Social Media Policy

This policy applies to all activities of Hurlingham School, including the Early Years Foundation Stage.

Statement of intent and outline of policy

Statement of intent

Hurlingham 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 mission, values 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.

This policy outlines the acceptable use of Facebook, Instagram, "X" and other platforms (hereafter referred to as Social Media). It relates to staff, children, parents, Board of Advisors and the Board of Directors.

This Policy is intended to provide information to pupils and their parents, carers or guardians (referred to in this policy as "parents") about how social media will be used by Hurlingham School ("the School"). It also covers the School's approach to the use of cameras and filming equipment at school events and on school premises by parents and pupils themselves, and the media.

It applies in addition to the School's terms and conditions and parent contract, and any other information the School may provide about a particular use of pupil images, including e.g. signage about the use of CCTV (see our *CCTV Policy*); and more general information about use of pupils' personal data, e.g. the *School's Privacy Notice*. Images of pupils in a safeguarding context are dealt with under the School's relevant safeguarding policies.

Members of staff will be posting images and videos from the various activities that take place in and outside of school which will be of interest to our parents and a wider audience.

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 (2024) 'Keeping children safe in education 2024'

This policy operates in conjunction with the following school policies:

- Social Media and Mobile Devices in School Code of Conduct for Parents and Visitors
- Staff Acceptable Use Policy
- Device and Technology Acceptable Use Agreement for Pupils
- E Safety Policy
- Data Protection Policy
- Complaints Procedures Policy
- Anti-bullying Policy
- Safeguarding and Child Protection Policy (including)
    - Allegations of Abuse Against Staff
    - Low-level Safeguarding Concerns
- Taking, Storing and Using Images of Children Policy
- Staff Code of Conduct
- Confidentiality Policy
- Disciplinary Policy and Procedure
- Promoting Positive Relationships and Supporting Behaviour Regulation Policy

2. Roles and responsibilities

The Principal, on behalf of the Board of Directors, will be responsible for:

- Ensuring this policy is implemented by the school.
- Reviewing this policy on an 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 Head 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 the Head of IT Services 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 Device and Technology 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 Head 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 and the Social Media Code of Conduct for Parents.
- 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 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 Pupil Code of Conduct.
- 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 Head of Admissions and Marketing 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.

The Head of IT Services 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 Head.
- 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 the Head of Admissions and Marketing and other designated staff members, following approval from the Head. 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 Head 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 Head will be allowed to post on the school's accounts.

Passwords for the school's social media accounts are stored securely. The passwords are only shared with people authorised by the Head.

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 Head of Admissions and Marketing 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.

- Staff must check that consent has been given for uploading the images of pupils to Social Media.
- No published images will ever disclose a student's full name. In the majority of cases, any text accompanying photographs will describe the context of the activity, rather than naming the pupils involved at all, although first names may be used for special achievements with parental permission.
- Staff will ensure images of pupils that do not have permission are not used for the purposes of social media.
- The images should be of good quality and be in line with our School ethos and values.
- The accompanying text should be grammatically correct and accurately spelt. If uploaded content contains grammatical or spelling errors, it will be removed and the member of staff who posted it will be informed.

School social media accounts will be moderated by the Head of Admissions and Marketing or another designated member of staff.

Staff conduct

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

Staff will get content approved by the Head of Admissions and Marketing before it is posted. 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.
● 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 Head.
● 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, in accordance with the Social Media Code of Conduct for Parents.

Any parents that are seen to be breaching the guidance in this policy will be required to attend a meeting with the Head, 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 lesson time, unless it is part of a curriculum activity. Pupils will not be permitted to use the school's WiFi network to access any social media platforms unless prior permission has been sought from the Head, and the Head of IT Services has ensured appropriate network security measures are applied.

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 Head.

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. The Use of Pupil Images in Social Media

Examples of posts might include: Images of children at work in the classroom, images from a school production, concert or sporting fixture, images of children on a residential or day visit, or many other notable achievements.

We will not use Social Media as a primary tool to communicate important information, this will still be done using the usual school communications.

8. Data protection principles

Parents who accept a place for their child at the school are invited to agree to the School using anonymous

images of their child and information relating to his or her achievements for promotional purposes. This may be published in the prospectus or on the website, as well as displayed within the premises, in newsletters and on social media.

Permission for this is requested on a form given to parents during the admissions process (See New Starter Form - Consents) and/or from time to time if a particular use of the pupil's image is requested.

However, parents should be aware of the fact that certain uses of their child's images may be necessary or unavoidable (for example if they are included incidentally in CCTV or a photograph).

Parents and pupils are able to withdraw or amend their consent at any time. To do so, parents and pupils must inform the school in writing. Where parents or pupils 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 pupils' 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.

Only school-owned devices will be used to take images and videos of the school community, which have been pre-approved by the online safety officer for use. 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.

Before posting on social media, staff will:

● Refer to the consent 'Photo Consents List' to ensure consent has been received for that pupil and for the exact processing activities required.

Any breaches of the data protection principles will be handled in accordance with the school's Cyber-security Policy.

9. 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 Child Protection and Safeguarding Policy.

Concerns regarding a staff member's online behaviour will be reported to the Head, 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 Head, 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 Head and Head of IT Services, and manage concerns in accordance with relevant policies depending on their nature, e.g. the Behaviour Policy and Child Protection and Safeguarding Policy.

Where there is a concern that illegal activity has taken place, the Head 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 Child Protection and Safeguarding 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.

10. Blocked and inappropriate content

In accordance with the school's E Safety Policy, the online safety officer will install firewalls on the school's network to prevent access to certain websites. The following social media websites are not accessible on the school's network:

● X
● Facebook
● Instagram

The Head of IT Services 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 and referencing

● Hurlingham welcomes any referencing, mentions or interactions that show the School in a positive light only.
● We deem the following as inappropriate: Offensive language or remarks aimed at the School, its staff, pupils, parents, governors, directors or others affiliated with the School; Unsuitable images or content posted into its feed; Images or text that infringe copyright; Comments that aim to undermine the School or those associated with it.
● Any inappropriate content will be deleted, and its users will be removed, blocked and, depending on the nature of the comment, reported to the relevant Social Media authorities.

Inappropriate content accessed on the school's computers will be reported to the Head of IT Services so that the site can be blocked.

11. 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.

12. 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 **annually** and ongoing training as part of their development.

Pupils will be educated about online safety and appropriate social media use on a termly basis through a variety of mediums, including assemblies, PSHEE lessons and cross-curricular links. Pupils will be provided with material to reinforce their knowledge.

Parents will be invited to online safety and social media training on an annual basis and provided with relevant resources, such as our Social Media Code of Conduct for Parents.

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

13.   Monitoring and review

This policy will be reviewed on an **annual** basis by the Head, Principal and Head of Marketing and Admissions.