



SOCIAL MEDIA POLICY

1. Introduction

The principles set out in this policy are designed to ensure that the personal and professional lives of staff remain separate, that staff use personal and College social media sites responsibly, so that the confidentiality of pupils and staff is maintained, and the reputation of Dulwich College is protected.

2. Scope

2.1 This policy applies to the Dulwich College governing body, all staff, trainees, volunteers, casual workers, agency workers and other individuals who work for the College. These individuals are collectively referred to as 'staff' in this policy.

2.2 This policy covers the use of social media for both personal and for official College purposes (i.e., sites hosted and maintained on behalf of the College) whether during working hours or otherwise.

3. Guidance and Related Policies

3.1 This policy has due regard for all relevant legislation and guidance including Government guidance: [Charities and social media.](#)

3.2 This policy should be read in conjunction with other College policies including:

- Staff Code of Conduct
- The ICT Acceptable Use Policy - Staff
- Data Protection Policy
- College Policy on the taking and use of Photographs of Pupils

3.3 For the avoidance of doubt, if a social media post would breach any of the College policies in another forum it will also breach them in an online forum. For example, staff are prohibited from using social media to disclose personal information about parents/staff/pupils (which would be a breach of the Data Protection Policy).

4. Definitions

For the purposes of this Policy:

- the term 'social media' means websites and applications that allow users to create profiles and share content and/or take part in online networking with other users, for example Instagram, Facebook,

Snapchat, blogs, microblogs such as X (formerly known as Twitter), TikTok, 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 term “College social media site” means a social media site that is set up by a member of staff during the course of their work for the College and which is accessible to the public (including pupils).

5. General Principles

5.1 Staff must be aware that their role comes with responsibilities, and they must adhere to the College’s strict approach to social media as set out in this policy.

5.2 Staff must:

- ensure all interactions relating to the College that take place between members of staff and other people associated with the College occur in an open and transparent way;
- speak to their Head of Department or line manager immediately if they see or become aware of social media content that disparages or reflects poorly on the College or any of its staff or pupils.;
- consider whether they should obtain a colleague’s permission first before referring to them by name on social media. If a colleague asks a member of staff to remove a comment about them or photograph of them they have put on social media, they should do so promptly; and
- immediately remove any social media content (from a College or personal social media account) that the College considers to constitute a breach of this or any other College policy.

5.2 Staff must not:

- post comments on any social media that may damage the reputation of the College in any way. Particular care should be taken when a member of staff’s private views conflict with statements made by the College;
- represent their personal views as those of Dulwich College;
- not use social media (either their personal sites or the College’s social media sites): (a) to make negative comments about the College or any of its staff or pupils or their families; (b) to harass or bully or unlawfully discriminate against another member of staff; (c) to make false or misleading statements about the College or any of its staff or pupils or their families; or (d) to impersonate another member of staff.

5.2.1 Occasionally, visiting speakers ask for permission to use photographs taken by (or for) the College during their visit (e.g., to accompany reporting of their visit in the media, including social media). As

stated in the College's Policy on the Taking and Use of Photographs of Pupils, the College may agree to permit such usage, where it is appropriate and in the broader interests of the College.

6. Using Social Media on Behalf of Dulwich College

Setting Up a Social Media Site for the College

6.1 The College is a charity and any member of staff setting up a social media site on behalf of the College must ensure the purpose of any site aligns with the charitable purposes of the College in the furtherance of education.

6.2 New college social media sites must approved by the Director of Communications and staff must attend a content guidance briefing before launch. The considerations for the creation of a new site will include:

- the strength of the pedagogical or business reason for creating the site;
- whether the proposed platform is appropriate;
- whether the proposed site is to communicate with pupils and/or others and for what purpose;
- whether there will be discussion forum and if so, how it will be moderated;
- what third party content will be posted and shared.

Staff must not create College social media sites for trivial or other reasons which could expose the College to unwelcome publicity or cause reputational damage. Staff must ensure there are always two members of staff on any social media site, particularly those which pupils have access to.

6.3 Information about the purpose, audience and administration of a College social media site must be included when requesting permission to set up a new site.

6.4 Staff must follow the terms and conditions of social media service providers, for example with regard to minimum age requirements.

6.5 To the extent that the College undertakes an fundraising on social media, the College will comply with the Code of Fundraising Practice.

6.6 All social media accounts (including blogs, forums etc.), set up for the College shall remain the property of the College and the Head of Computer Services must have access to them.

Branding and Non-clementure

6.6 All College social media sites should carry the Dulwich College icon and staff should approach the Director of Communications for the correct protocols before setting up a College social media site

(see above). Staff will have the freedom to customise College social media sites as they see fit but must use an approved branded icon to identify the site as an official College one and to provide consistency across the various College social media sites.

- 6.7 An individual's name should not be included in a College social media site name, URL or username.
- 6.8 College social media site names should reflect site content or department and include reference to the College (Dulwich College or DC as character limits allow). Examples of good naming practice:
<https://twitter.com/DCdepARTment>,
https://twitter.com/Alleyn_Club,
<https://twitter.com/DCWodehouse>.

Running and Monitoring

- 6.9 Staff can only use official College sites (i.e., branded Dulwich College or approved by Dulwich College) for work-related purposes.
- 6.10 Any member of staff posting on the College's social media site(s) should not post or share content which is: (i) harmful or likely to cause distress, (ii) inconsistent with the College's purpose as a charitable education provider, (iii) or in breach of the law; or (iv) not in the College's best interests.
- 6.11 The College social media sites should be monitored by at least two members of staff within the relevant Department or College (having been set up with an official College email address). This should include an administrator and a moderator (see Online Application Form for details). Monitoring of College social media activities (which includes monitoring of posts made by the College and any comments from third parties) must take place on a regular basis.
- 6.12 Staff must be gracious about other schools when they post comments on a College social media site about competitive events (both in victory and defeat).
- 6.13 Staff must think responsibly about who they follow "like" and connect with when acting on behalf of the College in managing a Dulwich College social media site.
- 6.14 If there are any concerns regarding College social media sites, particularly if negative comments are made about the College or any of its staff or pupils on a College social media site, or inappropriate comments are posted, the Director of Communications and Head of Department should be informed immediately.

Privacy

- 6.16 Staff must not disclose on College social media sites any personal information about pupils, staff, and other professionals they interact with as part of their job (including personal phone numbers).

6.17 Staff must exercise due discretion about appropriate choice of photos for College social media sites and be aware of the pupils whose photos may not be used for publishing either in print or online. The names of the pupils can be found in the News Reporting section on MyDulwich.

7. Personal use of Social Media

7.1 A member of staff should not use personal social media to communicate with (and should politely decline 'friend requests' received from):

- any current pupil of Dulwich College; or
- any former pupil of Dulwich College (unless they have completed their secondary education at least 3 months previously); or
- a current pupil of one of the staff member's previous schools; or
- a former pupil of one of the staff member's previous schools (unless they have completed their secondary education at least 3 months previously)

except (in each case) where the current or former pupil in question is a family member.

7.2 Staff must not contact current Dulwich College pupils by means of personal social media sites after their employment by the College ends.

7.3 Staff should remember that postings may be copied and pasted elsewhere, that many 'private' social media sites still have a wide audience and that privacy settings on social media sites may vary from time to time.

7.4 Staff must not identify themselves as employees of Dulwich College on their personal social media sites (except on LinkedIn) as there is the potential for an individual's personal use of social media to impact on the College. Some members of staff may be publicly associated with the College, and they should take particular care in what they post as their personal views may be misunderstood as being the College's view.

7.5 Staff must not name Dulwich College or use Dulwich College logos or branding on their personal social media sites.

7.6 A member of staff should not have any social media contact with the family of any College pupil if that contact is likely to create a conflict of interest or call into question their objectivity (except where the staff member is a member of the pupil's family).

7.7 Private information which a member of staff has access to as part of their employment (including information about pupils, their families, staff or the College) must not be discussed on their personal

social media sites. (For these purposes, information is considered private if it is not freely available to the public on the College's website.)

- 7.8 The following rules apply in relation to the use of images (whether photographic, video or other) on a staff member's personal social media sites: (a) Images of a College pupil may not be used without the consent of the pupil's parents. (b) Images whose main subject is staff wearing College uniform or clothing with College logos may not be used without the consent of the Director of Communications. (c) Images of sensitive areas of College buildings may not be used (e.g., bedrooms, dormitories, changing rooms, toilets, showers, bathrooms and medical facilities).
- 7.9 Staff must not edit online encyclopaedias such as Wikipedia in a personal capacity when logged on to the College network. This is because the source of the correction will be recorded as if it comes from the employer's IP address.
- 7.10 Staff must think responsibly about who they follow, "like" and connect with in their personal webspace. In particular, staff must exercise caution and appropriate professional judgment when they follow, "like" or connect with work colleagues 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 it might be embarrassing, if too much personal information is known in the work place.
- 7.11 Staff are strongly advised to ensure that they set the privacy levels of their personal sites as strictly as they can (particularly so that pupils cannot access information relating to their personal lives) and to opt out of public listings on social networking sites to protect their own privacy. Staff should keep their passwords confidential and ensure they change them often.
- 7.12 Staff should never provide references for other individuals on social or professional networking sites (including LinkedIn), because such references, positive and negative, can be attributed to the College and create legal liability for both the author of the reference and the College.
- 7.13 College email addresses and other official College contact details must not be used for setting up new personal social media accounts.
- 7.14 Staff are reminded that whilst at work the College permits the incidental use of internet, e-mail and telephone systems to send personal e-mail, browse the internet, access social media, and make personal telephone calls subject to certain conditions set out in the ICT Acceptable Use Policy - Staff.
- 7.15 If there are any concerns regarding a member of staff's social media sites, particularly if negative comments are made about the College or any of its staff or pupils on a College social media site, or inappropriate comments are posted, the Director of Communications and Head of Department should be informed immediately.

8. Monitoring of Social Media

- 8.1 Dulwich College monitors usage of its social media.
- 8.2 Users of Dulwich College email and internet and social media sites should have no expectation of privacy in anything they create, post online, store, send or receive using the College's IT system. Please see the ICT Acceptable Use Policy - Staff for more information.

9. Responding to Incidents regarding Social Media

- 9.1 Any issues with use of social media (whether personal social media sites or College social media sites) will be dealt with by the Director of Communications who will consider appropriate actions to take according to whether it involves a member of staff or third party.
- 9.2 The Director of Communications has the right to delete content from a College social media site and require a member of staff to delete content from their personal social media account if it is considered in breach of this or any other College policy and will take into consideration should other reports need to be made or regulators informed.

10. Social Media and the end of Employment

- 10.1 If a member of staff's employment with the College should end, for whatever reason, any personal profiles on social networking sites should be immediately amended to reflect the fact that they are no longer employed or associated with the College.
- 10.2 All professional contacts that a member of staff has made through their course of employment with Dulwich College belongs to the College, regardless of whether the member of staff has made social media connections with them.
- 10.3 On the termination of employment for any reason, and when requested by the College at any time, staff will provide to their Head of Department or Head of Computer Services any relevant passwords and other information to allow access to any social media site, page or account which has been used or set up in the name of the College and will relinquish any authority they may have to manage or administer any such site, page or account.

11. Legal Framework & Breaches of the Policy

- 11.1 All individuals working for the College are bound by a legal duty to protect confidential information to which they have access to during the course of their work. Posting confidential information on social media would be a breach of that duty.
- 11.2 Staff should be aware that other laws (including libel, defamation, discrimination, harassment and copyright) may also expose them to liability when they post information on social media and that (in

addition) the College may be held vicariously liable for wrongful acts committed by staff during the course of their employment.

- 11.3 Any breach of this policy may lead to disciplinary action being taken against the staff member(s) involved.

Policy Owner:	Director of Communications
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