

# Social Media Policy August 2019 Review August 2022

#### Statement of intent

The Acorn Childcare Centre (the Centre) understands that social media is a growing part of life outside work. We have a responsibility to safeguard our children against potential dangers when accessing the internet, and to educate our children about how to protect themselves online when outside Centre.

#### We are committed to:

- Encouraging the responsible use of social media by all staff, parents and children in support of the Centre's mission, values and objectives.
- Protecting our children from the dangers of social media.
- Preventing and avoiding damage to the reputation of the Centre through irresponsible use of social media.
- Protecting our staff from cyber bullying and potentially career damaging behaviour.
- Arranging e-safety meetings for parents.

## 1. Legal framework

- 1.1. This policy has due regard to legislation and guidance including, but not limited to, the following:
  - The General Data Protection Regulation (GDPR)
  - DfE (2018) 'Data protection: a tool kit for Centres'
  - The Data Protection Act 2018
- 1.2. This policy will be implemented in accordance with the following Centre policies and documents:
  - Acceptable Use Policy
  - E-Safety Policy
  - General Data Protection Policy under GDPR
  - Code of Conduct
  - Complaints Policy
  - Anti-Bullying Policy
  - Allegations of Abuse Against Staff Policy
  - Photography & CCTV Policy

## 2. Roles and responsibilities

#### 2.1. The Centre Manager is responsible for:

- The overall implementation of this policy and ensuring that all staff, parents and children are aware of their responsibilities in relation to social media use.
- Promoting safer working practices and standards with regards to the use of social media.
- Establishing clear expectations of behaviour for social media use.
- Ensuring that this policy, as written, does not discriminate on any grounds, including, but not limited to: ethnicity/national origin, culture, religion, gender, disability or sexual orientation.
- In conjunction with the Directors, handling complaints regarding this policy and its provisions in line with the Centre's Complaints Policy.
- Implementing appropriate sanctions and disciplinary methods where there
  is a breach of this policy.
- Taking steps to minimise the amount of misplaced or malicious allegations in relation to social media use.
- Working alongside the E-Safety Officer and Data Protection Officer (DPO) to ensure appropriate security measures are implemented and compliance with the GDPR.

#### 2.2. Staff members are responsible for:

- Adhering to the principles outlined in this policy and the Staff Acceptable Use Policy.
- Ensuring children adhere to the principles outlined in this policy and that it is implemented fairly and consistently in the classroom.
- Reporting any social media misuse by staff, children or parents to the Centre Manager immediately.
- Attending any training on social media use offered by the Centre.

#### 2.3. Parents are responsible for:

- Adhering to the principles outlined in this policy.
- Taking appropriate responsibility for their use of social media and the influence on their children at home.
- Promoting safe social media behaviour for both themselves and their children.

- Attending e-safety meetings held by the Centre wherever possible.
- 2.4. Children are responsible for:
  - Adhering to the principles outlined in this policy via the Centre rules as known by them
  - Ensuring they understand how to use social media appropriately and stay safe online.

#### 3. Definitions

- 3.1. For the purpose of this policy, the Centre defines "social media" as any online platform that offers real-time interaction between the user and other individuals or groups including, but not limited to, the following:
  - Blogs
  - Online discussion forums, such as netmums.com
  - Collaborative spaces, such as Facebook
  - Media-sharing devices, such as YouTube
  - 'Micro-blogging' applications, such as Twitter
- 3.2. For the purpose of this policy, "cyber bullying" is defined as any social media or communication technology intentionally used to bully an individual or group, including the posting or sharing of messages, images or videos.
- 3.3. For the purpose of this policy, "members of the Centre community" are defined as any member of staff, children, parent of a child, director or ex-member of the Centre in any capacity.

#### 4. Data protection principles

- 4.1. The Centre will obtain consent from children and parents on admission which will confirm whether or not consent is given for posting images and videos of a pupil on the Centre social media platforms. The consent will be valid until a parent with Parental Responsibility reverses that consent which can be done at any time through the year by contacting the Centre office or by amending the consents.
- 4.2. A record of consent is maintained throughout the academic year, which details the children for whom consent has been provided. The Centre Manager is responsible for ensuring this consent record remains up-to-date.
- 4.3. Parents are able to withdraw or amend their consent at any time. To do so, parents must inform the Centre in writing.
- 4.4. Consent can be provided for certain principles only, for example only images of a pupil are permitted to be posted, and not videos. This will be made explicitly clear on the consent form provided.
- 4.5. Where parents withdraw or amend their consent, it will not affect the processing of any images or videos prior to when consent was withdrawn or amended. Processing will cease in line with parents' and children' requirements following this.

- 4.6. In line with section 4.5, wherever it is reasonably practicable to do so, the Centre will take measures to remove any posts before consent was withdrawn or amended, such as removing an image from a social media site.
- 4.7. The Centre will only post images and videos of children for whom consent has been received.
- 4.8. Only Centre-owned devices will be used to take images and videos of the Centre community.
- 4.9. The Centre will not post children' personal details on social media platforms.
- 4.10. Children' full names will never be used alongside any videos or images in which they are present unless specific parental consent has been obtained beforehand.
- 4.11. Only appropriate images and videos of children will be posted in which they are suitably dressed, i.e. it would not be suitable to display an image of a pupil in swimwear.
- 4.12. When posting on social media, the Centre will use group or class images or videos with general labels, e.g. 'sports day'.
- 4.13. Before posting on social media, staff will:
  - Refer to the consent record log to ensure consent has been received for that pupil and for the exact processing activities required.
  - Ensure that there is no additional identifying information relating to a pupil.
- 4.14. Any breaches of the data protection principles will be handled in accordance with the Centre's General Data Protection Policy under GDPR.
- 4.15. Consent provided for the use of images and videos only applies to Centre accounts. Staff, children and parents are not permitted to post any imagery or videos on personal accounts.

## 5. Social media use – staff

#### **Centre accounts**

- 5.1. Centre social media passwords are kept by the Centre Manager. These are not shared with any unauthorised persons, including children, unless otherwise permitted by the Centre Manager.
- 5.2. Staff will ensure any posts are positive in nature and relevant to children, the work of staff, the Centre or any achievements.
- 5.3. The Centre Manager, or one of the Deputy Managers, are the only persons who posts onto social media. All content is checked before posts are made.
- 5.4. On occasions, parents ask the Centre to make posts of their child's achievements. The Centre will celebrate those achievements on its social media sites if the achievement, wording and images used are deemed suitable by the Centre Manager.

- 5.5. Reminders to parents ie for returning slips re Centre trips are never posted on social media.
- 5.6. The Centre will post job advertisements and similar for itself and for the school on its social media sites.
- 5.7. Staff will adhere to the data protection principles outlined in <u>section 4</u> of this policy at all times.
- 5.8. If inappropriate content is accessed online, a written notification will be completed and passed on to the Designated Safeguarding Lead. The Designated Safeguarding Lead retains the right to monitor staff members' internet usage.

#### Personal accounts

- 5.9. Staff members will not access social media platforms during lesson times.
- 5.10. Staff members will not use any Centre-owned mobile devices to access personal accounts, unless it is beneficial to the material being taught. Prior permission will be sought from the Centre Manager.
- 5.11. Staff members are permitted to use social media during break times.
- 5.12. Staff are not permitted to use the Centre's WiFi network to access personal accounts.
- 5.13. Staff will not use social media in front of children.
- 5.14. Staff will not "friend" or otherwise contact children through their personal social media accounts.
- 5.15. If children attempt to "friend" a staff member, they should refuse the request and report the request to the Designated Safeguarding Lead.
- 5.16. Staff members will not provide their home address, phone number, mobile number, social networking details or email addresses to children.
- 5.17. Any contact with children will be done through authorised Centre contact channels.
- 5.18. Staff members will ensure the necessary privacy controls are applied to personal accounts.
- 5.19. Staff members will avoid identifying themselves as an employee of the Centre on their personal social media accounts.
- 5.20. No staff member will post any personal content online that is damaging to the Centre, its reputation or the reputation of the staff member.
- 5.21. Where staff members use social media in a personal capacity, they will ensure it is clear that views are personal and are not that of the Centre.
- 5.22. Staff will not take any posts, images or videos from social media that belong to the Centre for their own personal use.

- 5.23. Staff members will not post anonymously or under an alias to evade the guidance given in this policy.
- 5.24. Breaches of this policy by members of staff will be taken seriously, and in the event of illegal, defamatory or discriminatory content, could lead to prosecution, disciplinary action or dismissal.
- 5.25. Members of staff will be aware that if their out-of-work social media activity brings the Centre into disrepute, disciplinary action will be taken.
- 5.26. Members of staff will regularly check their online presence for negative content via search engines. Staff members who do not know how to do this should speak to the Business Manager for training.
- 5.27. Attempts to bully, coerce or manipulate members of the Centre community via social media by members of staff will be dealt with as a disciplinary matter.
- 5.28. Members of staff will lock their desktop when away from their desk.
- 5.29. Staff members will use their Centre email address for Centre business and personal email address for their private correspondence; the two should not be mixed.
- 5.30. Staff should not respond to parent comments or matters relating to the Centre on behalf of the Centre using their person social media accounts.

#### 6. Social media use – children and parents

- 6.1. Children will not access social media during lesson time, unless it is part of a curriculum activity.
- 6.2. Children are instructed not to sign up to any social media sites that have an age restriction above the pupil's age.
- 6.3. If inappropriate content is accessed online on Centre premises, it will be reported to a teacher.
- 6.4. Children are not permitted to use the Centre's WiFi network to access any social media platforms.
- 6.5. Parents are not permitted to use the Centre's WiFi network to access any social media platforms on personal devices. Social media access on Centre-owned devices may be permitted in line with this policy.
- 6.6. Breaches of this policy will be taken seriously, and in the event of illegal, defamatory or discriminatory content could lead to prosecution, or exclusion.
- 6.7. Children should not send friend requests to members of the Centre staff. Such requests will be refused, and the pupil will be reported to a Designated Safeguarding Lead.

#### 7. Blocked content

- 7.1. The school arranges for the installation of firewalls on the Centre's network to prevent access to certain websites. The following social media websites are not accessible on the Centre's network:
  - Twitter
  - Instagram
- 7.2. Facebook is not a blocked site as the Centre requires access to it for its own use. Staff should not access their personal Facebook accounts from Centre equipment or in Centre hours other than during their break times.
- 7.3. Attempts made to circumvent the network's firewalls will result in a ban from using Centre computing equipment, other than with close supervision.
- 7.4. Inappropriate content accessed on the Centre's computers will be reported to the Centre Manager so that the site can be blocked.
- 7.5. The Centre retains the right to monitor staff and pupil access to websites when using the Centre's network and on Centre-owned devices.
- 7.6. Requests may be made to access erroneously blocked content by submitting a written request to the Centre Manager.

## 8. Cyber bullying

- 8.1. Cyber bullying incidents are taken seriously at the Centre. Any reports of cyber bullying on social media platforms by children will be handled in accordance with the Anti-Bullying Policy.
- 8.2. Allegations of cyber bullying from staff members will be handled in accordance with the Allegations Against Staff Policy.
- 8.3. Staff members will not respond or retaliate to cyber bullying incidents. Incidents will be reported as inappropriate, and support will be sought from the Centre Manager.
- 8.4. Evidence from the incident will be saved, including screen prints of messages or web pages, and the time and date of the incident.
- 8.5. Where the perpetrator is a current pupil or colleague, most incidents can be handled through the Centre's own disciplinary procedures.
- 8.6. Where the perpetrator is an adult, in nearly all cases, the Centre Manager will invite the victim to a meeting to address their concerns. Where appropriate, the perpetrator will be asked to remove the offensive content.
- 8.7. If the perpetrator refuses to comply, it is up to the Centre to decide what to do next. This could include contacting the internet service provider in question through

- their reporting mechanisms, if the offensive content breaches their terms and conditions.
- 8.8. If the material is threatening, abusive, sexist, of a sexual nature or constitutes a hate crime, the Centre will consider whether the police should be contacted.
- 8.9. As part of the Centre's ongoing commitment to the prevention of cyber bullying, regular education and discussion about e-safety will take place as part of computing and PSHE lessons.

## 9. Training

- 9.1. At the Centre we recognise that early intervention can protect children who may be at risk of cyber bullying or negative social media behaviour. As such, all staff will receive training in identifying potentially at-risk children.
- 9.2. All staff will receive training on the Social Media Policy as part of their new starter induction.
- 9.3. All staff will receive ongoing training as part of their development.
- 9.4. Children will be educated about e-safety and appropriate social media use on a termly basis through a variety of mediums, including assemblies, PSHE lessons and cross-curricular links.
- 9.5. Children will be provided with material to reinforce their knowledge during their e-safety curriculum lessons.
- 9.6. Parents will be invited to e-safety and social media training on an annual basis and provided with relevant resources.
- 9.7. Training for all children, staff and parents will be refreshed in light of any significant incidents or changes.

## **10.**Monitoring and review

- 10.1. This policy will be reviewed every three years or more often as necessary.
- 10.2. The next scheduled review date for this policy is August 2022.
- 10.3. Any changes made to this policy will be communicated to all staff, children and parents.