



**Social Media Policy and Administrative Procedure  
#400.12**

<b>Adopted:</b>	June, 2023
<b>Last Reviewed/Revised:</b>	N/A
<b>Responsibility:</b>	Director of Education
<b>Next Scheduled Review:</b>	2027

**POLICY STATEMENT**

The Brant Haldimand Norfolk Catholic District School Board (BHNCDSB/School District) welcomes the responsible use of social media technologies and other forms of electronic communication to support learning and responsible digital citizenship, for school district business, and communication purposes. Social media usage must be undertaken in a manner that is respectful, privacy compliant and consistent with the role of school district staff, students, and parents/guardians as members of our Catholic learning community.

**APPLICATION AND SCOPE**

The use of social media is a complementary communication tool.

Social media should not be a substitute for direct communication or for what the School District views as the primary source of sharing information, which would be the Board and school websites, the automated information system, and one designated social media platform. Social media should be used to enrich the websites and to showcase the Board and its schools.

Social media is not intended to be used by the Board, schools, and staff as a means to discuss contentious, emotional or highly confidential issues. These issues should be dealt with face-to-face or by phone.

**REFERENCES**

- [Accessibility for Ontarians with Disabilities Act](#)
- [Copyright Act \(R.S.C., 1985, c. C-42\)](#)
- BHNCDSB Compassionate Care Guidelines
- BHNCDSB Social Media Guidelines
- [Digital Citizenship and Bring Your Own Device \(Administrative Procedure 600.04\)](#)
- [Education Act, R.S.O., 1990, c. E.2](#)
- Employee Code of Conduct
- Freedom of Information and Privacy
- [Human Rights Code, R.S.O. 1990, c. H.19](#)
- [Municipal Freedom of Information and Protection of Privacy Act \(M.F.I.P.P.A.\)](#)
- Ontario College of Teachers professional advisory “[Maintaining Professionalism – Use of Electronic Communication and Social Media](#)”
- [Personal Information and Protection of Electronic Documents Act \(P.I.P.E.D.A.\)](#)
- Privacy
- Privacy Breach administrative Procedure
- Professional Standards and Conflict of Interest #300.17
- [Information and Communications Technology Use #600.02](#)

**FORMS**

- 600.02.01F – Information and Communications Technology Use Acknowledgement Form



- 600.02.02F – Technology Use Agreement – Primary Students
- 600.02.03F – Technology Use Agreement – Junior Students
- 600.02.04F – Technology Use Agreement – Intermediate and Senior Students
- Consent or Limited Consent Form
- Privacy Breach Reporting Form

## APPENDICES

n/a

## DEFINITIONS

**Additional Affiliated Accounts:** Social media accounts affiliated with the Board/school, where the content focuses on a specific department, group, subject, classroom, etc. and are considered an extension of the school (i.e. School District Arts Twitter account, Leadership Twitter account, Secondary Athletics Facebook account, Secondary Art Class Instagram account). These accounts can be categorized in three ways:

1. Push/Broadcast Accounts: One-way communication from account to audience or an information portal that is not interactive and does not allow for users to post comments or content.
2. Learning Interactive/Engagement Accounts: Public or private accounts used for a learning activity that has a designated start and end time, i.e. Facebook community engagement project, etc.
3. Every-day Interactive/Engagement Classroom/Instructional Accounts: Everyday use accounts that allow for two-way communication between the account and audience that is interactive and allows for users to post comments, questions or content, i.e. Twitter, Facebook, Instagram, Pinterest.

**Administrators:** Administrators and Vice-Principals in a school.

**Blog:** A word that was created from two words: “web log.” Blogs are usually maintained by an individual or a business with regular entries of content on a specific topic, descriptions of events, or other resources such as graphics or video. “Blog” can also be used as a verb, meaning to maintain or add content to a blog.

**Board Sanctioned Social Media Platforms/Accounts at the Board Level:** Refer to the Board website’s [Social Media](#) page.

**Board Sanctioned Social Media Platforms/Accounts at the School Level:** Refer to the Board website’s [Social Media](#) page.

**Digital Citizenship:** The concept of educating technology users about appropriate and effective use of technology, and not to misuse it to disadvantage others.

**Live Streaming:** Means to broadcast live video content (i.e. an event) on the internet as it happens.

**Engagement:** Social media engagement is an umbrella term for actions that reflect and measure how much your audience interacts with your content and/or an individual’s activity on social media. Social media engagement can include likes, comments, and shares, but varies by platform.

**Social Media:** refers to all internet-based applications and technologies which provide for the creation, exchange or sharing of information, opinions, commentary, personal messages and other user generated content, including but not limited to the use of social networks, digital citizenship, digital footprint, social bookmarking blogging, tweeting, wikis, podcasts, video casts, video, audio, media, social bookmarking, postings through apps using mobile devices using iOS or Android operating systems (e.g. Facebook, Twitter, Instagram, Snapchat, Tumblr, YouTube, Vimeo, Google+ and Google Hangouts).



**Social Media Managers:** Staff that have administrative access to social media sites and are responsible for: managing administrative permissions for their sites; developing and implementing their site's social media strategy; and monitoring for positive or negative feedback.

**Electronic Communication:** refers to any written, audio, video, visual or digital communications occurring between employees or any one or more individuals through electronic means, including email, texting, and other messaging services whether or not such communications are internet based.

**User:** All employees, students, trustees, members of Board committees, school council chairs, parents/guardians, and all other persons given authorized access to the Board's computing and information technology facilities and resources are considered users. Users may access these tools from locations other than their work locations. Using Board-provided technology from the office, home or other location is using a corporate asset. Therefore, the Board, its employees and students are responsible for any misuse of its technology. If an employee sends personal views, they must provide appropriate disclaimers so that the remarks are not taken as representative of the Board.

**Prerequisites (or perks):** n/a

## ADMINISTRATIVE PROCEDURES

This administrative procedure has been developed to provide users an understanding of the impact of social media and electronic communications and their appropriate uses in order to ensure professional communication standards and to mitigate the school district's, employee's and student's exposure to risk.

While social media, both personal and professional purposes, has many advantages, professionalism remains a priority. Employees have a duty of loyalty to their employer; therefore, an employee's online conduct is subject to the same standards of conduct that ordinarily apply to their on and off-duty conduct.

This procedure and corresponding guidelines clarify user's responsibilities when posting material online and exchanging electronic communications with individuals like students, parents, or co-workers. It applies to social media use and other electronic communications by employees whether during the hours of work or at other times, on the district network or from outside the district network, and on district devices or personal devices. Users should be aware that there is not an expectation of privacy in social media use and electronic communications.

### No Expectation of Privacy

Users should understand that there is no expectation of privacy in the use of social media or electronic communications, and that online and other electronically recorded communications may potentially be read, accessed, or published by third parties or transferred to others without the knowledge or consent of the creator.

### Informed Consent

Users must adhere to the Board's consent process, including all required forms, before posting information about individuals (including but not limited to image/video/work/facts) to social media. If information has been posted/shared without consent, it is considered a privacy breach and staff should involve the Board's Privacy Officer.

For students, informed consent is required from their parents and/or guardian unless the student is over the age of 18. Staff must ensure that parents/guardians and students are aware of the social media platforms being utilized.

Verbal consent must be obtained from any adult (teacher, volunteer, other board staff member) whose photo, video footage and/or work is posted on social media. Exceptions include images of school administrators, managers, supervisors, senior leadership team and trustees that are taken during the course of their employment or photos taken at public events where there is no expectation of privacy. Users must be aware of imagery or words in the background of an image, video footage or work that is posted on social media and their implications.

Unless re-shared from a public media outlet post, student names should not be used in social media posts. The Board's practice is to de-identify all images when possible. There are exceptions:



- First name and last initial can be used if necessary. (Example: sharing class artwork, use first name and last initial.)
- First name and last name can be used if sharing images connected to an elected or prominent position if consent has been acquired. (Examples: sharing the image and name of newly elected student trustees; sharing images/information pertaining to a student academic or athletic award ).

Staff must never post live pictures or updates that disclose the location of students when offsite from BHNCD SB school spaces. Should staff post content that has acquired consent, the posts must remain non-identifying and cannot include personal information, identifiers, or locations, except as outlined within the consent form. This extends beyond pictures and includes dates, times, locations, geolocators and pin locations for future events and field trips. The only time the specific date and time of an event or location can be disclosed on social media is if it is open to the public.

## Privacy and Confidentiality

Any staff that uses social media to disclose confidential information in relation to their work, students, staff and colleagues at BHNCD SB are subject to the privacy and confidentiality terms in their employment agreements. This extends to BHNCD SB professional accounts (school and classroom/instructional and authorized BHNCD SB social media accounts) as well as personal, private, and anonymous social media accounts. Particular care must be taken with students and staff for whom there have been identified legal/safety concerns.

BHNCD SB is subject to the Municipal Freedom of Information and Protection of Privacy Act (MFIPPA). All staff are required to comply with the rules regarding the collection, use, retention, and disclosure of personal information at all times, including interactions and engagement through social media.

## Conflict of Interest

Sponsored content in relation to BHNCD SB is prohibited for all types of BHNCD SB social media accounts. Content that relates to BHNCD SB cannot be monetized. Endorsements of products or people that results in a personal gain, that has a monetary value or could result in a monetary value is also strictly prohibited. BHNCD SB social media accounts must not include any advertisements, logos (other than BHNCD SB authorized logos), testimonials or endorsements of any product or company, except for official partnerships.

## Reporting

In the event of a social media issue or concern, BHNCD SB staff should immediately report inappropriate/concerning online behaviour to their direct supervisor, manager or school administrator.

To support an investigation, BHNCD SB staff may collect evidence (screenshot or capture the image) while maintaining compliance with related Board policies and procedures.

School administrators, managers and supervisors are responsible for responding (involving appropriate staff) to social media issues or concerns brought forward by BHNCD SB staff, students, and community. If an issue is raised regarding a manager, supervisor, administrator, or member of senior leadership team, it must be raised to the next level of reporting supervisor.

## Non-compliance

Staff who do not comply with this Policy will be subject to appropriate consequences consistent with the Employee Code of Conduct . Consequences may include, but are not limited to, the following, either singularly or in combination depending on the individual circumstances:

- appropriate disciplinary measures, up to and including dismissal or termination;
- legal action and prosecution by the relevant authorities.

## ROLES AND RESPONSIBILITIES



## Trustees

- Adhere to the Social Media Policy and Administrative Procedure as outlined in the “All Employees” section.
- Entrust the implementation of this Policy to the Director of Education.

## Director of Education

- Provide system leadership to ensure implementation of this Policy and related Procedures.
- Allocate staff and resources to support the Social Media Policy, including any procedures aligned to the Policy.

## Superintendent

Support administrators, managers, and supervisors with investigating social media issues and devise an action plan for addressing any hurt, harm or reputational damage that has been done to students, community, staff or the board.

Review any concerns investigated by the school administrator, manager or supervisor to ensure social media issues are handled appropriately.

Collaborate with the Manager of Communications and Community Relations.

Support school administrators, managers and/or supervisors when collaborating with the Human Resources Department on matters pertaining to staff professional misconduct, and/or consult with Legal and Governance Department on matters that may involve legal action or prosecution by relevant authorities.

Facilitate professional learning with administrators, managers and/or supervisors to ensure compliance with BHNCD SB policies and professional roles and responsibilities, including establishing a collective understanding of the social media administrative procedure and practices for departments and/or schools.

In collaboration with the Manager of Communications and Community Relations | Privacy Officer, review, decide, and communication in writing, all requests for the creation/use of student social media accounts as part of instruction.

## School Administrator

School administrators are responsible, as the school social media manager, for contributing to a positive, celebratory faith-centred, online environment in their schools.

All official school-level social media sites account login credentials must be the knowledge of the school administrator.

All official school-level social media sites are to be maintained by a school administrator/supervisor or a school/district employee delegated by the school administrator/supervisor. Responsibility is not to be delegated to a parent volunteer or student, as the established social media site will represent the school and BHNCD SB. Only with advance permission from the Director of Education, will a Board/school social media account be facilitated by an individual/organization other than described. An agreement/contract must be established before a non-BHNCD SB individual/organization begins facilitation of the account.

If online issues present, the school administrator should conduct one or more of the following, dependent on the content/severity of the activity:

- Take the conversation offline.
- Report the issue to the school Superintendent.
- Report the issue to the Manager of Communications and Community Relations.
- Follow the Board’s Privacy Breach Protocol (if applicable).
- Share BHNCD SB Social Media Policy with online best practices with individuals involved.



## School Administrators will:

- Request that staff provide notification regarding BHNCD SB social media accounts that exist. Administrators are asked to track these social media accounts annually and keep them on file for school records.
- Report any concerns raised by community, families, students, or staff regarding social media posts to their field Superintendent and collaborate with the Manager of Communications and Community Relations, Privacy Officer.
- Collect evidence of any concerns or inappropriate social media issues.
- Restrict any use of social media in the classroom or close a school and classroom social media account that is deemed inappropriate.
- Communicate and collaborate with the Human Resources Department on any issues pertaining to professional misconduct with staff implicated.
- Facilitate support or direction for professional learning with all school staff to ensure compliance with BHNCD SB policies and professional duties and responsibilities.

## Managers and Supervisors

Managers and supervisors are responsible, as the department/area social media manager, for contributing to a positive, celebratory faith-centered, online environment in their schools.

All official department/area-level social media sites account login credentials must be the knowledge of the manager/supervisor.

All official department/area-level social media sites are to be maintained by a manager/supervisor or a school/district employee delegated by the manager/supervisor. Responsibility is not to be delegated to a parent volunteer or student, as the established social media site will represent the school and BHNCD SB. Only with advance permission from the Director of Education, will a Board social media account be facilitated by an individual/organization other than described. An agreement/contract must be established before a non-BHNCD SB individual/organization begins facilitation of the account.

## The manager/supervisor will:

- Request that staff provide notification regarding BHNCD SB social media accounts (authorized and school and classroom social media accounts) that exist. Managers and supervisors are asked to track these social media accounts annually and keep them on file for department records.
- Report any concerns raised by community, families, students, or staff regarding social media posts to the next level of reporting supervisor and collaborate with the Manager of Communications and Community Relations, Privacy Officer.
- Collect evidence of any concerns or inappropriate social media issues.
- Restrict any use of social media in the department or close a department/area social media account that is deemed inappropriate.
- Communicate and collaborate with the Human Resources Department on any issues pertaining to professional misconduct with staff implicated.
- Facilitate support or direction for professional learning with all department staff to ensure compliance with BHNCD SB policies and professional duties and responsibilities.

If online issues present, the manager/supervisor should conduct one of the following, dependent on the content/severity of the activity:

- Take the conversation offline.
- Report the issue to the school Superintendent.
- Report the issue to Communication Services.
- Follow the Board's Privacy Breach Protocol (if applicable)
- Share online best practices with individuals involved.





## **Communication Services**

Communication Services staff are expected to:

- Monitor official School District social media channels as the social media manager.
- Respond to requests for information via the social media channel, should the account be set up to receive communication.
- Ensure that current and relevant content is posted to each channel.
- Facilitate social media training opportunities for staff and others (at the request of the school administrator).
- Respond accordingly to inappropriate online activity.
- Support senior staff in respect to social media issues/concerns.
- Involve the appropriate law enforcement agency when required.

## **All Employees**

Users are responsible for their electronic communications and for any content that they publish online, whether it is under their own name, an alias or is anonymous, and must ensure it complies with applicable laws, this Policy and Administrative Procedure, and professional standards of conduct, including those of the Ministry of Education, OECTA, OSSTF, OCT, and any other organization that guides its members in respect to appropriate use of social media and communications.

This expectation of conduct includes a responsibility to ensure that engagement with any site that is created or used by an employee is monitored, administered, and moderated to ensure compliance with this Policy and all Regulations.

A personal account for staff or a user on behalf of a BHNCD SB social media account, whether the individual identifies their place of work or not, is considered public. Staff must always consider their professional standards of practice. Board or school personnel may address an individual's choice of content that contradicts the Board's mission and values.

Inappropriate communications using social media or other electronic devices are subject to the same policies and principles as other forms of work-related misconduct.

## **Tragic Events and Social Media Use**

All employees must the standards outlined in the Immediate Communication Section of the BHNCD SB Compassionate Care Guidelines including refraining from posting sensitive information until the proper communication chain has been completed.

Before posting information about a tragic event, always consult with your supervisor.

## **General Standard of Conduct and Use of Social Media for Employees**

Anything posted online by employees or communicated electronically to non-school district parties may be perceived to be an official representative of the School District. Therefore, employees are expected to model an appropriate online presence and to exercise good judgment to ensure that postings and communications do not reflect negatively on the employee's professional reputation or that of the School District. This may require employees to take reasonable steps to monitor and exercise appropriate controls over their online presence, including by requesting that friends and third parties not post photos, videos or other online content depicting or pertaining to the employee that is not appropriate to the employee's role in the School District.

What is inappropriate in the workplace is also inappropriate online, and when expressed in other electronic communications. Electronic communications and online posts involving students, co-workers, or parents should always be professional in nature. Incidental personal use of district information technology, consistent with these guidelines, is permissible, provided it is not performed during work periods.



Employees must ensure that any information they post online or distribute through other electronic communications does not breach the privacy or confidentiality of another person. The use or disclosure of “personal information” of co-workers, students, or parents/guardians in connection with social networking websites and services and through other electronic communications may be subject to the Freedom of Information and Protection of Privacy Act (FIPPA), the Municipal Freedom of Information and Protection of Privacy Act (MFIPPA), and/or the Personal Health Information Protection Act (PHIPA) (For example, photos of co-workers, students or workplace events should not be posted online without the consent of the affected individuals and postings should never include full name unless direct written consent has been acquired). Consent should ordinarily be sought before posting any person’s image or information online.

In their use of social media, employees must respect and model copyright and fair use guidelines. Employees must not plagiarize and must properly acknowledge the authorship of materials posted by them. When using a hyperlink to attribute authorship, employees must be sure that the content of the linked site is appropriate and adheres to School District policies and/or administrative procedures. Employees must recognize the importance of original social media posts or ‘reposting’ other’s work rather than re-using content found as their own.

When posting online content employees should not speak on behalf of the School District or use School District logos on private social media sites unless specifically authorized to do so by the School District’s Communication Services department.

Employees should pay particular attention to the privacy settings for their personal social media page. Some content that is appropriate for personal friends, is not appropriate for circulation to work colleagues, parents/guardians, and students; however, employees should not look to the privacy settings on their personal social media page as creating anonymity or as a guarantee that postings will not be shared more broadly.

To maintain a professional and appropriate relationship with students, district employees should not ‘friend’ or ‘follow’ students on their personal social media sites, especially if there is a student/teacher relationship, and should not request or accept any students as ‘friends’ or ‘followers’ on social media sites. Employees should also refrain from interacting with students on social media sites for purposes not related to the delivery of the student’s educational program.

Employees should ask friends not to tag them in any photos or videos without their permission and remove anything that is not appropriate to the employee’s role in the School District, particularly for social media sites that do not have appropriate privacy settings.

Confidential/sensitive information pertaining to the employee’s role in the School District or information involving the operation of BHNCDNB that is/was obtained through the course of employment shall not be disclosed on social media sites.

[Information and Communications Technology Use #600.02](#) provides standards associated with and relevant to these guidelines.

The School District recognizes that there are potential benefits to the use of social media and other electronic communications as an educational tool; however, employees must always ensure that social media and electronic communications use for communicating with parents and students is consistent with appropriate professional boundaries and the policies, procedures, and practices of the School District.

Student safety and supervision are top priorities. Staff use of social media and online activities must not interfere with student safety, the performance of their job or their effectiveness as an employee of the School District. Staff use of social media must respect School District’s time and resources.

It is the recommendation of the Board that employees do not have ‘blended’ social media accounts meaning an account that is shared for professional and personal posts. Establishing different professional and personal social media accounts is the recommended way to support privacy and safety. It is important to note that even if a staff member has individual professional and personal social media accounts, what they do online, regardless of the account, is a reflection of them as an employee and will be considered in accordance with Board policy.





Communications with students and parents through social media and through other electronic communications must be formal, courteous, and respectful and relevant to school related matters. They should not involve or be linked to social media sites of a personal nature that may be maintained by the employee.

Only School District authorized social media tools are to be used for online communication with students and parents. Should employees wish to create other sites and/or use other online forums for communicating with students or parents, they must obtain approval from their school Administrator AND the tool must be on the Information Technology's approved tool list.

All school-level professional social media sites are to be maintained by a school administrator/supervisor or a school/district employee delegated by the school administrator/supervisor. Responsibility is not to be delegated to a parent volunteer or student, as the established social media site will represent the School District. All official school social media account login credentials must be shared with the school administrator.

Employees are responsible for ensuring that any use of social media or other electronic communications with students complies with School District policies. Any personal student information that is posted to social media websites or circulated in other electronic communications while the student is under an employee's supervision must be compliant with the permission granted by the student's parents/guardians in a signed School District's Consent or Limited Consent form.

The School District is not responsible for social media accounts established and maintained by school or district RCPIC or SPCs.

The School District reserves the right to remove, disable and provide feedback regarding professional social media sites that do not adhere to the law or do not reasonably align with these procedures.

Employees are required to monitor contributions to any site they create, administer or moderate for professional purposes. Posts that are not in keeping with the spirit of the page should be removed immediately.

Employees must report, immediately, any occurrence or observation of inappropriate content posted to social media.

Employees must follow the School District's Privacy Breach procedure.

Staff should not, without prior written permission from a Superintendent of Education, participate in the creation and/or use of student social media accounts as part of instruction.

### **General Standard of Conduct and Use of Social Media for Students**

The School District appreciates the online support and sharing of good news by students and trust that all individuals converse/engage in a way that is appropriate, kind, and reflects the values upheld by our Catholic Learning Community.

Student use of social media accounts, whether personal or instructional based, during class time shall be at the discretion of the school administrator and teacher, respectively.

Students are encouraged to maintain their privacy settings to the highest level of security and obtain guidance from an adult when altering security settings.

Live streaming is only permitted during public events with the permission of the event organizer.

Online activities related to school are an extension of the classroom and subject to all school and district expectations. Student online behavior should reflect their school and/or School District's Code of Conduct.

Students should report any content or behavior through school-related social media that is not suitable for the school environment.

Students should consider the potential consequences of what they post online. Students should only post what they want friends, peers, teachers, or a future employer to see. Links to other websites should be appropriate for their school setting.



Students should be safe online; they should never give out personal information, including last names, birthdates, phone numbers, addresses, and pictures. Students should not share their password with anyone.

Students must not intentionally misrepresent themselves or use someone else's identity.

Students are responsible for the work they create. They should not use intellectual property without permission. When paraphrasing another's idea(s), the sources must be cited.

Pictures are protected under copyright and protection of privacy laws.

Students must adhere to the Information and Communications Technology Use Acknowledgement.

All individuals are encouraged to report inappropriate online activity to help ensure, and secure, the benefit, safety, and positive learning environments for all.

### **General Standard of Conduct and Use of Social Media for Parents/Guardians**

The School District appreciates the online support and sharing of good news by parents/guardians and trust that all individuals converse/engage in a way that is appropriate, kind, and reflects the values upheld by our Catholic Learning Community.

Parents/guardians should consider the potential consequences of what they post online. All information posted, or online dialogue engaged in, will be considered, and handled the same way as if the information/conversation took place at the school. Individuals are culpable for their online activity.

Parents/guardians must not intentionally misrepresent themselves or use someone else's identity.

Parents/guardians should not use intellectual property without permission. When paraphrasing another's idea(s), the sources must be cited.

Parents/guardians should not post the information or image of other individuals without permission. This includes images from sporting events, school-sanctioned events, class pictures, etc. Although some of these events occur in a public forum, a certain level of privacy, by individuals, is expected.

Parents/guardians should not engage in online conversations, the sharing of information, or post derogatory comments about staff or students. If parents/guardians have issues or concerns, the School District asks that you reach out to the appropriate staff member by contacting the school and have a conversation. If a resolution is not achieved, parents/guardians are asked to follow our regular escalation procedure.

All individuals are encouraged to report inappropriate online activity to help ensure, and secure, the benefit, safety, and positive learning environments for all.

### **General Standard of Conduct and Use of Social Media for Regional Catholic Parent Involvement Committee and Parent Council Members**

Members are held to the same expectations as parents/guardians.

Members are encouraged to request that the school's social accounts support and share information about the work/activities of the committees.

Members do not have school-sanctioned social media accounts and if information is shared on personal accounts, it should be clear that the school social media account is the official account of the school. The School Board strives to ensure that school sanctioned accounts are accessed as the primary source of information.



All individuals are encouraged to report inappropriate online activity to help ensure, and secure, the benefit, safety, and positive learning environments for all.