



**west lothian**  
college

# **Social Network & Internet Policy**

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## **1 Introduction**

The use of online social media sites (eg Facebook, Twitter, YouTube, blogs, wikis, microblogs, message boards, chat rooms, electronic newsletters, online forums and other sites and services that permit users to share information with others) has become a standard method of communication for many people. They provide a very positive way to communicate with friends and family and generally can be used to exchange ideas and thoughts on common interests.

This policy is intended to provide clear guidance and advice on the use of these sites to avoid circumstances occurring where an employee's actions have a detrimental effect on West Lothian College, other employees of West Lothian College or on their employment relationship with West Lothian College.

## **2 Scope**

This policy applies to all staff of the College.

## **3 Key Principles**

- 3.1 Any instances where the College is brought into disrepute may result in disciplinary action being taken.
- 3.2 If an employee's personal internet presence does not make any reference to the College and the College cannot be identified, the content is unlikely to be of concern to the College. If employment at the College is referred to or identifiable then the information and content posted must comply with the conditions outlined below.
- 3.3 Any interaction with learners via the internet must conform to the highest standards of professionalism. Staff should not blur professional boundaries when interacting with learners or colleagues, or College customers. Please seek guidance from your Line Manager if in doubt.
- 3.4 Posting any information about learners is not acceptable unless it forms part of an educational activity and the learners' consent has been given, in writing, prior to the exercise.
- 3.5 An employee must not disclose confidential information relating to his/her employment at the College.
- 3.6 Sites must not be used to abuse others or to share inappropriate material. Others must be respected at all times. Care must be taken to avoid language and behaviours which could be reasonably judged offensive to others. The College Harassment Policy applies to social media interactions.

- 3.7 If approached by a media contact about content on-line relating to West Lothian College, employees must advise their line manager and should not comment to the media.
- 3.8 Viewing and updating social media unconnected with the workplace during working times is unacceptable other than in exceptional circumstances and if this is agreed in advance by the line manager. Reasonable access is acceptable before/after working hours and during working breaks.
- 3.9 Social Media must not be used for accessing or sharing illegal content. Any instance involving illegal content or offensive material or which breaches the College's Equal Opportunities and/or Harassment Policy may result in disciplinary action being taken and may be reported to the Police. All inappropriate use will be reported to the service provider to allow them to remove the content from the site.
- 3.10 Any misuse of Social Media sites which has a negative impact on the College materially or reputationally may result in disciplinary action being taken.
- 3.11 Online content which is considered to be online bullying or harassment, discrimination or victimisation will be dealt with in the same way as other such instances of bullying and harassment or discrimination or victimisation, as described in the College's Harassment Policy.
- 3.12 Staff should ensure that when using sites such as Facebook, privacy settings are used to prevent inappropriate communication and/or that the individual is not identifiable as a member of College staff. Learners must not have access to "private" pages or inappropriate material.
- 3.13 If staff become aware that learners have communicated with extremist groups via the internet, this matter must be reported to the Safeguarding Team as a matter of urgency.
- 3.14 Guidance from the General Teaching Council (GTC) for Scotland is attached to this document. This provides valuable guidance for all staff and a professional standard for GTC members.

## **4 Appendix 1 – General Teaching Council for Scotland Guidance**

### **Professional Guidance on the Use of Electronic Communication and Social Media**

#### **The Purpose of this Professional Guidance**

The rise in popularity of social media in recent years has resulted in many teachers using social media to enhance their classroom practice, introducing their pupils to new tools and delivering the curriculum in innovative and engaging ways. The majority of teachers using these tools do so without encountering any difficulty; however registered teachers student teachers and others who may seek registration in the future should be aware of the many challenges and ramifications associated with the use of electronic communication and social media.

This Professional Guidance will help identify potential dangers, offer some guidance about how to avoid them and provide a context for responsible, professional use of electronic communication and social media.

Online communications and social media include software, applications (including those running on mobile devices), e-mail and websites which enable users to interact, create and exchange information online. Examples include, but are not limited to, sites such as Facebook, Twitter, LinkedIn, YouTube, Wikipedia and MySpace. Also included is the use of SMS and instant messaging systems, such as MSN Messenger and BBM.

#### **The Code of Professionalism and Conduct (CoPAC)**

This Guidance should be read in conjunction with The Code of Professionalism and Conduct (CoPAC) and the Student Teacher Code (STC), ('the Codes') in which GTC Scotland sets out the key aspects of teacher professionalism.

Maintaining the public's trust in individual teachers, and in the teaching profession as a whole, is central to the concept of fitness to teach this trust can be undermined by behaviour occurring not only in a teachers professional lives but also in their private lives, including activity online.

#### **New Contexts for Teaching and Learning**

From e-mail to text and from blogging to tweets, technology is becoming ever-present in our lives and is an increasingly essential tool in the classroom. New technologies open up a whole range of creative possibilities to help pupils; they provide new access to assignments and resources and connect classrooms with other communities and countries in ways which would have been unthinkable only a few years ago.

The ability to communicate in real time with others and to access networks across the world offers great opportunities for teachers to promote good

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learning; it also presents great challenges, as the traditional boundaries between teacher and pupil can quickly become blurred. The views of teachers about their own profession are central to the integrity of a self-regulating profession. However, the difficulty with social media is that teachers sometimes forget that the things they say and do online may be perceived differently from another point of view. The perspective of parents and the understandable fears of the wider public about inappropriate use of the internet also have to be considered; and these views can sometimes be shaped by sources which are unpredictable - including the media. Teachers therefore need to be alert to the risk that actions which may seem quite innocent can be misunderstood and misconstrued by others.

### **Private and Professional Life**

It is important to note that the GTC Scotland Codes emphasise that teachers are individuals with the right to private lives. Off-duty conduct may however still have a bearing on the professional life of a teacher: actions which may not seem relevant to pupils may still have an impact on a teacher's fitness to teach. Sound judgement and due care should therefore be exercised at all times.

### **Professional Vulnerability**

Teachers can be vulnerable to unintended misuses of electronic communication. E-mail, texting and social media encourage casual dialogue; and very innocent actions can easily be misconstrued or manipulated.

Electronic messages are not anonymous and can continue to develop a life of their own long after the original message has disappeared. Social Media sites can archive content even when deleted from online profiles. In effect, once information is placed online you relinquish control of it.

Social media can disarm inhibitions; it brings a new dimension and 'feel' to a relationship. It is particularly important to be mindful of this whenever a student and a teacher consider becoming 'friends' in an online environment. A teacher should never share information with students in ANY environment that they would not willingly or appropriately share in a school or school-related setting, or in the community.

### **The Legal Implications**

The Codes draw attention to the potential impact of criminal convictions on registered teachers and on those wishing to become registered.

Careless or unwise behaviour online can result in criminal action or, in some cases, civil action brought by others. Online behaviour should therefore be treated with caution.

## **Fitness to Teach Implications**

Central to GTC Scotland's Fitness to Teach framework is the protection of children, young people and vulnerable adults; and the maintenance of public trust in the teaching profession. All complaints are considered fairly and in the same way regardless of whether or not they are associated with the internet or involve electronic communication.

In the area of electronic communication and social media, however, the behaviours listed below have previously warranted disciplinary measures:

- inappropriate electronic communication with pupils, colleagues and parents/carers, including SMS and instant messaging;
- posting/sending sexually explicit pictures/images to colleagues or pupils;
- grooming - whereby a teacher uses electronic messages with a view to establishing an inappropriate relationship with a pupil;
- possessing, making, viewing or distributing indecent images of children;
- using inappropriate YouTube content in the educational setting.

## **How can teachers minimise risk when using electronic communication and social networking?**

As a teacher you should:

- always maintain a formal and courteous and professional tone in communicating with pupils and ensure that professional boundaries are maintained;
- only use official channels of communication e.g. GLOW and work e-mail addresses, and be aware of and comply with employer's policies and guidance;
- not exchange private texts, phone numbers, personal e-mail addresses or photos of a personal nature with pupils;
- firmly decline student-initiated 'friend' requests from pupils and do not instigate any yourself. Use your own discretion when dealing with "friend" requests from parents. It is acceptable to decline these invitations and remind parents of more formal channels through which they can discuss their child's education;
- operate online in a way in which would not call into question your position as a professional;
- realise that pupils will naturally be curious about your personal life outside school and may try to find out more about you.
- manage your privacy settings and keep them under review. These are particularly important in regard to photos. Remember that no privacy mechanism is 100% guaranteed;
- ensure your settings prohibit others from tagging you in any photos or updates without your permission. You can ask others to remove any undesirable content related to you;
- audit and re-evaluate the information about you and who has access to it if you are entering a programme of teacher education, or your Teacher Induction Period;

- be aware that potential employers may try and view your online social media profiles;
- consider that conversations held online may not be private. Be aware of who may have access to what you post;
- assume that information you post can be accessed and altered;
- do not discuss pupils, colleagues, parents or carers online or criticise your employer or others within the school community;
- respect pupil privacy and confidentiality at all times;
- use strong passwords and change them regularly. Protect your mobile phone/smart phone/tablet computer with a PIN, especially when in school, to protect access to its content and potential misuse;
- bring the matter to the attention of your employer using the proper procedures, if you are the victim of cyber bullying or are uncomfortable with comments, photos or posts made by pupils about you.

### **How can teachers minimise risk for their pupils when using electronic communication and social networking?**

As a teacher you should:

- report the matter to your manager using the appropriate procedures if you come across or are made aware of inappropriate use of electronic communication or social networking by a pupil or concerning a pupil;
- alert your pupils to and encourage them to use appropriate, responsible and safe online behaviour;
- be aware of and comply with your employer's rules and policy in regard to taking and sharing photos of children.

### **In Conclusion**

Before posting materials online stop and ask yourself:

- (1) Will the content reflect poorly on you, your school, employer or the teaching profession?
- (2) Is your intention to post this material driven by personal reasons or professional reasons?
- (3) Are you confident that the comment or other media in question, if accessed by others, (colleagues, parents etc) would be considered reasonable and appropriate?

This can be viewed online through the following link; <http://www.gtcs.org.uk/web/FILES/FormUploads/ecomms-social-media-guidance-pd.pdf>

## **5 Review**

This Policy will be subject to review every three years or whenever any change affects any part of it by the Facilities Manager.

## Section 2: The Equality Impact Assessment Process

### Phase 1: Screening and Prioritisation

The first phase of the Equality Impact Assessment (EIA) is to screen the policy, practice, strategy etc to establish if it has an impact upon anyone because of a protected characteristic (age, disability, ethnicity, gender, gender reassignment, pregnancy and maternity, race, religion or belief, sexual orientation).

A single EIA should be conducted and recorded for each individual policy, practice, strategy etc.

Please complete the following:

<b>Name of policy/ practice/strategy/ decision</b>	<b>Named individual responsible for policy/practice/strategy/ decision</b>	<b>Name of person conducting initial EIA</b>
<b>Social Network &amp; Internet Policy</b>	<b>G Hotchkiss</b>	<b>G Hotchkiss</b>

### Supporting notes to help in the completion of Phase 1

- Consider impact in terms of the protected characteristics and other groups who may experience disparities in opportunity.
- Make use of existing knowledge, experience, research and consultation.
- Caution is needed not to consider a policy or practice 'equality neutral' just because no evidence of adverse impact exists (e.g. you might find little research exists with regard to equality areas such as sexual orientation).
- When thinking about positive impact consider ways to tackle discrimination, promote equality of opportunity and promote good community relations.

**Q1. Given the aims of the proposed policy, practice, strategy, decision is it likely that there will be a negative impact on one or more of the groups named above. Or is it clear at this stage that it will be equality neutral?**

Protected Characteristic	Impact (explain)
Age	Neutral
Disability	Neutral
Gender reassignment	Neutral
Pregnancy and maternity	Neutral
Race	Neutral
Religion or belief	Neutral
Sex	Neutral
Sexual orientation	Neutral

Comments:

No negative impact on any protected characteristic anticipated.

**Q2. For which groups are there likely to be a negative impact? What is this impact likely to be, and what plans could be built in to address negative impacts and to add measures which promote a positive impact at this stage?**

Protected Characteristic	Impact (explain)
Age	N/A
Disability	N/A
Gender reassignment	N/A
Pregnancy and maternity	N/A
Race	N/A
Religion or belief	N/A
Sex	N/A
Sexual orientation	N/A

Comments:

**Q3. At this stage, how could the policy, project, strategy, decision etc promote positive impacts for any of the groups named above?**

**Q4. Is a full impact assessment required? ~~YES~~ / NO (use box to explain rationale behind decision)**

Signature of named individual responsible for policy	Signature of individual responsible for carrying out initial impact assessment (if different from previous)	Date of completion of initial impact assessment
<i>G Hotchkiss</i>		<i>07/07/16</i>

***In the event of a full impact assessment being required this document must be attached and used as part of that process***

## Phase 2: Full Equality Impact Assessment

Once Phase 1 has been completed and it has been deemed necessary to conduct a full EIA for a given policy, procedure or project the following questions should also be worked through.

**Q5. Summarise the evidence that describes the current situation for those groups where an impact has been initially assessed, and the sector or geographical area in which this policy/practice / strategy decision will operate.**

Comments:

### Q5. Supporting Notes

- Consider impact in terms of age, disability, ethnicity, gender, gender reassignment, pregnancy and maternity, race, religion or belief, sex, sexual orientation and other groups who may experience disparities in opportunity.
- Look at existing evidence, research & data or statistics (both quantitative & qualitative).
- Are any of these groups under or over represented, do they have access to the same resources and is the reality of their experience the same?
- Is it useful to consider the underlying causes of any inequalities?

**Q6. Where the initial impact assessment indicated that there is potential for this policy, project, strategy, decision etc to have a negative impact on one or more group, provide further information.**

Protected Characteristic	Impact (explain)
Age	
Disability	
Gender reassignment	
Pregnancy and maternity	
Race	
Religion or belief	
Sex	
Sexual orientation	

Comments:

**Q6. Supporting Notes**

- Is this impact likely to be different for different groups?
- Are some equality groups excluded from the benefits?
- Are there barriers to certain communities enjoying the benefits?
- Are certain sub-groups disadvantaged e.g. Gypsies and Travellers or Somali community?
- Does it challenge or reinforce stereotypes?
- Does it give different groups real choice?

**Q7. Where the initial impact assessment showed that there is potential for this policy, project, strategy, decision etc to have a positive impact, such as tackling discrimination, promoting equality of opportunity for one or more groups, provide information.**

<b>Protected Characteristic</b>	<b>Impact (explain)</b>
Age	
Disability	
Gender reassignment	
Pregnancy and maternity	
Race	
Religion or belief	
Sex	
Sexual orientation	

Comments:

**Q7. Supporting Notes**

- Is this impact likely to be different for different groups?
- Will this project help communication between groups?
- Does it support education for Black, Asian and Minority Ethnic (BAME) groups where needed?
- Is there a focus on reducing barriers for a specific group e.g. disabled people?
- Are jobs created accessible to all?
- Does this strategy extend the provision of affordable childcare?
- Does it harness the potential of refugees and asylum seekers to contribute to Scotland's economy?

**Q8. Given your answers to the previous questions, how will your delivery plans be revised to reduce or eliminate negative and to enhance positive impacts?**

Comments:

## Q8. Supporting Notes

- If the assessment shows adverse impact consider if the project is legal and how this adverse impact can be reduced. This might include finding another way to meet the objectives, introducing new steps to meet specific needs for specific groups. Can the adverse impact be justified by overall aims or by other legislation? If the strategy, policy, project, etc are unlawful it must be changed. Ensure any changes don't disadvantage another group.
- If the assessment shows that no adverse or positive impact is likely (equalities neutral) this might be acceptable but consider if measures could be added to promote WLCs equality aims.
- If the assessment shows your policy, project, strategy, etc is not likely to result in adverse impact and does promote equality then there may be little revision required. Some policy, project, strategy, etc have a differential impact because they are designed to promote equality for a specific group. This can be justified as part of a wider strategy but a clear rationale should be given.

**Q9. Where the initial EIA indicates that this policy, project, strategy, decision etc may impact adversely upon community relations and cohesion, the gender pay gap, attitudes toward disabled people, the involvement of disabled people in public life, or require special steps to be taken for disabled people, provide further information.**

<b>Additional Considerations</b>	<b>Impact (explain)</b>
Community relations and cohesion	
The gender pay gap	
Attitudes toward disabled people	
Involvement of people in public life	
Special steps for disabled people	

**Q10. Where the initial impact assessment indicated that this policy, project, strategy, decision etc provides an opportunity to promote equality in terms of community relations and cohesion, the gender pay gap, attitudes toward disabled people, the involvement of disabled people in public life, or require special steps to be taken for disabled people, provide further information**

Additional Considerations	Positive Impact (explain)
Community relations and cohesion	
The gender pay gap	
Attitudes toward disabled people	
Involvement of people in public life	
Special steps for disabled people	

**Q11. Given your answers to the above questions how will your delivery plans be revised to reduce or eliminate negative impacts and to enhance positive impacts?**

Comments:

**Q12. How have the different stakeholders / beneficiaries / staff who are affected by this policy / practice / strategy etc been consulted? Please note any important issues**

Comments:

**Q12. Supporting Notes**

- Has relevant consultation already taken place?
- If not how and when will consultation take place?
- Will this be direct consultation with groups that share a protected characteristic and / or organisations that represent them?
- What steps will be put in place to ensure full participation is possible e.g. using sign language interpreters for events, provision of crèche facilities arranging meetings in local community venues at different times of day, questionnaires available online etc.
- How will those consulted be informed of the outcome of the process?
- Is it possible to carry out a joint consultation with a similar project or a project in the same geographical area?

**Q13. How will the real impact of this policy, project, strategy, decision etc on groups be monitored to ensure all targets set are met?**

Comments:

**After the Assessment**

Once an EIA has been conducted it is important to make certain that correct monitoring and review mechanisms are in place to ensure that predicted outcomes and outputs are delivered. These should be factored into the initial EIA process and timelines for the review and development of the item agreed and published along with the policy, project, strategy, decision etc.

If circumstances change or unexpected situations develop that could impact upon a policy, project, strategy, etc the relevant items should have another EIA conducted upon them as necessary in light of the changed circumstances.

EIA should be published on the College website.

**Annex A: Supporting information, guidance**

Information and advice is available on the internet to help you to understand the issues which are addressed through the EIA process and more generally as part of the Equalities agenda. The following are useful resources to consider for some of the questions posed by the EIA process. Further web based searching is encouraged to help expand and develop issues and ideas more fully.

**Useful links**

<http://www.equalityhumanrights.com/scotland/> - Equality and Human Rights Commission Scotland

<http://www.scotland.gov.uk/Topics/Statistics> - Scottish Government Statistics

<http://www.scotland.gov.uk/library5/social/gpgc-00.asp> - Guidance on how to ensure that equalities groups are included in consultation exercises.