# CARBON CAREER & TECHNICAL INSTITUTE

SECTION: OPERATIONS

TITLE: SOCIAL MEDIA

ADOPTED: May 16, 2024

**REVISED:** 

# 815B. SOCIAL MEDIA

1. Purpose

The purpose of this policy is to ensure the orderly operation of Carbon Career & Technical Institute (CCTI) by establishing standards for the operation of CCTI social media accounts and personal social media accounts, and to differentiate between personal and third party social meacounts and those accounts controlled by CCTI.

2. Delegation of Responsibility

The Administrative Director shall develop procedures to implement this policy, and may delegate to his/her designee(s) the right to enforce this policy.

3. Definitions

Discriminatory or Harassing Comments – comments or imagery that attack or mock an individual due to his/her real or perceived race, color, national origin/ethnicity, gender, age, disability, sexual orientation, gender identity, or religion.

Limited Public Forum – a government operated location where the public may comment and post online, subject to viewpoint neutral guidelines.

Non-public Forum – a government operated location where the public may not comment or post online; free expression by the public is restricted regardless of message or viewpoint.

Personal Social Media Account – a social media account, regardless of platform, that is operated by a CCTI employee or Joint Operating Committee member for his/her personal use, including personal professional development. A personal account is not regularly used to promote or communicate about CCTI events or activities, or the activities of students.

CCTI Social Media Account – a social media account, regardless of platform, that is operated by a CCTI employee or Joint Operating Committee member in his/her professional capacity, and that is designed to further the educational mission of CCTI by communicating with members of the CCTI community and the general public.

Third Party Social Media Account – a social media account, regardless of platform, that is operated by a volunteer, student, parent, alumnus, or other member of the public on behalf of a club, foundation, sports team, or other extracurricular group affiliated with CCTI. Third party social media accounts are *not* operated by CCTI employees or Joint Operating Committee members.

### 4. Guidelines

# CCTI Policy 815

If any social media post is published using CCTI technology resources, including computing devices, mobile devices, and networks, CCTI's acceptable use policy applies and is hereby incorporated by reference.

# **CCTI SOCIAL MEDIA ACCOUNTS**

CCTI social media accounts must remain professional, and consistent with the educational mission of CCTI at all times. The operators of CCTI social media accounts are responsible for the content on the social media accounts that they manage.

# Account Ownership

CCTI social media accounts are owned by CCTI, and operated by CCTI employees or Joint Operating Committee members on behalf of CCTI. The Director of Technology shall maintain a list of all social media accounts operated by CCTI, along with a list of credentials to access the accounts.

## Photos, Videos, & Livestreams of Students

CCTI social media account operators may post photographs, videos, and livestreams of students engaged in the educational process or at school-related events *unless* the student's parents have opted the student out of FERPA's directory information sharing, or if parents have declined to sign CCTI's media release form. The operators of the CCTI social media accounts are responsible for complying with this provision.

## **Public Comments**

### U.S. Const. Amend. I

All CCTI social media accounts shall operate as either a non-public forum (where the public may not comment on CCTI's posts), or as a limited public forum, where the public may comment publicly on CCTI's posts – subject to certain guidelines. Whether a social media account is operated as a non-public forum or limited public forum shall be determined by the account operator.

CCTI social media accounts that operate as a limited public forum shall include a prominent link to the following comment guidelines, posted on CCTI's website:

- a. Comments must be related to the original CCTI post
- b. No personal attacks
- c. No lewd, vulgar, or obscene posts
- d. No discriminatory or harassing comments
- e. No posts promoting violence or illegal conduct
- f. No posts that include links to external websites

Individual comments or posts that violate the above guidelines may be deleted (if possible given the social media platform) without further notice. Posts may <u>not</u> be deleted simply because they are critical of CCTI, or because they promote an unpopular opinion, if the post otherwise complies with the above guidelines.

CCTI social media account operators may not block users from accessing CCTI's social

# Page 2 of 4

# 815B. SOCIAL MEDIA - Pg. 3

media posts. The Director of Technology shall refer any user who repeatedly violates the above guidelines to the Administrative Director for further investigation and potential legal remedies.

CCTI may delete certain of its social media posts, in their entirety and including all comments, at the discretion of the CCTI's administration. CCTI has no obligation to maintain its social media posts in perpetuity and their temporary presence on the internet is not a warranty of their future presence.

# **Tagging**

22 Pa. Code § 235.9

CCTI social media account operators may tag the social media accounts of educational applications, products, and services, so long as CCTI and its employees do not receive financial or other tangible compensation for the tag.

CCTI social media account operators shall not tag individual students using their social media usernames or handles, but may tag other adult members of the CCTI community.

CCTI social media accounts shall not be used to communicate directly with students. One-to-one communication with a student shall be limited to electronic resources provided by CCTI such as e-mail or classroom management applications.

## **Accessibility**

All content posted to CCTI social media accounts shall be as accessible to individuals with disabilities as it is to non-disabled individuals. To ensure accessibility, so long as the social media platform allows, social media posts must:

- a. include alternate text or detailed captions for images
- b. include captions for videos
- c. include captions for livestreams
- d. avoid images of text
- e. avoid acronyms, wherever possible
- f. ensure that links to PDFs are accessible to screen readers

The Director of Technology or his/her designee shall ensure that all individuals operating CCTI social media accounts receive training on social media accessibility.

## Copyright

The copyright for all content posted to CCTI social media accounts must be either owned by CCTI, licensed by the copyright owner, or not subject to copyright protection. The operator of a CCTI social media account is responsible for ensuring compliance with this provision.

#### Reposts

CCTI social media accounts may highlight social media posts by others by reposting their messages, so long as the repost follows these guidelines.

# PERSONAL SOCIAL MEDIA ACCOUNTS

CCTI employees may not use personal social media accounts to communicate privately (via direct message or private chat) with students concerning any CCTI business. One-to-one

28 C.F.R. § 35.160

# 815B. SOCIAL MEDIA - Pg. 4

	communication with a student concerning any CCTI business shall be limited to the
	electronic resources provided by CCTI such as e-mail or classroom management
	applications.
	CCTI employees are urged to exercise extreme caution before communicating with students
	via social media about non-school matters. Such electronic communication may cross professional boundaries in violation of the Pennsylvania Code of Professional Practice and Conduct for Educators, and the Educator Discipline Act. CCTI employees are urged to
	maintain strict professional boundaries on social media, and to protect against even the
22 Pa Code §235 et seq.	appearance of impropriety.
24 P.S. §§2070.1 et seq.	
	CCTI employees and Joint Operating Committee members shall not post personally identifiable and otherwise confidential information from educational records on their personal social media accounts. Personally identifiable information includes information that could indirectly identify a student through linkages with other information.
20 U.S.C. § 1232g; 34	CCTI employees are strongly encouraged to utilize privacy settings on personal social media
C.F.R. Part 99	accounts to ensure that a professional boundary is maintained between the employee and students and parents.
24 P.S. § 11-1122	CCTI does not actively monitor personal social media accounts for its employees. Nonetheless, should CCTI administration or Joint Operating Committee's attention be brought to a personal social media post that demonstrates insubordination, immorality, cruelty, unlawful discrimination, other unlawful act(s), or that impedes the efficient and effective operation of CCTI, the employee may be subject to disciplinary action.
Pickering v. Board of	THIRD PARTY SOCIAL MEDIA ACCOUNTS
Education, 391 U.S. 563 (1968)	Third party social media accounts are not operated or controlled by CCTI. These accounts are privately created and maintained, and are not actively monitored by CCTI.
	Third party social media accounts may <i>not</i> use CCTI's logo, unless given express written permission by the Administrative Director.
	CCTI encourages the operators of all third party social media accounts to be good-faith ambassadors of CCTI, and to operate these private social media accounts in a manner that represents CCTI in a positive light.
5. Consequences	Consequences for Violation of this policy
	Employees that violate this policy may be subject to disciplinary action, up to and including dismissal.