Bronte Academy Trust
Social Media Policy

Reviewed By	Approved By	Date of Approval	Version Approved	Next Review Date
Working Party	JB	17 Sep 18		17 Sep 20
DH	JB	13 Jan 20		13 Jan 22
DH	Trustees	11 June 24		11 June 25

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STATEMENT OF INTENT

Bronte Academy Trust 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 Trust's mission, values and objectives
- Protecting our pupils from the dangers of social media
- Preventing and avoiding damage to the reputation of the Trust through irresponsible use of social media
- Protecting our staff from cyberbullying and potentially career damaging behaviour
- Arranging online safety meetings for parents

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 Trust policies

- Code of Conduct for Parents
- IT Acceptable Use Agreement for Pupils
- Data Protection Policy
- Pupil Code of Conduct
- Complaints Procedures Policy
- Anti-bulling Policy
- Allegations of Abuse Against Staff Policy
- Staff Code of Conduct
- Cyber Security Policy
- Child Protection and Safeguarding Policy
- Disciplinary Policy and Procedures
- Behaviour Policy

ROLES AND RESPONSIBLITIES

The Trustees will be responsible for:

- Ensuring this policy is implemented by the Trust
- Reviewing this policy on an annual basis
- Ensuring their own knowledge of social media and online safety issues is up-to-date
- 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 Governors of the individual academy will be responsible for:

- Ensuring the DSL's remit covers online safety
- Ensuring all staff undergo safeguarding and child protection training, including online safety, at induction
- Ensuring their own knowledge of social media and online safety issues is up-to-date

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 body, handling complaints regarding this policy and its provisions in line with the Trust'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 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 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 and the 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 Trust

ICT technicians will be responsible for:

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

ACADEMIES SOCIAL MEDIA ACCOUNTS

Social media accounts for the individual academies will only be created by the designated staff members, 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 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.

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

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

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

Staff Conduct

Only staff with authorisation form the headteacher will post on school accounts and they will adhere staff code of conduct.

Staff will get content approved by the headteacher 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 Trust 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 take a side in any political debate or express political opinions
- The post does not contain any legal or unlawful content

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 Trust-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 not to '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 Trust on their personal social media accounts
- Staff will ensure it is clear that views posted on personal accounts are personal and not those of the Trust
- Staff will not post any content online that is damaging to the Trust, its staff or pupils
- Staff members will not post any information which could identify a pupil, class or the Trust – 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 Trust, 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 Trust 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.

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 Trust.

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 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 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.

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 headteacher, and an ICT technician 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 headteacher.

Pupils will not post any content online which is damaging to the Trust 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 Trust 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.

DATA PROTECTION PRINCIPLES

The school will obtain consent from pupils and parents at the beginning of each academic year using the Social media consent 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 entire academic year. Consent provided for the use of images and videos only applies to school accounts. Staff, pupils are not permitted to post any imagery or videos on personal accounts.

A record of consent is maintained throughout the academic year, which details the pupils for whom consent has been provided. The Office Managers will be responsible for ensuring this consent record remains up-to-date.

Parents are able to withdraw or amend their consent at any time. To do so, parents must inform 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.

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 from provided. The school will only post images and videos of pupils for whom consent has been received.

Only Trust-owned devices will be used to take images and videos of the school community, which have been pre-approved by the ICT technician 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 and image of a pupil in swimwear.

When posting on social media, the school will use group or class images or videos with general labels, e.g. 'sports day'.

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

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

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 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 technician 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 headteacher will contact the police. The school will avoid unnecessarily criminalising pupils, e.g. calling the policy, 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 Trust 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.

BLOCKED CONTENT

In accordance with the Trust's Cyber-security Policy, the ICT technician will install firewalls on the Trust's network to prevent access to certain websites. The following social media websites are not accessible on the Trust's network.

- Instagram
- Tiktok

ICT technicians retain the right to monitor staff and pupil access to websites when using the Trust's network and on Trust owned devices.

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

Inappropriate content accessed on the Trust's computers will be reported to an ICT technician so that the site can be blocked. Requests may be made to access erroneously blocked content, which will need approval from the headteacher.

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.

TRAINING

The Trust 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 annual 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, PSHE 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 Code of Conduct for Parents.

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

Monitoring and Review

This policy is reviewed on an annual basis by the Trustees; any changes made to this policy will be communicated to the relevant members of staff

Declaration of Responsibility
This Social Media Policy was reviewed and formally adopted by Bronte Academy Trust on

....................................11 June 2024....................................Date

....Signed Chair of Trustees

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....Signed Chief Executive Officer

Appendices 1 – Social Media Consent Form

This consent form provides information pertaining to how Bronte Academy Trust wishes to use personal data on social media, details the terms under which the Trust will use this data and requests consent for the Trust to use your personal data on social media.

Name of parent	
Name of pupil	
Class	

Why do we need your consent?

The Trust requests the consent of parents on an annual basis to use images and videos of their child for a variety of different purposes.

Without your consent, the Trust will not use images, videos, names or other forms of personal data of your child on social media. Similarly, if there are only certain conditions under which you would like images and videos of your child to be used, the Trust will abide by the conditions you outline in this form.

Why will we be using personal data on social media?

The Trust wants to use certain types of data on social media to promote the positive and inclusive ethos of the Trust – we aim to celebrate our pupils' and Trust's achievements and social media allows us to do this.

Where the Trust uses images of individual pupils, the name of the pupil will not be disclosed. Where an individual pupil is named in a written publication, a photograph of the pupil will not be used to accompany the text.

If, for example, a pupil has won an award and their parent would like their name to be published alongside their image, separate consent will be obtained prior to this.

With your consent, the Trust may use personal data on social media, the Trust or individual academies website, in Trust prospectuses and other printed publications, such as a newsletter.

Who will be able to see the data once it's on social media?

The Trust's privacy settings only allow people who have been accepted to view the content on our social media platforms; additionally, where it is possible, the Trust's settings do not allow for further sharing. Please note, this sharing restriction may not be possible on all social media platforms, meaning that, if the content has been posted and is subsequently shared, more people will be able to view that piece of content.

What are the conditions of use?

- This consent form is valid for the current academic year
- It is the responsibility of parents to inform the school, in writing, if consent needs to be withdrawn or amended.
- The Trust will not use the personal details or full names of any pupil in an image or video on social media

- The Trust will not include personal emails, postal addresses or telephone numbers on images or videos on social media
- The Trust may use pictures of pupils and teachers that have been drawn by pupils
- The Trust may post pictures of work created by pupils on social media
- The Trust may use group or class images or videos with general labels, e.g. 'sports day'
- The Trust will only use images and videos of pupils who are suitably dressed, e.g. it would not be suitable to display an image of a pupil in swimwear
- The Trust will not post any sensitive data, such as details of SEND, without express and additional consent, and will then still anonymise the posts

Providing your consent

Please read the following conditions thoroughly and provide your consent as appropriate by ticking either 'Yes' or 'No' for each criteria.

The Trust will only post personal data on social media for the conditions that you provide consent for:

I provide consent to	Yes	No
Using images of my child on the Trust's social media accounts		
Using videos of my child on the Trust's social media accounts		
Using images of my child on social media, including the following: • Facebook • Twitter		
Using Videos of my child on social media, including the following: • Facebook • Twitter		
Using my child's first name on social media		
Using my child's age on social media		

Refreshing your consent

This form is valid for the entire academic year, it will be updated on an annual basis. Parents are required to fill in a new form every academic year.

Consent will also be refreshed where any changes to circumstances occur – this can include, but is not limited to, the following:

- New requirements for consent, e.g. an additional social media account will be used to share pupil images and videos
- Changes to a pupil's circumstances, e.g. safeguarding requirements means a pupil's image cannot be used
- Changes to parental consent, e.g. amending the provisions for which consent has been provided for

Where you would like to amend the provisions for which consent has been provided, you must submit your request in writing to the school office manager. A new form will be supplied to you to amend your consent accordingly and provide a signature.

Withdrawing your consent

Parents have the right to withdraw their consent at any time. Withdrawing your consent will not affect the legality of processing personal data that was shared prior to withdrawal; however, the school will make every effort to remove posts about the pupil where possible, e.g. images of the pupil on social medial will be removed.

If you would like to withdraw your consent, you must submit your request in writing to the school office manager.

Declaration

I, _____ (name of parent), understand:

- Why my consent is required
- The reasons why Bronte Academy Trust uses my child's personal data on social media
- Who will be able to view my child's personal data once posted
- The conditions under which the Trust uses personal data of my child on social media
- I have provided my consent above as appropriate, and the Trust will act in accordance with my requirements
- Consent is refreshed on an annual basis and I must re-provide consent in subsequent academic years
- I will be required to re-provide consent where any circumstances change
- I can amend or withdraw my consent ay any time and must do so in writing to the office manager

Name of Parent   _____

Signature of Parent _____

Date   _____

If you have any questions regarding this form, please do not hesitate to contact the school.