



SOCIAL MEDIA POLICY

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1 POLICY STATEMENT

- 1.1 We recognise that the internet provides unique opportunities to participate in interactive discussions and share information on particular topics using a wide variety of social media, such as Facebook, Twitter, blogs and wikis. However, employees' use of social media can pose risks to the safeguarding of our children, as well as risks to our confidential information and the reputation of the Island Project ("the School"). As well as jeopardising our compliance with legal obligations, it can also expose members of staff to risk of accusations and allegations.
- 1.2 To minimise these risks and to ensure that our IT resources and communications systems are used only for appropriate business purposes, we expect all members of Staff to adhere to this policy.
- 1.3 This policy does not form part of any member of Staff's contract of employment and it may be amended at any time. You will be notified of any changes by email.

2 WHO IS COVERED BY THE POLICY?

- 2.1 This policy covers all individuals working at all levels, including tutors, admin staff, senior managers, officers, directors, consultants, contractors, trainees, part-time and fixed-term employees, and volunteers (collectively referred to as "Staff" in this policy).
- 2.2 Third parties who have access to our electronic communication systems and equipment are also required to comply with this policy.

3 CHILD PROTECTION POLICY AND PROCEDURES

- 3.1 The Child Protection Policy and Procedures is the primary policy of the School. In accordance with this Policy and as set out therein:
- (a) Staff must not communicate with pupils through private email accounts, social networking sites, even if this relates to educational matters, but must use official email sanctioned by the School.
 - (b) Staff must be circumspect in their use of social networking sites and must not discuss School business or School issues on any personal social networking sites
 - (c) Staff will not accept children at the School as "friends" on social networking sites.



- (d) The School believes it is far safer for Staff not to accept either pupils' parents or ex-pupils as 'friends'. Great care must be taken if members of Staff make an exception to this guidance (for example if a young person is also a family member) and they may be accountable to the School Principal for their decision.
- (e) Mobile phones have been issued to all Staff who work directly with children. These have been chosen carefully as they do not have the facility of a camera, video or internet services. These phones are to be used for the sole purpose of Behaviour Support and emergencies and are not to be used for any other purpose. These phones must be left at School at the end of the school day and must not under any circumstances be taken home at any time.
- (f) Personal mobile phones belonging to members of Staff should not be used whilst working with the children. They should be stored in a safe place either in a bag or coat in the Staff room. If Staff have concerns over the safety of the phone or other possessions, lockers are available on request. Staff will be able to check personal phone at break times and lunch breaks. Staff may give out the School telephone number in case someone needs to contact them urgently.
- (g) Staff who do not have any direct daily contact with children or who do not have designated responsibility for children and therefore are not in unsupervised contact with the children (Directors, Trustees, Estate Management and contractors) may use personal mobile devices. These should not be used by these members of Staff to photograph children or in the proximity of children unless the express prior permission of the School Principal has been obtained.

4 SCOPE AND PURPOSE OF THE POLICY

- 4.1 This policy deals with the use of all forms of social media, including Facebook, LinkedIn, Twitter, Wikipedia, all other social networking sites, and all other internet postings, including blogs.
- 4.2 It applies to the use of social media for both business and personal purposes, whether during office hours or otherwise. The policy applies regardless of whether the social media is accessed using our IT facilities and equipment or equipment belonging to Staff.
- 4.3 Breach of this policy may result in disciplinary action up to and including dismissal. Disciplinary action may be taken regardless of whether the breach is committed during working hours, and regardless of whether our equipment or facilities are used for the purpose of committing the breach. Any member of Staff suspected of committing a



breach of this policy will be required to co-operate with our investigation, which may involve handing over relevant passwords and login details.

- 4.4 Staff may be required to remove internet postings which are deemed to constitute a breach of this policy. Failure to comply with such a request may in itself result in disciplinary action.

5 PERSONNEL RESPONSIBLE FOR IMPLEMENTING THE POLICY

- 5.1 The Trustees and board of directors (collectively referred to as “the Board”) has overall responsibility for the effective operation of this policy, but has delegated day-to-day responsibility for its operation to the Compliance Director. Responsibility for monitoring and reviewing the operation of this policy and making recommendations for change to minimise risks also lies with Board.
- 5.2 All Unit Heads have a 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 its requirements.
- 5.3 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 Compliance Director.
- 5.4 Questions regarding the content or application of this policy should be directed to the Compliance Director or another member of the Board.

6 COMPLIANCE WITH RELATED POLICIES AND AGREEMENTS

- 6.1 Social media should never be used in a way that breaches any of our other policies. If an internet post would breach any of our policies in another forum, it will also breach them in an online forum. For example, members of Staff are prohibited from using social media to:
- (a) Breach our Child Protection Policy and Procedures;
 - (b) Breach our Mobile Phone Policy;
 - (c) Breach our obligations with respect to the rules of relevant regulatory bodies;
 - (d) Breach any obligations the member of Staff may have relating to confidentiality;



- (e) Publish or discuss any details in relation to any pupils or ex-pupils of the School, or their parents;
 - (f) Discuss any personal information in relation to any member of Staff without their express permission;
 - (g) Breach our Capabilities and Discipline Policy;
 - (h) defame or disparage the School, other members of Staff, Trustees, Directors, pupils, parents of pupils, business partners, suppliers or other stakeholders;
 - (i) Harass or bully other members of Staff in any way;
 - (j) Breach our Bullying and Harassment policy;
 - (k) Unlawfully discriminate against other Staff or third parties or breach our Equality and Diversity Policy;
 - (l) Breach our Data Protection Policy (for example, never disclose personal information about a colleague online);
 - (m) 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).
- 6.2 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 School.
- 6.3 Members of Staff who breach any of the above policies will be subject to disciplinary action up to and including termination of employment.

7 PERSONAL USE OF SOCIAL MEDIA

- 7.1 We recognise that members of Staff may work long hours and occasionally may desire to use social media for personal activities at the office or by means of our computers, networks and other IT resources and communications systems. We authorise such occasional use **as long as**:



- (a) It does not involve unprofessional or inappropriate content;
- (b) It does not interfere with the member of Staff's duties;
- (c) It is not done in the presence of a pupil at the School;
- (d) If using your own personal mobile phone, it is done in the staff room or other area not accessed by pupils and is and not done within a teaching space;
- (e) It does not interfere with your employment responsibilities or productivity.

While using social media at work, circulating chain letters or other spam is never permitted. Circulating or posting commercial, personal, religious or political solicitations, or promotion of outside organisations unrelated to the School's business are also prohibited.

8 MONITORING

- 8.1 The contents of our IT resources and communications systems are the property of the School. Therefore, Staff should have no expectation of privacy in any message, files, data, document, facsimile, 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.
- 8.2 We reserve the right to monitor, intercept and review, without further notice, any or all 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. You consent to such monitoring by 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, log-ins, recordings and other uses of the systems as well as keystroke capturing and other network monitoring technologies.
- 8.3 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.
- 8.4 Do not use our IT resources and communications systems for any matter that you wish to be kept private or confidential from the School.



9 BUSINESS USE OF SOCIAL MEDIA

- 9.1 If your duties require you to speak on behalf of the School in a social media environment, you must still seek approval for such communication from the Board, who may require you to undergo training before you do so and who may impose certain requirements and restrictions with regard to your activities.
- 9.2 Likewise, if you are contacted for comments about the School for publication anywhere, including in any social media outlet, direct the inquiry to a member of the Board and do not respond without written approval.
- 9.3 The use of social media for business purposes is subject to the remainder of this policy.

10 RECRUITMENT

- 10.1 We may use internet searches to perform due diligence on candidates in the course of recruitment. Where we do this, we will act in accordance with our data protection and equal opportunities obligations.

11 RESPONSIBLE USE OF SOCIAL MEDIA

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

11.2 **Protecting our business reputation:**

- (a) Staff must not post disparaging or defamatory statements about:
- (i) The School;
 - (ii) Other members of Staff
 - (iii) Trustees;
 - (iv) Directors;
 - (v) Pupils, ex-pupils or their parents;
 - (vi) Suppliers and vendors; and



- (vii) Other affiliates and stakeholders,
- (b) Staff should also avoid social media communications that might be misconstrued in a way that could damage our business reputation, even indirectly.
- (c) Staff should avoid social media communications that may represent any safeguarding issues.
- (d) Staff should at all times remember that they are in a position of trust in respect of all pupils or ex-pupils of the School.
- (e) Staff should make it clear in social media postings that they are speaking on their own behalf. Write in the first person and use a personal e-mail address when communicating via social media.
- (f) Staff are personally responsible for what they communicate in social media. Remember that what you publish might be available to be read by the masses (including the School itself, future employers and social acquaintances) for a long time. Keep this in mind before you post content. Publication on Facebook has been held by the Courts to increase the risk of being a continuing act because it can remain ongoing for a much longer period than verbal comments.
- (g) If you disclose your affiliation as a member of Staff at the School, you must also state that your views do not represent those of your employer. For example, you could state, "the views in this posting do not represent the views of my employer". You should also ensure that your profile and any content you post are consistent with the professional image you present to clients and colleagues.
- (h) Avoid posting comments about sensitive business-related topics, such as our performance, reputation or standing. Even if you make it clear that your views on such topics do not represent those of the School, your comments could still damage our reputation.
- (i) If you are uncertain or concerned about the appropriateness of any statement or posting, refrain from making the communication until you discuss it with your Head of Unit or the Compliance Director.
- (j) If you see content in social media that disparages or reflects poorly on the School, you should contact your Head of Unit, the Compliance Director or another



member of the Board. All staff are responsible for protecting our business reputation.

11.3 **Respecting intellectual property and confidential information:**

- (a) Staff should not do anything to jeopardise the safety or privacy of our pupils or their families and other confidential information through the use of social media.
- (b) Staff should not do anything to jeopardise the intellectual property of the School.
- (c) In addition, Staff should avoid misappropriating or infringing the intellectual property of other companies and individuals, which can create liability for the School, as well as the individual author.
- (d) Do not use our logos, brand names, slogans or other trademarks, or post any of our confidential or proprietary information without prior written permission.
- (e) You are not permitted to add business contacts made during the course of your employment to personal social networking accounts, such as Facebook accounts.

11.4 **Respecting colleagues, clients, partners and suppliers:**

- (a) Do not post anything that another member of staff, other colleagues, parents of our pupils or ex-pupils, former employees, customers, clients, business partners, suppliers, vendors or other stakeholders would find offensive, including discriminatory comments, insults or obscenity.
- (b) Do not post anything related to another member of staff, former employees, our pupils, their parents, the Board, Trustees, or our business partners, suppliers, vendors or other stakeholders without their written permission.

12 **MONITORING AND REVIEW OF THIS POLICY**

- 12.1 The Compliance Director will be responsible for reviewing this policy at least on an annual basis, but more frequently if necessary to ensure that it meets legal requirements and reflects best practice.
- 12.2 Staff are invited to comment on this policy and suggest ways in which it might be improved by contacting the Compliance Director.