

Social Media and Networking Policy

Last Review: 5/9/2024	Constructed / Reviewed by:
Next Review: 4/9/2025	Approval Required:
	Board Sign Off Date: 5/9/2024

1. Statement of Context and Purpose

- 1.1 Social media and social networking have become an integral part of society, but is an area where a number of issues and risks arise. EISM requires EISM Member Schools to take great care in order to act in the best interests of the EISM Member School and EISM when participating in social media and taking or using images of children.
- 1.2 The purpose of this Policy is to set out EISM’s expectations and requirements for EISM Member Schools regarding the use of social media and the taking or using of images of children.

2. Application

- 2.1 This Policy applies to all employees, contractors and authorised personnel of EISM.
- 2.2 To properly implement this Policy, all EISM Member Schools must ensure that they implement their own Social Media and Networking Policy or equivalent.

3. Reference Points/Background Papers

- 3.1 *Privacy Act 1988 (Cth)*;
- 3.2 *Copyright Act 1968 (Cth)*;
- 3.3 *Occupational Health and Safety Act 2004 (Vic)*;
- 3.4 *Child Safety and Wellbeing Act 2005 (Vic)*;
- 3.5 Ministerial Order No. 1359 – Implementing the Child Safe Standards – Managing The Risk Of Child Abuse In Schools And School Boarding Premises;
- 3.6 Privacy Policy;
- 3.7 Employment Practices Policy and Procedure; and
- 3.8 Harassment, Discrimination and Grievance Policy and Procedure.

4. Definitions

- 4.1 **Social media** includes social media networks (such as but not limited to Instagram, TikTok, Facebook, Twitter and LinkedIn), video/photo sharing sites (such as but not

limited to YouTube and Instagram), chat rooms, video chat (such as but not limited to Skype), online forums and discussion groups, wikis, blogs, micro-blogging tools (such as but not limited to Tumblr) and any other website that facilitates the:

- 4.1.1 publishing of user generated content and opinion (such as traditional media news websites);
 - 4.1.2 opportunity to connect with others online;
 - 4.1.3 creation and sharing information and ideas; and
 - 4.1.4 development of relationships and networks.
- 4.2 **Electronic communication and information resources** includes, but is not limited to: internet, email, instant messaging, voicemail, all EISM supplied computers and software, digital cameras, mobile phones, USB memory sticks and other storage devices.
- 4.3 **Supervisor** means an individual who has been delegated the authority to be responsible for another employee of the EISM Member School who is enacting EISM business in respect of specified workplace matters and/or decisions.
- 4.4 **EISM personnel** means all employees, contractors and other authorised personnel of EISM.

5. Responsibilities

5.1 Use of EISM's electronic communication and information resources

5.1.1 EISM personnel and employees, contractors and other authorised personnel of a EISM Member School must not use EISM computer systems or any equipment owned by EISM to access social media, unless they have prior permission from their Supervisor and access is for designated EISM business.

5.1.2 Personal use of social media by EISM personnel or an employee of an EISM Member School in their private capacity and using their own computer systems and equipment is not a matter covered by this Policy.

5.2 Communications with current students and current parents

EISM employees and contractors must not use social media to connect or communicate with current students and current parents unless they have prior permission from their Supervisor and communication is for designated EISM business.

5.3 Communications with former students and former parents

EISM personnel and employees, contractors and other authorised personnel of an EISM Member School are advised to use professional discretion and seek school guidance as appropriate before communicating with former students and former parents on social media.

5.4 Disclosure of confidential and/or sensitive information

EISM personnel and employees, contractors and other authorised personnel of a EISM Member School must not, under any circumstances, disclose or refer to any information through social media that relates to EISM or a EISM Member School, students or colleagues that is confidential, proprietary or privileged.

5.5 **Disparagement, bullying and harassment over social media**

5.5.1 EISM personnel and employees, contractors and other authorised personnel of a EISM Member School must not, on social media:

- (a) disparage or speak adversely about EISM, EISM Member Schools and their staff, students or colleagues; or
- (b) bully, harass or make discriminatory remarks about EISM, EISM Member Schools and their staff, students or colleagues.

5.5.2 EISM personnel and employees, contractors and other authorised personnel of a EISM Member School should consult their own EISM Member School's Human Resources Manager for further guidance.

5.6 **Communicating on behalf of EISM and EISM Member Schools**

5.6.1 EISM personnel and employees, contractors and other authorised personnel of an EISM Member School must not speak on behalf of EISM or EISM Member Schools, or imply that they are speaking on behalf of EISM or an EISM Member School, on social media.

5.6.2 In some circumstances, a Supervisor may give an authorisation as a delegated authority or from time to time to speak on behalf of EISM and a EISM Member School. In such circumstances, prior **written** authorisation of the Supervisor is required.

5.7 **Privacy settings**

5.7.1 EISM personnel and employees, contractors and other authorised personnel of a EISM Member School are reminded that they should not have any expectations of privacy on social media. Even if it is intended that content be private, it may unintentionally enter the public domain and be viewed by colleagues, the media, students and families of students of EISM Member Schools.

5.7.2 Inappropriate content and information on social media, which is capable of being connected with EISM or a EISM Member School, may adversely affect EISM and EISM Member School, student or a colleague.

5.7.3 Against that background, EISM strongly recommends EISM personnel and employees, contractors and other authorised personnel of EISM Member School consider all options and strategies to restrict social media activity being distributed to unintended audiences, by for example, adjusting privacy settings.

6. Position Statement regarding taking/using images of children

- 6.1 EISM takes action photographs and video images during sports events for promotional purposes, which may appear on EISM social media or website platforms. Where appropriate, it is mandatory for individuals to obtain permission from a child's parent/guardian before using an image of a child that is not their own and indicating how that image will be used.
- 6.2 To respect people's privacy and reduce the risk of inappropriate or illegal use of images, we do not allow camera phones, videos or cameras to be used inside changing areas, showers and toilets which we control or which are used in connection with our sport.
- 6.3 EISM Member Schools use their own photographers at events. These photographers should be clearly identifiable by wearing colour vests. These photographers are used at the discretion of EISM Member Schools at sporting events.
- 6.4 EISM requires that, prior to providing EISM with any images, Member Schools will have obtained the necessary consent of children in the image (from their parent/guardian) for the Member School and EISM to capture and publish the image.
- 6.5 When using a photo of a child, EISM will not publish personal information, such as residential address, email address or telephone number. EISM will not provide information about a child's hobbies, interests, or other information that allows the child to be identified.
- 6.6 EISM will only use images of children that are relevant to sport and will ensure that they are suitably clothed in a manner that promotes participation in the sport.
- 6.7 If any person has concerns or complaints around the use of inappropriate images or inappropriate behaviour in obtaining images, please contact the EISM Executive Officer.

7. Consequences of a Breach of this Policy

- 7.1 EISM emphasises the need for EISM personnel or other staff conducting EISM business to comply with the requirements of this Policy. Any EISM personnel or employees, contractors or other staff conducting EISM business found to be in breach of the requirements of this Policy may be subject to disciplinary action. Such action will be determined by the EISM Member School in consultation with EISM.

8. Implications for practice

8.1 EISM Board/EISM Member School Principal Level

To properly implement this Policy, EISM, the EISM Board and/or the Principal of a EISM Member School must ensure;

- 8.1.1 that this Policy is endorsed on an annual basis;

- 8.1.2 that copies of this Policy are made available to employees, for example, on EISM and EISM Member School intranet,
- 8.1.3 that this Policy is incorporated into EISM's record of current policies;
- 8.1.4 that this policy is incorporated into EISM's induction program, to ensure that all employees are aware of the Policy, have read and understood the Policy, and acknowledge their commitment to comply with the Policy; and
- 8.1.5 that periodic training and refresher sessions are administered to all employees of EISM in relation this Policy.

8.2 **At Other Levels**

- 8.2.1 To properly implement this Policy, all EISM Member Schools must ensure:
 - (a) that they will abide by this Policy and assist EISM in the implementation of this Policy; and
 - (b) that they notify EISM if it becomes aware of a breach of this Policy.
- 8.2.2 EISM will require Member Schools to sign an annual attestation of compliance with this policy.