



DISTRICT OF COLUMBIA
PUBLIC SCHOOLS

Office of the Chief of Staff

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Social Media Policy

Chancellor's Directive #265

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1/18/17

Chancellor's Signature and Date

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I. Executive Summary

Introduction

Social media can serve to enhance communications and drive student achievement by providing educational and professional development benefits. As social media continues to become more prevalent in our culture as a resource for sharing news, knowledge and other information, the District of Columbia Public Schools (DCPS) has crafted this social media policy to help guide its employees in both effective and ethical social media practices. This policy will deliver DCPS guidance on social media engagement. It will also discuss data security and compliance considerations but will not deliver DCPS' comprehensive policy on data security and compliance. Please view DCPS' Data Security and FERPA Compliance Policy for a complete guide on data security, internet protocols and technology guidelines.

Purpose

This policy provides a set of guidelines for social media use by DCPS employees, including communications by employees under professional and personal usernames and handles in online communities. Since this policy does not cover every possible situation that an employee may encounter via social media and participation in online communities, employees are encouraged to exercise caution, sound judgment and common sense when using social media.

Moreover, this policy is not intended to infringe on an employee's right to engage in certain activities related to union membership. Employees may still use social media to engage in protected union activity. All DCPS employees shall be subject to the terms and conditions outlined in this policy as well as those outlined by the Office of the Chief Technology Officer (OCTO).¹ Please familiarize yourself with the contents of this policy before engaging in any social media use associated with DCPS.

Road Map

The first section lays out general guidelines on professional versus personal social media use. This section also lays out standards on monitoring social media use and employee responsibilities for reporting violations in social media use. The next section covers the do's and don'ts of social media behavior. The final section covers teacher and student interactions in the context of the Freedom of Information Act (FOIA). A list of definitions can be found in the appendix along with frequently asked questions on social media use, best practices and sample social media accounts. Bolded terms used throughout this directive will be defined in the Glossary. For further assistance regarding this guide, please contact DCPS' Communications Team.

¹ Office of the Chief Technology Officer. (2010, January 31). *Social Media Access and Use Policy*. Retrieved from <http://octo.dc.gov/page/social-media-access-and-use-policy>.

General Guidelines

I. Guidelines for Social Media Use

Section 1 – Professional Social Media Use

- 1.1 All professional social media use must be in compliance with DCPS policies and procedures, DC Municipal Regulations (DCMR) and any and all applicable state and federal laws, including, but not limited to, the Family Educational Rights and Privacy Act (FERPA).² Any professional social media use that violates such laws and regulations, or any other applicable state and federal laws, may subject the user to disciplinary action.
- 1.2 Employees shall not use professional usernames and/or handles to engage in personal social media use.
- 1.3 Employees shall ensure that any professional social media use is conducted through a password protected account.
- 1.4 Employees shall obtain their supervisor's approval in writing prior to establishing a professional username and/or handle in online communities. Employees shall provide their supervisor with a list of their existing professional usernames and/or handles and the online communities in which they use those usernames within 30 days of the effective date of this policy. Following the effective date of this policy, employees shall notify their supervisor of any professional usernames and/or handles and the online communities in which they use those usernames within 30 days of establishing the account. Employees shall also provide their supervisors with their login information for these online communities. Failure to provide this information shall constitute a violation of this policy. Supervisors are responsible for maintaining a list of all professional usernames and/or handles and the online communities that each username and handle is used in by employees in his/her school or office.
- 1.5 Employees shall ensure that their professional social media use is appropriately "branded." For more information about branding policies and guidelines, please contact the DCPS Director of Communications.
- 1.6 In all communications with students in online communities, employees shall maintain a professional relationship and conduct themselves in the same manner as they would if interacting with the student in person.
- 1.7 Employee communications with students shall be school-related and within the scope of the employee's professional responsibilities, unless otherwise authorized by this policy (See Section 2.3).

² FERPA is a Federal law that protects the privacy of student education records (20 U.S.C. § 1232g; 34 CFR Part 99).

- 1.8 It is each employee's individual responsibility to understand the rules and policies governing any online community in which they participate.
- 1.9 The posting or disclosure of confidential DCPS personnel or student information, or any other confidential DCPS information in any online community is strictly prohibited.
- 1.10 Using the login information provided by the employee, DCPS reserves the right to delete postings made using professional usernames and/or handles that contain the following content:
 - Vulgar language;
 - Personal attacks;
 - Content that promotes, fosters, or perpetuates discrimination, particularly discrimination based on an individual's protected traits (i.e. – age, race, gender identity/expression, sexual orientation, etc.);
 - Content that advocates illegal activity;
 - Promotion of particular services, products or political organizations;
 - Information that may compromise the safety, security or proceedings of public systems or any criminal or civil investigations; or
 - Any other content that DCPS reasonably determines is inconsistent with the employee's job duties or DCPS' mission.

Section 2 – Personal Social Media Use

- 2.1 Any personal social media use must be in compliance with DCPS policies and procedures, the DCMR, and any and all applicable state and federal laws, including, but not limited to, FERPA. Any personal social media use that violates such laws and regulations, or any other applicable state and federal laws, may subject the user to disciplinary action.
- 2.2 The DCPS and any other District government logo, including but not limited to all other DCPS or District government intellectual property, shall not be used for any personal social media use purpose. The DCPS name and the names of any DCPS entity or office shall not be used for personal social media use in such a way as to suggest that DCPS endorses an individual employee, or any of an employee's personal social media use.
- 2.3 Employees shall limit communication with students who are currently enrolled in DCPS (regardless of the student's age) or with DCPS alumni who are under 18 years of age to online communities where the employee uses his/her professional username and/or handle. However, an employee may communicate with a student using his/her personal username and/or handle if the student:
 - 2.3.1 Is a relative;

- 2.3.2 Is a member or participant in the same civic, social, recreational, athletic or religious organization;³ or
- 2.3.3 Is involved in an emergency situation requiring such communication. In such cases, the employee shall notify his/her supervisor of the contact as soon as possible.
- 2.4 Employees shall take reasonable precautions to restrict students from viewing their engagement in personal social media use.
- 2.5 The posting or disclosure of confidential DCPS personnel or student information, or any other confidential DCPS information, on any online community is strictly prohibited.

Section 3 – Monitoring of Social Media Use

- 3.1 Employees have no expectation of privacy with regard to professional social media use and DCPS reserves the right to regularly monitor such use and delete or modify any professional social media use content.
- 3.2 If a supervisor discovers communications or behavior by an employee in an online community that violates any terms in this policy, the supervisor has an obligation to report such information to either the Office of Compliance or the Office of Labor Management and Employee Relations immediately. DCPS reserves the right to take any action necessary to remove an employee's professional social media account if his/her communications violate any terms in this policy. Additionally, DCPS reserves the right to take any and all necessary personnel actions, up to and including termination.
- 3.3 DCPS does not consistently monitor personal social media use. However, if DCPS discovers that an employee's personal social media use has violated any terms in this policy, DCPS reserves the right to take any and all necessary personnel actions, up to and including termination.

Section 4 – Duty to Report

- 4.1 Employees shall be required to report any violations of this policy on the part of another employee to a supervisor or Labor Management and Employee Relations.
- 4.2 All employees are mandated reporters of child abuse and neglect. As such, employees are required to abide by the reporting requirements under the District's Mandated Reporter law,⁴ even when witnessing questionable conduct in online communities. In the event you

³ This provision does not apply to DCPS sponsored organizations (e.g. Future Business Leaders of America, DC Interscholastic Athletic Association, etc.).

⁴ DC Code § 4-1321.02.

must report, immediately notify the DC Child and Family Services Agency on the hotline at (202) 671-SAFE (7233).

Section 5 – Press Inquiries

5.1 Any press inquiries related to DCPS should be referred to the DCPS Press Secretary.

Section 6 – Savings Clause

6.1 In the event that any provision of this policy is determined to be contrary to law or otherwise invalidated, all other provisions of this policy shall continue in effect.

Section 7 – Consequences

7.1 Any employee who is found to have violated this policy, in whole or in part, may be subject to disciplinary action, up to and including termination of his/her position(s) with DCPS.

Section 8 – Photos and Videos

8.1 Any employee sharing photos or videos of students on social media, from professional or personal accounts, must ensure that any student reasonably visible in the photo or video has a signed media release form applicable to such use (e.g., a signed DCPS media release form for a student may not necessarily entitle an employee to use such student's photo for a personal social media use). Please contact your school's counselor or front office to obtain the status of students' media release permissions before posting photos anywhere on social media.

Section 9 – Hatch Act

9.1 In accordance with the Local Hatch Act,⁵ DC government employees are prohibited from engaging in certain political activities. Accordingly, DCPS employees are prohibited from engaging in political advocacy when engaging in professional social media use, e.g., a teacher's Facebook page for her classroom.

⁵ DC Code § 1-1171 et al.

III. Do's & Don'ts

Social media is an important way to communicate with students, families and other external stakeholders. We encourage DCPS employees to use social media to share their work so we've created simple do's and don'ts, best practices and frequently asked questions to help clarify applicable legal and policy guidelines. If you have any questions, please reach out to the Director of Communications.

Section 10 – Do the following on social media:

10.1 All the time:

- 10.1.1 Exercise sound judgment.
- 10.1.2 Be professional in all internet postings related to or referencing the school district, students and other employees.
- 10.1.3 Share school news and stories.
- 10.1.4 Post about DCPS and/or your school.
- 10.1.5 Report anything required under the District's Mandated Reporter law, even when witnessing questionable conduct in online communities.
- 10.1.6 Contact DCPS if you have questions or are unclear on what you should or should not share.

10.2 If you would like to interact with students on social media:

- 10.2.1 Create a professional social media use account (i.e. Facebook page or Twitter account) for your students to "like" and interact with online.
- 10.2.2 Provide your principal or supervisor with the login information to your professional social media use account.

10.3 If you would like to post content about DCPS with your personal social media use account:

- 10.3.1 Add a disclaimer to your page or account that indicates the account is strictly personal (i.e. "The views expressed here are personal and do not represent DCPS").

Section 11 – Don't do the following on social media:

- 11.1 Accept requests from or interact with current students on your personal social media use accounts, subject to the exceptions in Section 2.3.

- 11.2 Access social networking sites for personal use during instructional time or with DCPS' technological resources.
- 11.3 Use profane, pornographic, obscene, vulgar or sexually offensive language, pictures or graphics.
- 11.4 Use internet posts to libel or defame DCPS, students or other employees.
- 11.5 Use internet posts to harass, bully or intimidate employees or students.
- 11.6 Post confidential information about students, employees or the regular business of DCPS.
- 11.7 Post content about specific students without parental or student consent.
- 11.8 Post photos or videos of students without making sure they have signed media release forms.

IV. Federal Guidance

Section 12 – FOIA

- 12.1 The Freedom of Information Act (FOIA) requires government agencies to make public information available upon request.⁶ Employee should assume no privacy and every entry and exchange posted using their professional social media accounts will be considered as public information and subject to FOIA. Any disclosures of an employee's social media content will have any personally identifiable information (PII) of students removed or de-identified. In accordance with FOIA, FOIA requests submitted for information on an individual must have written consent by the individual in question before information is disclosed.⁷ In addition, written justifications are required for any redactions in social media content sent to requesters.

Section 13 – FERPA

- 13.1 The Family Educational Rights and Privacy Act (FERPA) protects the privacy of student information.⁸ FERPA emphasizes privacy and limits the access to and release of information. In the context of this policy, no personal information will be requested or exchanged between teachers and students on social media. Parents and eligible students, students who are at least 18 year old, should be notified in advance of any FOIA request that is accepted that involves their children or themselves in the case of eligible students. To ensure data security, professional and personal social media accounts and passwords should not be shared with others. In addition, employees must not exchange or share information related to their respective job duties unless the employees are teachers sharing educational information with students.

⁶ 5 USC § 552

⁷ 5 USC § 552a

⁸ 20 USC § 1232g

Appendices

Appendix I: Definitions

Definitions

Online Communities: Forums for online publication or presence that provide individuals a platform to communicate with others, including, but not limited to, social network sites, personal websites, blogs or web logs, video-sharing websites, virtual worlds⁹, online forums, wikis, email and other web-based applications. Examples of online communities include, but are not limited to, Facebook, Twitter, Instagram, YouTube, Google+, Snapchat, Tumblr, LinkedIn, Flickr and Groupme.

Social Media Use: Participation in online communities via electronic communication, including but not limited to, making comments, exchanging/sharing information and ideas in online communities, posting personal messages, pictures, videos and other content in online communities.

Professional Social Media Use: Participation in online communities using professional usernames and/or handles for the purpose of communicating with employees, students and other DCPS stakeholders regarding work and/or work-related topics, such as meeting dates and times, class homework assignments and athletic practice locations. For example, a teacher would be engaging in professional social media use if she uses online communities to keep her students and parents informed of homework assignments and upcoming field trips.

Personal Social Media Use: Participation in an online community using personal usernames and/or handles for purposes of communicating with family, friends and others regarding personal matters such as life events and other activities that are not related to work. For example, an employee would be engaging in personal social media use if she were to communicate with friends in online communities about plans for the weekend.

⁹ A virtual world is defined as a computer-based online community which is shared by individuals who interact with each other in the community via an avatar, such as Edusim and Active Worlds.

Appendix II: Frequently Asked Questions (FAQ)

1. Does this policy apply to employees who are not based in schools?

Yes. This policy applies to all DCPS employees regardless of work location.

2. Can I communicate with former students using my personal username and/or handle?

Yes. It is acceptable to communicate with former students who are 18 years of age or older. Please note that any such communications should remain professional, and it is also acceptable to communicate with them through your professional handle.

3. Can I discuss a student in an online community using my personal or professional username or handle if I do not include the student's name or any other personally identifying information about the student?

No. You cannot discuss students in an online community even if you do not identify the student.

4. Would I be subject to discipline if I posted something that violates this policy on someone's wall because I didn't know that posting it to their wall meant that it was public and not private?

Yes. As is outlined in Section 1 of the guidelines, all employees are responsible for knowing and understanding the operating principles for the online community that they are a member of. Additionally, employees are responsible for the content that they post on their own page and that of another and the extent to which that content is accessible to the public.

5. May I accept a student's request to connect with my personal username or handle in an online community?

Only under limited circumstances (See Section 2.3).

Appendix III: Best Practices

- Social media is best used **frequently**, especially if students or staff rely on your social media feeds for information. Tweet, post and share often, but not so often as to spam your followers.
- Have a **personality**! It's okay to be a human.
- Use **visuals** whenever possible. People love photos, graphics and lively images. Just make sure any students you put online have signed media release forms.
- Be open to having **conversations** with people instead of posting like a one-way street. If people are tagging you or asking you questions, respond.
- **Don't engage with** people trying to fight with you (often referred to as "**trolls**"). They're best left alone.
- While it's good to have fun, remember that certain types of **humor don't often translate** on the internet. Be careful not to leave room for misinterpretation.
- **Tag @dcpublicschools** in your posts, and use the hashtag **#DCPSRising**! We want to see the cool things you're doing for DCPS.
- If you begin a tweet with a handle (i.e. "@HendersonKaya"), **you must put a "." or "/" in front of the handle**. Twitter is set up to allow for lengthy back-and-forth conversations, so if someone who follows you doesn't ALSO follow @HendersonKaya, that tweet will not show up in their feed. A good example looks like this: ".@HendersonKaya is at our school assembly today!" Note that you do NOT need a "." or "/" in front of a handle if it appears anywhere other than the first thing in your tweet.

Appendix IV: Sample Social Media Accounts

DCPS employees who intend to communicate with students via social media should create professional social media accounts, meaning accounts that have been created solely for the purpose of representing oneself as, for example, a DCPS teacher or principal. [Principal Pride of Hardy Middle School](#) (@principalpride) is a good example of a DCPS staff member who uses her Twitter account to share good news related to her school and interact with the Hardy MS community.



On Facebook, [Principal Riddlesprigger of Ketcham Elementary School](#) has a good example of a Facebook page created to share news and information about Ketcham and other relevant topics for her school's community:



While you aren't required to create a professional social media account to associate with DCPS on social media, professional accounts are the only permissible means by which to communicate with students on social media.

If you do not intend to interact with students, but still plan to associate yourself with DCPS or share news about DCPS on your personal social media accounts, take care to abide by the guidelines set forth in this policy.

For More Information Contact:

DCPS' Communications Team
1200 First Street, NE
Washington, DC 20002
Email: dcps.communications@dc.gov

OR

Labor Management and Employee Relations
1200 First Street, NE
Washington, DC 20002
Telephone: (202) 442-5373
Email: dcps.lmer@dc.gov