



## COMPANY SOCIAL MEDIA USE POLICY OFL-Duarte

### **SCOPE**

It is essential that any and all employees charged with monitoring and or contributing to company-related social media accounts conduct themselves in a manner consistent with OFL brand standards and in compliance with state and federal law. This policy is intended to address proper use and guidelines for those employees who are responsible for creating and or posting content, and monitoring and or moderating company-related social media accounts, including employees of third-party vendors which may be contracted to perform said services on behalf of OFL-Duarte.

### **Policy Use**

This policy should be presented to anyone who may perform company-related social media work as a part of their job description and or assigned tasks, during the two weeks of training after hire or promotion. Employees must read the policy in its entirety and acknowledge their understanding via signature on page seven of this document before commencing with any company-related social media work activity. A signed copy of this policy should be placed in the employee's file.

For information regarding the proper conduct of OFL-Duarte employees on their personal social media accounts, please refer to the current OFL-Duarte employee handbook.

### **SOCIAL MEDIA PLATFORMS & ACCOUNTS**

Social media is defined as any online publication, website, or application in which users are encouraged to post, view, and or interact with user-generated content, in forms including but not limited to videos, photos, graphics, animations, and text. Social media websites and applications include blogs, video blogs, wikis, imageboards, and social networking sites such as Facebook, Twitter, Instagram, LinkedIn, Snapchat, YouTube, and Tik Tok.

### **Existing OFL Accounts**

Authorized OFL accounts are listed by the platforms and usernames/handles below. Any social media account affiliated with OFL or OFL-Duarte that is not listed below is not authorized and any knowledge thereof should immediately be reported to Kelly Bishop, Director of Enrollment



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& Outreach ([kbishop@propelcmg.org](mailto:kbishop@propelcmg.org)), or Maricela Frymark, Director of School Policy ([mfrymark@propelcmg.org](mailto:mfrymark@propelcmg.org)), at Propel Management.

Facebook	Instagram	Twitter
@oflschools @oflalumniassociation @OFLSCHDSharks @sgvlions @LBCEagles	@oflschools @oflalumni @oflcapo @oflduarte @oflramona @oflschdsharks @oflonline @sgvlions	@oflschools @oflalumniassociation @sgvlions @LBCEagles

You may not alter the username or password of any existing OFL or OFL affiliated social media account without express written approval from your direct supervisor.

### Creation of New Social Media Accounts

If any OFL-Duarte staff member wishes to create a new or additional OFL or OFL-affiliated social media account for any reason, they should contact Kelly Bishop, Director of Enrollment & Outreach at Propel ([kbishop@propelcmg.org](mailto:kbishop@propelcmg.org)), for more information. While the creation of additional accounts is not prohibited by a matter of policy, all OFL and OFL affiliated accounts must be authorized in advance to ensure proper account security and oversight.

### GENERAL CONDUCT

The safety and privacy of OFL students, both current and former, and staff members is of paramount importance. Social media coordinators, contributors, and consultants should also consider how company-related social media activity reflects on the OFL brand; publication and commentary on any social media platform carries the same or similar obligations as that of any other published organizational content.

**OFL does not tolerate or condone any online activity that might be deemed an expression of racism, bigotry, misogyny, homophobia, xenophobia, harassment, hate speech, doxing, or threats of violence, physical or otherwise, explicit or implied.**

### General Principles

When interacting on social media on behalf of OFL, keep the following principles in mind:

1. Know the context before interacting and interact only about what you know



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2. Add value to OFL's reputation and or the conversation
3. Respond to errors quickly and be transparent about modifying previous posts
4. Be respectful and factual in tone
5. Do not disclose confidential school or student information, including any internal procedures or plans
6. Do not create false or misleading endorsements

### Internal Information

Information regarding internal school practices, including those related to operational procedures and policies, emergency and sensitive situations, and finance, should not be shared publicly on social media. If you're unsure whether the social media content you're preparing to post or share is appropriate for social media audiences, please see your direct supervisor for guidance.

### Copyright & Fair Use Compliance

Posted (rather than liked or shared) content should be original to avoid copyright infringement issues. If you choose to post an unoriginal quote or data point on social media, you must cite your source in the post graphic, video, and or caption. A best practice is to use deep links where possible. Deep linking is the process of placing a link that leads to another website. This helps with attribution issues. When deep linking, link straight to the source rather than to a social media account or other similar website where the original link has been reposted.

When deep linking is not possible, use embedded links, which are generally acceptable for sharing publicly available articles because attribution is automatic, and it is usually made clear by the formatting of embedded links that OFL is not the creator or source of the embedded content.

Avoid linking to personal social media pages (celebrities, public figures, etc.) without approval from your direct supervisor and legal counsel first.

When neither deep links nor embedded links are possible, obtain written permission from the source and be clear about intended use.

Ultimately, although content posted to the internet may appear to be public, it is not necessarily available to download, edit, and or share on social media. If you're unsure about the boundaries of copyright and fair use laws, please consult your direct supervisor and legal counsel for guidance.

### Copyright of Photographs & Fair Use



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As discussed further in the sections below, photographs of students (age 13+) may only be posted on social media as long as a signed photo release form is on file with the school. As for posting photographs of other teachers, staff, and/or administrators, express written consent is required.

If sharing photographs found online, ensure that you have obtained written permission from the photographer to share the image. As long as the permission is in writing, it can be obtained through social media channels. When obtaining permission is not possible, you can check to see if the photograph is in the public domain. Assume that images are generally not in the public domain. A photograph that is in the public domain can be used freely, without concern for copyright infringement.

You can also check whether the photograph is available for use under a Creative Commons license or a similar license. Creative Commons is a set of licenses that allow for certain types of commercial use. If a photograph is labeled with a Creative Commons license, it may be available for commercial use with just a few conditions. A final option is to use a reverse image search, which is available through nearly all popular web search engines, to help determine who owns the photograph in question.

Note that photographs may be used without written permission from the copyright holder for the limited purposes of fair use, which are: criticism, commentary, news reporting, teaching, scholarship, and research. Commercial use is not fair use. Any doubts about the planned use of a photograph should be communicated to your direct supervisor and legal counsel for guidance and approval.

### CRISIS MANAGEMENT

#### Safety & Privacy

Any threatening language directed at students, staff, property, or the public, no matter how minor, should be reported to your direct supervisor immediately. DO NOT attempt to investigate or confirm the validity of any such threat before escalating it to a superior. Supervisors, Managers, and Directors who are made aware of such threats should immediately report them to law enforcement if appropriate, as well as to school Principal(s), the Superintendent and or Executive Director at Propel, and to members of marketing leadership at Skyrocket, Inc. (Skyrocket marketing contacts are listed on page eight of this document.)

In general, information about individual OFL students, families, and staff should never be shared on social media. If you'd like to post an image of a student (age 13+) on social media, you may do so as long as they have a signed photo release form on file with the school and are only



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identified by first name and last initial. Please see below for additional information regarding best practices and legal guidelines for social media posting and interaction.

### Public Relations

At times, followers and or members of the general public may comment on or send direct messages to an OFL social media account. On many social media platforms, comments may be disabled for individual posts if follower and public interaction are not desired. If, however, comments are enabled, you must take steps to ensure that members of the public have equal opportunity to exercise their legal right to free speech. In the event that a public comment made to an OFL social media account is obscene, defamatory, threatening, harassing, or calls for violence, it may be deleted or hidden from public view, but only with express written approval from your direct supervisor and only after a screenshot of the comment has been taken and archived for legal reference. Please also notify marketing leadership at Skyrocket, Inc., the email address of which can be found on page seven of this document. If you're unsure whether a public comment meets the legal standard described above, see your direct supervisor, and legal counsel if appropriate.

### BEST PRACTICES & LEGAL GUIDELINES

#### Student Safety

- Never identify a student by first and last name and the OFL campus they attend, regardless of the age of the student. This is a legal requirement for minors but a best practice for all students.
- If possible, avoid posting pictures of campus interiors that clearly show marked entrances, exits, or security camera locations.
- Do not post photos or illustrations of campus floor plans.
- Do not post photos, screenshots, or descriptions of student information system interfaces, nor of documents or records located in hard copy or electronic student or staff files.
- To prevent malicious reproductions, do not post photos of student or staff ID badges.
- Staff must confirm that any student visibly featured in a photograph intended for social media has a signed photo release consent form on file before posting. Consent forms must also be signed by a student's parent or legal guardian if they are under the age of 18. Do not post photographs visibly featuring any student if their signed consent form has been altered in any way, ie. inclusion of hand-written notes or text strikethroughs.
- No individuals under the age of 13, regardless of whether they attend OFL or have a signed consent form on file, can be visibly featured in any social media content. Be sure



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to keep this regulation in mind when attending and or live-streaming events in which younger members of the public may be present.

- In the event that an OFL parent, legal guardian, or student (current or former), at least 18 years of age, requests that their image be removed from OFL or OFL-affiliated social media, please make all reasonable attempts to accommodate them, and immediately inform your direct supervisor of the request and subsequent steps taken to comply.

### Brand Management

- If you plan to capture photo or video content for social media while attending public events, on or off-site, we recommend doing so without audio and posting printed or hand-written signs which clearly state the following:

This area is being photographed and/or recorded. By entering, you consent to have your image captured and shared, and acknowledge that you are not entitled to any related compensation.

- Only post content with audio if the subjects all have signed photo release consent forms on file with OFL-Duarte.
- Unless directed by your Supervisor, do not create, like, share, or comment on content that is or could be construed as political in nature
- Do not share your social media login credentials with anyone.
- No inappropriate content may be posted, reposted, liked, or shared. Pay careful attention to subject attire, gestures, printed and hand-written or painted signs, and backgrounds and landscapes before posting, reposting, or sharing. Erring on the side of caution, we recommend refraining from posting any photos in which subjects are making visible hand gestures, regardless of the nature or implied meaning, if any, of the gesture.
- Sharing and liking content on social media signals endorsement. Use common sense and always be sure to check any links and hashtags included in posts you wish to like or share to ensure that they are functional and appropriate for OFL audiences.
- Always research hashtags before use to confirm that they do not correlate with any unrelated or inappropriate topics.
- Following student social media account profiles is strictly prohibited.
- Unless directed otherwise by senior leadership during a crisis situation, searching and storing content from any students' social media accounts is prohibited.
- Following the social media account profile of anyone who is not a student or staff member (both prohibited) is only allowed with express written permission from your direct supervisor.



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- There are times when a user will post a question that is viewable to the general public on an OFL social media account. In these instances, consider the situation carefully:
  - Would a public response identify a student or staff member or present an opportunity for harm? If so, or if you're unsure, contact the person privately instead, unless doing so would require that you investigate the identity of the commenter, ie. search a student's private handle. Whether public or private, never share student or staff information via social media.
  - If no student or staff member would be identified and the requested information may be useful and appropriate for the general public, feel free to respond publicly, ie. the score of a game or the time a center closes.

### Additional Resources & Support

For more information related to social media best practices, including ways to optimize user engagement, please review the [\[Social Media Best Practice deck\]](#) created by Skyrocket, Inc., a contracted provider of Education Support Services, including marketing services, to OFL-Duarte.

Skyrocket, Inc. marketing team members are available to consult about OFL-Duarte social media anytime. For inquiries related to account credentials, training, content development, posting schedules, account moderation, and general social media strategy, please contact:

marketing@skyrocket-ed.com

### POLICY ENFORCEMENT

If you have any doubts or concerns about company-related social media content or activity, don't post, like, share, comment, or respond to any direct messages or comments until you have reached out to your Supervisor for feedback and instruction. Any incidents of misuse of company-related social media and or failure to comply with the terms of this policy may result in disciplinary action, up to and including employment termination.

### Acknowledgement of Receipt

By signing below, you acknowledge that you have read this policy in its entirety and agree to abide by the regulations and recommendations herein:

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Employee Name

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Employee Title



**Opportunities For Learning**  
**Public Charter Schools**

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Employee Signature

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Date