



Thinking Schools Academy Trust

“Transforming Life Chances”

Social Media Policy

This policy was adopted on	December 2022
The policy is to be reviewed on	December 2026

1 INTRODUCTION

- 1.1 It is crucial that pupils, parents, governors and the public at large have confidence in Thinking Schools Academy Trust's services, decisions and decision-making processes. This policy is intended to minimise the risks to Thinking Schools Academy Trust through the use of Social Media and sets out the principles which must be adhered to when using Social Media.

2. DEFINITIONS

- 2.1 "*Trust*" means the Thinking Schools Academy Trust, including its subsidiaries.
- 2.2 This Policy applies to all Academies of The Thinking Schools Academy Trust and all Nurseries and Pre Schools of Little Thinkers Nursery & Pre School, a subsidiary of The Thinking Schools Academy Trust. When 'Academy' is used within this policy it applies to Nursery and Pre School settings. When 'Headteacher/Principal' is used with this policy it applies to Nursery Managers. When 'The Thinking Schools Academy Trust' is used within this policy it applies to Little Thinkers Nursery and Pre School.
- 2.3 "*Social Media*" means websites and applications that enable users to create and share content or to participate in social networking including but not exclusively: Facebook, LinkedIn, Twitter, Google+, and all other social networking sites, internet postings and blogs. This policy applies to use of Social Media for Academy or Trust purposes as well as personal use that may affect the Academy or Trust in any way.
- 2.4 "*ICT Facilities*" means all IT devices, facilities, systems and services including, but not limited to, network infrastructure, desktop computers, laptops, tablets, phones, personal organisers, music players, software, websites, web applications or services and any device, system or service which may become available in the future which is provided as part of the ICT service.

3 SCOPE

- 3.1 This policy applies to all Trust employees, employees of TSfE & Little Thinkers, Trust directors, governing bodies, volunteers whether full time, part time, fixed-term or casual and other individuals who work for or provide services on behalf of the Academy or Trust or anyone carrying out Academy business or who has access to Academy electronic communication systems and equipment.

4 SOCIAL MEDIA POLICY

- 4.1 The use of Social Media is permitted so long as it does not involve unprofessional or inappropriate content and is in accordance with the contents of this policy.

- 4.2 Social Media must not be used to defame or disparage the Academy or Trust, members of staff, the board of directors or individual governors, pupils or their families, other members of the Academy or Trust or any other third parties and should not be used to harass, bully or unlawfully discriminate against anyone or to make false or misleading statements, or to impersonate others.
- 4.3 Individuals must not express opinions on behalf of the Academy via Social Media, unless expressly authorised to do so the Headteacher/Principal or Head of Service.
- 4.4 Individuals must not post comments about sensitive or controversial topics or matters or do anything that could lead to the disclosure of or put at risk confidential information held by the Academy or the Trust.
- 4.5 The Academy's branding or logos must not be used in any Social Media posting or in an individual's Social Media profile without the prior approval of the Headteacher/Principal.
- 4.6 Individuals must always be respectful to others when making any statement on Social Media and be aware that they are personally responsible for all communications which will be published on the internet for anyone to see.
- 4.7 Individuals are strictly prohibited from posting material which is sexually explicit, offensive and derogatory or which may give rise to a legal claim against the Academy or the Trust.
- 4.8 You must be accurate, fair and transparent when creating or altering online sources of information on behalf of the Academy.
- 4.9 If an individual is uncertain or concerned about the appropriateness of any statement or posting they should refrain from posting it until it has been discussed with Headteacher/Principal.
- 4.10 If an individual sees Social Media content that disparages or reflects poorly on the Academy or another Academy Member they should contact the Headteacher/Principal or Deputy CEO.
- 4.11 Breach of the Social Media policy by anyone covered by the scope of the policy may result in disciplinary action up to and including dismissal. Anyone suspected of committing a breach of this policy will be required to co-operate with any investigation, which may involve handing over relevant passwords and login details.
- 4.12 Individuals found to be in breach of this policy may be required to remove any Social Media content that the Academy considers constitutes a breach of this policy. Failure to comply with such a requirement may in itself result in disciplinary action.

5 PERSONAL USE OF SOCIAL MEDIA

- 5.1 Staff should be aware that any use of social media websites (whether or not accessed for work purposes) may be monitored and, where breaches of this policy are found, action may be taken under the Disciplinary Policy.

Posting, forwarding or posting a link to any of the following types of material on a social media website, whether in a professional or personal capacity, will amount to gross misconduct (this list is not exhaustive):

- Pornographic material (that is, writing, pictures, films and video clips of a sexually explicit or arousing nature).
- A false and defamatory statement about any person or organization;
- Material which is offensive, obscene, criminal discriminatory, derogatory or may cause embarrassment to the Academy or Trust, our clients or our staff.
- Confidential information about the Academy, Trust, or any of our staff, pupils or clients (which you do not have express authority to disseminate).
- Any other statement which is likely to create any liability (whether criminal or civil, and whether for you or the Academy or Trust).
- Material in breach of copyright or other intellectual property rights, or which invades the privacy of any person.

Any such action will be addressed under the Disciplinary Policy and may result in disciplinary action up to and including dismissal.

- 5.2 Staff members must not have contact through any personal social medium with any pupil, that is a member of the Academy or Trust, unless the pupils are family members.
- 5.3 The Academy does not expect staff members to discontinue contact with their family members via personal social media once the Academy starts providing services for them. However, any information staff members obtain in the course of their employment must not be used for personal gain (whether financial or otherwise) nor be passed on to others who may use it in such a way.
- 5.4 Staff members must not have any contact with pupils' family members through personal social media.
- 5.5 If staff members wish to communicate with pupils through social media sites they can only do so with the approval of the Academy and through official Academy sites created according to the requirements specified in section 7 and Appendix A.
- 5.6 On leaving the Academy's service, staff members must not contact any pupils of the Academy by means of personal social media sites. Similarly, staff members must not contact pupils from their former Academies by means of personal social media.
- 5.7 Information that staff members have access to as part of their employment, including personal information about pupils and their family members, colleagues, and other parties and Academy corporate information must not be discussed on their personal webpage.
- 5.8 Photographs, videos or any other types of image of pupils and their families must not be published on personal webpage.
- 5.9 Academy email addresses and other official contact details must not be used for setting up personal social media accounts or to communicate through such media.

- 5.10 Staff members must not edit open access online encyclopaedias such as *Wikipedia* in a personal capacity at work. This is because the source of the correction will be recorded as the employer's IP address and the intervention will, therefore, appear as if it comes from the employer itself.
- 5.11 The Academy does not permit personal use of social media while at work. Staff members are expected to devote their contracted hours of work to their professional duties and, in practice, personal use of the internet should not be on the Academy's time
- 5.12 Caution is advised when inviting work colleagues to be 'friends' in personal social networking sites. Social networking sites blur the line between work and personal lives and it may be difficult to maintain professional relationships or it might be just too embarrassing if too much personal information is known in the work place.
- 5.13 Staff members are strongly advised to ensure that they set the privacy levels of their personal sites as strictly as they can and to opt out of public listings on social networking sites to protect their own privacy. Staff members should keep their passwords confidential, change them often and be careful about what is posted online; it is not safe to reveal home addresses, telephone numbers and other personal information. It is a good idea to use a separate email address just for social networking so that any other contact details are not given away.

6 USING SOCIAL MEDIA ON BEHALF OF THE ACADEMY

- 6.1 Staff members can only use official Academy sites for communicating with Parents/Carers/Pupils.
- 6.2 There must be a strong business reason for creating official Academy sites to communicate with pupils or others. Staff must not create sites for trivial reasons which could expose the Academy to unwelcome publicity or cause reputational damage. A Data Protection Impact Assessment may need to be completed before an Academy sets up a new site, and any such site must be frequently monitored for compliance with Academy policies.
- 6.3 Official Academy sites must be created only according to the requirements specified in Appendix A of this Policy. Sites created must not breach the terms and conditions of social media service providers, particularly with regard to minimum age requirements.
- 6.4 Staff members must at all times act in the best interests of children and young people when creating, participating in or contributing content to social media sites.

7 MONITORING OF INTERNET USE

- 7.1 The Academy may monitor the usage of any or all ICT Facilities and has access to reports on any internet sites that have been visited. Such monitoring will be performed in compliance with this policy and the Academy's ICT Monitoring policy

APPENDIX 1

Requirements for creating social media sites on behalf of the Academy

A.1 CREATION OF SITES

- 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 the Academy.
- 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.
- A.1.3 The proposed audience and level of interactive engagement with the site, for example whether pupils, Academy staff or members of the public will be able to contribute content to the site, must be discussed with the Academy's SLT
- 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.
- A.1.5 The Headteacher/Principal/Service Manager 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.
- 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 Academy's brand and image.
- 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. 1.8 The Data Protection Officer must always be consulted prior to setting up and social media site, including as to whether it is necessary to conduct a data protection impact assessment in respect of the site.

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 Academy or the LA. 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 SLT line manager

A.3 APPROVAL FOR CREATION OF OR PARTICIPATION IN WEBSITE

- A.3.1 The Academy’s social media sites can be created only by or on behalf of the Academy. Site administrators and moderators must be the Academy’s employees or other authorised people.
- A 3.2 Administrators and moderators must have individual access to the account and cannot share login credentials with other personnel.
- A.3.3 Approval for creation of sites for work purposes, whether hosted by the Academy or hosted by a third party such as a social networking site, must be obtained from the Headteacher/Principal.
- A.3.4 Approval for participating, on behalf of the Academy, on sites created by third parties must be obtained from the Headteacher/Principal

- A.3.5 Content contributed to own or third-party hosted sites must be discussed with and approved by the staff member's line manager and Principal
- A.3.6 The Academy's SLT must be consulted about the purpose of the proposed site and its content. In addition, SLT approval must be obtained for the use of the Academy logo and brand.
- A.3.7 Staff must complete the Social Media Site Creation Approval Form (Appendix B) and forward it to the Academy's SLT before site creation.
- A.3.8 Be aware that the content or site may attract media attention. All media enquiries must be forwarded to the Headteacher/Principal and Thinking Creative (admin@thinkingcreative.com) immediately. Staff members must not communicate with the media.

A.4 CONTENT OF WEBSITE

- A.4.1 The Academy's 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 Academy standards of professional conduct and service.
- A.4.2 Staff members must not disclose information, make commitments or engage in activities on behalf of the Academy without authorisation provided through a job description, the Academy's Procurement policy or from the Deputy CEO.
- 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 be respectful of their audience and sensitive in their tone of voice and discussion of topics that others may find offensive. If employees are unsure of the message they wish to post, they may consult with Thinking Creative.
- 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 The Academy's hosted sites must always include the Academy logo or brand to ensure transparency and confidence in the site. The logo should, where possible, link back to the relevant page on the Academy website. You can acquire all logos and branding via Thinking Creative.
- A.4.8 Staff members participating in the Academy's hosted or other approved sites must identify who they are. They must disclose their positions within the Academy 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 4.11 Staff must not have 1:1 communication, including direct messaging (DM), with pupils through any social media, apart from via school email accounts, Google Meet hangouts via a school account and school mobile devices for text messaging. 1:1 communication via Google Meet as part of the Schools Online Learning, must follow the School's Online Learning: Policy and Procedures for Teaching Staff

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 the Academy's 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 Where necessary and practical individuals wishing to be 'friends' on a site must be **known people only, in the case of adults, those who have undergone appropriate security checks.**
- A.5.8 Any proposal to use social media to advertise for contributors to sites must be approved by the Headteacher/Principal.
- A.5.9 Approval must also be obtained from the Headteacher/Principal to make an external organisation a 'friend' of the site.

A.5.10 All content posted on social media must be in line with the Trust [Data Protection Policy](#) and staff posting content must also adhere to the following:

- Check twice, post once to ensure that all content is suitable to be in the public domain
- Check adequate consent is in place for any images posted. Schools will have a list of pupils and staff who have given consent for their images to be shared on social media and this must be checked before posting
- Check appropriateness of content before posting, including uniforms where applicable

The above is also set out in a checklist in Appendix 3 of this policy.

APPENDIX 2

Social Media Site Creation Approval Form

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

Please complete this form and forward it to the Headteacher/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 the Academy (provide age range)
- The Academy's 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 the Academy (provide age range)
- The Academy's 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?	The Academy 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/Principal).

<u>Line Manager</u> I approve the aims and content of the proposed site.	Name	
	Signature	
	Date	
<u>Principal / Service Manager</u> I approve the aims and content of the proposed site and the use of Academy brand and logo.	Name	
	Signature	
	Date	
	Name	

<u>Deputy Data Protection Officer</u> I approve the aims and content as being compliant with Data Protection policies	Signature	
	Date	

Data Protection considerations for social media contributors and moderators of content

Data Protection is about protecting people’s privacy. This is the purpose of data protection in any organisation, and is at the heart of data protection law.

The Thinking Schools Academy Trust is committed to meeting their legal obligations concerning data protection and confidentiality and to seeking to achieve best practice in relation to information governance. Any breach of this or any other information governance policy will be taken seriously and may result in legal action being taken against the Academy, the Trust and/or the individual responsible for the breach. It is, therefore, important that all staff have a good awareness of data protection and their responsibilities when it comes to handling the personal data of others.

Social media contributors and moderators of content must confirm that the following is in place/has been checked prior to posting:

Social Media Contributors and Moderators Checklist	
Content posted on social media is in line with the Trust Data Protection Policy	Yes/No
Content has been checked twice and is suitable to be in the public domain	Yes/No
Adequate consent is in place for any images to be posted	Yes/No
The content has been checked to ensure appropriateness before posting	Yes/No