



## **SOCIAL MEDIA POLICY**

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Formally endorsed by	Trustees	
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## **SOCIAL MEDIA POLICY**

### **Introduction**

St Paul's Waldorf School applies this policy to every individual working for the School irrespective of their status, level or grade. It, therefore, includes the Headteacher, Chairs of Meetings, members of the Senior Leadership Team, Trustees, employees, consultants, contractors, trainees, volunteers, home-workers, part-time or fixed-term employees, casual and agency staff (collectively referred to as "you" and "Staff" in this policy). Third parties who have access to our electronic communication systems and equipment are also required to comply with this policy.

Except where expressly stated otherwise, this policy does not form part of the terms and conditions of employee's employment with the School and is not intended to have contractual effect. It does however set out our current practices and required standards of conduct and all staff are required to comply with its contents.

This policy may be amended from time to time, particularly in accordance with our data protection obligations and staff will be notified of any changes no later than one month from the date those changes are intended to take effect.

We understand that the internet and social media platforms are increasingly used as a means of communication both at work and at home.

This policy outlines the standards we require Staff to observe when using social media, the circumstances in which we will monitor use of social media and the action we will take if this policy is breached.

It applies to the use of social media for both work and personal purposes, whether during work hours or otherwise. This policy applies regardless of whether social media is accessed using our IT facilities and equipment or equipment belonging to yourself.

We recognise that the internet provides unique opportunities to participate in interactive discussions and share information on particular topics using a wide variety of different applications. However, your use of social media can pose a risk to the School's confidential and proprietary information, its reputation and it can jeopardise our compliance with legal obligations.

To minimise these risks, to avoid loss of productivity and to ensure that our IT resources and communications systems are used only for appropriate work-related purposes, all of our Staff are required to comply with the provisions in this policy.

This policy is to be read in conjunction with our Electronic Information and Communications Systems Policy.

### **Scope and Purpose of this Policy**

In this policy, 'social media' means internet-based applications which allow users to collaborate or interact socially by creating and exchanging content, such as social networks or platforms, community sites, blogs, microblogging sites, wikis, web forums, social bookmarking services and user rating services. Examples include Facebook, LinkedIn, Yammer, YouTube, Instagram, X (formerly known as Twitter), Snapchat, TikTok, Tumblr, Flickr, SlideShare, Foursquare and Pinterest and the review areas of e-commerce sites.

Social media platforms allow us to build connections and to share ideas and content more broadly and quickly than ever before, and we support their use. However, improper use of social media may give rise to a breach of your employment contract and/or our policies, and/or the following:

- bullying, sexual harassment, harassment and unlawful discrimination;
- defamation (i.e. damaging the good reputation of another person or organisation);
- contempt of court (i.e. interfering with the administration of justice, e.g. by revealing someone's identity that had been protected by the courts);
- breach of data protection laws;
- misuse of confidential information belonging to us or to our Staff, pupils or parents, affiliates, partners, suppliers, vendors or other stakeholders; and
- damage to the reputation of the user, the School and/or our Staff, pupils or parents, affiliates, partners, suppliers, vendors or other stakeholders.

This policy does not seek to regulate how Staff use social media in a purely private capacity, provided its use has no bearing on us or our activities.

This policy is intended to ensure that Staff understand the rules governing their use of social media in relation to their work for the School, or when referencing the School, or where use of social media may affect us or our activities. It is designed to help you use these platforms and services responsibly, so as to minimise the risks set out above and to ensure consistent standards of use of social media.

This policy therefore applies where:

- your use of social media relates to us or our activities;
- your use of social media relates to, or is otherwise connected with, your work, whether the intended use is personal or professional;
- you represent yourself, or are otherwise identifiable, as someone employed by, or otherwise associated with us.

### **Personnel Responsible for Implementing the Policy**

The Board of Trustees overall responsibility for the effective operation of this policy but has delegated day-to-day responsibility for its operation to the Headteacher.

Responsibility for monitoring and reviewing the operation of this policy and making recommendations for change to minimise risks also lies with the Headteacher in liaison with the HR Group.

All senior Staff have 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 the requirements.

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 Headteacher in the first instance.

Questions regarding the content or application of this policy should be directed by email to the Headteacher.

### **General rules for use of social media**

Social media should never be used in a way that breaches any of our other policies or your contract of employment. If an internet post would breach any of our policies in another forum, it will also breach them in an online forum. For example, Staff are prohibited from using social media to:

- breach our Electronic Information and Communications Systems Policy;
- breach our obligations with respect to the rules of relevant regulatory bodies;
- breach any obligations they may have relating to confidentiality;
- breach our Code of conduct;
- defame or disparage the School, its Staff, pupils or parents, affiliates, partners, suppliers, vendors or other stakeholders or damage to the reputation of such;
- harass, sexually harass or bully other Staff or third parties in any way or otherwise breach our Anti-Harassment and Bullying Policy;
- unlawfully discriminate against other Staff or third parties or breach our Equal Opportunities and Diversity policy;
- not create or exchange or link to abusive, obscene, discriminatory, derogatory, defamatory or pornographic content;
- not upload, post or forward any content belonging to a third party unless you have that third party's consent;
- breach data protection laws (for example, never disclose personal information about a colleague online);
- 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).

Staff should never provide references for other individuals on social or professional networking sites, as such references, positive and negative, can be attributed to the School and create legal liability for both the author of the reference and the organisation.

Staff who breach any of the above policies may be subject to disciplinary action up to and including termination of employment for gross misconduct.

### **Personal use of Social Media**

You must not use our computers, networks or systems (including via smartphones or tablets) to access social media platforms for personal use during working hours. Permission to use our systems to access social media platforms for personal use may be withdrawn at any time at our discretion. Any use of social media platforms is strictly prohibited.

You must not use a work email address to sign up to any social media account and any personal social media page should not make reference to your employment with the School (excluding LinkedIn), unless prior permission is sought from the Headteacher.

Staff must not take photos or posts from social media that belongs to the School for their own personal use.

You should have no expectation of privacy or confidentiality in anything you create or share on social media platforms. When you create or exchange content using social media you are making a public statement. As such, your content will not be private and can be retweeted, copied or forwarded to third parties without your consent. You should therefore consider the potential sensitivity of disclosing information (such as health information) on a platform. Once sensitive or confidential information (or offensive or defamatory information) has been disclosed, it cannot be recovered and this may result in liability both for the School and for you personally.

Bear in mind that, even if you are using social media in a personal capacity, other users who are aware of your association with the School might reasonably think that you speak on behalf of it. You should always take account of any adverse impact your content might have on the School reputation or its relationships with parents, pupils, affiliates, partners, suppliers, vendors or other stakeholders.

## **Monitoring**

The contents of our IT resources and communications systems are the School's property and therefore, Staff should have no expectation of privacy in any message, files, data, document, 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.

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 your acknowledgement of this policy and 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, logins, recordings and other uses of the systems as well as keystroke capturing and other network monitoring technologies.

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.

All Staff are advised not to use our IT resources and communications systems for any matter that he or she wishes to be kept private or confidential from the School.

## **Educational or Extra Curricular use of Social Media**

If your duties require you to speak on our behalf in a social media environment, you must follow the protocol outlined below.

The Headteacher may require you to undergo training before you use social media on the School's behalf and impose certain requirements and restrictions with regard to your activities.

Furthermore, if you are contacted for comments about the School for publication on any forum, including in any social media outlet, you must direct the inquiry to the Headteacher and must not respond without advanced written approval.

## **Recruitment**

We may use internet searches, including social media searches, to perform pre-employment checks on candidates in the course of recruitment. Where we do this, we will act in accordance with our data protection and equal opportunities obligations.

## **Responsible use of Social Media**

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

### **1. Photographs for use of Social Media**

Any photos for social media posts may only be taken using School cameras or devices that have been approved in advance by the Headteacher.

Where any device is used that does not belong to the School, all photos must be deleted immediately from the device, once the photos have been uploaded to a device belonging to the School.

## **2. Protecting the School's Reputation**

You should have no expectation of privacy or confidentiality in anything you create or share on social media platforms. When you create or exchange content using social media you are making a public statement. As such, your content will not be private and can be retweeted, copied or forwarded to third parties without your consent. You should therefore consider the potential sensitivity of disclosing information (such as sickness absence information) on a platform. Once sensitive or confidential information (or offensive or defamatory information) has been disclosed, it cannot be recovered, and this may result in liability for both the School and the member of staff personally.

Bear in mind that, even if you are using social media in a personal capacity, other users who are aware of your association with the School might reasonably think that you speak on the school's behalf. You should take account of any adverse impact your content might have on the School's reputation or our Staff, pupils or parents, governors, members, trustees, affiliates, partners, suppliers, vendors or other stakeholders

When creating or exchanging content on a social media platform, you must at all times comply with your contract of employment with the School, our disciplinary rules and any policies that may be relevant.

In particular you must:

- not breach our Anti-Bullying and Harassment Policy by harassing, sexually harassing or bullying other members of staff;
- not discriminate against other members of staff or third parties;
- not breach our Data Protection Policy, Electronic Information and Communications Systems Policy or Whistleblowing Policy and Procedure;
- respect any confidentiality obligations owed by you or the School, and not disclose sensitive material or privacy rights of the School or any third party;
- not create, exchange, share or link to abusive, obscene, discriminatory, derogatory, defamatory, pornographic or sexually suggestive content;
- not upload, post or forward any content belonging to a third party unless you have that third party's consent;
- ensure that any quotes from third party material are accurate;
- check that a third party website permits you to link to it before including a link and ensure that the link makes clear to the user that the link will take them to the third party's site; and
- not post, upload, forward or post a link to chain mail, junk mail, cartoons, offensive jokes or gossip.

In addition, you must not post disparaging or defamatory statements about:

- the School;
- current, past or prospective Staff as defined in this policy;
- current, past or prospective pupils;

- current, past or prospective parents, carers or families of pupils mentioned above;
- the School's trustees, members, suppliers and services providers; and
- other affiliates and stakeholders.

You should be honest and open but also be mindful of the impact your activity on a social network or platform may have to the perception of the School.

You should avoid posting in relation to or discussing topics that may be inflammatory, such as politics or religion.

Do not escalate 'heated' discussions, try to be conciliatory and respectful and quote facts to lower the temperature and correct misrepresentations. Never contribute to a discussion if you are angry or upset.

If you disclose, whether directly or indirectly, your affiliation to the School as a member of staff whether past, current or prospective, you must also state that your views do not represent those of the School.

If you are uncertain or concerned about the appropriateness of any statement or posting, you should refrain from making the communication until you have discussed it with the Headteacher.

If you see content on social media that disparages or reflects poorly on the School, its Staff, pupils, parents, members, trustees, service providers or stakeholders, you are required to report this directly to the Headteacher without unreasonable delay. All Staff are responsible for protecting the School's reputation.

You should regularly review the privacy settings on your personal social media accounts and appropriately restrict the people who can read your posts or comments. Review the content of your personal social media accounts on a regular basis and delete anything that could reflect negatively on you in a professional capacity or on the School.

### **3. Respecting Intellectual Property and Confidential Information**

Staff should not do anything to jeopardise the School's confidential information and intellectual property through the use of social media.

In addition, Staff should avoid misappropriating or infringing the intellectual property of other Schools, organisations, companies and individuals, which can create liability for us, as well as the individual author.

Staff must not use our logos, slogans or other trademarks, or post any of our confidential or proprietary information without express prior written permission from the Headteacher.

To protect yourself and St Paul's Waldorf School 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 Headteacher in the first instance before making the communication.

#### **4. Respecting Colleagues, Students, Parents, Clients, Service Providers and Stakeholders**

Staff must not post anything that their colleagues, past, current or prospective pupils, parents, governors, members, trustees, directors, service providers or stakeholders may find offensive or derogatory, including discriminatory comments, insults or obscenity.

Staff must not post anything related to colleagues, past, current or prospective pupils, parents, governors, trustees, members, directors, service providers or stakeholders without their advanced written permission.

No communication should take place with pupils of the School via any social media platform. You must not accept friend invitations or become friends with any student of the School on any social media platform. You should also refrain from following any student on X, Instagram or other social media accounts of students or their parents.

If you are contacted via social media by a pupil, you must inform the Headteacher immediately.

#### **Rights to the School's social media accounts**

This paragraph forms part of your contract of employment with the School.

If, during the course of your employment with the School you create or make use of our social media account ('School Account'):

- to the extent that the rights to the School Account do not belong to the social media platform (e.g. LinkedIn, X), they belong to us; and
- the rights to any database of details created or maintained in connection with the School Account belong to us and you must not create or maintain any separate database of those contact details.

On termination of your employment for any reason, and when requested by us at any time, you must:

- provide us with the current login and password details for all School Accounts created or used by you; and
- return any copies of the database relating to each School Account and refrain from using any contact details included on that database, except to the extent that those contacts are personal to you or formed part of a database that you created before you joined the School.

Where any post is going to be made on our own social media the following steps must be taken:

- ensure that permission from the child's parent has been sought before the information is used on social media.
- ensure that there is no identifying information relating to a child/children in the post - for example, any certificates in photos are blank/without names or the child's name cannot be seen on the piece of work.
- the post must be a positive and relevant post relating to the children, the good work of staff, the School or any achievements.
- social media can also be used to issue updates or reminders to parents/guardians and the Admissions & Marketing Officer will have overall responsibility for this. Should you wish for any reminders to be issued you should contact the Admissions & Marketing Officer ensure that any post can be issued.

- the proposed post must be presented to the Headteacher for confirmation that the post can 'go live' before it is posted on any social media site, unless it is within the realm of agreed content.
- the Admissions & Marketing Officer will post the information, but all staff have a responsibility to ensure that this has been adhered to.

### **Monitoring and Review of this Policy**

The HR Group shall be responsible for reviewing this policy from time to time to ensure that it meets legal requirements and reflects best practice. The Board of Trustees has responsibility for approving any amendments prior to implementation.

The HR Group has the 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.

### **Breaches of this Policy**

We consider this policy to be extremely important and any breach will be taken seriously.

You should note that creating or sharing content on a social media platform may amount to misconduct even if it takes place:

- on a personal account with appropriate privacy settings;
- outside normal working hours; and/or
- without using our computers, systems and networks.

You may be required to remove content created or shared by you which we deem to be in breach of this policy. Failure to comply with such a request may in itself result in disciplinary action.

If you are found to be in breach of the provisions of this policy, it will be treated as a disciplinary offence which may result in disciplinary action up to and including summary dismissal in accordance with our Disciplinary Policy and Procedure. If you are not an employee, breach of this policy may result in termination of our contract with you.

As an alternative, we may withdraw your access to social media platforms on its systems. If you are not an employee, breach of this policy may result in termination of the School's contract with you.

You are also reminded that, in certain circumstances, an act that breaches this policy may also constitute a criminal offence.

If, in the course of using social media, you become aware of any misconduct or wrongdoing by any employee, worker or agency staff of the School, you must report it to the Headteacher.

If you feel that you have been harassed, sexually harassed, bullied or victimised because of material posted or uploaded by a colleague or third party onto a social media platform, you should inform the Headteacher in accordance with our Anti-Harassment and Bullying Policy. We encourage you to report such instances to us.