

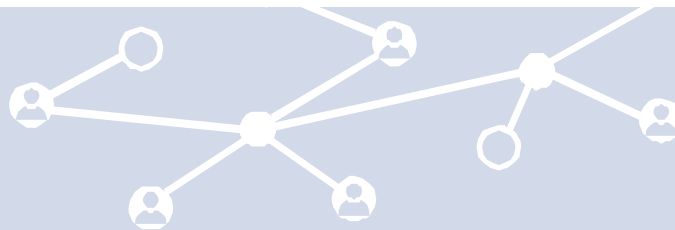
Social media policy

Implementation procedures – August 2020

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1. Introduction



Social media can be a powerful tool to facilitate and enhance communication and learning, as well as build connected communities.

Employees of the department are subject to a level of public scrutiny over and above most other public sector employees because of their work with children. It is vital that they employ best practice in the use of social media.

1.1 Audience and applicability

These procedures provide guidance to employees about how to comply with the department's social media policy and implement best practice when using social media.

The standards set out in the Social Media Policy and these implementation procedures are provided to support all employees as they engage in social media conversations and interactions for official, professional and personal use.

1.2 Definitions

1.2.1 'School official use' refers to when an employee is participating on behalf of the department in relation to their role. For example, a school can request the Department to create a school Facebook Page to engage the local community.

1.2.2 'Professional use' refers to when an account is publicly open, content is published on an open, publicly accessible channel or the purpose of the account has a connection to work-related or department-related topics or issues. For example, an English teacher might create an Instagram account specifically to share

their knowledge about literature with the general public. Although they are not officially representing the school, there is a connection between the content created and their employment as a teacher.

Another example could include a Maths teacher that has a Twitter account that is publicly visible and posts regular content.

1.2.3 'Personal use' refers to an account that has secure privacy settings and is not visible to the general public. The purpose of the account has no connection to work-related or department-related topics or issues.

Examples could include an employee using a personal Facebook profile that has secure privacy settings or a private Instagram or Twitter account.

1.2.4 'Social media' refers to a range of online platforms and applications – such as Facebook, Twitter, Instagram, Tiktok and Snapchat – that allow people to publish, share and discuss content. This includes any department enterprise social media platforms, such as Yammer.

2. Official social media accounts

2.1 All school official Facebook Pages as defined in section 1.2.1 must be set up under the NSW Department of Education's Business Manager account. School Facebook admins for existing accounts should liaise with the social media team via socialmedia@det.nsw.edu.au to register under the NSW Department of Education's Business Manager account. For set up and enquiries about school social media accounts, contact socialmedia@det.nsw.edu.au

2.2 Staff should engage in personal or professional conduct that upholds the reputation of the department as per the [Code of Conduct Policy](#) when engaging in official and professional social media use.

2.3 Staff should follow the [Protecting and Supporting Children and Young People Policy](#) when engaging in official and professional social media use.

2.4 School Social Media Accounts

2.4.1 The principal or another member of the school executive must approve, in writing, all official school social media accounts.

2.4.2 Using social media for communication between educators and students is only appropriate when there is a valid educational context.

Examples

- Teachers could use social media to communicate with their current students about the syllabus.
- Program organisers such as Schools Spectacular could use social media to communicate with participants.
- Central staff could use social media to communicate with students about career prospects.

2.4.3 For a valid educational context to exist that is linked to the curriculum or other school based purpose, all communication and content should relate to the original agreed and approved purpose of the channel.

Example

An English teacher (the administrator) sets up a Facebook Group for their HSC English class to share resources and communicate outside of school hours about their readings. It is intended that the group will continue through the school holidays.

The English teacher and/or appointed moderator ensures that all posts relate to the purpose of the group and removes any other posts.

2.4.4 When a school sets up any social media platforms for educational purposes, the account administrator must ensure that at least two members of staff, including an executive, have administration rights and regularly monitor the interactions, as per recommendation in 2.4.5.

2.4.5 Depending on the purpose of the account, monitoring may consist of daily moderation on the interactions occurring on the channel to ensure they are in line with section 9.1. If the account administrator has concerns about the content or nature of any interactions on the channel, they should advise the principal and moderate the account promptly and appropriately. The Code of Conduct Policy and Protecting and Supporting Children and Young People Policy apply.

2.4.6 All content on official accounts must be visible to the executive members of staff. Staff must not create accounts that cannot be monitored. Where social media accounts are created for communication between a staff member and students, the social media environment is viewed as an extension of the classroom and the same duty of care is owed.

2.4.7 When personal devices such as mobile phones or cameras are used to take photos of students for social media purposes, please delete said photos from the device within one week from the time of uploading. Do not store photos of students on your personal device.

2.4.8 Staff should make it clear in the account's rules of engagement that communications will be monitored from 9am – 3pm on weekdays and will not necessarily be monitored out of hours. However, if a teacher see inappropriate content there is a duty of care to take action, for example, inform the police.

2.4.9 Once the original agreed and approved purpose of the channel ceases as in the example above, the channel should be closed or deactivated. Any content that adheres to section 3.1 should be downloaded and archived.

2.4.10 Teachers who choose to use social media as part of their educational program should provide education to students on the appropriate use of social media including establishing acceptable standards of behaviour whilst using social media.

Staff can find resources on the [intranet](#) and from the e-Safety Commissioner's channels.

2.4.11 Please read the [Social Media Toolkit](#) on the intranet for more information on managing a school social media account, including:

- [Content guidelines](#)
- [The NSW Schools Facebook Project](#)
- [How to handle and report negative comments](#)
- [Legal responsibilities](#)

3. Records management

In some cases, social media interactions may be evidence for legal or investigation purposes. Staff should implement a strategy for social media records management that is in line with the department's [Record Management Procedures](#) relevant to an event.

3.1 Keep the following content for a minimum of two calendar years:

- As defined in the Code of Conduct, content that serves an essential administrative, legal and historical purpose, includes electronic documents, digital image, video and audio recordings, correspondence, files, forms and notes.. Staff should refer to the school principal for further clarity.
- all permission to publish forms
- all permission for students to use social media, privacy notices and consent forms.

3.2 There is no need to keep the following content:

- contributions of short-term value such as general chat
- copy already placed on file or captured in an appropriate way within a record-keeping system.

3.3 Further reading and guidance

- [NSW State Records' strategies for managing social media information](#)
- [Records Management Program](#) (intranet only)
- [Code of Conduct](#)



4. Professional use of social media



Employees of the department have a great deal of experience across a range of education and public policy areas. Staff are encouraged to engage in public conversations in their area of expertise through social media.

There is a natural association between what a department employee publishes online and the department itself. The lines between personal and professional life are blurred in online social networks. For this reason, employees are required to act as ambassadors for the department and role models for students and the community.

4.1 Staff should know and follow relevant department policies:

- [Bullying: Preventing and Responding to Student Bullying in Schools Policy](#)
- [Student use of digital devices and online services](#)
- [Media Relations Policy](#)
- [Values Education in NSW Public Schools](#)
- [Controversial Issues in Schools Policy](#)
- [Code of Conduct](#)
- [Sponsorship Policy](#)

4.2 Staff can use professional social networks such as LinkedIn and Yammer to create a connection between the employee and the department.

Staff are encouraged to use these channels for professional development purposes according to the rules of engagement (see section 9) that are published on the page by the page administrator.

4.3 Staff should be transparent and identify themselves as a department employee when discussing department related topics or issues. Comments should be apolitical,

impartial and professional. As defined in the Code of Conduct.

4.4 Staff should add short disclaimers to their profile to help clarify the purpose of their account. For example:

- I'm a teacher in NSW Public Schools, but all comments expressed here are my own and are not official statements from the NSW Department of Education.

As per the Code of Conduct, You must make sure that confidential information, in any form, cannot be accessed by unauthorised people. Sensitive information should only be provided to people, either within or outside the Department and TAFE NSW, who are authorised to have access to.

4.5 Staff should adopt a polite and considerate tone and avoid crossing the line from healthy debate into attack.

Staff should know and respect the terms of use of any social media community they have joined (see section 9).

4.6 As per the Sponsorship policy, endorsement of a sponsor's products or services by the Department, a school principal or employees or is not permitted. Further, sponsors are never given the right to claim endorsement of their product or service by the Department or its agents.



5. Personal use of social media



5.1 Employees should be aware that they could be identified as an employee of the department from their online activities. For this reason, staff should not post about their work, colleagues, students or official information for the work-related purpose it was intended. Any identifiable information can be deemed a breach of privacy.

5.2 Employees should be mindful of time spent engaging on personal social media while at work.

5.3 Employees must not post images, video and/or any identifying information about students or department staff unless it is through an official department social media account in accordance with the procedures for posting on official accounts.

5.4 Employees can post on professional accounts, where the content is work-related. This excludes video, images and/or identifying information about students or department staff unless that information has been made publically available.

5.5 Employees must not post on personal accounts, images, video and/or any identifying information about students or department staff where the relationship between them predominantly stems from their work. However, identifying information about other staff can be posted on private accounts with their consent. Employees can share official department content that is publicly available.



6. Age and accessibility

6.1 Where social media is officially used to extend teaching and learning opportunities, educators must make alternative communication channels available for students who do not have social media access or parental permission to participate. As with other school communication channels. Parents and caregivers, including those of students from language backgrounds other than English, should be informed of the educational context of the social media account and how it is an integral part of the learning program and in reference to the curriculum.

6.2 Students must comply with the terms of service of social media networks. Teachers must take this into account when considering communications with students through these platforms, ensuring they are inclusive across the cohort. For example, Facebook, Twitter and Instagram require people using the service to be 13 years of age or older.



7. Permissions and consent



7.1 Student consent

Schools must seek parental consent to publish any identifying information such as full name or image, about any student within any social media channel.

Consent forms should include how the social media channel will be used for educational purposes and must explicitly describe:

- which social media networks will be used
- the purpose for the social media account
- how the interactions will be monitored
- who will monitor and moderate interactions
- the duration of the account, for example, when the social media account will be removed
- the rules of engagement relating to the use of the social media account
- who they can contact if they want to view the personal information or make changes.
- Permission to publish form

7.1.2 Schools should provide parents and guardians with information explaining how the social media platform works.

7.1.3 Schools should advise parents and guardians that they are able to withdraw this consent at any time and have robust procedures to support this ensuring that no further publications are made after the date that consent is withdrawn.

7.1.4 Opt-out forms: Once the permission to publish form has been signed by parents, the school can send out an opt-out form the following year, instead of re-sending the permission to publish form. The opt-out form allows parents to revoke their permission to publish, should their situation have changed. If no changes, the form assumes continued consent to publish for another year. The process can be repeated each year, but only where a permission to publish form has been signed in the first place.

7.1.5 Schools should develop procedures to manage the risks of publishing any identifying information about students, particularly where parental or guardian consent has not been obtained.



7.2 Educator and content permissions

7.21 Teachers and staff must seek approval from their principal, director or director's delegate to create official social media channels. At least two staff members must have administration rights to the account, including a school executive.

7.22 Account creators accept the responsibility to monitor and moderate any accounts they create. As defined in section 2.4.5.

7.23 An account administrator must always seek permission when publishing content that specifically represents the department. This should be in writing for the purpose of record keeping.

For example:

- When posting content that mentions the department, the employee must seek permission from the school principal.
- When posting content that clearly identifies a co-worker by image or name, or any other way which can identify the co-worker either on its own, or in combination with other information, the employee must obtain permission from the co-worker.
- When publishing content that clearly identifies a student by image or name or any other way which can identify the student either on its own, or in combination with other information, the employee must ensure the student's parent or guardian has signed a permission to publish form.

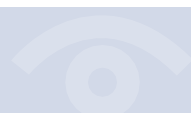
- When posting content that clearly identifies the school or any other information which can identify the school either on its own, or in combination with other information, the employee must seek permission from the school principal. Examples could include school classrooms, floor plans, school yard or other school premises.

7.24 Staff should respect and obtain permission to use third-party copyrights, trademarks or other intellectual property including user-generated content. Where using third-party content protected by copyright, staff must acknowledge their source.

7.25 Staff should use discretion. In trying to be transparent, they need to take care not to publish information that has not been, or should not be, made public. They should ask permission to publish any information that isn't already in the public domain.



8. Privacy



8.1 Teachers must maintain appropriate privacy of students' information, even when they have obtained permission to publish content publicly via an official social media account.

8.2 Teachers need to be mindful of the information they are publishing regarding the student's identity. In line with the [Privacy Bulletin No.9](#), staff can only publish photographs of a student if they have received signed permission to publish forms from the student's parent or guardian. In addition:

- Staff should also undertake a review of the school social media channels at least once every school year to ensure that any content that is no longer relevant or accurate is removed.
- Staff must not tag photos of children.
- Staff must never name a student in comments without permission from the student's parent or guardian.
- If they follow all other rules of engagement, parents or friends may include tags within the comment box.

8.3 Schools should provide parents the link to the Australian Government's eSafety office (www.esafety.gov.au) to help them understand online privacy and to enable them to make decisions to help protect their children as they see fit.

8.4 Administrators should set privacy settings that are appropriate to the situation and check them regularly ([see the Privacy Bulletin No. 9](#)).

8.5 Staff should be mindful of the privacy settings on personal social media accounts.

- Staff must never share passwords.
- On Facebook, staff should carefully check their privacy settings so that only the friends they approve can access information, comments and photos. Staff should not allow 'friends of friends'.

- Staff should stay up to date with any changes – Facebook frequently revises its settings regarding platform access.
- Staff should keep their photos private. Once they are published online, anyone who has access to them can reuse them. Nothing lends credibility to an imposter profile more than a photo.
- The department advises not to 'friend' or 'follow' parents on social media.
- Staff must not 'friend' or 'follow' students on social media.

Further information:

- [NSW Privacy and Personal Information Protection Act 1998](#)
- [Permission to Publish \(intranet only\)](#)

Email socialmedia@det.nsw.edu.au for further information on checking your privacy settings.

Note: Permission to publish student information in social media is not the same as permission for students to participate in social media. If a student has permission to have a social media account, staff still must seek permission to publish from the student's parent or guardian.



9. Rules of engagement

Rules of engagement are explicit and mandatory rules about the acceptable behaviour for all participants. They should clarify what type of behaviour is not acceptable and what actions will be taken if the rules are broken. All student participants should sign a statement outlining their understanding of these rules where possible.

9.1 Users of all online channels are governed by the specific terms of use set out by each channel. For example:

- [Facebook's terms of use](#)
- [The Twitter Rules](#)
- [YouTube Community Guidelines](#)
- [Instagram Community Guidelines](#)

9.2 Facebook allows each organisational Facebook page to publish individual rules of engagement on their respective page. All official Facebook pages must publish their rules of engagement in clear view of the page. Account administrators can tailor the below example to the needs of their school or community. They can then copy and paste it onto the 'about' section of their page, or create a 'rules' tab and paste it there.

9.3 Behaviour or language that is not appropriate in a school or classroom setting is not appropriate on social media channels created for educational purposes. Social media for educational purposes should complement existing classroom activities and not interrupt learning.

Facebook rules of engagement

In joining our community on Facebook, [NAME OF SCHOOL/COMMUNITY] follows the Department of Education Code of Conduct and Facebook's Community Standards.

Students

Facebook Terms and Conditions state no one under the age of 13 years should have a Facebook profile.

Therefore, any comments or page fans from primary students on the [Name of school/Community] page will be removed and, if warranted, users will be reported.

Tagging or naming student photos

Photos of students can only be published if the correct Department of Education permission to publish forms have been completed by the student's parent or guardian. The photo must be removed after one year of publishing unless further permission from the parent is sought.

For privacy and protection, please do not tag photos of children, and please do not name them in your comments, unless the previously mentioned permissions is sought. On rare occasions and with parental permission, students may be named by the school Facebook administration team. Tagging of parents or friends within the comment box is permitted with the understanding that all other rules of engagement are followed.

Comments

[Name of school/Community] encourages interaction from participants with the understanding that the school does not endorse comments or wall postings made by visitors to the page.

We ask that visitors making comments on the page show respect for other users by ensuring discussions remain civil. Personal attacks, trolling or spam will not be tolerated.

We reserve the right to remove comments that do not adhere to the rules of engagement of the page and Facebook's community standards including comments that:

- are deemed racist, sexist, abusive, profane, violent, obscene, spam
- advocate illegal activity
- are wildly off-topic
- libel, incite, threaten or make personal character attacks on [NAME OF SCHOOL/ COMMUNITY] students, employees, guests or other individuals.

We reserve the right to remove any participant that does not adhere to the rules of engagement or Facebook's Community Standards.

Remember, your name and photo will be seen next to your comment, visible to all visitors to the page.

We will not permit messages selling products or promoting commercial, political or other ventures.

Moderation Hours

This page is moderated from 9am to 3pm on weekdays.

9.4 Social media for educational purposes should complement existing classroom activities and not interrupt learning.

9.5 Facebook encourages all users to use the 'Report' links when they find abusive content.

Note to Facebook administrators: Legal precedents exist where organisations have been deemed responsible for comments made by others on their official Facebook pages. Owners of Facebook pages or groups have a responsibility to remove comments that could cause offense with a reasonable amount of time. For corporate organisations this is 24 hours. For schools there has been no definitive guide given, however, the site should be monitored within a 24-hour period.



10. Risk management

10.1 Teacher profile pictures should reflect role specific-appropriate clothing as outlined in the [Code of Conduct Policy](#).

10.2 When establishing official social media accounts, department staff should consider the intended audience for the account as well as the level of privacy assigned to the account. They should pay particular attention to whether the account should be a private or public network.

For example, a private network could be one that is limited to a particular class or particular year within a school. A public network could be anyone within the school community or from other schools with a shared interest or program such as School Spectacular or sporting groups.

It is recommended practice for professional social media accounts to be closed private groups, unless there is a specific educational need for the account to be public.

10.3 Administrators should choose an account structure which does not require students and teachers to 'friend', 'follow' or directly message each other. For example, a Facebook group creates a common space for all members to participate, without requiring private or direct messages between the group members.

Facebook also allows further groups to be set up within the original school page to create a community. There is no minimum number of participants required in a group, meaning this format can be used for one-on-one communication as well as larger groups.

10.4 At least two staff members must have administration rights to the page or group, including one of the school executive.

10.5 Social media networks change their default privacy settings often. Staff must regularly check the settings on their own accounts to keep personal information separate and hidden from public view.

10.6 All social media account passwords should be strong passwords. A password is strong if it:

- contains at least eight characters
- does not contain your user name, real name, or company name
- does not contain a complete word
- is significantly different from previous passwords
- contains characters from each of the following four categories: uppercase letters, lowercase letters, numbers and symbols.

10.7 Communication and content shared between teachers and students should directly relate to an agreed educational purpose and not be personal in nature.

10.8 Staff should not have contact with a student via social media, text messages, email or other electronic means without a valid context and written permission from the parent or guardian and school principal.

10.9 In some circumstances, school-based staff have personal connections with families. This could create a valid context for social media, text messages, phone calls, email or other electronic means of communication between the staff member and a student. For the sake of transparency this should be discussed with the school principal.

10.10 Staff should avoid direct messages or private spaces when communicating with students.

10.11 Online education for students carries various risks including:

- access to inappropriate or restricted materials
- cyber predators and cyber bullying
- inappropriate behaviour by a student arising from the imagined anonymity when seated in front of a computer
- commercial exploitation of students while on the internet through advertising
- breach of copyright law through the unlicensed downloading and use of material from the internet.

10.12 Therefore, students must be protected from exposure to inappropriate material and need to know how to adopt protective online behaviours. They should be instructed on how to minimise the risks.

10.13 Staff should cease communication with students via electronic channels when there is no longer an appropriate educational purpose.

Example

A teacher who coaches junior school football on weekends may find it most effective to communicate with team members via social media. As the rules of engagement outline that department staff should not 'friend' students, a Facebook group would be the best format for communication with the students. In this case, the teacher should:

- clarify the context and purpose of communications, and seek written permission from the parents to engage via social media with the minor
- advise the principal of the context of the relationship (such as family friends, senior football team mates, etc)
- go to the school's Facebook page, if one already exists, and click the '+ Create Group' button, ensuring that a member of the school executive is an administrator of the group
- ensure ongoing communication via the group is for educational purposes only



11. Removal of social media posts



11.1 School social media admins should act immediately to remove any content when directed by the Principal or the Department's social media team.

11.2 Teachers should act on all reasonable requests by students or parents of students to have content removed as soon as practical.

11.3 In recognition of the important role that the eSafety Commissioner plays in keeping Australian children safe online, the department should comply with any direction from the eSafety Commissioner to

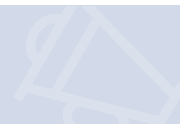
remove a post within 48 hours of receiving that direction

11.4 Further reading

- [The Social Media Toolkit \(intranet only\)](#)



12. Social media advertising



12.1 Under the Government Advertising Act 2011, all social media advertising requires a Compliance Certificate from the Secretary of the NSW Department of Education, irrespective of budget or purpose.

This expenditure is required, under law, to be reported to Department of Premier and Cabinet on a quarterly basis and will be published on relevant websites. Permission for social media advertising must be made explicitly to socialmedia@det.nsw.edu.au



13. Caretaker period – State elections

13.1 Special rules apply to Government communications in election years. The NSW Department of Premier and Cabinet has mandated that Government advertising campaigns cannot be run during the allocated Caretaker period. Caretaker period timings are determined by the NSW Department of Premier and Cabinet.

Certain campaigns are allowed, such as public health or safety campaigns. Government advertising can resume as normal when the election result is clear or, if there is a change of Government, when the new Premier is commissioned. For more detailed guidance, [read more here](#).

