

Book	Policy Manual
Section	800 Operations
Title	Center (School) Social Media
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Purpose

The purpose of this policy is to establish the process and standards for approval and operation of center (school)-owned social media accounts, and to identify the differences between personally owned social media accounts and those maintained by the center (school).

Definitions

Social media - a category of Internet-based resources that integrate user-generated content and user participation to share information, ideas, personal messages and other content, including photos and videos. Social media includes **social networks**, which are online platforms where users can create profiles, share information and personal messages, and connect with others.

Center (School)-owned social media account - a social media account, regardless of platform, that is approved by the Joint Operating Committee and operated by a designated center (school) employee(s), and is designed to further the educational mission of the center (school) by providing information to the school community and general public.

Personal social media account - a social media account, regardless of platform, that is attributed to and operated by an employee, individual Joint Operating Committee member or student for personal use and is not approved by the Joint Operating Committee as an official communications channel of the center (school).

[Choose this option if center (school) establishes one or more social media accounts as a designated public forum and allows comments on posts]

{X} Designated public forum - created when a center (school)-owned social media account is intentionally opened for use by the public as a place for expressive activity where members of the public may communicate, post or comment on information, subject to viewpoint neutral rules designated by the Joint Operating Committee. In terms of social media, this would include the ability of public users to comment on or reply to social media posts, pictures, or videos.

[Choose this option if center (school) establishes social media accounts as a nonpublic public forum which disables the ability to comment on posts for one or more accounts]

{ } Nonpublic forum – created when a center (school)-owned social media account enables members of the public to read and receive center (school) information, but the center (school) has not designated opportunity for expressive activity by the public, and no commenting or posting of information by members of the public is permitted. In terms of social media, the ability to comment, post or reply is disabled on the center (school)’s account for public users.

Authority

The Joint Operating Committee shall approve all official social media accounts created and/or maintained as center (school)-owned accounts.^[1]

All center (school)-owned social media accounts shall display the official name

{ } and logo

of the center (school).

[Choose one or both of the appropriate options on forum, in consultation with school solicitor – the center (school) may designate on the platform which forum type is applicable for the account]

{X} The Joint Operating Committee establishes that center (school)-owned social media accounts may operate as a **designated public forum**, where the public may comment and interact with information posted by the center (school), subject to the Joint Operating Committee’s established rules.

{ } The Joint Operating Committee establishes center (school)-owned social media accounts as a **nonpublic forum** and directs center (school) staff to disable functions allowing public users to comment or post information on center (school)-owned social media accounts.

[Choose this option and the listing if the center (school) establishes one or more accounts as a designated public forum]

{X} The Joint Operating Committee approves the following rules for public interaction with center (school)-owned social media accounts and directs staff to post this information on the center (school) website and all social media accounts:

The center (school) encourages community members to respond to posts and share comments that are constructive and courteous toward the school community. Statements and opinions expressed by visitors to the account do not reflect the opinions of the center (school). Questions regarding information should be directed to the building administrator or to the Administrative Director’s office for center (school)-wide information. The center (school) shall review comments and may remove comments which:

1. Are profane, vulgar, harmful to minors or obscene, in accordance with Joint Operating Committee policy.^[2]
2. Contain threats or contain personal attacks on individuals in the school community.

3. Promote, suggest or encourage illegal activity or incite violence.
4. Promote or endorse commercial products, services or businesses.[3]
5. Contain confidential information.
6. Contain false or libelous statements.
7. Contain hate speech directed at a protected class of individuals, in accordance with Joint Operating Committee policy on discrimination and harassment.[4][5]
8. Are spamming in nature (same comment posted repeatedly).

Delegation of Responsibility

The Joint Operating Committee designates the

☒ Administrative Director or designee

☐ Communications Director

☒ Director of Technology

☐ Other _____

to oversee all center (school)-owned social media accounts and serve as the primary contact person for center (school)-owned social media accounts.

The Administrative Director or designee shall notify students and staff about this policy through employee and student handbooks, posting on the center (school) website and by other appropriate methods.

All center (school) staff assigned to monitor and maintain center (school)-owned social media accounts shall receive training on:

1. Regularly reviewing center (school)-owned social media accounts, in coordination with the center (school)'s chief communications representative, to update, remove and/or correct information.[6]
2. Complying with confidentiality provisions of student and staff information, in accordance with applicable law, regulations and Joint Operating Committee policy and administrative regulations.[7][8]
3. Monitoring content for confidentiality and intellectual property violations, documenting potential violations, and notifying appropriate center (school) staff to consider further action.[7][8][9]
4. Monitoring content for web accessibility standards and responding to public requests for accommodations.[2][4][5]

[Choose this option if the center (school) establishes a designated public forum]

5. ☒ Monitoring public comments and responding, where appropriate, with clarification or redirection to additional information.

[Choose this option if the center (school) establishes a designated public forum]

6. ☒ Monitoring public comments according to the Joint Operating Committee's established rules, documenting potential violations, and notifying appropriate center (school) staff to consider further action. Staff shall be provided training to assess comments in a viewpoint neutral manner, based on the Joint Operating Committee's approved rules, regardless of the specific subject matter of comments.

[Choose this option if the center (school) establishes a designated public forum]

☒ The Joint Operating Committee authorizes designated center (school) staff maintaining center (school)-owned social media accounts to remove individual posts or comments by public users that violate the established social media rules of this policy. The Joint Operating Committee directs that review and consideration of posts or comments shall not discriminate on the basis of content or viewpoint, and staff must always be able to articulate the reason for removing a specific post, in accordance with Joint Operating Committee policy. Staff may consult with the Administrative Director or designee and the school solicitor in determining appropriate actions. Posts and comments may not be removed solely because they are critical of the center (school) or center (school) leadership, because they promote an unpopular opinion, or because of their viewpoint if the post or comment otherwise complies with the established social media rules.

[Choose this option if the center (school) establishes a designated public forum]

☒ Designated center (school) staff may not block users from accessing or commenting on center (school)-owned social media accounts unless the outside account is identified as a security or system threat or spam account. Staff may consult with the Administrative Director or designee and the school solicitor in determining appropriate actions.

Guidelines

Posting of Personally Identifiable Information

The Joint Operating Committee authorizes posting of student images in photos or videos depicting the educational process or center (school)-related events on center (school)-owned social media accounts, unless the students' parents/guardians have opted out of sharing directory information under the Family Educational Rights and Privacy Act and Joint Operating Committee policy.[7][8][10][11]

☒ or have declined to sign and return the center (school)'s notice of photography permission form.

The Joint Operating Committee prohibits posting of other personally identifiable information of students on center (school)-owned social media accounts without the consent of the parent/guardian, in accordance with applicable law, regulations and Joint Operating Committee policy and administrative regulations.[7][8]

The Joint Operating Committee prohibits posting of staff images in photos or videos when a staff member has submitted a request to the Administrative Director or designee that their image not be posted publicly online.

☒ The Joint Operating Committee directs center (school) staff to post images and information to social media accounts in a manner that protects the safety and security of students and staff, such as posting images without identification.

Accessibility

The Joint Operating Committee directs center (school) staff who maintain center (school)-owned social media accounts to post content that is accessible to individuals with disabilities, to the greatest extent possible based on the limitations of the platform. This shall include, but is not limited to:[4][5][12][13][14][15]

1. Including alternate text descriptions or captions for images.
2. Including captions for video content.
3. Avoiding text that is posted as an image.
4. Creating links and attachments in formats that are accessible to screen readers and other assistive technology.
5. Formatting text so that it is accessible to screen readers and other assistive technology.

All center (school)-owned social media accounts shall contain clear contact information that may be used by members of the public to request accommodations or assistance.

Intellectual Property Rights

The illegal use of copyrighted, branded or trademarked materials or trade secrets is prohibited on center (school)-owned social media accounts. All content shall be subject to copyright fair use guidelines and applicable laws, regulations and Joint Operating Committee policy and administrative regulations.[9]

Connecting with Other Social Media Accounts

Content or information posted to center (school)-owned social media accounts shall not be connected to other social media accounts through linking or tagging if the outside account is for a commercial application, product or service and the center (school) or its employees would receive financial or other compensation as a result of the connection.

{ } When an official Joint Operating Committee-approved corporate sponsorship or partnership includes connecting with the sponsor on center (school)-owned social media accounts through linking or tagging, such connections shall be addressed in accordance with the provisions of the approved contract or partnership.

Center (School)-owned social media accounts shall not be connected to social media accounts of individual students through linking or tagging.

{X} Center (School)-owned social media accounts may be connected through linking or tagging to social media accounts of center (school)-related groups when the content or information has been reviewed and approved by the center (school)'s chief communications representative.

Personal Social Media Accounts

The center (school) shall not authorize, endorse or participate in posting on private social media accounts of individual Joint Operating Committee members or center (school) employees.

Joint Operating Committee members and employees are strongly encouraged to use privacy settings on social media accounts and to clearly identify that it is their personal social media account and that it does not officially represent the Joint Operating Committee or center (school).

In accordance with Joint Operating Committee policy establishing professional boundaries, center (school) employees should only communicate with students through center (school)-provided communication devices or platforms, and shall not follow, accept or make requests to connect or be friends with current students on personal social networking or social media platforms.[16]

The center (school) respects employees' freedom of expression. The center (school) does not actively monitor personal social media accounts of current employees; however, the center (school) reserves the right to address employees' job-related speech or employee speech posted on social media that has the potential to affect the center (school)'s operations. Speech that takes place off-site and on an employee's own time, including posting on personal social media accounts, may be addressed if the center (school) establishes that the employee's expression infringed on the interests of the center (school) in promoting the efficient and effective functioning and educational purpose of the center (school). If employee speech or expression would violate law or Joint Operating Committee policy in a traditional forum, it is also prohibited in an online forum. When an employee speaks as a citizen on a matter of public concern, the center (school) shall consult with the school solicitor in determining the appropriate course of action, in accordance with applicable law, regulations and Joint Operating Committee policy.[17][18][19][20][21][22]

Student use of personal social media accounts shall be addressed in accordance with applicable Joint Operating Committee policies and administrative regulations related to student conduct, expression and students' individual rights and responsibilities. In accordance with Joint Operating Committee policy, the center (school) shall ensure that students are provided education on network etiquette and appropriate online behavior for students, including interaction with other individuals on social networking websites and in chat rooms, and cyberbullying awareness and response.[2][4][23][24][25][26][27][28]

Consequences

A center (school) employee who violates this policy may be subject to disciplinary action, up to and including termination, in accordance with applicable law, regulations and Joint Operating Committee policy and administrative regulations.[16][21][29]

1. 24 P.S. 1850.1
2. Pol. 815
3. Pol. 913
4. Pol. 103
5. Pol. 104
6. Pol. 911
7. Pol. 113.4
8. Pol. 216
9. Pol. 814
10. 20 U.S.C. 1232g
11. 34 CFR Part 99
12. 42 U.S.C. 12101 et seq
13. 29 U.S.C. 794
14. 28 CFR 35.160
15. Pol. 103.1
16. Pol. 824
17. 24 P.S. 1122
18. 24 P.S. 2070.1a et seq
19. 22 PA Code 235.1 et seq
20. U.S. Const. Amend. I
21. Pol. 317
22. Pol. 320
23. 24 P.S. 1303.1-A
24. 47 U.S.C. 254
25. Pol. 218
26. Pol. 220
27. Pol. 235
28. Pol. 249
29. Pol. 317.1
- Knight First Amendment Inst. at Columbia Univ. v. Trump, 928 F.3d 226 (2d Cir. 2019)
- Davison v. Randall, 912 F.3d 666 (4th Cir. 2019)
- Garcetti v. Ceballos, 547 U.S. 410 (2006)
- Mike Campbell v. Cheri Toalson Reish, 986 F.3d 822 (8th Cir. 2021)
- Pickering v. Board of Education, 391 U.S. 563 (1968)
- Connick v. Myers, 461 U.S. 138 (1983)
- Rankin v. McPherson, 483 U.S. 378 (1988)
- Pol. 801