CYFLAWNI TEGWCH A RHAGORIAETH
MEWN ADDYSG A GWELL LLES I BAWB

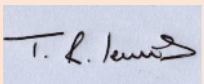
EQUITY AND EXCELLENCE IN EDUCATION
AND ENHANCED WELLBEING FOR ALL

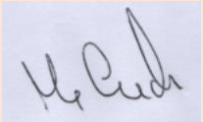
Social Media Policy

Penpych Community Primary School
Ysgol Gynradd Gymunedol Penpych

Policy Leader	Mr N Evans
Headteacher	Mr T Lewis
Chair of Governors	Mr M Cude

Policy applies to Academic Year 2026 -27

Signed HT:  **Date: September 2026**

Signed CoG:  **Date: September 2026**

This Policy is a:	**School plan using LA & WG guidelines**
This Policy is a:	**Non-statutory policy**
Policy/Document Leader:	**Mr N Evans**
Link Governor:	**Mr T Morris**
Key Personnel in Policy:	**Headteacher**
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Aim of Policy:	**To outline the policy and provision for the use of social media at the school**
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1. Policy Statement

Rhondda Cynon Taf Council recognises the benefits associated with the effective use of social media in terms of providing residents, service users and visitors with relevant information, promoting services, communicating policy and service change updates, events, online services and responding to queries and issues raised relating to the Council and the services provided.

There is also recognition that the Council's use of social media needs to be co-ordinated and managed centrally in order to support its effective use and to manage the potential risks associated with social media.

This policy provides information and guidance on the appropriate professional use of social media for Council employees with responsibility for using social media as part of their roles or those wishing to utilise social media within their service area.

The policy sets out the processes in place to set up a social media accounts and outlines the expectations and service standards in terms of professional use of social media.

Social media is also used in a personal capacity by many employees and therefore this policy also provides guidance in relation to the personal use of social media - **which all employees are advised to note.**

Many schools within Rhondda Cynon Taf also utilise social media to engage with parents and pupils and therefore included in this policy is guidance for schools and staff responsible for school social media accounts.

Elected Members are advised that the Code of Conduct applies to all social media use.

2. What is Social Media?

The term 'social media' is defined as websites and applications for social networking, where people create, share and exchange content and ideas in virtual networks and communities. The content shared may include (but is not limited to) personal information, opinions, research, commentary, video, pictures, or business information.

For the purpose of this policy, the term applies, but is not limited to: blogs, Facebook, X (formally known as Twitter), Snapchat, Instagram, LinkedIn, YouTube, discussions forums, special interest forums, user communities and any other personal web space where content is created, manipulated and shared.

Employees should be aware that there are many more examples of social media than can be listed here and this is a constantly changing area. Employees should follow this policy and accompanying guidelines in relation to any social media that they use.

3. Background and Context

The Council utilises a range of social media channels to keep residents, service users and visitors up to date with latest news, service provision updates and to respond to queries and questions raised.

The Council's use of social media complements other communication, engagement and customer service channels available such as web, local press, face to face, telephone and email. Demand for interaction with the Council via social media continues to grow and it is important that this demand is met through a co-ordinated approach and in a manner which minimises the potential risks to the Council, its employees and residents.

To this end the Council's Communications Team manages and oversees all social media use within the Council, which includes managing the approval and set up process for new accounts.

4. Legal Framework

RCTCBC is committed to ensuring that all staff members provide confidential services that meet the highest standards. All individuals working on behalf of the Council 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;
- The UK General Data Protection Regulation (GDPR)
- The Data Protection Act 2018.

Confidential information includes, but is not limited to:

- Person-identifiable information, e.g. pupil and employee records protected by the GDPR and Data Protection Act 2018;
- Information divulged in the expectation of confidentiality;
- School or RCTCBC 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 also be aware that other laws relating to libel, defamation, harassment and copyright may apply to information posted on social media, including:

- Defamation Acts 2013;
- Protection from Harassment Act 1997;
- The Protection of Freedoms Act 2012;
- Criminal Justice and Public Order Act 2001;
- Malicious Communications Act 1998;

- Communications Act 2003; and
- Copyright, Designs and Patents Act 1988.

RCTCBC 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 RCTCBC liable to the injured party.

5. Related Policies

This policy should be read in conjunction with the following:

- Data Protection Policy;
- Internet and Email Acceptable Use Policy;
- Unreasonably Persistent Customers Policy;
- Password Management Standard.

6. Professional Use

6.1 Access Requests and Set Up

If used correctly, the use of social media enables the Council to be able to interact effectively and accurately with service users, residents and businesses via a range of social media platforms as appropriate.

However, if used incorrectly there are potential risks to the Council in terms of safeguarding, information management and reputational damage. It is therefore imperative that measures are in place to ensure the safe and effective use of social media by the Council and its staff.

It is for this reason that all social media use is managed and monitored by the Corporate Communications Team.

Under no circumstance are staff permitted to use social media in a professional capacity without the approval of the Communications Team and without undergoing the necessary training.

To request access to social media for a service area a business case and background information must be provided through completion of a Social Media Access Request Form – Appendix 2. Requests must be supported by Head of Service or Director.

Completed requests are considered by the Corporate Communications Team taking into account proposed use, evaluate need and consider how such an account or accounts would impact on other accounts and Council wide communications.

Once considered, feedback is provided on whether or not social media access has been approved or not. Further, more detailed discussions may be required with the requester to inform a decision and agree next steps.

The process ensures any accounts created complement existing Council communication channels.

If approved, an account will be set up by the Communications Team for use by agreed staff once appropriate training has been conducted.

Training will include the following with relevant information and guidance for specific service areas provided in the form of a user guide:

- Social platform training;
- Monitoring and understanding audience;
- Service standards;
- Use of pictures and videos – GDPR, copywrite, consent and safeguarding;
- Welsh Language requirements;
- Practicalities such as scheduling posts;
- Corporate support available;
- Tone, style and language;
- Service specific advice and guidance;
- Good practise examples relevant to service;
- Performance indicators.

Once set up the account/s is the responsibility of the individual service area and approved staff. Training and ongoing support is provided by the Communications Team to all staff responsible for using social media professionally.

Services will be charged £25 per annum, per member of staff who require access to social media. This is to contribute towards the costs of providing individual logins via the platform used to post, respond to queries, monitor and analyse social media performance.

6.2 Principles

It is important to note that information provided on social media can be shared instantly and becomes available to a worldwide audience in a matter of seconds. It is therefore imperative that, when using social media professionally, employees are:

- **Respectful –** residents, service users and visitors engaging with the Council via social media deserve to receive a respectful response.
- **Accurate –** content and responses provided by the Council on social media are often shared/re-tweeted to a wide audience and therefore it is essential that information posted is accurate.
- **Consistent –** as the Council's social posts are publicly accessible it is important a consistent approach is taken corporately and across services when engaging with

residents, service users and visitors in terms of response timescales, acceptable use and service standards.

- **Responsive –** social media is all about 2 way interaction and it is therefore important that the Council not only uses its accounts to promote services, latest news etc. but that questions and queries raised directly or in response to Council posts are responded to in a timely fashion as outlined in the Council's Customer Service Standards.

- **Bilingual –** in compliance with Welsh Language standards, social media content must be available in English and Welsh. This includes re-tweets, sharing of content and ensuring that posts are responded to in the language used (English and Welsh).

The Communications Team will monitor accounts to ensure compliance with the above principles and reserves the right to remove individual access or accounts if necessary.

Inappropriate use of social media professionally may lead to disciplinary action being taken.

6.3 Service Standards and Acceptable Use

Details of the Council's use of social media, service standards, what customers can expect and what the Council expects (outlined below) is published on www.rctcbc.gov.uk

Social Media Use - What Users Can Expect from Rhondda Cynon Taf Council

- The Council operates a number of social media accounts, details of which can be found here: https://www.rctcbc.gov.uk/EN/Council/SocialMediaUseandServiceStandards/SocialMediaAc counts.aspx

- Residents, service users and visitors to RCT who choose to interact with us on social media can expect information provided to be accurate and consistent.

- The Council provides a range of services online and, if appropriate, we may signpost you to one of our e-forms for you to report an issue rather than go back and forth via social media. This ensures all the required information is captured and relayed to the relevant department.

- Similarly, if the answer to your query can be found on our website, we may signpost you to the appropriate page/section for more detail. This is to ensure you can access all of the relevant information rather than trying to condense information to fit, for example, character limits on X (formally known as Twitter).

- If required we will log your issue with our customer services team and will provide you with a reference so you can check progress.

- If you want a specific bit of information, it may be more appropriate for us to refer you to the Council's FOI email address. This is to ensure we capture all of the necessary details to fully answer your query.

- Times during which accounts are monitored are on the respective bio for each account. If your query is urgent or you need an answer outside of these periods, please visit www.rctcbc.gov.uk/contactus to find the best way to get in touch. Whilst the Council may post outside of these hours these are often scheduled posts or

posts being put out in response to situations such as severe winter weather or emergencies.

- We recognise that people expect to be answered quickly on social media and we will do our best. However it is important appropriate time is taken to ensure we respond accurately and we may need to check details with colleagues in other departments before doing so. We will therefore attempt to provide responses to specific questions asked regarding Council business and services in line with the Council's Customer Service Standards.

- We may sometimes ask you to contact a Council service area directly or ask you to provide contact details via DM or Messenger should we not be able to help resolve your query. Please do not post personal information publicly. The information you provide may need to be shared with the relevant department in order to deal with your enquiry or issue. If this is the case, we will inform you which department we are passing your information to.

- General comments or questions not relating to Council business or services may not receive a response due to the amount of traffic we receive on our accounts.

- Where online communities have their own rules and guidelines, we'll normally follow those.

- Where possible, we will rely on the measures of protection and intervention which the social networking site already has in place (e.g. against illegal, harmful or offensive content), for example by flagging comments or alerting them to any breaches of the site's terms and conditions. The Council's Policy in respect of Managing Unreasonably Persistent Customers also applies to the use of social media.

- We may re-tweet or share content which we think would be of interest and/or follow or like pages or accounts – this is not an endorsement of an account or other content from that account.

- Similarly we may not re-tweet or share content, please don't take this personally!

Social Media Use – What Rhondda Cynon Taf Council Expects:

We want to engage and interact with residents, service users and visitors to RCT as effectively as we can through Social Media. In order to do so, when engaging with the Council on social media please:

- Be civil, tasteful and relevant.

- Do not post messages that are unlawful, libellous, harassing, defamatory, abusive, threatening, harmful, obscene, profane, sexually oriented or racially offensive.

- Do not swear.

- Do not post content copied from elsewhere, for which you do not own the copyright.

- Do not post the same message, or very similar messages, more than once (also called "spamming").

- Do not publicise your or anyone else's personal information, such as contact details.

- Do not advertise products or services.

- Do not impersonate someone else.

If the above are not followed the Council can and will, without prior notice given, take action to block, hide, delete or report as appropriate.

The Council's policy on the management of unreasonably persistent customers is also applicable to social media users.

6.4 General Data Protection Regulations (GDPR)

Information captured and published via one of the Council's social media accounts must be dealt with in compliance with the GDPR and the Council's Data Protection Policy. This includes pictures and videos and personal information such as addresses, email address, telephone number, etc.

Consent must be captured for all identifiable individuals in photographs and videos. The Council's consent form and process for capturing and storing consent is set out at Appendix C.

All social media accounts must include reference to the Council wide Privacy Notice relating to social media which will be published on the Council's website.

The Corporate Communications Team will ensure all accounts link to the Privacy Notice but it is the responsibility of each service area operating their own account/s to ensure compliance with the GDPR.

Training will be provided to all staff using social media professionally regarding the GDPR.

6. Personal Use Guidance

The Council respects all employees' rights to a private life. Staff must be aware however that, where they are identifiable as a Council employee, they are expected to behave appropriately and in accordance with Council policies.

The following guidelines have been prepared regarding personal use of social media:

- A Council employee has to be aware that posting information or views about the Council cannot be isolated from your working life. Staff should therefore consider whether or not it is appropriate to react to and/or comment on social posts relating to the Council, elected members and/or officers.
- Staff must ensure any reactions and/or comments made on their personal social accounts in relation to the Council, elected members and/or officers, do not bring the Council into disrepute.
- Staff should take care that any comments made are their own personal view and not made on behalf of the Council – a statement on their personal account profile make it clear opinions expressed are their own may be considered appropriate.
- Information or views posted on social media channels can, if unprotected, be accessed around the world within seconds and is available for all to see.

- All Council employees are accountable for what they post on their own social media accounts.

- Social media channels are available 24/7 and are accessible through a range of platforms (mobile phones, tablets, pc, laptop etc..). However, it is vital that personal social media use does not interfere with an employee's work and therefore personal social media accounts must only be accessed during an employee's personal time i.e. before or after work, during lunchtime, etc.

- Staff members should not identify their specific job titles on personal social media accounts such as Facebook, X (formally known as Twitter) and Instagram (LinkedIn and other such accounts used for professional purposes are permissible). This is to prevent information on these sites from being linked with individuals and RCTCBC and to safeguard the privacy of staff members, particularly those involved in providing sensitive frontline services.

- Staff members are strongly advised not to have contact through any personal social medium with any service users unless they are family members.

- 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 service users' family members through personal social media if that contact is likely to constitute a conflict of interest or call into question their objectivity.

- Staff members must decline 'friend requests' from service users they receive in their personal social media accounts.

- On leaving RCTCBC's service, it is advisable that staff members do not contact service users by means of personal social media sites.

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

- Photographs, videos or any other types of image of service users and their families or images depicting staff members wearing RCTCBC uniforms or clothing with RCTCBC logos or images identifying sensitive RCTCBC premises (e.g. care homes, secure units) must not be published on personal webspace.

- Council email addresses and other official contact details must not be used for setting up personal social media accounts or to communicate through such 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.

- RCTCBC corporate, service or team logos or brands must not be used or published on personal webspace.

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

- Staff members are strongly advised to review their privacy settings and have an understanding of who see your personal information and content you publish.
- **Staff members should be aware that information posted publicly on social media is instantly available across the world and that online conversations can never be fully private.**

This is not an exhaustive list but is intended to act as useful guidance for staff to consider when using social media personally.

Should an employee be concerned that service users or a member of the public has posted or tweeted about them in relation to their work they are advised to contact the Council's Digital Communications Officer on 01443 424156 to allow appropriate action to be taken.

8. Elected Members

Elected Members are reminded that the Members Code of Conduct applies to their use of social media channels.

9. School Use

A Social Media Policy for school based staff, which has been disseminated to schools, is attached at Appendix 1. The policy provides school specific guidance to school-based staff who may use social media in a work capacity.

Schools may decide to adopt this policy and guidance or agree their own policy.

10. Policy Breaches

Any breach of this policy in either a personal or professional capacity may lead to disciplinary action being taken against the staff member/s involved in line with the Council's Disciplinary Policy and Procedure.

A breach of this policy leading to breaches of confidentiality, or defamation or damage to the reputation of RCTCBC or any illegal acts or acts that render RCTCBC liable to third parties may result in disciplinary action or dismissal.

Staff must inform the Corporate Communications Team 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 RCTCBC.

11. Conclusion

The Council's use of social media can positively impact on communication with residents and service users. There are however associated risks with the use of social media, both in a personal and professional capacity, which this policy seeks to mitigate. The Council's social media policy applies to all staff.

NOTE:
Text that needs to be inserted or amended by the school or specific advice about Policy clauses (which needs to be deleted from the final published Policy) is given in red.

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1. Introduction

1.1 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 X (formally known as Twitter) and maintaining pages on internet encyclopaedias such as Wikipedia.

1.2 While recognising the benefits of these media for new opportunities for communication, this policy sets out the principles that school name staff are expected to follow when using social media.

1.3 It is crucial that pupils, parents and the public at large have confidence in the school'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 pupils and other staff and the reputation of the school and Rhondda Cynon Taf are safeguarded.

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

1.5 This policy incorporates previous social guidance provided by the education department and is in line with other local authority social media guidance for schools.

2. Scope

2.1 This policy applies to Penpych Community Primary School governing body, all teaching and other staff, whether employed by RCTCBC or employed directly by the school such as:-

- external contractors providing services on behalf of the school or RCTCBC;
- teacher trainees and other trainees;
- volunteers and other individuals who work for or provide services on behalf of the school.

These individuals are collectively referred to as 'staff members' in this policy.

2.2 This policy covers personal use of social media as well as the use of social media for official school purposes, including sites hosted and maintained on behalf of the school (see sections 5, 6, 7).

2.3 This policy applies to personal webspace such as social networking sites (for example *Facebook*), blogs, microblogs such as X (formally known as Twitter), Snap Chat, 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, YouTube and TikTok. 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.

3. Legal Framework

3.1 Penpych Community Primary School is committed to ensuring that all staff members provide confidential services that meet the highest standards. All individuals working on behalf of the school 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;
- UK General Data Protection Regulation (GDPR)
- The Data Protection Act 2018.

3.2 Confidential information includes, but is not limited to:

- Person-identifiable information, e.g. pupil and employee records protected by the GDPR and Data Protection Act 2018;
- Information divulged in the expectation of confidentiality;
- School or RCTCBC 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.

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

- Defamation Acts 2013;
- Protection from Harassment Act 1997;
- The Protection of Freedoms Act 2012;
- Criminal Justice and Public Order Act 2001;
- Malicious Communications Act 1998;
- Communications Act 2003, and
- Copyright, Designs and Patents Act 1988.

3.4 Penpych Community Primary School and RCTCBC 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 Penpych Community Primary School or RCTCBC liable to the injured party.

4. Related Policies

4.1 This policy should be read in conjunction with the following school and County Council policies:

- Rhondda Cynon Taf Code of Conduct for Employees
- 360º degree safe cymru - https://360safecymru.org.uk
- The RCT Source for Schools - https://rct.learningpool.com/
- Add relevant school policies.

5. Principles – be professional, be responsible and respectful

5.1 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 school or RCTCBC and your personal interests.

5.2 You must not engage in activities involving social media which might bring Penpych Community Primary School or RCTCBC into disrepute.

5.3 You must not represent your personal views as those of Penpych Community Primary School or RCTCBC on any social medium.

5.4 You must not discuss personal information about pupils, Penpych Community Primary School or RCTCBC staff and other professionals you interact with as part of your job on social media.

5.5 You must not use social media and the internet in any way to attack, insult, abuse or defame pupils, their family members, colleagues, other professionals, other organisations, Penpych Community Primary School or RCTCBC.

5.6 You must be accurate, fair and transparent when creating or altering online sources of information on behalf of Penpych Community Primary School or RCTCBC.

6. Personal Use of Social Media

6.1 Staff members must not identify themselves as employees of school name. This is to prevent information on these sites from being linked with the school and RCTCBC and to safeguard the privacy of staff members, particularly those involved in providing sensitive frontline services.

6.2 Staff members are strongly advised not to have contact through any personal social medium with any pupil, whether from school name or any other school, unless the pupils are family members.

6.3 School name does not expect staff members to discontinue contact with their family members via personal social media once the school 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.

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

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

6.6 Staff members must decline 'friend requests' from pupils they receive in their personal social media accounts. Instead, if they receive such requests from pupils who are not family members, they must discuss these in general terms in class and signpost pupils to become 'friends' of the official school site.

6.7 On leaving Penpych Community Primary School service, it is advisable that staff members do not contact Penpych Community Primary School pupils by means of personal social media sites. Similarly, staff members must not contact pupils from their former schools by means of personal social media.

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

6.9 Photographs, videos or any other types of image of pupils and their families or images depicting staff members wearing school or RCTCBC uniforms or clothing with school or RCTCBC logos or images identifying sensitive school or RCTCBC premises (e.g. care homes, secure units) must not be published on personal webspace. This includes images of pupils/staff on any school based activity whether in school uniform or not.

6.10 School email addresses and other official contact details must not be used for setting up personal social media accounts or to communicate through such media.

6.11 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.

6.12 Penpych Community Primary School or RCTCBC corporate, service or team logos or brands must not be used or published on personal webspace.

6.13 Penpych Community Primary School only permits limited personal use of social media while at work in line with the RCTCBC Social Media and Internet Acceptable Use policies. Staff members are expected to devote their contracted hours of work

to their professional duties and, in practice, personal use of the internet should not be on the school's time. **NOTE: the school should amend this statement in line with their own rules.**

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

6.15 Staff members are strongly advised to review their privacy settings and have an understanding of who can see your personal information and content you publish. Security settings on social media sites are notoriously unreliable, and should they fail, you cannot get back any information which spills into the public domain. 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 other contact details are not given away.

6.16 Staff members should be aware that information posted publicly on social media is instantly available across the world and that online conversations can never be fully private.

7. Using Social Media on Behalf of Penpych Community Primary School

7.1 Staff members can only use official school sites for communicating with pupils or to enable pupils to communicate with one another.

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

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

8. Monitoring of Internet Use

8.1 Penpych Community Primary School monitors usage of its internet and email services without prior notification or authorisation from users.

8.2 Users of Penpych Community Primary School email and internet services should have no expectation of privacy in anything they create, store, send or receive using the school's ICT system.

9. Breaches of the Policy

9.1 Any breach of this policy may lead to disciplinary action being taken against the staff member/s involved in line with school name Disciplinary Policy and Procedure.

9.2 A breach of this policy leading to breaches of confidentiality, or defamation or damage to the reputation of Penpych Community Primary School or RCTCBC or any illegal acts or acts that render Penpych Community Primary School or RCTCBC liable to third parties may result in disciplinary action or dismissal.

9.3 RCTCBC services must inform the relevant school or RCTCBC 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 school and RCTCBC. Any action against breaches should be according to contractors' internal disciplinary procedures.

9.4 There are a number of categories into which social networking/social media problems for schools can fall:

1. Interaction between pupils.
2. Interaction between teaching staff.
3. Interaction between pupils and teaching staff.
4. Interaction between teaching staff and parents.
5. Unpleasant/abusive postings about teaching staff.
6. Postings that are critical of leadership/management of school.

Points 1-4
Any concerns regarding Points 1-4 should be addressed by reference to the relevant parts of this policy.

Point 5
With regard to postings involving teaching staff, the advice is as follows:

A) If the post is threatening or causes the member of staff to feel threatened (where violence is threatened or encouraged or the post has a racist element) the matter should be referred immediately to the Police.

B) Where the post falls short of that described in A), but none the less causes upset to a member of staff, the quickest way to get the material taken down is to ensure the person who posted it understands why the material is unacceptable and to request they remove it. It is recommended that this is not done via the social media site that hosts the offending post but is

undertaken by the school either face to face with the person who posted the offending comment, by letter (model letters attached as Appendix 1 and 2 to be sent from Headteacher) or telephone call.

Should this prove unsuccessful, the school are able to approach the host of the media site in question and request that the comments are removed. Appendix 3 contains information on how schools can approach the hosts of the various media sites such as Facebook, X (formally known as Twitter), YouTube, etc. with a view to having the offending comment removed. This is not an action that requires input from the Council's legal services department but rather something that can be undertaken by individual schools and in many ways is best undertaken by the school as they are best placed to understand the background to the offending post.

C) Where posts are more minor but still unpleasant for the staff member involved or refer to incidents in school which may be factually correct but have been portrayed in a way that deliberately sets out to undermine the member of staff or where requests to have the post removed have failed, matters may be more difficult to resolve. Whilst it may be difficult to accept, sometimes ignoring the post is the best answer. Schools are advised to consider whether in the particular instance and given the person responsible for the post, whether there is a real possibility that a response from the school to the post will have the effect of disseminating the content of the post to a wider audience.

D) The school may wish to consider incorporating into its school policy reference to parents' use of social media. Within this document parents can be made aware of their responsibilities when using social networking such as being reminded that parents are not expected to post pictures of pupils other than their own children on social networking sites, that parents should make complaints through official channels rather than posting them on social networking sites and that parents should not post malicious or fictitious comments on social networking sites about any member of the school community. Parents should be reminded that if they are found to be posting defamatory comments on social media site, they will be reported to the appropriate 'report abuse' section of the network site and may be referred to the Council's legal section for further action. If the school's policy contains this information, it may make responding directly to parents more appropriate in the circumstances described in B) above.

E) There may well be instances where the post may be regarded as defamatory. Section 1 of the Defamation Act 2013 states:

> *A statement is not defamatory unless its publication has caused or is likely to cause serious harm to the reputation of the claimant*.

However there are defences to such a claim and sections 2 and 3 state:

> *Section 2:*
> *It is a defence to an action for defamation for the defendant to show that the imputation conveyed by the statement complained of is substantially true.*

Section 3:
It is a defence to an action for defamation for the defendant to show that the following conditions are met.

(1) The first condition is that the statement complained of was a statement of opinion.

(2) The second condition is that the statement complained of indicated, whether in general or specific terms, the basis of the opinion.

(3) The third condition is that an honest person could have held the opinion on the basis of —

(a) any fact which existed at the time the statement complained of was published;

(b) anything asserted to be a fact in a privileged statement published before the statement complained of.

Given the above and the publicity associated, such action would not be lightly entered into by the Council and only where:

1) The requirements of the offence are clearly made out; **and**

2) Where the steps mentioned in B) above has failed to have the desired effect.

Point 6
With regard to postings that are critical of the leadership/management of a school, the advice is as follows:

a) If the post criticises management of the school but is not personally abusive, the advice is to contact those responsible (see model letter at Appendix 3) and invite them to address any legitimate concerns via appropriate channels, i.e. meetings, etc.

Support is available via the Council's Press Office for advice and guidance relating to the school's use of social media.

Point of contact for schools is: James Whitehurst, Strategic Communications & Marketing Manager. Phone: 01443 424015 / Mobile: 07384537278 james.whitehurst@rctcbc.gov.uk

Appendix 1

Template Letter

Dear

I am writing to advise that I have been made aware of a post made by yourself on Facebook/X (formally known as Twitter)/rate my teachers (*delete as appropriate)* regarding:

.....
.....
.....
.....

As Head of ..... I find the content of this post to be unacceptable for the following reasons:

.....
.....
.....
.....

I therefore politely request that you take steps to remove this post as soon as possible. Should you fail to do so, you will leave me no alternative but to report you to the network site hosting the post and also refer the matter to the Council with a request that they take whatever action they deem appropriate in the circumstances.

Appendix 2

Template Letter

Dear

I am writing to advise that having viewed your post on Facebook/X (formally known as Twitter)/etc. regarding:

…….
……
……
……..

I wish to inform you that I find such comments unacceptable.

If you are unhappy about any aspects of your child's education or the management of the school there are appropriate and established channels through which such views can be raised (make reference to school policy, should it be relevant).

Therefore should you have a legitimate complaint, I would advise that you follow the school's complaints procedure which can be obtained (where) or where your concern falls short of a complaint but wish clarification on a specific aspect of school management, I am happy to meet with you (subject to availability) to discuss the matter face to face.

In the meantime I would be grateful if you could remove the said post which I believe is inappropriate and undermines the school ethos of all members of the school community working together for the benefit of the children.

Appendix 3

Reporting Content on Social Media Sites

The following information provides you with a link to the relevant Social Media application where you can find out how to report inappropriate content.

FACEBOOK HELP CENTRE

Go to the following link: https://www.facebook.com/help/reportlinks

Select ***Report Something*** to report content you can see.

If you do not have a Facebook Account or cannot see the content that you want to report, select the ***Something I Can't See*** option.

Facebook - Support Inbox to:

1. Get updates about things that you've reported.
2. Check and reply to the messages from the Help Team.
3. See important messages about your account: https://www.facebook.com/support/?ref=help_center

X (FORMALLY KNOWN AS TWITTER) HELP CENTRE

Go to the following link:
https://support.twitter.com/

See ***Policies & Violations*** and ***Safety & Security***

YOU TUBE REPORTING AND ENFORCEMENT CENTRE

Go to the following link:
http://www.youtube.com/yt/policyandsafety/en-GB/reporting.html

INSTAGRAM HELP CENTRE

Go to the following link: https://help.instagram.com/165828726894770/

Appendix 4

Governors Code of Conduct

In order to be effective and efficient, governors should:

- Ensure that their actions reflect the considered, best interests of the school and its pupils.
- Attend governing body meetings regularly.
- On appointment/election attend the mandatory training required as set out in The Government of Maintained School (Training requirements for Governors) (Wales) Regulations 2013.
- Familiarise themselves with the work of the school and the governing body.
- Acquire and maintain their knowledge of current education policy, regulations, guidance and extend their skills by participating in training programmes and other events.
- Demonstrate a commitment to equality of opportunity reflected this developing and applying the policies the school is required to have (as defined in the Equality Act 2010).
- Act as a critical friend towards those with professional responsibilities in the school, bearing in mind the governing body's own responsibility to promote high standards of education achievement.
- Be conscious of, and act within the limits of the responsibilities of the governing body and when necessary, seek and give due consideration to professional information, advice and guidance.
- Respect the responsibility of the Headteacher for the day-to-day decisions arising from the management of the school and make clear distinctions between the responsibilities of the Headteacher and those of the governing body.
- Observe collective responsibility by supporting, once determined by democratic means, the decisions of the governing body.
- Respect the governing body's right to deem certain matters to be confidential, restricting discussion of such matters, whether inside or outside governing body meetings, solely to governor colleagues or where appropriate, officers of the local authority.
- Develop, with colleagues and governors a clear vision of the purpose, nature and future for the school.
- Focus their contribution to governing body decisions upon what is considered to be in the best interests of the pupils, staff and parents. The welfare of pupils should always come first in terms of child protection, safeguarding, health & safety and helping each child to develop to their full potential.

- Encourage the use of and participate in systems which provide for open and effective communication, helping to establish a clear vision of the school's development.

- Be aware that all governors are equal and respect the views of others accordingly.

- Be aware their accountability to parents and others in the local community and seek to devise an effective dialogue with those interested in the conduct and standards on the school.

- Observe all protocols and procedures agreed by the governing body.

- Be open, honest, objective, fair and impartial and prepared to confront the personal prejudices that may hinder informed decision-making, including conflicts of interest.

- Governors must remember that they are a representative of the governing body and part of the corporate body. It is sensible for governors to maintain a certain level of separation on social networking sites, e.g. Facebook and X (formally known as Twitter), as this may create conflict or a difficult situation.

Appendix 5

Parent/Carer Code of Conduct

Penpych Community Primary School PARENT/CARER CODE OF CONDUCT

Mission Statement

Insert School Mission Statement

Code of Conduct

At Penpych Community Primary School we value the strong relationship with parents and carers. Together, this helps us achieve the very best for the children in a mutually supportive partnership between parents, class teachers and the school community.

As a partnership, parents understand the importance of a good working relationship with the school. We continually welcome and encourage parent and carers to participate in the life of the school. Parents and carers are always encouraged to contact the school with any concerns and/or issues so that they can be resolved.

Parents, carers and visitors are reminded:

- To respect the caring ethos and values of the school;
- That both teachers and parents need to work together for the benefit of their children;
- Approaching school staff for help to resolve an issue is done in an appropriate manner; and
- All members of the school community are treated with respect using appropriate language and behaviour.

The school will not tolerate:

- Disruptive behaviour which interferes or threatens to interfere with any of the school's operation or activities anywhere on the school premises;
- Any inappropriate behaviour on the school premises;
- Use of loud or offensive language or displaying temper;
- Threatening, in any way, a member of staff, visitor, fellow parent/carer or pupil;
- Damaging or destroying school property;
- Sending abusive or threatening e-mails or text/voicemail/phone messages or other written communications to anyone within the school community;

- Defamatory, offensive or derogatory comment regarding the school or any of the pupils/parents/staff at the school on Facebook or other social sites (**see below*).

Should any of the above occur on school premises, the school may feel it necessary to take action by contacting the appropriate authorities and/or consider banning the offender from entering the school premises.

* ***'Social media'*** *is the term commonly given to web-based tools which allow users to interact with each other in some way – by providing information, signposting to services, sharing opinions, knowledge and interests online. As the name implies, social media involves the building of online communities or networks to encourage participation, engagement, pass information and services over a wide network of people. This could include blogs, message boards, social networking websites (such as Facebook, X (formally known as Twitter), LinkedIn, My Space) and content sharing websites (such as TikTok, Flickr, YouTube) and many other similar online channels.*

Definitions of Misuse or Inappropriate Behaviour

The following actions may constitute misuse of social media or inappropriate behaviour; it is however by no means exhaustive:

- Publishing materials that might be considered inappropriate, offensive or libellous.

- Publishing materials considered to be defamatory or to the detriment of the School and its community.

In the event that any pupil/parent/carer of the school is found to be posting libellous or defamatory comments on Facebook or other social media network sites, they will be reported to the appropriate "report abuse" section of the network site. The school will also expect the pupil/parent/carer to remove such comments immediately. The school will consider its legal options to deal with any such misuse or inappropriate behaviour.

Appendix 6

Social Media Guidance for School Use

SCHOOLS SOCIAL MEDIA GUIDANCE FOR USE

This guidance should be read in conjunction with the School Based Social Media Policy

Introduction

Social media provides a two-way communication portal for engaging with parents, students and for sharing news with the local community. Teachers, students, staff, and other school community members should feel encouraged to use social networking/media (X (formally known as Twitter), Facebook, etc..) as a way to connect with others, share educational resources, create and curate educational content, if they believe it will enhance the school experience.

While social networking is fun and valuable, there are some risks you should keep in mind when using these tools. In the social media world, the lines are blurred between what is public or private, personal or professional.

This guidance is not an exhaustive list of dos and don'ts but aims to provide some useful information for schools to consider when using social media to communicate with parents and staff.

Please do the following when using social media on behalf of the school:

Use good judgement

- You must know and follow the school's Code of Conduct and Privacy Policy if one has been set out.
- Regardless of the account's privacy settings, assume that all of the information you have shared on any social network, on behalf of the school, is public information.

Be respectful

- Always treat others in a respectful, positive and considerate manner when using the school's corporate account.

Be a good listener

- Keep in mind that one of the biggest benefits of social media is that it gives others another way to talk to you, ask questions directly and to share feedback.
- Be responsive to others when conversing online. Provide answers, thank people for their comments, and ask for further feedback, etc.
- Always be doing at least as much listening and responding as you do "talking".

Don't share the following:

Confidential information

- Do not publish, post or release information that is considered confidential or not public.
- If it seems confidential, it probably is. Online "conversations" are never fully private.

Private and personal information

- Schools are advised to consider making their social media account(s), particularly X (formally known as Twitter), private to prevent any unwanted followers from accessing the information shared. Schools should be aware that a private X (formally known as Twitter) account prevents followers from sharing content or accessing web links.
- NEVER give out or transmit personal information of students, parents, or co-workers.

<u>Engaging with parents and students</u>:

Following/befriending

- Schools are advised not to directly follow or befriend students or parents through the school social media account(s). Many people use social media for personal reasons and may not wish for their school to read everything.

Sharing/Retweeting

- Only share student or parent posts if they tag the school their message or ask consent from the person before sharing through the school platform.

Communication with students

- Hashtags on X (formally known as Twitter) are a great way to get students talking about specific projects or events – such as charity bake sales, sports days, etc. This will stir up conversation around these topics so students/pupils can engage with you and each other.
- Homework reminders can also be sent out on platforms.
- Share insightful videos or images that can encourage pupils to study and improve their learning.

Communication with parents

- Most communication with parents is welcomed – discussion of school holiday dates, closure dates, discussion of community-school events.
- If a parent asks for sensitive information on social media, then the conversation needs to be taken into a more private domain.
- Never get into political/personal conversations with parents on social media – whether this be in private or in public view.
- If a parent comments favourably for something school related – you can re-share this with your followers, providing you check that the parent is OK to do so.

<u>Please be cautious with respect to</u>:

Images

- You may use photos and video (products, etc..) that are available on the school's website – providing consent was given for use.
- It is not acceptable to post pictures of students under 16 without the consent of their parents. Students over the age of 16 may give their own consent but schools advised to also seek parental consent.

- Do not post pictures of others (co-workers, etc..) without their permission.

Other sites

- A significant part of the interaction on blogs, X (formally known as Twitter), Facebook and other social networks involves passing on interesting content or linking to helpful resources.
- However, the school is ultimately responsible for any content that is shared. Don't blindly repost a link without looking at the content first.
- Pay attention to the security warnings that pop up on your computer before clicking on unfamiliar links. They serve a purpose and protect you and the school.
- When using X, Facebook and other tools, be sure to follow their printed terms and conditions.

And if you don't get it right…

- Be sure to correct any mistake you make immediately, and make it clear what you've done to fix it.
- Apologise for the mistake if the situation warrants it.
- If it's a MAJOR mistake (e.g., exposing private information or reporting confidential information), please let someone know immediately so the school can take the proper steps to help minimise the impact it may have.

Netiquette

- Users should always use the Internet, network resources, and online sites in a courteous and respectful manner.
- Users should also recognise that among the valuable content online is unverified, incorrect, or inappropriate content. Users should use trusted sources when conducting research via the Internet.
- Users should also remember **not to post anything online that they wouldn't want parents, teachers, or future colleges or employers to see**. Once something is online, it's out there - and can sometimes be shared and spread in ways you never intended.

Safeguarding

If you see any content which raises safeguarding concerns, please follow the school and local authority safeguarding protocols.

Appendix B

Social Media Access Request Form

Service Area	
Subsection (if necessary)	
Officer Completing	
Head of Service/Director Approval	

1.	What are your aims and objectives for the use of social media?
2.	Will the use of Social Media support income generation/reduce costs? If so, how?
3.	What is your target audience?
4.	How do you currently communicate with your target audience?
5.	How much do you currently spend on communication with your target audience?
6.	Which social media channel/s would you like to be able to access for your service?
7.	Are there any good practise examples you are aware of similar service area social media usage at other local authorities?
8.	How will you know your social media use is effective?
9.	Will social media use contribute to any service PIs? If yes, which ones and how?
10.	How do you envisage managing and monitoring of your social media account/s?
11.	Do you have a Welsh speaker within your team capable of maintaining any Welsh language account/s?

Once completed please return to James Whitehurst, Strategic Communications & Marketing Manager. Phone: 01443 424015 / Mobile: 07384537278 james.whitehurst@rctcbc.gov.uk who will make contact to discuss the next steps.

Appendix C

Process for Obtaining and Storing Consent

Under the GDPR, the Council must ensure that appropriate consent is obtained for the use of all pictures and video footage containing identifiable individuals. This applies to all potential uses of the photo/video.

To this end, a new Photo/Video Consent Form (Appendix A) has been designed and approved by the Information Management Team. This form must be used by all staff when obtaining consent for use of photos and/or video featuring identifiable individuals.

Once obtained, consent forms should be scanned and stored electronically in a password protected folder, paper copies of consent forms should be placed in confidential waste or shredded.

Please note school consent is not transferable and if a photocall or video work is undertaken with school pupils by Council staff, for Council promotional purposes, the Council must also obtain consent using the form below.

Photos and videos featuring identifiable individuals may only be used if consent has been given.

It is good practice to use pictures and videos featuring identifiable individuals for a maximum period of three years.

Should staff have any questions or issues with consent they are advised to contact the PR department:

Email:

Telephone:

Rhondda Cynon Taf County Borough Council

Photo/Video Consent Form

How we use your personal information

The legal basis for Rhondda Cynon Taf County Borough Council (RCTCBC) processing your information under data protection law for photography and videography purposes is consent.

You can withdraw consent at any time, by contacting [enter department name] on [enter number] or by emailing [enter email address].

I understand if I choose to withdraw consent in future, RCTCBC will remove the imagery from its platforms, but the image may still be available by other means, e.g. newspapers, brochures, the internet, etc.

To find out more about how we use your information for these purposes, please see the Photography and Videography Privacy Notice and the Council's data protection pages on the Council website.

Section 1: Photo/Video Details	
Purpose for imagery:	
Location:	
Date:	
Name of Photographer/Videographer:	

Section 2: Agreement and Release		
Name of Individual:		
Telephone Number:		
Name of Parent/Guardian if Individual (above) is Under 16:		
Telephone number of Parent/Guardian if Applicable:		
Name of School if Applicable:		
I consent to RCTCBC using the imagery/video for the following purposes:		
Council websites	Yes ☐	No ☐
Council digital and print publications (e.g. newsletters, brochures)	Yes ☐	No ☐
Council outdoor media (e.g. billboard, advertising on bus)	Yes ☐	No ☐
Council social media accounts	Yes ☐	No ☐
Local/national media (e.g. TV, newspapers)	Yes ☐	No ☐

Section 3: Consent for individuals aged 16 and over.	
I confirm that RCTCBC may use, store and own the copyright of imagery that relates to me: Yes □ No □	
I confirm that I have read and understood the information on this form: Yes □ No □	
Name:	
Signature:	

Section 4: Parental/Guardian Consent for individuals under 16.	
I confirm that RCTCBC may use, store and own the copyright of imagery that relates to the young person named on this form: Yes □ No □	
I confirm that I have read and understood the information on this form: Yes □ No □	
Name:	
Signature:	