - Consulting with staff on the purpose of the social media account and the content published.

- Maintaining a log of inappropriate comments or abuse relating to the school.
  - Handling inappropriate comments or abuse posted on the school's social media accounts, or regarding the school.
  - Creating a terms of use agreement, which all content published must be in accordance with.
  - Ensuring that enough resources are provided to keep the content of the social media accounts up-to-date and relevant.
- 2.2. The Principal is responsible for holding a meeting with any individuals who are seen to be in breach of this policy.
- 2.3. The DPO will be responsible for:
- Ensuring that social media is used in accordance with the Data Protection Act 2018.
  - Obtaining consent from individuals who the school wishes to post content about.
- 2.4. Members of staff are responsible for:
- Not engaging in activities involving social media which might bring the school into disrepute.
  - Not representing their personal views as those of the school on any social medium.
  - Acting in the best interests of pupils when creating, participating in or contributing to social media sites.
  - Demonstrating the same high standards of behaviour as expected within the school.
  - Only using official school social media sites for communicating with pupils, parents, or to enable pupils or parents to communicate. Social media sites may be used in other ways, e.g. advertising a job vacancy; however, this will be approved by the business manager.

### **3. General social media rules**

- 3.1. Staff members' personal information, or pupils' personal information, will not be discussed on social media.
- 3.2. Authors will be accurate, fair and transparent when creating or altering online sources of information.
- 3.3. Social media will not be used as a platform to attack, insult, abuse or defame pupils, their family members, colleagues or other professionals.
- 3.4. All content expressed on school social media accounts will not breach copyright, data protection or freedom of information legislation.
- 3.5. The school social media accounts will comply with site rules at all times, particularly with regards to the minimum age limit for use of the site.

- 3.6. It will be noted that each networking site has their own rules which must be followed – the business manager will induct staff to each new social media platform, providing them with the relevant training and information.

#### **4. Data protection**

- 4.1. The school will ensure that data that is to be used on social media, i.e. image, is obtained and processed in line the Data Protection Act 2018 and the school's Data Protection Policy.
- 4.2. Unless another lawful basis is being used, the school will not post content without the express consent of individuals.
- 4.3. Pupils will be asked to provide their own consent, where appropriate.
- 4.4. A record of consent is maintained throughout the academic year, which details the pupils for whom consent has been provided. The DPO is responsible for ensuring this consent record remains up-to-date.
- 4.5. The DPO and pupils' parents will assess whether a pupil is capable of providing their own consent for content to be published on social media, e.g. images.
- 4.6. Parents and pupils are able to withdraw or amend their consent at any time. To do so, parents and pupils must inform the school in writing.
- 4.7. 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.
- 4.8. 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.
- 4.9. The school will only use first names when posting images, so that individuals are not easily identifiable.
- 4.10. When posting images and videos of pupils, the school will apply data minimisation techniques, such as pseudonymisation (blurring a photograph), to reduce the risk of a pupil being identified.
- 4.11. The school's social media privacy settings will be set so that only certain people can see the content.
- 4.12. The school will ensure that all processing information in relation to social media is included on privacy notices.
- 4.13. The school will ensure that any photographs that are to be published have been checked by the DPO.

- 4.14. If an individual wishes for the school to remove an image on social media in which they appear, the school will oblige.
- 4.15. As well as seeking consent beforehand, the school will ensure the details of any personal data that is shared on social media will be outlined in a privacy notice.

## **5. Creating accounts on behalf of the school**

- 5.1. The school social media sites will only be created and monitored by the business manager and other designated staff members.
- 5.2. There will be a strong pedagogical or business reason for the creation of social media accounts on behalf of the school; official school profiles and accounts will not be created for trivial reasons.
- 5.3. If members of staff wish to create a new social media account, they will complete the [Social media site creation approval form](#) and return it to the business manager, who will approve it with the Principal and then create the account on the behalf of the requesting individuals.
- 5.4. The business manager will be consulted about the purpose of the proposed site and its content.
- 5.5. A school social media account will be entirely separate from any personal social media accounts held by staff members and will be linked to an official school email account.
- 5.6. Consideration will be given to the following aspects:
  - The purpose for using social media
  - Whether the overall investment will achieve the pedagogical aim
  - 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 are staff members willing to commit to the proposed site
  - A clear plan which outlines aspects such as how long the site will last
  - How the success of the site will be evaluated
- 5.7. Approval for participating, on behalf of the school, on sites created by third parties will be obtained from the Principal via the business manager

## **6. Content published on behalf of the school**

- 6.1. All content and information provided on social media accounts will be worthwhile and accurate.
- 6.2. Staff will only post information on school social media accounts where it is deemed beneficial and necessary.

- 6.3. Staff members will not disclose information, make commitments or engage in activities on behalf of the school without authorisation from the business manager.
- 6.4. All staff will be made aware of the relevant child protection, privacy, data protection, libel, defamation, harassment and copyright law that may apply to the content.
- 6.5. Staff members will respect their audience and be sensitive in the tone of language used when discussing topics that others may find controversial or objectionable.
- 6.6. Consideration will be given to the type of language that is used in order to ensure it is appropriate for the audience, e.g. swearing and innuendos are highly inappropriate on school sites.
- 6.7. Personal opinions will not be expressed on any school media accounts.
- 6.8. A document stating the terms of use will be created by the business manager, which all content will comply with.
- 6.9. School account profiles will always include the school logo or brand to ensure transparency and confidence in the site.
- 6.10. The school logo will, where possible, link back to the relevant page on the school website.
- 6.11. Any content that is contributed to staff members' own or third-party hosted sites will be discussed with, and approved by, the business manager.
- 6.12. The business manager will take overall responsibility to ensure that enough resources are provided to keep the content of the site up-to-date and relevant.
- 6.13. Images and videos of pupils will not be published without written consent from a parent/guardian, or the pupil when appropriate.
- 6.14. Content will not identify any pupil by their full name or allow any identifying information to be published without the written consent of a parent/guardian, or the pupil when appropriate.
- 6.15. Where a pupil is assessed by the school to have the competence to understand what they are consenting to, the school will obtain consent directly from that pupil; otherwise, consent is obtained from whoever holds parental responsibility for the child.
- 6.16. Consideration will be given to the level of engagement of contributors.
  - Measures will be in place to monitor content uploaded by users.
  - Permission will be sought from the relevant people before citing or referencing their work.

## 7. Parental interaction with school social media



- 7.1. Parents are able to comment on or respond to information shared via social media sites; however, parents must do so in a way which does not damage the reputation of the school.
- 7.2. Parents will not share any photos or personal details of pupils when commenting on the school social media sites.
- 7.3. Parents will not post comments concerning other pupils or staff members on the school social media sites, in accordance with the Social Media Code of Conduct for Parents.
- 7.4. Any parents that are seen to be breaching the guidance in this policy will be required to attend a meeting with the Principal, and may have their ability to interact with the social media websites removed.

## **8. Monitoring and moderation**

- 8.1. All content is moderated and reviewed, using the terms of use as guidance.
- 8.2. Moderation of social media content is the responsibility of the individual or team that initiated the account.
- 8.3. At least two members of staff will be appointed as administrators, whose role it is to review and moderate the content.
- 8.4. In case of absence or turnover, other members of staff will be adequately trained and prepared to maintain and moderate the social media accounts.
- 8.5. Sites created for, and contributed to, by pupils will have the strongest privacy settings to prevent breaches of confidentiality.
- 8.6. Pupils will read and sign a Social Media Agreement prior to using any school social media accounts.
- 8.7. Pupils and other young participants on school social media accounts will not be able to be identified.
- 8.8. Staff members contributing to school accounts will identify who they are.
- 8.9. Members of staff will disclose their positions within the school on social media accounts and profiles. They will never give out their personal information, such as home contact details or email addresses, on these sites.
- 8.10. Inappropriate comments or abuse about the school are to be immediately removed, and reported to the business manager. Such comments will never be posted on behalf of the school.
- 8.11. In the case of illegal content or behaviour, the business manager will immediately inform the appropriate authorities, such as the police and the Child Exploitation and Online Protection Centre.
- 8.12. Any media enquiries will be forwarded to the business manager immediately.

- 8.13. Staff members will not communicate with the media without the advice or approval of the business manager.
- 8.14. Care will be taken to ensure that any links to external sites from the account are appropriate and safe.
- 8.15. Any proposal to use social media to advertise the school, or a third party, will be approved by the business manager.
- 8.16. Approval will be obtained from the school's business manager to mention an external organisation in content or make them a 'friend' or 'follower'.
- 8.17. Individuals wishing to be 'friends' on the school's social media platforms will be vetted and approved by the business manager before being accepted. Their activity will be reviewed regularly and checked against the terms of use.

## **9. Breaches of the policy**

- 9.1. Any breach of this policy may lead to disciplinary action being taken against the staff member(s) involved, in line with the school's Disciplinary Policy and Procedure.
- 9.2. Breaches of confidentiality, defamation or damage to the reputation of the school may result in disciplinary action or dismissal.
- 9.3. The school will inform the LA immediately of any breaches of the policy, so that appropriate action can be taken.
- 9.4. Any action that is taken against breaches of this policy will be according to the relevant disciplinary procedures.
- 9.5. Data breaches may be reported to the ICO, if there is a risk of the data adversely affecting individuals' rights and freedoms.
- 9.6. The DPO will be responsible for handling any breaches.

## **10. Monitoring and review**

- 10.1. This policy will be reviewed on two yearly basis by the business manager in conjunction with the Principal; any changes made to the policy will be communicated to all members of staff and parents, where necessary.
- 10.2. All members of staff are required to familiarise themselves with this policy as part of their induction programmes.

## Social media site creation approval form

Use of social media on behalf of the school must be approved by the Principal prior to setting up sites.

Please complete this form and return it to the Principal.

Team details		
Department:		
Moderator of site:		
Purpose of using social media		
Please describe why you want to set up this site and the content of the site		
What are your aims and what do you hope to achieve by setting up this site?		
What is the proposed content of the site?		
Proposed audience of the site		
<input type="checkbox"/> Pupils of the school Ages: age range	<input type="checkbox"/> School staff	<input type="checkbox"/> Pupils' family members
<input type="checkbox"/> External organisations	<input type="checkbox"/> Pupils from other schools Schools involved: name of school	<input type="checkbox"/> Members of the public
<input type="checkbox"/> Other (please give details)		
Proposed contributors to the site		
<input type="checkbox"/> Pupils of the school Ages: age range	<input type="checkbox"/> School staff	<input type="checkbox"/> Pupils' family members
<input type="checkbox"/> External organisations	<input type="checkbox"/> Pupils from other schools Schools involved: name of school	<input type="checkbox"/> Members of the public
<input type="checkbox"/> Other (please give details)		
Administration of the site		
Names of administrators (the site must have at least two approved administrators):		
Who will vet external contributors? (Please state name and job role)		
Who will host the site?		

Proposed date of going live:	
How do you propose to advertise for contributors?	
If contributors include pupils, how do you propose to inform and obtain the consent of parents or responsible adults?	
What security measures will you take to prevent unwanted or unsuitable individuals from contributing or becoming 'friends' etc. 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 Principal.

Business manager  I approve the aims and content of the proposed site and the use of the school brand and logo.	Name:	
	Signature:	
	Date:	
Headteacher  I approve the aims and content of the proposed site and the use of the school brand and logo.	Name:	
	Signature:	
	Date:	

## Social media consent form

This consent form provides information pertaining to how Richmond Hill Primary Academy wishes to use personal data on social media, details the terms under which the school will use this data and requests consent for the school to use your personal data on social media.

Name of parent:	
Name of pupil:	
Year:	

Why do we need your consent?

The school requests the consent of parents on an annual basis to use images and videos of their child for a variety of different purposes.

Without your consent, the school will not use images, videos, names or other forms of personal data of your child on social media. Similarly, if there are only certain conditions under which you would like images and videos of your child to be used, the school will abide by the conditions you outline in this form.

Why will we be using personal data on social media?

The school wants to use certain types of data on social media to promote the positive and inclusive ethos of the school – we aim to celebrate our pupils' and school's achievements and social media allows us to do this.

Where the school uses images of individual pupils, the name of the pupil will not be disclosed. Where an individual pupil is named in a written publication, a photograph of the pupil will not be used to accompany the text.

If, for example, a pupil has won an award and their parent would like their name to be published alongside their image, separate consent will be obtained prior to this.

With your consent, the school may use personal data on social media, the school website, in school prospectuses and other printed publications, such as a newsletter.

Who will be able to see the data once it's on social media?

The school's privacy settings only allow people who have been accepted to view the content on our social media platforms; additionally, where it is possible, the school's settings do not allow for further sharing. Please note, this sharing restriction may not be possible on all social media platforms, meaning that, if the content has been posted and is subsequently shared, more people will be able to view that piece of content.

What are the conditions of use?

- This consent form is valid for the current 2018/2019 – 2019/2020 academic year.
- It is the responsibility of parents to inform the school, in writing, if consent needs to be withdrawn or amended.

- The school will not use the personal details or full names of any pupil in an image or video on social media.
- The school will not include personal emails or postal addresses, telephone or fax numbers on images or videos on social media.
- The school may use pictures of pupils and teachers that have been drawn by pupils.
- The school may post pictures of work created by pupils on social media.
- The school may use group or class images or videos with general labels, e.g. 'sports day'.
- The school will only use images and videos of pupils who are suitably dressed, i.e. it would not be suitable to display an image of a pupil in swimwear.
- The school will not post any sensitive data, such as details of SEND, without express and additional consent, and will then still anonymise the posts.

### Providing your consent

Please read the following conditions thoroughly and provide your consent as appropriate by ticking either 'Yes' or 'No' for each criteria.

The school will only post personal data on social media for the conditions that you provide consent for.

I provide consent to:	Yes	No
Using images of my child on the school's social media accounts .		
Using videos of my child on the school's social media accounts..		
Using images of my child on social media, including the following: [Delete and/or add as appropriate] <ul style="list-style-type: none"> <li>• Twitter</li> <li>• School App</li> </ul>		
Using videos of my child on social media, including the following: [Delete and/or add as appropriate] <ul style="list-style-type: none"> <li>• Twitter</li> <li>• School App</li> </ul>		
Using my child's first name on social media.		
Using my child's age on social media.		

### Refreshing your consent

This form is valid for the entire academic year, – it will be updated on an annual basis. Parents are required to fill in a new form for their child every academic year.

Consent will also be refreshed where any changes to circumstances occur – this can include, but is not limited to, the following:

- New requirements for consent, e.g. an additional social media account will be used to share pupil images and videos

- Changes to a pupil's circumstances, e.g. safeguarding requirements mean a pupil's image cannot be used
- Changes to parental consent, e.g. amending the provisions for which consent has been provided for

Where you would like to amend the provisions for which consent has been provided, you must submit your request in writing to the data protection officer (DPO). A new form will be supplied to you to amend your consent accordingly and provide a signature.

#### Withdrawing your consent

Parents have the right to withdraw their consent at any time. Withdrawing your consent will not affect the legality of processing personal data that was shared prior to withdrawal; however, the school will make every effort to remove posts about the pupil where possible, e.g. images of the pupil on social media will be removed.

If you would like to withdraw your consent, you must submit your request in writing to the DPO.

#### Declaration

I, \_\_\_\_\_ (name of parent), understand:

- Why my consent is required.
- The reasons why name of school uses my child my child's personal data on social media.
- Who will be able to view my child's personal data once posted.
- The conditions under which the school uses personal data of my child on social media.
- I have provided my consent above as appropriate, and the school will act in accordance with my requirements.
- Consent is refreshed on an annual basis and I must re-provide consent in subsequent academic years.
- I will be required to re-provide consent where any circumstances change.
- I can amend or withdraw my consent at any time and must do so in writing to the DPO.

Name of parent: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

If you have any questions regarding this form, please do not hesitate to contact the DPO at PA@richmond.doncaster.sch.uk or 01302 782421.

