

Social Media Policy

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1. Policy statement

City of Dublin Education and Training Board uses social media as a channel to communicate, engage and inform stakeholders, while supporting the delivery of operational and strategic objectives. We use this technology to complement traditional channels of communication.

The purpose of this policy is to ensure the safe and responsible use of social media, as appropriate by both staff and students, within each School/Centre/Office. All social media channels associated to City of Dublin ETB schools, colleges and centres while managed locally, ultimately come fall under the authority of the Chief Executive supported by the Communications Officer.

This policy should be read in conjunction with other City of Dublin ETB policies and procedures including for example, Bullying and Harassment, ICT Usage Policy, Data Processing Policy and Freedom of Information all of which are applicable to social media usage. See **Appendix 1** for a list of other related policies and procedures.

This policy on social media applies to all City of Dublin ETB employees. For the purposes of this policy, social media is the collective term referring to social and professional networking sites (for example Facebook, LinkedIn, Twitter, Instagram), blogs, wikis, message boards and other similar platforms. The policy extends to all such sites and incorporates any future developments of such media.

This policy applies to social media usage in both a professional and personal capacity (see Section 5).

2. Background

City of Dublin ETB is making increased use of social media and networking to engage with service users, staff and other stakeholders. The organisation recognises social media and networking can positively contribute to service user and staff management and supports and encourages its appropriate and professional use.

This policy deals with professional use of social media but also extends to private usage as many employees enjoy sharing their professional knowledge and experience with others with similar roles and interests. City of Dublin ETB encourages these online activities and acknowledges that staff can improve their personal skills and experience through relevant interactions with colleagues both inside and outside the organisation. However, the organisation has a responsibility to ensure the operational effectiveness of its communications, including its reputation; confidentiality for service users and data protection. This involves ensuring confidentiality and maintaining security in accordance with the organisation's governance policy and good practice.

As in all their conduct, staff must adhere to their professional codes of conduct and employment terms and conditions while using and contributing to social media. This includes reflecting the aims and strategic objectives of the organisation.

The administration and management of social media accounts is set out in **Appendix 2** (Administration and management of social media sites), **Appendix 3** (Request to create a social media account) and **Appendix 4** (Register of social media accounts)

3. Duties, accountabilities and responsibilities

City of Dublin ETB is committed to providing an environment where staff, students and service users, are treated with dignity and respect in the workplace / learning environment. It uses social media as a channel to communicate, engage and inform stakeholders, while supporting the delivery of operational and strategic objectives. City of Dublin ETB will use social media to complement traditional channels of communication.

The organisation will not tolerate any employee using social networking or social media technology in a way that may be viewed as discrimination, harassment, bullying or victimisation. Any individuals found to have undertaken such action will be subject to disciplinary action in line with the organisation's Disciplinary Policy.

All employees of the organisation have a responsibility to ensure that they are informed of this policy. Inappropriate activities carried out by employees on social media and networking sites which have a negative or detrimental impact on the organisation, colleagues, or service users may be viewed as a disciplinary issue. Any individual made aware of such activity should take immediate action and seek the advice of an appropriate senior manager at the first opportunity.

Staff should:

- be aware of this policy and comply with the provisions of same
- set a positive example by treating others with respect at all times
- ensure use of technology and social media is appropriate at all times
- not make personal or offensive comments
- be supportive of colleagues who may be subject to inappropriate activities on social networking sites

Senior management have responsibility for reporting inappropriate social media and networking behaviour. This information, along with the outcomes of any investigations and disciplinary procedures, will contribute to future reviews of this policy.

Inappropriate or suspicious incidents on City of Dublin ETB social media channels should be reported to the office of the Communications Officer and include a notification to the relevant Director of service.

4. Professional use of social media

Any communication made on behalf of or referencing the central organisation of City of Dublin ETB or any of its affiliate services should only be made by the Corporate Communications Team or appropriate senior manager. Individual City of Dublin ETB service social media pages approved for use by a nominated social media user from that service can communicate on behalf of their service on that platform in line with this policy.

Staff can identify themselves as working for the organisation and are entitled to make professional statements but cannot imply their view is that of the organisation as a whole.

So long as there is a clear, professional and appropriate purpose, such as viewing training material on YouTube or taking part in a professional forum on Twitter, the use of social media and networking to enhance service provision, contribute to staff development or facilitate communication is encouraged.

Social media and networking used to enhance service users' experience should only be done if professionally appropriate and with the permission of the service user. Consent for service user participation in promotional activities for the organisation should be obtained in advance. Further advice and guidance can be sought from the Communications Officer.

Staff must not disclose information about City of Dublin ETB that is, or may be, sensitive or confidential, such as information about service users, other staff and stakeholders, other organisations, commercial suppliers and other information about the organisation and its business activities. This includes the disclosure of any information relating to service user identifiable information, such as name, address, personal circumstances, personal opinions relating to service users or their circumstances. See Data Processing Policy on City of Dublin ETB website — www.cityofdublinetb.ie

Corporate logos or other visible markings or identifications associated with City of Dublin ETB may only be used where prior permission has been obtained from the Communications Officer.

Staff are not permitted to set up City of Dublin ETB related sites/pages without first applying through the Corporate Services department using the application forms found at the end of this policy document.

City of Dublin ETB can use social media and networking sites to support internal communication techniques with its staff.

5. Private use of social media

The use of social media platforms for personal matters/interests that do not identify the user as an employee of City of Dublin ETB or discuss the activities of the organisation will generally fall outside the scope of this policy. However, where members of staff place material on such personal social media sites which would identify the user as an employee of City of Dublin ETB and discuss the activities of the organisation, this activity will fall within the scope of this policy.

Staff should be aware that, at all times, the organisation reserves the right to monitor the web and all the organisation's technologies including social networking sites, for content that it finds inappropriate or contrary to the provisions of this policy.

All employees should be aware that the organisation regularly monitors the internet and social media in reference to its work and to keep abreast of general internet commentary, organisation presence and industry perceptions. The organisation does not specifically monitor social media sites for employee content on an ongoing basis, however employees should not expect privacy in this regard. The organisation reserves the right to utilise for disciplinary purposes any information that could have a negative effect on the organisation or its employees, which is brought to its attention by employees, students/trainees and members of the public.

City of Dublin ETB recognises that employees use social media tools as part of their daily lives. Employees should always be mindful of what they are posting, who can see it, and how it can be linked back to the organisation and work colleagues. When using social media, members of staff are encouraged to state that they are communicating in a personal capacity. This can be done by adding a disclaimer to private online profiles, such as "All views are my own and do not necessarily reflect those of my employer". However, this does not negate responsibilities for professional and appropriate use of social media and networking.

Members of staff are ultimately responsible for their own online behaviour, which includes any statement or activity which identifies them as a professional or City of Dublin ETB employee; they remain bound by the organisation's policies.

All employees are prohibited from using or publishing information on any social media sites, where such use has the potential to negatively affect the organisation or its staff. Examples of such behaviour include, but are not limited to:

- publishing material that is defamatory, abusive or offensive in relation to any employee, manager, office holder, student/trainee, or client of the organisation;
- publishing any confidential or business-sensitive information about the organisation;
- publishing material that might reasonably be expected to have the effect of damaging the reputation or professional standing of the organisation.

6. Good practice guidelines when using social media

All employees must adhere to the following when engaging in social media.

- 1. Be aware of your association with the organisation when using online social networks. You must always identify yourself and your role if you mention or comment on the organisation. Where you identify yourself as an employee, ensure your profile and related content is consistent with how you would present yourself with colleagues and clients. You must write in the first person and state clearly that the views expressed are your own and not those of the organisation. Wherever practical, you must use a disclaimer saying that while you work for the organisation, anything you publish is your personal opinion, and not necessarily the opinions of the organisation.
- 2. You are personally responsible for what you post or publish on social media sites. Where it is found that any information breaches any policy, such as breaching confidentiality or bringing the organisation into disrepute, you may face disciplinary action up to and including dismissal.
- 3. Be aware of data protection rules you must not post colleagues' details or pictures without their individual permission. Photographs of City of Dublin ETB events should not be posted online except where this is done as part of publicity or promotion and is in line with established protocols. Employees must not provide or use their City of Dublin ETB password in response to any internet request for a password.
- 4. Material in which the organisation has a proprietary interest such as software, products, documentation or other internal information must not be transmitted, sold or otherwise divulged, unless the organisation has already released the information into the public domain. Any departure from this policy requires the prior written authorisation of your senior manager.
- 5. Be respectful at all times, in both the content and tone of what you say. Show respect to your audience, your colleagues, staff/trainees, customers and suppliers. Do not post or publish any comments or content relating to the organisation or its employees, which would be seen as unacceptable in the workplace or in conflict with the organisation's website. Make sure it is clear that the views and opinions you express are your own.
- 6. Recommendations, references or comments relating to professional attributes, are not permitted to be made about employees, former employees, staff/trainees, customers or suppliers on social media and networking sites. Such recommendations can give the impression that the recommendation is a reference on behalf of the organisation, even when a disclaimer is placed on such a comment. Any request for such a recommendation should be dealt with by stating that this is not permitted in line with organisation policy and that a formal reference can be sought through HR.
- 7. Once in the public domain, content cannot be definitively retracted. Assume what you are posting will be indefinitely available online. Therefore, always take time to review your content in an objective manner before uploading. If in doubt, ask someone to review it for you. Think through the consequences of what you say and what could happen if one of your colleagues had to defend your comments to a customer.
- 8. If you make a mistake, be the first to point it out and correct it quickly. You may factually point out misrepresentations, but do not engage or encourage arguments with other users.
- 9. It is very important that employees immediately report any inappropriate activity or behaviour regarding the organisation, its employees or third parties. Inform your Principal/Head of Centre

or another member of management or HR. All allegations made in good faith will be fully and confidentially investigated. You are required to cooperate with all investigations of alleged policy violations.

10. Online posting or commentary about City of Dublin ETB internal or confidential processes and procedures is strictly prohibited and will be viewed very seriously.

See Appendix 5 for further guidance on the do's and don'ts of social media usage.

Specific managerial responsibilities

By virtue of their position, managers have particular obligations with respect to general content posted on social media. Managers should consider whether or not personal thoughts they publish may be misunderstood as expressing the organisation's opinions or positions even where disclaimers are used. Managers should err on the side of caution and should assume that their teams will read what is written. A public online forum is not the place to communicate organisation policies, strategies or opinions to employees.

Managers should not make 'friend' requests or other similar requests of staff, as this may place undue pressure on the staff member.

Breaches of this policy may be investigated and the organisation retains the right to take disciplinary action, up to and including dismissal where applicable.

7. Security considerations

You are responsible for all postings made on or to your social media accounts. This applies to: postings or activity made directly by you, postings or activity made by any other party but under your username/account, and/or postings made by friends or third parties to your accounts (e.g., Facebook wall posts made by Facebook friends to your timeline).

You must be conscious at all times of your overall online presence and its effect, or potential effect, on City of Dublin ETB, its students/trainees or your colleagues. Disciplinary action may ensue, in line with this policy and the disciplinary procedures, for any activity on, or related to, your social media accounts, regardless of how such activity occurred.

In addition to the above rules, there are a number of key guiding principles that City of Dublin ETB employees should note when using social media tools:

- always remember on-line content is never completely private;
- regularly review your privacy settings on social media platforms to ensure they provide you with sufficient personal protection and limit access by others;
- consider all online information with caution as there is no quality control process on the internet and a considerable amount of information may be inaccurate or misleading;

• at all times respect copyright and intellectual property rights of information you encounter on the internet. This may require obtaining appropriate permission to make use of information. You must always give proper credit to the source of the information used.

You are therefore advised to maintain the security of your personal social media accounts. This includes, but is not limited to: using secure passwords, changing passwords regularly, not disclosing your passwords to third parties, and logging out of accounts when leaving your computer/devices unattended. If you are concerned about any activity on your social media account, however created, and its interaction with your employment, please contact your manager immediately.

For advice on devising a secure password or on social media security tips, please contact the relevant IT person in your centre.

8. Training

New starters will be provided with a copy of this policy at induction training. The policy will also be available via the organisation's website.

Social media training will be provided to individuals/teams upon request via the Professional Development Unit or Communications Officer. Individuals and teams who would like to explore the potential use of social media and networking to support their service should also contact their manager for further advice and guidance.

9. Enforcement

Non-compliance with the general principles and conditions of this social media policy and the related internet, e-mail and confidentiality policies may lead to disciplinary action, up to and including dismissal.

This policy is not exhaustive and is continually reviewed and updated. In situations that are not expressly governed by this policy, you must ensure that your use of social media and the internet is at all times appropriate and consistent with your responsibilities towards the organisation. In case of any doubt, you should consult with your Principal/Head of Centre or manager who can raise the issue further with the Communications section.

10 Implementation and Review

This policy will be implemented by Principals/Heads of Centres/Centre Managers. Staff members will also be responsible for implementation in their own area of work.

This policy will be subject to review two years from the date of implementation and changes will be notified to staff.

Appendices

The following is a list of some of the policies and procedures in operation in City of Dublin ETB:

- Code of Conduct for Staff Members
- ICT Usage Policy for City of Dublin ETB
- Grievance Procedures for Staff employed by ETBs
- Bullying Prevention Policy
- Harassment/Sexual Harassment Prevention Policy
- Data Processing Policy
- Complaint Procedure (for dealing with Complaints made by Parent(s), Guardian(s) of a Student or by a Student (who has reached the age of eighteen) currently enrolled in a school/centre, against a staff member employed by City of Dublin ETB)

All City of Dublin ETB policies/procedures can be located at http://cityofdublin.etb.ie/policies-procedures/

Other useful reference documents include:

- Child Protection Procedures for Primary and Post Primary Schools (www.education.ie)
- The Teaching Council Code of Professional Conduct for Teachers (<u>www.teachingcouncil.ie</u>)

Administration and management of social media accounts

Each individual service Principal, Head of Centre or nominated Senior Manager is ultimately responsible for the social media activity related to his/her School/Centre and reserves the right to modify social media content based on best educational practice and standard. The support and guidance of the City of Dublin ETB Communications Officer is available at all times in relations to the management of social media accounts.

This includes, but is not limited to, the following:

- providing guidelines (e.g. Social Media guidelines for students, parents, and staff) and make reasonable efforts to train staff and students in acceptable use and policies governing online communications.
- monitoring the use of online activities. This may include real-time monitoring of network activity and/or maintaining a log of Internet activity for later review.
- removing any inappropriate user accounts on the network.
- amending local procedures and rules as required.

A staff member may be appointed to coordinate and monitor such activity related to their School/Centre/Office. Those who coordinate and monitor social media channels associated with City of Dublin ETB must ensure that they are in a position to respond to comments and posts made on the site in a timely manner. In order to ensure a consistent brand voice and standard it is best practice that each centre/school maintains one public facing Social Media profile and ensure the School or City of Dublin ETB logo is visible in a prominent place on the profile as required.

Setting up social media accounts

When setting up social media account relating to City of Dublin ETB or one of its schools/centres, written consent must be secured in advance from senior management. See **Appendix 3** (Request to create a social media account

Each School/Centre must establish and maintain a register of all social networking application domain names in use, the names of all administrators of these accounts, as well as the associated user identifications and passwords currently active within their School/Centre as outlined in (Appendix 4 Register of social media accounts). A copy of this register should be sent to the Communications Officer.

In availing of Social Media Services approved by City of Dublin ETB, staff must follow regulations and guidelines according to the <u>ICT Usage Policy</u>.

School/Centre Logo

Request to create a social media account

Name of staff member responsible for managing the account	
Name of School/Centre/ Department	
Type of social media (e.g. Facebook, Twitter, etc.)	
Username	
Password	
What is the educational purpose of the social media facility?	
How will this social media facility be managed?	
What email address will be used to create this account?	
Authorisation: Permission has been	en granted to create this social media by
Signature:	
Title/Position:	
Date:	

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Register of social media accounts

School/Centre/Office Name:		Contact Person:	
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Name of Social Media Account/Profile	Account Username and Password	Email Address used to open account	Date of Account Setup	Staff Administrator(s)	Other Account Users

Social media – some do's and don'ts

- Staff should never post or send abusive, defamatory or distasteful messages or post
 photographs, videos or other media which could be considered in breach of City of Dublin ETB
 policies and procedures.
- Staff should not publish personal identifiable information of City of Dublin ETB staff or students unless this is in line with the policies of the school/centre/service and City of Dublin ETB.
- Staff should not send individual emails to students from their personal email accounts or reply to individual emails sent by students from their personal email accounts.
- Staff should note that student names will not be recorded in website photographs unless it is an
 officially sanctioned photograph by the School Principal or Centre/Service Manager and consent
 has been secured from the student. In the event that the student is a minor, Parental/Guardian
 consent is required.
- Staff should never post a comment about City of Dublin ETB that purports to represent the views of the organisation or an individual School/Centre/Service unless approved by the School Principal/ Centre or Service Manager or the Chief Executive.
- Harassment/Sexual Harassment or Bullying via Social Media will not be tolerated and will be subject to the appropriate sanction as set out in the relevant policy and procedure.