



Milbourne Lodge School  
*ad optima petenda*

**COGNITA**

# **Social Media Policy Europe**

**September 2024 onwards**

### 1 Introduction

- 1.1 Social media is a broad term for any kind of online platform which enables people to directly interact with each other. Well known examples of social media include Facebook, Twitter, Instagram, LinkedIn, TikTok, and Snapchat. References to social media in this policy are to be widely interpreted.
- 1.2 We recognise the benefits and opportunities which a social media presence offers individuals. Staff are encouraged to find creative ways to use social media. However, there are some risks associated with social media use, especially around the issues of safeguarding, bullying and personal reputation. This policy aims to encourage the safe use of social media.

### 2 Scope

This policy:

- applies to all staff, and to all social media communications which, directly, or indirectly, represent Cognita, or a school/s; and any third parties, including contractors and volunteers, which have agreed to comply with our policies and who are made aware of this policy (hereafter “users”);
- applies to such online communications posted at any time and from anywhere; and

encourages the safe and responsible use of social media through training and education.

### 3 Further guidance

- 3.1 Annex 1 – Good Practice Guide
- 3.2 Annex 2 – Cognita Media Guide
- 3.3 Annex 3 – Social Media Response Protocol
- 3.4 Annex 4 – Emergency Sensitive Incident Response

### 4 Setting up social media accounts

- 4.1 For a social media guide about how to:
  - 4.1.1 set up new social accounts;
  - 4.1.2 make the most of each social media platform;
  - 4.1.3 plan your content for the year;
  - 4.1.4 filter abusive language / block specific words; and
  - 4.1.5 grow your followers and audience,

see the [Cognita Social Media Guide](#), or speak to the Communications Team.

### 5 Types of account and communications

- 5.1 **Personal social media account** – a personal account which makes no reference to the school, or school business, or Cognita.
  - 5.1.1 all cases where a personal social media account is used which associates itself with the school, it must be made clear that the user is communicating on their own behalf and not on behalf of the school with an appropriate disclaimer (i.e. on the profile description, see the Annex for example wording);

5.1.2 Where users have personal accounts, and whether, or not, it is clear that the user is associated with a school, schools, or Cognita, the user must act appropriately on social media and is reminded of their contractual obligations to Cognita, to not bring the group into disrepute e.g. users must refrain from posting anti-LGBTQ or racist content.

5.1.3 We respect privacy and understand that users may use social media forums in their private lives. However, personal communications, likely to have a negative impact on professional standards and/or the school or Cognita's reputation are within the scope of this policy, even when communication is sent from a personal account.

5.2 **School social media account** - a school account, set up, managed and maintained by school staff; it is often used by multiple members of the same department, e.g. @'HistoryDept', or the whole school, e.g. @'School'.

5.2.1 Anyone wishing to create a school social media account must seek permission from the Headteacher. The content of everything in a school social media account should be of a professional standard.

5.2.2 The Headteacher must be satisfied that anyone running a school sponsored social media account endorsed by the school has read and understood this policy. This also applies to anyone who is not directly employed by the school, including volunteers or parents.

5.2.3 Staff may use social media to communicate with learners via a school social media account for teaching and learning purposes, but must consider whether this is appropriate and consider the potential implications. Staff must not communicate with pupils via the staff's personal social media accounts.

## 6 Personal Use

### Staff

6.1 Personal communications which do not refer to or impact upon the school are outside the scope of this policy.

6.2 Where excessive personal use of social media in school is suspected, and considered to be interfering with relevant duties, disciplinary action may be taken.

6.3 Reasonable and appropriate access to private social media sites is permitted.

6.4 Users should not engage on social media on their personal device whilst teaching or on duty with students.

### Students

6.5 Staff are not permitted to follow or engage with current students of the school on any personal social media account.

6.6 Ongoing contact, via personal social media accounts, with former students including adding/accepting friend requests is not recommended, due to needing to retain professional boundaries. Alumni may be contacted via school social media accounts.

6.7 The school's education programme should enable students to be safe and responsible users of social media.

- 6.8 Students are encouraged to comment or post appropriately about the school. Any offensive or inappropriate comments will be resolved by the use of the School's Behaviour Policy

### Parents

- 6.9 If parents have access to a school learning platform where posting or commenting is enabled, parents/carers will be informed about acceptable use.
- 6.10 Parents are encouraged to comment or post appropriately about the school. In the event of any offensive or inappropriate comments being made, the school will ask the parent to remove the post and invite them to discuss the issues in person. If a parent makes a complaint against the school on social media, the school should refer the parents to the School's Complaint Procedure and refer Social Media Response Protocol.

## 7 Tone

- 7.1 The tone of content published on a school social media account should be appropriate to the audience, whilst retaining appropriate levels of professional standards. Key words to consider when composing messages are:
- Engaging
  - Conversational
  - Informative
  - Friendly

## 8 Use of images

- 8.1 School use of images on a school's social media account is acceptable, providing the following guidelines are adhered to:
- 8.1.1 permission to use any photos or video recordings should be sought via the Group Communications Team (if they are Group images and you are unsure if they can be used).
  - 8.1.2 consent to use images of students should be sought via the Photo Consent Form. This consent can be withdrawn at any time.
  - 8.1.3 users should not use a personal device to take photographs of students.
  - 8.1.4 Users should exercise their professional judgement about whether an image is appropriate to share on school social media accounts. Students should be appropriately dressed, not be subject to ridicule, and must not be on any school list of children whose images must not be published.
- 8.2 If a member of staff inadvertently takes a picture which could be misconstrued or misused, they must delete it immediately.

## 9 User Behaviour

- 9.1 **Digital communications must be professional and respectful at all times and in accordance with this policy.** Users will not use social media to infringe on the rights and privacy of others or make ill-considered comments or judgments about staff. School social media accounts must not be used for personal gain. Staff must ensure that confidentiality is maintained on social media even after they leave the employment of the school.
- 9.2 Users must declare who they are in social media posts or accounts; anonymous posts in relation to school activity are not acceptable.

- 9.3 Unacceptable conduct (e.g. defamatory, discriminatory, offensive, harassing content or a breach of Data Protection Legislation or image rights (Spain only), confidentiality, or copyright will be considered extremely seriously by the school and will be reported as soon as possible to a relevant senior member of staff, and escalated where appropriate.
- 9.4 The school will take appropriate action in the event of breaches of this policy and may take action according to the Disciplinary Policy. Where conduct is found to be unacceptable, the school will deal with the matter internally. Where conduct is considered illegal, the school will report the matter to the police and other relevant external agencies.

### 10 Monitoring school accounts

- 10.1 **School accounts must be monitored regularly and frequently.** Any comments, queries or complaints made through those accounts must be responded to within 24 hours (or on the next working day if received at a weekend), even if the response is only to acknowledge receipt. Regular monitoring and intervention is essential in case a situation arises where inappropriate behaviour arises on a school social media account. Refer to the Social Media Response Protocol for further details.

### 11 Monitoring posts about the school

- 11.1 As part of active social media engagement, it is considered good practice to pro-actively monitor the internet for public postings about the school.
- 11.2 The school should effectively respond to social media comments made by others according to the Social Media Response Protocol.
- 11.3 In the event that your school account is continually targeted by a disaffected party, send a direct (private) message to the relevant Cognita corporate account so that a Communications Team member can provide timely advice.

### 12 Handling Abuse

- 12.1 When acting on behalf of the school, offensive comments should be handled swiftly and with sensitivity. See paragraph 4 for guidance on muting / blocking certain words, or contact the Communications Team.
- 12.2 If a conversation becomes offensive or unacceptable, school users should block, report or delete other users or their comments/posts and should inform the audience exactly why the action was taken.
- 12.3 If you feel that you or someone else is subject to abuse by colleagues through use of a social networking site, this action must be reported using the agreed school protocols.

### 13 Press

- 13.1 If a journalist makes contact about posts (made using social media) that relate to a school and/or Cognita, staff must follow the procedure outlined here before responding: In the event that a journalist makes contact, they should notify their line manager and the colleague in their school, or office, with responsibility for handling media queries, in order to receive guidance on how to respond to the media query. The response will be agreed in line with the Social Media Response Protocol.

### 14 Organisational Control

- 14.1 Roles and Responsibilities for school social media accounts

#### 14.1.1 SLT

- Facilitating appropriate guidance and support on social media use

- Developing and implementing this Social Media Policy
- Taking a lead role in investigating any reported incidents
- Making an initial assessment when an incident is reported and involving appropriate staff and external agencies as required
- Receive completed applications for school social media accounts
- Approve creation of school social media accounts

### 14.1.2 Administrator / Moderator

- Be involved in monitoring the school social media account(s)
- Control the process for managing an account after the lead staff member has left the organisation (closing or transferring)

### 14.1.3 Staff

- Create the account following SLT approval
- Store account details, including passwords, securely
- Know the contents of and ensure that any use of social media is carried out in line with this and other relevant policies
- Attend appropriate training
- Regular monitoring, updating and managing of the content he/she has posted via school accounts
- Add an appropriate disclaimer to personal accounts when naming the school (see the Annex)

## 15 **Associated policies and legislation**

This policy is subject to the following:

- Staff Code of Conduct and Acceptable Use Policy;
- Digital Safety Policy;
- Data Protection Legislation (as applicable in the respective country); and
- *For Spain only, Spanish Honour and Own Image Protection (Spanish: Ley Orgánica 1/1982, de 5 de mayo, de protección civil del derecho al honor, a la intimidad personal y familiar y a la propia imagen).*

### Annex 1: Good Practice Guide

#### **Managing your personal use of social media:**

- Nothing on social media is truly private
- Social media can blur the lines between your professional and private life. Don't use the school logo and/or branding on personal accounts
- Check your settings regularly and test your privacy
- Be aware of your digital footprint
- Keep your personal information private
- Regularly review your connections – keep them to those you want to be connected to
- When posting online, consider: Scale, Audience and Permanency of what you post
- If you want to criticise, do it politely
- Take control of your images – do you want to be tagged in an image? What would students or parents say about you if they could see your images?
- Know how to report a problem

#### **Managing school social media accounts:**

##### The Dos

- Use a disclaimer when expressing personal views (see below) but try to avoid controversial topics
- Use an appropriate and professional tone
- Be respectful to all parties
- Ensure you have permission to 'share' other people's materials and acknowledge the author
- Express opinions but do so in a balanced and measured manner
- Think before responding to comments and, when in doubt, get a second opinion
- Seek advice and report any mistakes to the Head, who will consult appropriate departments as necessary
- Consider turning off tagging people in images where possible
- Consider the appropriateness of content for any audience of school accounts
- Handle any complaints/criticism with care. Refer to the Social Media Response Protocol and/or check with Cognita Communications Team ([media@cognita.com](mailto:media@cognita.com)) if in doubt

##### The Don'ts

- Make comments, post content or links to materials that will bring the school into disrepute
- Publish confidential or commercially sensitive material
- Breach copyright
- Link to, embed, or add potentially inappropriate content
- Post controversial, derogatory, defamatory, offensive, harassing or discriminatory content
- Use social media to air internal grievances

#### **Disclaimer text:**

*"Views my own."*

**Annex 2 - Cognita Media Guide**

Accessible via this link: [Cognita Social Media Guide](#)



### Annex 3 - Social Media Response Protocol

<u>Step 1:</u> <b>Assign a rating to the comment or message:</b>	<u>Step 2:</u> <b>Consider whether the associated actions for that rating are appropriate in this instance:</b>
1. Abusive/detrimental	Remove comment, delete original post, block commenter
2. Highly negative	Publicly acknowledge the comment quickly to say that you will respond privately. Remember to respond privately! If your initial comment makes them respond negatively again, still message them privately but ignore the second comment so it doesn't escalate
3. Negative	Provide a quick, appropriate response to the comment. You may be able to use this as an opportunity to demonstrate positive customer service
4. Neutral	Comment or at least acknowledge with a 'like'
5. Positive	Retweet to showcase to other social media followers and comment with a note of thanks
6. Aligned with Cognita priorities i.e., academic excellence, character development, global perspective, Wellbeing, EdTech	Celebrate and reward. This includes the actions for 4. (comment) and 5. (RT), as well as: <ol style="list-style-type: none"> <li>I. on Twitter, send a DM to your Director of Education so they can also publicly endorse it (DM: "Celebrate: [link to tweet]")</li> <li>II. If they are a new Cognita colleague on social media, share our 'welcome' GIF and encourage them to get involved with #CognitaWay</li> </ol>

#### **A few general rules to follow...**

- Never argue or provoke!
- Treat a negative (but not abusive/detrimental) comment like a public review; it's good to respond. Studies show that people expect companies to respond quickly and that they can publicly shame them if they don't
- Where possible, use a negative comment as an opportunity to showcase a positive customer service
- Know when to take the conversation offline or at least make it private
- Remember: Facebook and Instagram allow you to 'hide' comments, which is a helpful feature.

### Annex 4 - Emergency Sensitive Incident Response

In the event of an emergency or sensitive incident, the Headteacher should brief all Receptionists and any staff who may take outside calls to expect that media may ring (or possibly even drop in to school), asking to speak to the Head, Chair of Governors, a teacher or anyone at the school who can comment on the incident.

Staff should:

1. Say they will get a colleague to ring the journalist back as soon as possible today. No one is available to take the call/see the journalist at the moment, but the appropriate person will respond to their query ASAP.
2. Take a message, noting:
  - the journalist's name
  - what media organisation they are calling from
  - their phone number(s)
  - their email address
3. The journalist may say, *"I just have a quick question/need a little information..."* *"Can you put me through to the Headteacher?"* *"Where is the Headteacher?"* *"What is the name of...?"* etc.

Anticipating such questions will help staff not to be drawn in. They can respond to the effect: *"I want to make sure you have the information you need, so I will get the best person who can help you with this to ring you back promptly, today."*

4. Do not say "no comment."
5. Staff should then immediately forward the journalist's query/details to the Headteacher and Director of Marketing & Admissions, Europe:

Head of Marketing for the Pod:

- Robert Carter (Pod 1)
- Kate Timms (Pod 2)
- Sam Chambers (NBH)
- Charlene Rogers (SBI)

6. The Director of Marketing & Admissions, Europe to follow up with the journalist and issue any agreed written statement/comments in consultation with the Headteacher and regional executive/education team.

7. Any briefing by the Headteacher to staff regarding the incident should include reference to possible media interest/approaches. Staff should not comment but refer any enquiries back to the Headteacher, for forwarding on to the Director of Marketing & Admissions, Europe to agree appropriate response in collaboration with the school.

## Social Media Policy

---

<b>Ownership and consultation</b>	
Document sponsor (role)	Karen Gray
Document author (name)	Digital Learning Adviser
Consultation	Safeguarding Team, Legal Team, Education Team, Communications Team

<b>Audience</b>	
Audience	All staff and third parties (as applicable)

<b>Document application and publication</b>	
England	Yes
Wales	Yes
Spain	Yes

<b>Version control</b>	
Implementation date	September 2024
Review date	September 2026