



# Huntington

## Community Primary School

### Social Media Policy

Signed by:

A handwritten signature in black ink, appearing to be "P. Rose".

Headteacher

Date: 06.03.24

A handwritten signature in black ink, appearing to be "L.M. Gibson".

Chair of Governors

Date: 06.03.24

Next review Spring 2027

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## **Statement of intent**

Huntington Community Primary School understands that social media is a growing part of life outside of school. We have a responsibility to safeguard our pupils against potential dangers when accessing the internet at school, and to educate our pupils about how to protect themselves online when outside of school.

We are committed to:

- Encouraging the responsible use of social media by all staff, parents and pupils in support of the school's ethos, aims and objectives.
- Protecting our pupils from the dangers of social media.
- Preventing and avoiding damage to the reputation of the school through irresponsible use of social media.
- Protecting our staff from cyberbullying and potentially career damaging behaviour.
- Arranging online safety meetings for parents.

## 1. Legal framework

This policy has due regard to all relevant legislation and statutory guidance including, but not limited to, the following:

- DfE (2023) 'Data protection in schools'
- The UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- Computer Misuse Act 1990, amended by the Police and Justice Act 2006
- Freedom of Information Act 2000
- Safeguarding Vulnerable Groups Act 2006
- Equality Act 2010
- DfE (2023) 'Keeping children safe in education 2023'

This policy operates in conjunction with the following school policies:

- Acceptable Use Agreement for Staff
- Online Safety Policy
- Data Protection Policy
- Pupil E-safety Rules (KS1 & KS2)
- Complaints Procedures Policy
- Anti-bullying Policy
- Allegations of Abuse Against Staff Policy
- Low-level Concerns Policy
- Use of Mobile Phones and Digital Photography Policy
- Staff Code of Conduct
- Safeguarding and Child Protection Policy
- Staff Disciplinary Policy and Procedure
- Behaviour Policy

## 2. Roles and responsibilities

The governing board will be responsible for:

- Ensuring this policy is implemented by the school.
- Reviewing this policy on a three yearly annual basis.
- Ensuring the DSL's remit covers online safety.
- Ensuring their own knowledge of social media and online safety issues is up-to-date.
- Ensuring all staff undergo safeguarding and child protection training, including online safety, at induction.
- Ensuring that this policy, as written, does not discriminate on any grounds, including against any of the protected characteristics, as outlined in the Equality Act 2010.

The headteacher will be responsible for:

- The overall implementation of this policy and ensuring that all staff, parents and pupils 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.
- In conjunction with the governing board, handling complaints regarding this policy and its provisions in line with the school's Complaints Procedures 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 DPO and ICT technicians to ensure appropriate security measures are implemented and compliance with UK GDPR and other data protection legislation.

The DSL will be responsible for:

- The school's approach to online safety.
- Dealing with concerns about social media use that are safeguarding concerns.

Staff members will be responsible for:

- Adhering to the principles outlined in this policy and the Acceptable Use Agreement for Staff.
- Ensuring pupils 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, pupils or parents to the headteacher immediately.
- Attending any training on social media use offered by the school.

Parents will be responsible for:

- Adhering to the principles outlined in this policy.
- Taking appropriate responsibility for their use of social media and its influence on their children at home.
- Promoting safe social media behaviour for both themselves and their children.
- Attending meetings held by the school regarding social media use wherever possible.

Pupils will be responsible for:

- Adhering to the principles outlined in this policy and the school's E-Safety Rules (for KS1 or KS2 pupils as relevant).
- Ensuring they understand how to use social media appropriately and stay safe online.
- Seeking help from school staff if they are concerned about something they or a peer have experienced on social media.
- Reporting incidents and concerns relating to social media in line with the procedures within this policy.
- Demonstrating the same high standards of behaviour as expected within the school.

The E-Safety Co-ordinator will be responsible for:

- Monitoring and reviewing all school-run social media accounts.
- Vetting and approving individuals who wish to be 'friends' or 'followers' on the school's social media platforms.
- Consulting with staff on the purpose of the social media account and the content published.
- Maintaining a log of inappropriate comments or abuse relating to the school.
- Handling inappropriate comments or abuse posted on the school's social media accounts, or regarding the school.
- Creating a terms of use agreement, which all content published must be in accordance with.
- Ensuring that enough resources are provided to keep the content of the social media accounts up-to-date and relevant.

ICT technicians will be responsible for:

- Providing technical support in the development and implementation of the school's social media accounts.
- Implementing appropriate security measures as directed by the headteacher.
- Ensuring that the school's filtering and monitoring systems are updated as appropriate.

### **3. School social media accounts**

Social media accounts for the school will only be created by a designated staff member, following approval from the headteacher. A school-based social media account will be entirely separate from any personal social media accounts held by staff members and will be linked to an official school email account.

When setting up a school social media account, consideration will be given to the following:

- The purpose of the account
- Whether the overall investment will achieve the aim of the account
- The level of interactive engagement with the site
- Whether pupils, staff, parents or members of the public will be able to contribute content to the account
- How much time and effort staff members are willing to commit to the account
- How the success of the account will be evaluated

The headteacher will be responsible for authorising members of staff and any other individual to have admin access to school social media accounts. Only people authorised by the headteacher will be allowed to post on the school's accounts.

School social media passwords are kept securely by the Headteacher – these are not shared with any unauthorised persons, including pupils, unless otherwise permitted by the Headteacher.

All posts made to school social media accounts will not breach copyright, data protection or freedom of information legislation.

The school's social media accounts will comply with the platform's rules. The designated staff member will ensure anyone with authorisation to post on the school's social media accounts are provided with training on the platform and the rules around what can be posted.

School social media accounts will be moderated by the designated member of staff.

### **Staff conduct**

Only staff with authorisation from the headteacher will post on school accounts and they will adhere to the School Social Media Accounts – Terms of Use Agreement.

Staff will only post content that meets the school's social media objectives, including the following:

- Reminders about upcoming events
- Good news regarding the school's performance, attainment or reputation
- Good news regarding the achievements of staff and pupils
- Information that parents should be aware of (e.g. school closure)

Staff will ensure that their posts meet the following criteria:

- The post does not risk bringing the school into disrepute
- The post only expresses neutral opinions and does not include any personal views
- The post uses appropriate and school-friendly language
- The post is sensitive towards those who will read it, and uses particularly neutral and sensitive language when discussing something that may be controversial to some
- The post does not contain any wording or content that could be construed as offensive
- The post does not take a side in any political debate or express political opinions
- The post does not contain any illegal or unlawful content

## **4. Staff use of personal social media**

Staff will not be prohibited from having personal social media accounts; however, it is important that staff protect their professional reputation by ensuring they use personal social media accounts in an appropriate manner.

Staff will be required to adhere to the following guidelines when using personal social media accounts:

- Staff members will not access personal social media platforms during school hours (except during lunchtime, in areas to which pupils are not permitted access).
- Staff members will not use any school-owned mobile devices to access personal accounts.
- Staff will not 'friend', 'follow' or otherwise contact pupils through their personal social media accounts. If pupils attempt to 'friend' or 'follow' a staff member, they will report this to the headteacher.
- Staff will be strongly advised to not 'friend' or 'follow' parents on their personal accounts.

- Staff members will ensure the necessary privacy controls are applied to personal accounts and will avoid identifying themselves as an employee of the school on their personal social media accounts.
- Staff will ensure it is clear that views posted on personal accounts are personal and are not those of the school.
- Staff will not post any content online that is damaging to the school, its staff or pupils.
- Staff members will not post any information which could identify a pupil, class or the school – this includes any images, videos and personal information.
- Staff members will not post anonymously or under an alias to evade the guidance given in this policy.
- Staff will not post comments about the school, pupils, parents, staff or other members of the school community.

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. Members of staff will be aware that if their out-of-work activity brings the school into disrepute, disciplinary action will be taken.

Attempts to bully, coerce or manipulate members of the school community via social media by members of staff will be dealt with as a disciplinary matter.

## **5. Parent social media use**

Parents are able to comment on or respond to information shared via social media sites; however, parents should do so in a way which does not damage the reputation of the school.

Parents will be asked not to share any photos or personal details of pupils when commenting on school social media sites, nor post comments concerning other pupils or staff members.

Any parents that are seen to be breaching the guidance in this policy will be required to attend a meeting with the headteacher, and may have their ability to interact with the social media websites removed.

Breaches of this policy will be taken seriously, and in the event of illegal, defamatory or discriminatory content could lead to prosecution.

## **6. Pupil social media use**

Pupils will not access social media during school time.

Pupils will not attempt to 'friend', 'follow' or otherwise contact members of staff through their personal social media accounts. Where a pupil attempts to 'friend' or 'follow' a staff member on their personal account, it will be reported to the headteacher.

Pupils will not post any content online which is damaging to the school or any of its staff or pupils. Pupils will not post anonymously or under an alias to evade the guidance given in this policy.

Pupils are instructed not to sign up to any social media platforms that have an age restriction above the pupil's age.



If inappropriate content is accessed online on school premises, this will be reported to a member of staff.

Breaches of this policy will be taken seriously, and managed in line with the Behaviour Policy.

## **7. Data protection principles**

The school will obtain consent from parents when their children join the school using the Photograph Permission Form, which will confirm whether or not consent is given for posting images and videos of a pupil on social media platforms. The consent will be valid for the duration of the pupil's time on roll at the school (unless later amended by the parents). Consent provided for the use of images and videos only applies to school accounts.

A record of consent is maintained (the Photo Permissions list), which details the pupils for whom consent has been provided. The admin team are responsible for ensuring this consent record remains up-to-date. Class teachers will have access to this record, to enable the recording of images and videos in line with this policy, but will endeavour not to reveal to other children which pupils do not have image/video permission, since the school believes this personal decision to be a private one. The record should not, therefore, be displayed in the classroom, and efforts made to ensure pupils do not appear in images/videos should be discreet.

Parents are able to withdraw or amend their consent at any time. To do so, parents must inform the school in writing. 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' requirements following this. Wherever it is reasonably practicable to do so, the school will take measures to remove any posts before consent was withdrawn or amended, such as removing an image from a social media site.

Consent can be provided for certain principles only (for example, consent for publication of images on the school website, but not on Twitter). This will be made explicitly clear on the consent form provided. The school will only post images and videos of pupils for whom consent has been received.

Only school-owned devices will be used to take images and videos of the school community, with the exception of staff use of personal mobile phones to facilitate the rapid uploading of images/videos to the school's X feed, as long as these media are then immediately removed from the personal device (ideally to storage on the school server).

Only appropriate images and videos of pupils will be posted in which they are suitably dressed, (e.g. it would not be suitable to display an image of a pupil in swimwear).

When posting images and videos of pupils, the school may apply data minimisation techniques, such as pseudonymisation (blurring a photograph), to reduce the risk of a pupil being identified, if that is required or appropriate (e.g. if a whole-class photograph, which it is felt important to publish, would otherwise feature a pupil for whom consent has not been given for publication). However, school staff will ideally not record any videos or images featuring such pupils, or in the case of still images may arrange for the pupil to move to the periphery of a group prior to recording (enabling the ready cropping of the image before publication).

The school will not post pupils' personal details on social media platforms and pupils' names will never be used alongside any videos or images in which they are present.

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 (e.g. their name visible on a certificate or book that they are holding).

Any breaches of the data protection principles will be handled in accordance with the school's Data Protection Policy.

## **8. Safeguarding**

Any disclosures made by pupils to staff about online abuse, harassment or exploitation, whether they are the victim or disclosing on behalf of another child, will be handled in line with the Safeguarding and Child Protection Policy.

Concerns regarding a staff member's online behaviour will be reported to the headteacher, who will decide on the best course of action in line with the relevant policies (e.g. the Staff Code of Conduct, Allegations of Abuse Against Staff Policy, and Disciplinary Policy and Procedures). If the concern is about the headteacher, it will be reported to the Chair of Governors.

Concerns regarding a pupil's online behaviour will be reported to the DSL, who will investigate any concerns with relevant staff members (e.g. the headteacher and ICT technicians), and manage concerns in accordance with relevant policies depending on their nature (e.g. the Behaviour Policy, and Safeguarding and Child Protection Policy).

Where there is a concern that illegal activity has taken place, the headteacher will contact the police. The school will avoid unnecessarily criminalising pupils (e.g. calling the police) where criminal behaviour is thought to be inadvertent and as a result of ignorance or normal developmental curiosity (e.g. a pupil has taken and distributed indecent imagery of themselves). The DSL will decide in which cases this response is appropriate and will manage such cases in line with the Safeguarding and Child Protection Policy.

As part of the usual communication with parents, the school will reinforce the importance of pupils being safe online and inform parents what systems the school uses to filter and monitor online use. The school will also make it clear to parents what their children are being asked to do online for school, including what platforms they will be asked to access and who from the school, if anyone, they will be interacting with online.

## **9. Blocked content**

The school's network prevents access to certain websites through the use of filtering, provided by the school's ISP (Capita). The following social media websites are not accessible on the school's network:

- Facebook
- Instagram

The E-Safety Co-ordinator retains the right to monitor staff and pupil access to websites when using the school's network and on school-owned devices.

Attempts made to circumvent the network's firewalls will result in a ban from using school computing equipment, other than with close supervision.

Inappropriate content accessed on the school's computers will be reported to the E-Safety Co-ordinator so that the site can be blocked. Requests may be made to access erroneously blocked content by submitting a blocked content access form to the E-Safety Co-ordinator, which will be approved by the headteacher.

## **10. Cyberbullying**

Any reports of cyberbullying on social media platforms by pupils will be handled in accordance with the Anti-Bullying Policy.

Cyberbullying against pupils or staff is not tolerated under any circumstances. Incidents of cyberbullying are dealt with quickly and effectively wherever they occur in line with the Anti-bullying Policy. Allegations of cyberbullying from staff members will be handled in accordance with the Allegations of Abuse Against Staff Policy.

## **11. Training**

The school recognises that early intervention can protect pupils who may be at risk of cyberbullying or negative social media behaviour. As such, staff will receive training in identifying potentially at-risk pupils. Staff will receive training on social media as part of their new starter induction. Staff will receive ongoing training as part of their development (through, for example, a subscription to SWGfL's Boost resources).

Pupils will be educated about online safety and appropriate social media use on an annual basis through a variety of mediums, including assemblies, PSHE lessons and cross-curricular links. Pupils will be provided with material to reinforce their knowledge (such as the online safety resources on the school website).

Parents will be invited to online safety and social media training on a regular basis and provided with relevant resources.

Training for all pupils, staff and parents will be refreshed in light of any significant incidents or changes.

## **12. Monitoring and review**

This policy will be reviewed on a three-yearly basis by the Premises and Health & Safety Committee, in conjunction with the Headteacher, E-Safety Co-ordinator (if different) and DPO.

The next scheduled review date for this policy is Spring 2027.

Any changes made to this policy will be communicated to all staff, pupils and parents.

## Blocked content access request form

<b>Requester</b>	
<b>Staff name</b>	
<b>Date</b>	
<b>Full URL</b>	
<b>Site content</b>	
<b>Reasons for access</b>	
<b>Identified risks and control measures</b>	
<b>Authoriser</b>	
<b>Approved?</b>	
<b>Reasons</b>	
<b>Staff name</b>	
<b>Date</b>	
<b>Signature</b>	

## Inappropriate content report form

<b>Staff name (submitting report)</b>	
<b>Name of individual accessing inappropriate content (if known)</b>	
<b>Date</b>	
<b>Full URL(s)</b>	
<b>Nature of inappropriate content</b>	
<b>To be completed by ICT technician</b>	
<b>Action taken</b>	
<b>Staff name</b>	
<b>Date</b>	
<b>Signature</b>	