



# KEW COLLEGE PREP

## Social Media Policy

This policy applies to the whole school including the EYFS

This policy is published on the Kew College Prep website and is also available to parents from the School office upon request.

This policy is written with due regard to the following:

***Keeping Children Safe in Education (KCSIE) (Sept 2023) including Annex D: Online Safety Regulation of Investigatory Powers Act 2000, General Data Protection Regulations (GDPR) 2018, The Human Rights Act 1998, The Equality Act 2010, The Defamation Act 2013***

See also the School's policies as follows:

***Anti-Bullying Policy and Anti-Cyber-Bullying Policy; Data Protection Policy, Good Behaviour, Discipline and Sanctions Policy, Online Safety Policy, Privacy Notice, Recruitment and Selection Policy including Safer Recruitment, Safeguarding and Child Protection Policy, Staff Code of Conduct***

### Definitions or abbreviations used in this policy

**DSL:** Designated Safeguarding Lead

**GDPR:** General Data Protection Regulation

**KCSIE:** Keeping Children Safe in Education

**Social Media:** a broad term for any kind of online platform which enables people to directly interact with each other. It allows people to share information, ideas and views. Examples of social media include blogs, Facebook, LinkedIn, Twitter, Google+, Instagram, Myspace, Flickr and YouTube.

### At Kew College Prep

**DSL:** Robyn Hodgson

**Deputy DSL and Head:** Jane Bond

**Deputy DSL Early Years:** Selbi Fryer

## 1. General

The School recognises and embraces the numerous benefits and opportunities that social media offers. While employees are encouraged to engage, collaborate and innovate through social media, they should also be aware that there are some associated risks, especially around issues of safeguarding, bullying and personal reputation.

## 2. Background and Scope

This policy is intended to provide clear guidance regarding the acceptable use of electronic communications and social media both within, and outside, of the School.

The policy covers:

- Pupils of the School
- All School staff
- All agency, temporary or contract staff working for the School
- All volunteers working for the School

### 3. Understanding the Risks of Electronic Communications and Social Media

It is important that all staff understand the different risks involved with electronic communications and social media.

The use of email can be seen as a good way to communicate with individuals and with small groups as a user can control choosing who they include in the To, CC and BCC fields. However once a mail has been sent, even if it includes a privacy note and disclaimer, it can be easy for others to forward on to unintended recipients.

Exceptional care should be taken when using any social media tools, for example, websites and tablet/smartphone apps. Most social media sites work on the principle of broadcast by default, which means you cannot always control who may, or may not, see the content. Even where such sites allow users to set up privacy settings and block unwanted contacts, the content published may be broadcast beyond a controlled audience. The terms and conditions of such sites give powers and, in many cases, ownership of the published content to the social media site itself and not to the originator.

Clearer legal precedents have now emerged whereby the misuse of social media can result in both civil and criminal action and users of such need to have due regard for such consequences. Recent high-profile cases have shown the dangers and led to both significant fines and imprisonment.

The Data Protection Act applies to the use of electronic communications and social media. Therefore, whether using such for work or personal purposes, you are advised to follow the principles of this Act when referring to any other living individual. Failure to do so could lead to enforcement action and potential civil or criminal action against the School and/or against the individual responsible.

### 4. Purpose of the policy

- The purpose of this policy is to encourage good practice, to protect the School and its employees, and to promote the effective use of social media as part of the School activities
- This policy covers personal and professional use of social media and aims to encourage its safe use by the School and its employees
- The policy applies regardless of whether the social media is accessed using the School's IT facilities and equipment, or equipment belonging to members of staff
- Personal communications via social media accounts that are likely to have a negative impact on professional standards or the School's reputation are within the scope of this policy
- This policy covers all pupils and all individuals working at all levels and grades, including full-time and part-time employees, fixed-term employees and agency workers

### 5. Official Communications

The School's policies and procedures for official communications, apply equally to electronic communications and social media. Only those with authority to issue such statements should use

electronic communications and social media to do so. If using social media for such communication, consideration must be made to the nature of the media and whether that communication is intended for broadcast publication.

Before any official public statement or communication intended as a press release or in response to an enquiry from the media is issued, it must be checked with the Marketing Manager and authorised by the Head.

It is important that we continue to have effective internal School communications that allow us to share important information with staff and others on a basis of trust and confidentiality. No content published or distributed as an internal communication or as a communication with or between trusted partner(s), can be copied or republished via electronic communications or social media without explicit authorisation by the Marketing Manager.

## **6. Social Media for Business Use**

The School will allow the use of social media for business purposes as defined in this policy. Indeed, where the use of social media benefits the School and/or our engagement with parents, it is encouraged. Examples of such include:

- To engage with partners who use social media
- To access and communicate with parents who may have a preference for social media as a communications tool - see below
- To access content that is for business use that has been posted or published via social media

The School has a duty to protect itself and its reputation with the community and wants to use social media in a way that is consistent with the overall communications policy and protocol.

If a staff member wants to set up a new social media forum for engaging with parents they need approval in advance, and need to agree to some policies and rules for the management of such social media sites. The Marketing Manager must be consulted, give approval in advance to each such channel and will provide advice on what is required and how the site should be branded. The use of such sites will be monitored.

Staff signing up to use any social media facility for business use, should use their School email address and job title. Staff must not use any alias or any avatar that could make their communications anonymous. Our customers and others have a right to transparency and openness.

The School reserves the right to obtain such formal or informal background information about an applicant as is reasonable in the circumstances to determine whether they are suitable to work at the School. This will include online searches on shortlisted candidates.

## **7. Personal Use of Social Media**

The School cannot and does not want to prevent or restrict staff's use of social media in their own time and for their own purposes.

However, the School needs to make all staff aware that if their personal use of social media conflicts with the policies or values of the School, or their obligations as an employee, as contracted suppliers, or a volunteer, then the School has the right to take appropriate action.

No information that staff have as a representative of the School should be copied, published or commented upon when using social media for personal use.

## 8. Roles, responsibilities and procedure

### Employees should:

- be aware of their online reputation and recognise that their online activity can be seen by others including parents, pupils and colleagues on social media
- ensure that any use of social media is carried out in line with this policy and other relevant policies
- be aware that any excessive use of social media in School may result in disciplinary action
- be responsible for their words and actions in an online environment. Staff are therefore advised to consider whether any comment, photograph or video that they are about to post on a social networking site is something that they want pupils, colleagues, other employees of the School, or even future employers, to read. If in doubt, don't post it!

### Managers are responsible for:

- addressing any concerns and/or questions employees may have on the use of social media
- operating within the boundaries of this policy and ensuring that all staff understand the standards of behaviour expected of them

### Marketing is responsible for:

- giving specialist advice on the use of social media
- implementing and reviewing this policy

## 9. Acceptable use and monitoring

This policy sits with the School's overall policies and as such, the Employee Code of Conduct applies and, the duty and obligations it imposes apply. Any action undertaken using electronic communications, including social media, which could be deemed a breach of the Code of Conduct, will be subject to investigation in the same way that similar action would be in other circumstances, for example, verbally in the workplace, on the phone or in public.

No data about individuals or organisations collected for School use in the conducting of its business should be published or distributed via social media without ensuring that we have explicit consent, as we have a duty of care to the data subject.

Staff can share data using e-mail but only with recipients who have a valid reason to receive such information. In some cases, there is a requirement, owing to the nature of the data, to use secure and encrypted email, and accordingly to follow the compliance rules for such. This data should never be sent or published outside of these controlled audiences and/or secure mail systems.

Employees should be aware that content uploaded to social media is not private. Even if access is restricted to 'friends', there is still capacity for it to be re-posted or distributed beyond the intended recipients. Therefore, employees using social media should conduct themselves with professionalism and respect.

**Employees should not upload any content on to social media sites that:**

- is confidential to the School or its staff
- amounts to bullying
- amounts to unlawful discrimination, harassment or victimisation
- brings the School into disrepute
- contains lewd, sexually explicit, threatening or similarly inappropriate or offensive comments, images or video clips
- undermines the reputation of the School and/or individuals
- is defamatory or knowingly false
- breaches copyright
- is in any other way unlawful

Employees should be aware of both professional and social boundaries and should not therefore accept or invite 'friend' requests from pupils or ex-pupils under the age of 18, or from parents on their personal social media accounts such as Facebook. All communication with parents via social media should be through the School's social media accounts. Employees should note that the use of social media accounts during lesson time is not permitted.

The School will not undertake random monitoring of the use of electronic communications and social media. It will however respond where there are allegations of behaviour that could breach the Staff Code of Conduct and will inspect logs and audit trails of internet activity if appropriate.

The School reserves the right to monitor and maintain audit trails of some forms of electronic communications including email sent using School email addresses and posting on social media pages set up for official School use.

## 10. Safeguarding

The use of social networking sites introduces a range of potential safeguarding risks to children and young people.

**Potential risks can include, but are not limited to:**

- online bullying
- grooming, exploitation or stalking
- exposure to inappropriate material or hateful language
- encouraging violent behaviour, self-harm or risk taking

**In order to mitigate these risks, there are steps staff can take to promote safety on line:**

- Staff should not use any information in an attempt to locate or meet a child
- Ensure that any messages, photos or information comply with School policies

**Reporting safeguarding concerns**

- Any content or online activity which raises a safeguarding concern must be reported to the School Designated Safeguarding Officer

- Any online concerns should be reported as soon as identified as urgent steps may need to be taken to support the child
- With regard to personal safeguarding, staff should report any harassment or abuse received online while using School social media accounts

### **11. Procedure for social media content found to be inconsistent with the School's policies or values**

If a staff member accesses a site or content on social media that they realise is inconsistent with School policies, they should report this to the Marketing Manager and IT Technician immediately. Where possible the School will seek to block such sites from future use.

If a staff member accesses a site, or content on social media, or receives emails or other electronic communications that they believe are in breach of the School's values, policies and/or code of conduct or that may be attacking or damaging to the School's reputation, then they have a duty to report them. Staff should not reply to any such content or emails directly.

### **12. Reporting, responding and recording cyberbullying incidents**

Staff should never engage with cyberbullying incidents. If in the course of employment with this School, a staff member discovers a website containing inaccurate, inappropriate or inflammatory written material relating to the staff member, or images which have been taken and/or which are being used without permission, this should be immediately reported to a member of the SLT.

Staff should keep any records of the abuse such as text, emails, voicemail, website or social media. If appropriate, screen prints of messages or web pages could be taken and the time, date and address of site should be recorded.

### **13. Action by employer: inappropriate use of social media by pupils**

Following a report of inappropriate use of social media, an SLT member will conduct a prompt investigation

If in the course of the investigation, it is found that a pupil submitted material to the website, that pupil will be disciplined in line with the School's Good Behaviour, Discipline and Sanctions Policy.

The SLT member, where appropriate, will approach the website hosts to ensure the material is either amended or removed as a matter of urgency, ie within 24 hours. If the website requires the individual who is complaining to do so personally, the School will give their full support and assistance.

Checks will be carried out to ensure that the requested amendments or removals are made. If the website(s) does not co-operate, the SLT member will contact the internet service provider (ISP) as the ISP has the ability to block access to certain sites and, in exceptional circumstances, can close down a website.

If the material is threatening and/or intimidating, SLT member will, with the member of staff's consent, report the matter to the police.

The member of staff will be offered full support and appropriate stress counselling.

#### 14. Breaches of this policy by staff

Any member of staff suspected of committing a breach of this policy (or if complaints are received about unacceptable use of social networking that has potentially breached this policy) will be investigated in accordance with the School's Anti-bullying or disciplinary procedure. The member of staff will be expected to co-operate with the school's investigation which may involve:

- handing over relevant passwords and login details
- printing a copy or obtaining a screenshot of the alleged unacceptable content
- determining that the responsibility or source of the content was in fact the member of staff

The seriousness of the breach will be considered including the nature of the content, how long the content remained visible on the social media site, the potential for recirculation by others and the impact on the School or the individuals concerned. Staff should be aware that actions online can be in breach of the harassment/IT/equality policies and any online breaches of these policies may also be treated as conduct issues in accordance with the disciplinary procedure. If the outcome of an investigation leads to disciplinary action, the consequences will be dealt with in accordance with the appropriate procedures. Serious breaches could result in the dismissal of the employee. Where conduct is considered to be unlawful, the School will report the matter to the police and other external agencies.

<b>Approved by:</b>	<b>Updated by:</b>
Name: Jane Bond	Name: Ellen Thurman
Title: Head	Title: Marketing Manager
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