

# **SOCIAL MEDIA POLICY**

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## **Best Practice - Quality Area 7**

### **PURPOSE**

This policy will provide clear guidelines for:

- establishing a standard of behaviour within social media forums for the Approved Provider, Nominated Supervisor, Teachers, Educators, staff, parents and all individuals involved in the programs and activities of Elsa MacLeod Kindergarten;
- promoting desirable and appropriate social media behaviours and interactions;
- ensuring that all interactions, including social media, across Elsa MacLeod Kindergarten services are respectful, honest, courteous, sensitive, tactful and considerate;
- and reflects the philosophy, beliefs, objectives and values of Elsa MacLeod Kindergarten.

### **POLICY STATEMENT**

#### **1. VALUES**

Elsa MacLeod Kindergarten is committed to:

- considering the wellbeing of all stakeholders as paramount;
- maintaining a duty of care towards all children at the service;
- providing a safe and secure environment for all at the service;
- respecting the rights of all;
- providing an open, welcoming environment in which everyone's contribution is valued and respected;
- encouraging parents/guardians, volunteers, students and community members to support and participate in the program and activities of each service;
- engaging and communicating with families of children enrolled at the centre as well as prospective families and the local community;
- maintaining the privacy and confidentiality of children attending the kindergarten and the families of children who attend;
- ensuring the online safety of children and families of children who attend the kindergarten.

#### **2. SCOPE**

This policy applies to the Committee of Management, Approved Provider, Persons with Management or Control, Nominated Supervisor, Persons in Day-to-Day Charge, educators, staff, students on placement, volunteers, families, parents/guardians, children and others attending, or intending to attend, the programs and activities of Elsa MacLeod Kindergarten.

#### **3. BACKGROUND AND LEGISLATION**

##### **Background**

The Committee of Management has determined that the kindergarten will establish a Facebook page to promote Elsa MacLeod Kindergarten to the local community including prospective families, as well as providing an additional form of communication with current families.

Social media, such as Facebook, represents a growing form of communication and can play an important role in building and maintaining relationships with families, prospective families and the local community.

However, it is also an area in which rules and boundaries are constantly being tested and we must be mindful of the effects of the use of social media on children and families within our kindergarten community, particularly in relation to privacy and confidentiality.

Social Media refers to the connection of people in an online environment, and it has become a key information source for many people.

Social Media includes but is not limited to:

- social networking sites e.g. Facebook, MySpace, Instagram, Snapchat
- video and photo sharing websites e.g. YouTube, Flickr
- micro-blogging sites e.g. Twitter
- weblogs, including corporate blogs, personal blogs or blogs hosted by traditional media publications
- forums and discussion boards e.g. Whirlpool, Google Groups
- online encyclopaedias e.g. Wikipedia
- any other web sites that allow individual users or companies to post comments to the web

Where social media differs from most other forms of traditional media is the ability to engage in true two-way communication and for virtually anyone to participate in and contribute to content.

Elsa MacLeod Kindergarten recognises that most of its employees and families will use or interact with social media on a personal level.

With this recognition comes the need for a policy that ensures employees who use Social Media, in a personal capacity or as part of their job, have information to support responsible use where Elsa MacLeod Kindergarten's business is involved, including its services, its people, its stakeholders and/or other business related individuals or organisations.

This policy covers an employee's use of social media as part of their employment or in a personal capacity, and applies whenever an employee's or contractor's use of social media relates to or impacts on their capacity to perform their role as an Elsa MacLeod Kindergarten employee.

### **Service Facebook Account**

Elsa MacLeod Kindergarten has a Facebook account to converse and share information with our families and community. This is administered by the Director, who must authorise all posts by staff. The Director will regularly monitor the Facebook page to ensure that any inappropriate comments/posts are dealt with in a timely manner.

Only current families and staff will have access to the service's Facebook page. The page is locked as "Privacy type: Closed: Limited public content. Members can see all content."

The objectives for our Facebook page are to:

- keep in touch with what is happening at the service, including upcoming and special events;
- connect with other parents and share thoughts about programs, policies and procedures;
- provide an avenue to ask other parents their thoughts and help with common child rearing issues, etc.;
- provide educational purposes to families and employees and not for a personal nature.

## Legislation and Standards

Relevant legislation and standards include but are not limited to:

- *Privacy Act 1988* – [www.privacy.gov.au/law/act](http://www.privacy.gov.au/law/act)
- *Privacy Amendment (Enhancing Privacy Protection) Act 2012*
- *Privacy Regulations 2013*
- *Education and Care Services National Law Act 2010*
- *Education and Care Services National Regulations 2011*
- *Early Childhood Australia Code of Ethics*
- *Guide to the National Quality Standard (3) Australian Children's Education and Care Quality Authority (ACECQA) 2011*

## 4. DEFINITIONS

The terms defined in this section relate specifically to this policy. For commonly used terms e.g. Approved Provider, Nominated Supervisor, Regulatory Authority etc. refer to the *General Definitions* section of this manual.

**Social Media:** Websites and applications that enable users to create and share content or to participate in social networking. In relation to this policy, social media includes Facebook, Twitter, Instagram, Snapchat and MySpace.

**Social Media Administrator:** Manages social media communication and day-to-day activities. Creates, curates and manages all published content (images, video and written).

## 5. SOURCES AND RELATED POLICIES

### Sources

- Information Privacy Principles Section 14 Privacy Act 1988 <https://www.oaic.gov.au/>
- Fair Work Ombudsman – 2008 Workplace Privacy Best Practice Guide\_ <https://www.fairwork.gov.au/>

### Service policies

- *Code of Conduct Policy*
- *Complaints and Grievances Policy*
- *Interactions with Children Policy*
- *Occupational Health and Safety Policy*
- *Privacy and Confidentiality Policy*
- *Staffing Policy*

## PROCEDURES AND RESPONSIBILITIES

### The Approved Provider or Nominated Supervisor will:

- obtain authorisation from a child's parents prior to posting any photos of their child to the page
- ensure personal information about families, children and staff is not posted online;
- implement high privacy settings on the service's Facebook and other social media accounts;
- maintain appropriate privacy of families, employees, students, children and volunteers, including when they have obtained permission to publish content publicly;
- remain up to date with any changes to social media, particularly Facebook, ensuring privacy setting remain up to date.
- ensure all passwords are kept confidential and are not shared without authorisation by the Director
- log out of Facebook or any service social media account when not in use and prior to leaving
- regularly scan online content related to the service to ensure appropriateness
- identify, prevent and address potential concerns before they become formal complaints/grievances
- adhere to our Complaints and Grievances Policy to investigate any occurrences where a person working at the service may:
  - post photos or information of the service or children
  - defame, harass or bully any other person who works at the service, or is connected to the service.
- ensure that any staff member or educator found guilty of any social media misconduct is aware this may result in termination of employment.

### The Approved Provider, Nominated Supervisor, Director, educators, staff members, volunteers and students will not:

- access personal social media accounts on any workplace device;
- access personal social media accounts whilst educating and caring for children;
- access their personal electronic devices whilst educating or caring for children;
- use their personal camera or phones to take photos or video while at the service
- post any photos taken of the children enrolled at the service on their personal Facebook page or any social media;
- vilify, harass or bully any other person who works at the service, family or community member connected to the service;
- post offensive or derogatory comments or information that could bring their professional standing or that of the service into disrepute;

### The Social Media Administrator is responsible for:

- regularly reviewing and updating the content of Elsa MacLeod Kindergarten's Facebook page;
- ensuring the content of the service's Facebook page reflects the values and purpose of this policy and philosophy of the kindergarten;
- ensuring the content, including comments, of the service's Facebook page adheres to the kindergarten's Code of Conduct;
- removing any inappropriate comments or posts.

### Parents/guardians are responsible for:

- respecting the rights and confidentiality of staff, other children and their families when using Elsa MacLeod Kindergarten's Facebook page or other service social media;
- adhering to the points contained within this policy and the kindergarten's Code of Conduct when using the Facebook page or other service social media;
- notifying the Director and/or President of Elsa MacLeod Kindergarten if there are concerns over a breach of this policy.

**The Committee of Management is responsible for:**

- ensuring this policy is implemented;
- developing and reviewing this policy;
- authorizing any changes to this policy;
- monitoring complaints and incidents regarding this policy.

**4. EVALUATION**

In order to assess whether the values and purposes of the policy have been achieved, the Approved Provider will:

- regularly seek feedback from everyone affected by the policy regarding its effectiveness;
- monitor the procedures in relation to this policy;
- keep the policy up to date with current legislation, research, policy and best practice;
- revise the policy and procedures as part of the service's policy review cycle, or as required;
- notify parents/guardians at least 14 days before making any changes to this policy or its procedures.

**AUTHORISATION**

This policy was adopted by the Approved Provider of Elsa MacLeod Kindergarten in July 2018.

**ATTACHMENTS**

- Attachment 1: Parent/Guardian Authority to Share Child Images via Social Media
- Attachment 2: General Conditions and Guidelines for Social Media Use

**REVIEW DATE: AUGUST 2022**

Elsa MacLeod

kindergarten inc.

## Parent/Guardian Authority to Share Child Images via Social Media

I..... parent/guardian of .....  
(parent/guardian name) (child's name)

give permission for ..... to share the above named child's  
(name)

non- identifiable images via social media, .....  
(please specify i.e. Facebook, twitter, Instagram etc.)

Parent/Guardian - Name.....

Parent/Guardian - Signed..... Date.....

Elsa MacLeod

Copies to be retained by all parties named on this form and a further copy provided to Elsa MacLeod Kindergarten.

k i n d e r g a r t e n inc.

### General Conditions and Guidelines for Social Media Use

- Any proposal by staff or families for the use of social media to engage with an audience or stakeholder will be evaluated by Elsa MacLeod Kindergarten Director and Committee of Management before it is adopted.
- Elsa MacLeod Kindergarten employees are bound by all our policies, including, but not limited to: Code of Conduct Policy, Confidentiality and Privacy Policy, Complaints and Grievances Policy and ECA Code of Ethics. The values, personal and professional behaviour required under all of these policies apply to interactions or engagements on social media.
- Elsa MacLeod Kindergarten families are also bound by all our policies, including, but not limited to: Code of Conduct Policy and Confidentiality and Privacy Policy. The values and behaviour required under all of these documents applies to interactions or engagements on social media that apply to connections within the Kindergarten community.
- As is the case when speaking to someone face-to-face, over the phone or to a group in a public forum, Elsa MacLeod Kindergarten employees are required to exercise prudence, good judgement, respect, confidentiality and privacy when using social media.
- You are encouraged to contact Elsa MacLeod Kindergarten Director and Committee of Management if you identify an issue that Elsa MacLeod Kindergarten should be interested in or respond to.
- Any personal social media interactions using Elsa MacLeod Kindergarten's information communication technology assets, whether the interactions relate to Elsa MacLeod Kindergarten or not, are covered by this policy.
- Educators and staff are to use their own personal discretion when adding a family of the service as a 'friend' on Facebook. Elsa MacLeod Kindergarten does not recommend staff to add families of the service as they will be seen still as a representative of the service and held to the service's Code of Conduct on all posts to their private wall. It is extremely important not to post information about the Kindergarten, children or families on personal social media accounts. Families are asked to respect that staff may have a personal policy on adding families due to their professional philosophy and that the Service does not recommend staff to have families as friends on their private account.

#### **Reporting inappropriate use**

If you notice inappropriate content relating to Elsa MacLeod Kindergarten and/or its employees, stakeholders, family members, or individuals connected to Elsa MacLeod Kindergarten (including bullying and disclosing inaccurate, private, confidential or classified information), you should report the incidents to Elsa MacLeod Kindergarten's Director and/or President.

#### **Enforcement**

Policy violation by employees will be subject to disciplinary action, up to and including termination.

Violation by family members or individuals connected to an Elsa MacLeod Kindergarten service, will be subject to possible termination of enrolment and/or legal action.

**Remember that nothing is temporary online.** The virtual world is full of opportunities to interact and share with people around the world. It's also a place where nothing is temporary and there are no "take-backs." A lot of what you do and say online can be retrieved, even if you delete it — and it's a breeze for others to copy, save, and forward your information.

## Personal social media use

Commenting within social media is equivalent to commenting publicly on radio, television or at a public speaking engagement. As a member of the community, you have the right to make public comment and enter into public debate on political and social issues. There are circumstances, however, in which public comment is inappropriate unless you are specifically authorised by Elsa MacLeod Kindergarten's Director or Committee of Management.

These include circumstances where:

- the implication that the public comment, although made in a private capacity, is in some way an official comment on Elsa MacLeod Kindergarten activities or programs
- you are directly involved in advising or directing the implementation or administration of policy and the public comment would compromise your ability to do so.

Outside of these circumstances, if you comment or write about Elsa MacLeod Kindergarten as an employee, family member, or individual connected to an Elsa MacLeod Kindergarten service, observe the following guidelines:

- If your online profile in some way identifies you as an Elsa MacLeod Kindergarten employee, or a family member or individual connected to a Elsa MacLeod Kindergarten service, you should comply with this policy. It is recommended that you remove any reference to your employment at/or connection with Elsa MacLeod Kindergarten from your personal social networks.
- Make it clear that your comments are being made on your own behalf, not on behalf of Elsa MacLeod Kindergarten. You should not imply that you are authorised to speak on Elsa MacLeod Kindergarten's behalf and you must use a disclaimer. For example, "The views expressed in this post are my personal views only and do not necessarily reflect the views of Elsa MacLeod Kindergarten".
- Do not use your Elsa MacLeod Kindergarten email address to publish comments or engage socially online. The identification of an Elsa MacLeod Kindergarten email address linked to content online implies you are authorised to speak on Elsa MacLeod Kindergarten's behalf.
- Any online social media engagement should not compromise or interfere with your relationships or your work for Elsa MacLeod Kindergarten.
- Do not disclose or comment on any private, confidential or secure information. You must not publish private contact details or other personal or health information relating to any individual child or family. You must not post/identify photos or images taken of any children or individuals (outside of your personal family) without prior written consent while in attendance at an Elsa MacLeod Kindergarten service or related event, such as an excursion or service family events.
- Ensure comments are respectful of the community in which you are interacting online.
- Do not post, or respond to, any inappropriate content (material that is offensive, obscene, defamatory, harassing, threatening, discriminatory, intimidating or otherwise inappropriate). Engagement in any such behaviour is a breach of our Code of Conduct Policy.
- When accessing social media at work, you must do so in accordance with Elsa MacLeod Kindergarten's IT Policy (if applicable), which includes access and use of email and internet.
- It is critical that you show proper respect for the laws governing copyright and fair use or fair dealing of copyrighted material owned by others, including Elsa MacLeod Kindergarten's own copyrights and brands. You should never quote more than short excerpts of someone else's work, and always attribute such work to the original author/source. It is good general practice to link to others' work rather than reproduce it.
- If you make an error, be up front about your mistake. Address it quickly and immediately communicate the error to the Director and/or President of Elsa MacLeod Kindergarten.
- If someone accuses you of posting something improper, such as their copyrighted material or a defamatory comment about them, immediately communicate the issue to the Director and/or President of Elsa MacLeod Kindergarten.