

1.17c Social Media Policy for St. Gregory's Child Care Trust

Section 1: Introduction

The internet provides a range of social media tools that allow users to interact with one another, for example from rediscovering friends on social networking sites such as Facebook to keeping up with other people's lives on Twitter and maintaining pages on internet encyclopaedias such as Wikipedia.

While recognising the benefits of these media for new opportunities for communication, this policy sets out the principles that St. Gregory's Child Care Trust's staff are expected to follow when using social media.

It is crucial that children, parents and the public at large have confidence in the Trust's decisions and services. The principles set out in this policy are designed to ensure that staff members use social media responsibly so that confidentiality of children and other staff and the reputation of the Trust are safeguarded.

Staff members must be conscious at all times of the need to keep their personal and professional lives separate.

Section 2: Scope

This policy applies to St. Gregory's Child Care Trust's staff, volunteers and other individuals who work for or provide services on behalf of the Trust. These individuals are collectively referred to as 'staff members' in this policy.

The policy covers personal use of social media as well as the use of social media for official purposes, including sites hosted and maintained on behalf of the Trust (see sections 5, 6, 7 and Appendices A and B).

This policy applies to personal webspace such as social networking sites (for example Facebook, MySpace), blogs, microblogs such as Twitter, chatrooms, forums, podcasts, open access online encyclopaedias such as Wikipedia, social bookmarking sites such as del.icio.us and content sharing sites such as flickr and YouTube. The internet is a fast moving technology and it is impossible to cover all circumstances or emerging media – the principles set out in this policy must be followed irrespective of the medium.

Section 3: Legal Framework

St. Gregory's Child Care Trust is committed to ensuring that all staff members provide confidential services that meet the highest standards. All individuals working on behalf of the Trust are bound by a legal duty of confidence and other laws to protect the confidential information they have access to during the course of their work. Disclosure of confidential information on social media is likely to be a breach of a number of laws and professional codes of conduct, including:

- The Human Rights Act 1998;
- Common law duty of confidentiality, and;
- The Data Protection Act 1998.

Confidential information includes, but is not limited to:

- Person-identifiable information, e.g. child and employee records protected by the Data Protection Act 1998;
- Information divulged in the expectation of confidentiality;
- Business or corporate records containing organisationally or publicly sensitive information.
- Any commercially sensitive information such as information relating to commercial proposals or current negotiations, and ;
- Politically sensitive information.

Staff members should be aware that other laws relating to libel, defamation, harassment and copyright may apply to information posted on social media, including:

- Libel Act 1843;
- Defamation Acts 1952 and 1996;
- Protection from Harassment Act 1997;
- Criminal Justice and Public Order Act 1994;
- Communications Act 2003, and;
- Copyrights, Designs and Patents Act 1988.

St. Gregory's Child Care Trust could be held vicariously responsible for acts of their employees in the course of their employment. For example, staff members who harass co-workers online or who engage in cyberbullying or discrimination on the grounds of race, sex, disability, etc or who defame a third party while at work may render St. Gregory's Child Care Trust liable to the injured party.

Section 4: Related Policies

This policy should be read in conjunction with the following policies:

- Confidentiality Policy
- Induction Policy
- Grievance Policy
- Child Protection Policy

Section 5: Principles – Be Professional, Responsible and Respectful

- You must be conscious at all times of the need to keep your personal and professional lives separate. You should not put yourself in a position where there is a conflict between your work for the Trust and your personal interests.
- You must not engage in activities involving social media which might bring St. Gregory's Child Care Trust in disrepute.
- You must not represent your personal views as those of St. Gregory's Child Care Trust on any social medium.
- You must not discuss information about any children, staff and other professionals you interact with as part of your job on social media.
- You must not use social media and the internet in a way to attack, insult, abuse or defame children, their family members, colleagues, other professionals, other organisations or the Child Care Trust.
- You must be accurate, fair and transparent when creating or altering online sources of information on behalf of the Child Care Trust.

Section 6: Personal Use of Social Media

Staff members must not identify themselves as employees of St. Gregory's Child Care Trust in their personal webspace. This is to prevent information on these sites from being linked with the Trust and to safeguard the privacy of staff members, particularly those involved in providing sensitive frontline services.

Staff members must not have contact through any personal social medium with any child, whether from St. Gregory's Child Care Trust or any other school, unless the children are family members.

St. Gregory's Child Care Trust does not expect staff members to discontinue contact with their family members via personal social media once the Trust starts providing services for them. However, any information staff members obtain in the course of

their employment must not be used for personal gain nor be passed on to others who may use it in such a way.

Staff members must not have any contact with children's family members through personal social media if that contact is likely to constitute a conflict of interest or call into question their objectivity.

If staff members wish to communicate with children through social media sites or to enable children to keep in touch with one another, they can only do so with the approval of the Trust and through official Trust sites created according to the requirements specified in section 7 and appendix A.

Staff members must decline 'friend requests' from children they receive in their personal social media accounts. Instead, if they receive such requests from children who are not family members, they must signpost children to become 'friends' of the official Trust site.

On leaving St. Gregory's Child Care Trust's service, staff members must not contact the Trusts' children by means of personal social media sites. Similarly, staff members must not contact children who no longer attend the Trust by means of social media.

Information staff members have access to as part of their employment, including personal information about children and their family members, colleagues, staff and other parties or corporate information must not be discussed on their personal webspace.

Photographs, videos or any other types of image of children and their families or images depicting staff members wearing uniform must not be published on personal webspace.

St. Gregory's Child Care Trust's email addresses and other official contact details must not be used for setting up personal social media accounts or to communicate through social media.

Staff members must not edit open access online encyclopaedias such as Wikipedia in a personal capacity at work. This is because the source of the correction will be recorded as the employer's IP address and the intervention will, therefore, appear as if it comes from the employer itself.

St. Gregory's Child Care Trust logo must not be used or published on personal webspace.

Caution is advised when inviting work colleagues to be 'friends' in personal social networking sites. Social networking sites blur the line between work and personal

lives and it may be difficult to maintain professional relationships or might be just too embarrassing if too much personal information is known in the work place.

Staff members are strongly advised to ensure that they set the privacy levels of the personal sites as strictly as they can and to opt out of public listings on social networking sites to protect their own privacy. Staff members should keep their passwords confidential, change them often and be careful about what is posted online; it is not safe to reveal home addresses, telephone numbers and other personal information. It is a good idea to use a separate email address just for social networking so that any contact details are not given away.

Section 7: Using Social Media on Behalf of St. Gregory's Child Care Trust

Staff members can use only official Trust sites for communicating with children to enable children to communicate with one another.

There must be a strong pedagogical or business reason for creating official Trust sites to communicate with children or others. Staff must not create sites for trivial reasons which could expose the Trust to unwelcome publicity or cause reputational damage.

Official Trust sites must be created only according to the requirements specified in Appendix A of this Policy. Sites created must not breach the terms and conditions of social media service providers, particularly with regard to minimum age requirements.

Staff members must at all times act in the best interests of the children when creating, participating in or contributing content to social media sites.

Section 8: Monitoring of Internet use

St. Gregory's Child Care Trust monitors usage of its internet services and email services without prior notification or authorisation from users.

Users of St. Gregory's Child Care Trust email and internet services should have no expectation of privacy in anything they create, store, send or receive using the Trust's ICT system.

Section 9: Breaches of the Policy

Any breach of this policy may lead to disciplinary action being taken against the staff member/s involved in line with St. Gregory's Child Care Trust's Disciplinary Policy and Procedures.

A breach of this policy leading to breaches of confidentiality, or defamation or damage to the reputation of St. Gregory's Child Care Trust or any illegal acts or acts that render St. Gregory's Child Care Trust liable to third parties may result in disciplinary action or dismissal.

Contracted providers of St. Gregory's Child Care Trust services must inform the relevant officer immediately of any breaches of this policy so that appropriate action can be taken to protect confidential information and limit the damage to the reputation of the Trust. Any action against breaches should be according to contractor's internal disciplinary procedures.

Appendix A

Requirements for creating social media sites on behalf of St. Gregory's Child Care trust.

Creation of sites:

Staff members participating in social media for work purposes are expected to demonstrate the same high standards of behaviour as when using other media or giving public presentations on behalf to St. Gregory's Child Care Trust.

Prior to creating a site, careful consideration must be given to the purposes for using social media and whether the overall investment is likely to be worthwhile for achieving the proposed pedagogical outcome.

The proposed audience and level of interactive engagement with the site, for example whether the children, staff or members of the public will be able to contribute content to the site, must be discussed with the Trust's manager.

Staff members must consider how much time and effort they are willing to commit to the proposed site. They should be aware that maintaining a site is not a one-off task, but involves a considerable time commitment.

The manager must take overall responsibility to ensure that enough resources are provided to keep the site refreshed and relevant. It is important that enough staff

members are trained and are able to maintain and moderate a site in case staff absences or turnover.

There must be a careful exit strategy and a clear plan from the outset about how long the site will last. It must not be neglected, creating a potential risk to the Trust's image.

Consideration must also be given to how the success of the site will be evaluated to assess whether the site has achieved the proposed objectives.

Children and Young People:

When creating social media sites for children and young people and communicating with them using such sites, staff members must at all times be conscious of their responsibilities; staff must always act in the best interests of the children and young people.

When creating sites for children and young people, staff members must be alert to the risks to which young people can be exposed. Young people's technical knowledge may exceed their social skills and awareness – they may post sensitive personal information about themselves, treat online 'friends' as real friends, be targets for 'grooming' or become victims of cyberbullying.

If children and young people disclose information or display behaviour or are exposed to information or behaviour on these sites that raises safeguarding or other concerns, appropriate authorities must be informed immediately. Failure to do so could expose vulnerable young people to risk of harm.

Staff members must ensure that the sites they create or contribute to for work purposes conform to the Good Practice Guidance for the Providers of Social Networking and Other Interactive Services (Home Office Task Force on Child Protection on the Internet, 2008)

Staff members must also ensure that the webspace they create on third party sites comply with the site owner's minimum age requirements (this is often set at 13 years). Staff members must also consider the ramifications and possibilities of children under the minimum age gaining access to the site.

Care must be taken to ensure that, content is suitable for the target age group and contributors or 'friends' to the site are vetted.

Careful thought must be given to the profile of young people when considering creating sites for them. For example, the internet may not be the best medium to communicate with vulnerable young people (or indeed any age group) receiving

confidential and sensitive services from the Trust. It may not be possible to maintain confidentiality, particularly on third-party-hosted sites such as social networking sites, when privacy settings may not be strong enough to prevent breaches of confidentiality, however inadvertent. If in doubt, you must seek advice from your Manager (Denise Arnold).

Approval for the creation of or participation in webspace:

St. Gregory's Child Care Trust's social media sites can be created only by or on behalf of the Trust. Site administrators and moderators must be St. Gregory's Child Care Trust employees or other authorised people.

Approval for creation of sites for work purposes, whether hosted by the Trust or hosted by a third party such as a social networking site, must be obtained from the manager.

Approval for participating, on behalf of St. Gregory's Child Care Trust, on sites created by third parties must be obtained from the manager.

Content contributed to own or third-party hosted sites must be discussed with and approved by the manager. The Trust's manager must be consulted about the purpose of the proposed site and its content. In addition, the manager's approval must be obtained for the use of the Trust's logo and brand.

Staff must complete the Social Media Site Creation Approval Form (Appendix B) and forward it to the manager before site creation.

Be aware that the content or site may attract media attention. All media enquiries must be forwarded to the manager immediately. Staff members must not communicate with the media without the advice and approval of the manager.

Content of webspace:

St. Gregory's Child Care Trust – hosted sites must have clearly expressed and publicised Terms of Use and House Rules. Third-party hosted sites used for work purposes must have Terms of Use and House Rules that conform to the Trust's standards of professional conduct and service.

Staff members must not disclose information, make commitments or engage in activities on behalf of St. Gregory's Child Care Trust without authorisation.

Information provided must be worthwhile and accurate; remember what is published on the site will reflect on the Trust's image, reputation and services.

Stay within the law and be aware that child protection, privacy, data protection, libel, defamation, harassment and copyright law may apply to content of social media.

Staff members must respect their audience and be sensitive in the tone of language used and when discussing topics that others may find controversial or objectionable.

Permission must be sought from the relevant people before citing or referencing their work or referencing service providers, partners or other agencies.

St. Gregory's Child Care Trust-hosted sites must always include the logo or brand to ensure transparency and confidence in the site. The logo should, where possible, link back to the relevant page on the Trust's website.

Staff members participating in St. Gregory's Child Care Trust-hosted or other approved sites must identify who they are. They must disclose their positions within the Trust on these sites.

Staff members must never give out their personal information such as home contact details or home email addressed on these sites.

Personal opinions should not be expressed on official sites.

Contributions and moderation of content:

Careful consideration must be given to the level of engagement of contributions – for example whether users will be able to add their own text or comments or upload images.

Sites created for and contributed to by children must have strongest privacy settings to prevent breaches of confidentiality. Children and other participants in sites must not be able to be identified.

The content and postings in St. Gregory's Child Care Trust-hosted sites must be moderated. Moderation is responsibility of the team that sets up or initiates the site.

The team must designate at least two approved Administrators whose role it is to review and moderate the content, including not posting or removal of comments which breach the Terms of Use and House Rules. It is important that there are enough approved moderators to provide cover during leave and absences so that the site continues to be moderated.

For third-party-hosted sites such as social networking sites used for work purposes, the responsibility for protection and intervention lies first with the host site itself. However, different sites may have different models of intervention and it is ultimately the responsibility of the staff member creating the site to plan for and implement

additional intervention, for example in the case of content raising child safeguarding concerns or comments likely to cause offence.

Behaviour likely to cause extreme offence, for example racist or homophobic insults, or likely to put a young person or adult at risk of harm must never be tolerated. Such comments must never be posted or removed immediately and appropriate authorities, for example the Police and Child Exploitation and Online Protection Centre (CEOP), informed in the case of illegal content or behaviour.

Individuals wishing to be 'friends' on a site must be checked carefully before they are approved. Their comments must be reviewed regularly and any that do not comply with the House Rules must not be posted or removed.

Any proposal to use social media to advertise for contributors to sites must be approved by the manager.

Approval must also be obtained from the Trust's manager to make an external organisation a 'friend' of the site, except for the Catholic School of St. Gregory the Great.

Appendix B

St. Gregory's Child Care Trust

Social Media Site Creation Approval Form

Use of social media on behalf of St. Gregory's Child Care Trust must be approved prior to setting up sites.

Please complete this form and forward it to the manager (Denise Arnold).

Name of author of site	
Purpose: Please describe why you want to set up this site and content of the site:	
What are the aims you propose to achieve by setting up this site? What is the content of the site?	
Proposed Audiences: Who are the proposed audiences of the site? (tick all that apply)	<input type="checkbox"/> Children and staff of St. Gregory's Child Care Trust <input type="checkbox"/> Children's family members <input type="checkbox"/> Children from other schools or pre-schools <input type="checkbox"/> External organisations <input type="checkbox"/> Members of the public <input type="checkbox"/> Others; please provide details
Proposed contributors: Who are the proposed contributors to the site? (tick all the apply)	<input type="checkbox"/> Children and staff of St. Gregory's Child Care Trust <input type="checkbox"/> Children's family members <input type="checkbox"/> Children from other schools or pre-schools <input type="checkbox"/> External organisations <input type="checkbox"/> Members of the public <input type="checkbox"/> Others; please provide details
Administration of the site:	

Names of administrators (the site must have at least 2 approved administrators)	
Names of moderators (the site must have at least 2 approved moderators)	
Who will vet external contributors?	
Who will host the site?	
Proposed date of going live	
Proposed date of site closure	
How do you propose to advertise for external contributors?	
If contributors include children how do you propose to inform and obtain consent of parents or responsible adults?	
What security measures will you take to prevent unwanted or unsuitable individuals from contributing or becoming 'friends' of the site?	

St. Gregory's Child Care Trust Photographic and Film Consent Form

We often take photographs or video film for publicity purposes. These images may appear in our printed publications or on our Twitter page, YouTube channel, Trust website or Facebook page. We may also send them to the media. We need your permission to do this.

Please answer questions 1, 2 and 3 below, then sign and date the form where shown. Please circle: Yes or No. Please cross out any options in the question that you do not want your photo/film to be used in/on.

1.	May we use your image(s), in printed publicity or promotional literature produced by the Trust, including leaflets, posters, newsletters and other display material? Yes/No
2.	May we use your image(s), on our website and other social media sites, including Facebook, Twitter and YouTube? Yes/No
3.	I understand that websites and other media can be seen throughout the world, and not just in the United Kingdom, where UK law applies. Yes/No
4.	We regularly send publicity material about our services, including photographs where appropriate, to the news media, especially the local press. Can we use your photograph in this way? Yes/No
	I have read and understood the conditions of use on this form. Yes/No Signature:..... Date:..... Please print your name in capitals:

Conditions of Use

1. We will not include details or full names (which means first name and surname) of any child or adult in an image on a video, on our website, or in printed publications, without good reason.
2. We will not include personal e-mail or postal addresses, or telephone or fax numbers on video or on our website or in printed publications.
3. If we use images of individual children, we will not use the name of that child in the accompanying text or photo caption without good reason.
4. We may use group or class images with very general labels.
5. We will only use images of children who are suitably dressed, to reduce the risk of such images being used inappropriately.
6. We cannot film or take photographs of any child that is at risk or under supervision order.

Please contact Denise Arnold if you have any questions relating to this consent form.

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