



# THE ORATORY

## The Oratory School (OS)

### Social Media Policy

September 2020

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Regulatory Body* (if a regulatory policy)	
Relevant Legislation* (if a regulatory policy)	
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## **1.1 INTRODUCTION**

- 1.1 The Internet provides a range of social media tools that allow users to interact with one another, for example from rediscovering friends on social networking sites such as Facebook to keeping up with other people's lives on Twitter and maintaining pages on Internet encyclopaedias such as Wikipedia.
- 1.2 While recognising the benefits of these media for new opportunities for communication, this policy sets out the principles that Oratory School staff and contractors are expected to follow when using social media.
- 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 staff members use social media responsibly so that confidentiality of pupils and other staff and the reputation of the school is safeguarded.
- 1.4 Staff members must be conscious at all times of the need to keep their personal and professional lives separate.

## **2. SCOPE**

- 2.1 This policy applies to the Oratory School's governing body, all teaching and other staff, teacher trainees and other trainees, volunteers and other individuals who work for or provide services on behalf of the school. These individuals are collectively referred to as 'staff members' in this policy.
- 2.2 This policy covers personal use of social media as well as the use of social media for official school purposes, including sites hosted and maintained on behalf of the Schools (see sections 5, 6 and 7).
- 2.3 This policy applies to personal webspace such as social networking sites (for example Facebook), Instagram blogs, microblogs such as Twitter, chatrooms, forums, podcasts, open access online encyclopaedias such as Wikipedia, social bookmarking sites such as del.icio.us and content sharing sites such as flickr and YouTube. 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 be followed irrespective of the medium.

## **3. LEGAL FRAMEWORK**

- 3.1 The Association is committed to ensuring that all staff members provide confidential services that meet the highest standards. All individuals working on behalf of the school are bound by a legal duty of confidence and other laws to protect the confidential information they have access to during the course of their work. Disclosure of confidential information on social media is likely to be a breach of a number of laws and professional codes of conduct, including:

the Human Rights Act 1998

Common law duty of confidentiality, and

the Data Protection Act 1998.

3.2 Confidential information includes, but is not limited to:

- Person-identifiable information, e.g. pupil and employee records protected by the Data Protection Act 1998
- information divulged in the expectation of confidentiality
- School business or corporate records containing organisationally or publicly sensitive information
- Any commercially sensitive information such as information relating to commercial proposals or current negotiations, and
- Politically sensitive information.

3.3 Staff members should also be aware that other laws relating to libel, defamation, harassment and copyright may apply to information posted on social media, including:

- Libel Act 1843
- Defamation Acts 1952, 1996 and 2013
- Protection from Harassment Act 1997
- Criminal Justice and Public Order Act 1994
- Malicious Communications Act 1988
- Communications Act 2003, and
- Copyright, Designs and Patents Act 1988.

3.4 The school could be held vicariously responsible for acts of their employees in the course of their employment. For example, staff members who harass co-workers online or who engage in cyberbullying or discrimination on the grounds of race, sex, disability, etc or who defame a third party while at work may render the school liable to the injured party.

#### **4. RELATED POLICIES**

4.1 This policy should be read in conjunction with the following School policies and DfE guidance:

- Safeguarding and Welfare Policy
- Staff Code of Conduct
- ICT Policy
- Keeping Children Safe in Education
- Working Together to Safeguard Children
- Prevent Duty Guidance: for England and Wales

#### **5. PRINCIPLES – BE PROFESSIONAL, RESPONSIBLE AND RESPECTFUL**

5.1 You must be conscious at all times of the need to keep your personal and professional lives separate. You should not put yourself in a position where there is a conflict between your work for the School and your personal interests.

5.2 You must not engage in activities involving social media which might bring the Schools into disrepute.

- 5.3 You must not represent your personal views as those of the School on any social medium.
- 5.4 You must not discuss personal information about pupils, staff, School or other professionals you interact with as part of your job on social media.
- 5.5 You must not use social media and the Internet in any way to attack, insult, abuse or defame pupils, their family members, colleagues, other professionals, other organisations, or the School.
- 5.6 You must be accurate, fair and transparent when creating or altering online sources of information on behalf of the School.

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

- 6.1 With the exception of LinkedIn, you are advised not to identify yourself as an employee of the Association on any personal social media pages. If you do identify yourself then it is particularly important that you present a professional image. Bear in mind that you cannot necessarily control what appears on your Facebook page, for example, since Facebook can allow friends to post comments and photographs without your prior approval.
- 6.2 Staff members must not have contact through any personal social medium with any pupil, whether from the School or any other school, unless the pupils are family members.
  - 6.2.1 The Association does not expect staff members to discontinue contact with their family members via personal social media once the school starts providing services for them. However, any information staff members obtain in the course of their employment must not be used for personal gain nor be passed on to others who may use it in such a way.
  - 6.2.2 Staff members must not have any contact with pupils' family members through personal social media if that contact is likely to constitute a conflict of interest or call into question their objectivity.
- 6.3 If staff members wish to communicate with pupils through social media sites or to enable pupils to keep in touch with one another, they can only do so with the approval of the School and through official School sites created according to the requirements specified in section 7.
  - 6.3.1 Staff members must decline 'friend requests' from pupils they receive in their personal social media accounts. Instead, if they receive such requests from pupils who are not family members, they must discuss these in general terms in class and signpost pupils to become 'friends' of the official School site.
  - 6.3.2 On leaving the Association's service, staff members must not contact the Schools' 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.

- 6.4 Information staff members have access to as part of their employment, including personal information about pupils and their family members, colleagues, and other parties and School or Association corporate information must not be discussed on their personal webpage.
- 6.5 Photographs, videos or any other types of image of pupils and their families or images depicting staff members wearing school uniforms or clothing with school logos or images identifying sensitive school buildings must not be published on any personal webpage, other than school social media accounts that are used by individual staff members and carry the school name.
- 6.6 School email addresses and other official contact details must not be used for setting up personal social media accounts or to communicate through such media.
- 6.7 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 School's IP address and the intervention will, therefore, appear as if it comes from the School itself.
- 6.8.1 The School logos or brands must not be used or published on personal webpage.
- 6.9 The Schools only permit limited personal use of social media while at work. Access to social media sites for personal reasons should only be made during non-contact hours. However, 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 School's time.
- 6.10 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.
- 6.11 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.

## **7. USING SOCIAL MEDIA ON BEHALF OF THE SCHOOLS**

- 7.1 All Social Media issues should be referred to Bea Butler. Anybody wanting to set up a Social Media account that is linked to the Oratory School should refer to her.
- 7.2 There must be a strong pedagogical or business reason for creating official School sites to communicate with pupils or others. Staff must not create sites for trivial reasons which could expose the School to unwelcome publicity or cause reputational damage.

- 7.3 Official School sites must be created only with the prior approval of the Head of Marketing who will inform the Head Master of her decision. Sites created must not breach the terms and conditions of the social media service providers, particularly with regard to minimum age requirements.
- 7.4 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.
- 7.5 All Social Media activity, whilst used by various staff members, should be the responsibility of the Marketing team and those people who have been authorised to use the sites will be allowed to use them on our behalf and if the Marketing team requests a different approach to the way the social media is being used by a member of staff, then they will be required to make the changes requested of them.

## **8. MONITORING OF INTERNET USE**

- 8.1 The Association monitors usage of its Internet and email services without prior notification or authorisation from users.
- 8.2 Users of School email and Internet services should have no expectation of privacy in anything they create, store, send or receive using the School's ICT system.
- 8.3 As part of the Association's duties in tackling extremism and radicalisation, the School's webfilters use the Home Office terrorism blocklist to block terrorist content as recommended by Government guidelines. Attempted visits to these sites are monitored by the system and a notification message is sent to the ICT Department should a pupil try to access a site on the blocklist.

## **9. BREACHES OF 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 Disciplinary Policy and Procedure.
- 9.2 A breach of this policy leading to breaches of confidentiality, or defamation or damage to the reputation of the Schools or any illegal acts or acts that render the Schools liable to third parties may result in disciplinary action or dismissal.
  - 9.3.1 Contracted providers of the School must inform the relevant School officer immediately of any breaches of this policy so that appropriate action can be taken to protect confidential information and limit the damage to the reputation of the School. Any action against breaches should be according to contractors' internal disciplinary procedures.



