

Section	Property
Title	Use of School Facilities
Code	707
Status	Active
Adopted	December 20, 1993
Last Revised	May 26, 2020
Review	March 2021 (In Process)

Authority

The William Penn Board of Directors authorizes the Superintendent or designee to develop and manage procedures governing the appropriate use of William Penn School District school buildings and outdoor facilities by the communities within the school district's boundaries and organizations outside of the district's boundaries.

Overview

The Board recognizes the community needs school facilities for recreational, social, and educational purposes. The Board encourages the public use of the district's facilities. The Board intends that school facilities are used by residents and community groups that are located within William Penn School District boundaries, and will show preference to such groups. Groups located outside of William Penn School District will be afforded the opportunity to use facilities according to the regulations in the appendices **Administrative Procedure 707: Use of School Facilities Procedures**. ~~These groups may use school facilities according to established regulations and when the usage does not interfere with school programs or building maintenance.~~

Cancellations

It is the position of the district that while the district and the community's best interests are served when the district facilities are responsibly used by community groups. ~~However, the Operations Supervisor, Building Principal, Athletic Director, or their designee~~ **Superintendent's designee** may cancel any application or permit for school facility usage if it ~~should~~ **conflicts with a school-sponsored event, interferes with the principal's efforts to effectively managing the school, or interferes with the learning process for students and teachers.** ~~school programs develop.[1] The Board authorizes the Superintendent, the Operations Supervisor of the Business Office, or their his/her designee, to revoke any permit.~~

Entities Eligible to use William Penn School Facilities

School facilities availability is affected by the school's calendar, requirements, and activities. The district may assign necessary employees to staff buildings. The user and/or sponsoring organization will pay such expenses

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when applicable. School, school-related, community or civic/service, and other organizations or individuals that provide educational, civic, recreational, or cultural programs are eligible to use the school facilities. Governmental agencies may use school facilities for public hearings and meetings. Profit-making organizations may be eligible to use the school facilities according to the regulations in **Administrative Procedure 707: Use of School Facilities Procedures**. All district residents, regardless of Borough of residence, shall be charged the same fees for events held at district facilities by any applicant.

~~Questions referencing a request for use eligibility shall be resolved by the Operations Supervisor of the Business Office. If eligibility is contested, the request will be referred to the Superintendent to make the final determination. The Superintendent will review the request and recommend action by the Board.~~

Legal

1. 24 P.S. 775

2. 24 P.S. 511

3. 18 Pa. C.S.A. 6306.1

4. 20 U.S.C. 7972

5. 20 U.S.C. 7973

6. Pol. 904

24 P.S. 510.2

24 P.S. 779

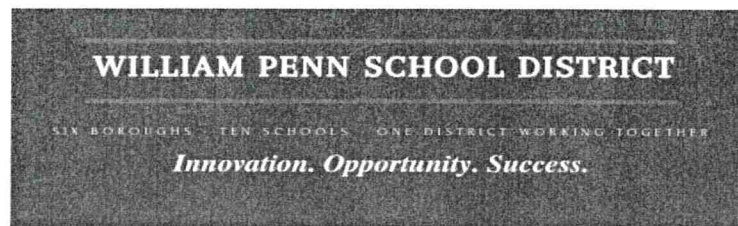
10 P.S. 328.101 et seq

61 PA Code 901.1

61 PA Code 901.701

20 U.S.C. 7905

20 U.S.C. 7971 et seq



Section	800 Operations
Title	815.1 Electronic Signatures/Records
Code	815.1
Status	Review/Updating
Adopted	September 24, 2012

Purpose

Under certain conditions, electronic records and signatures satisfy the requirements of a written signature when transacting business. The Board of the William Penn School District wishes to promote effective and efficient use of electronic communications to conduct business. Although all electronic signatures are represented digitally, they can take many forms and can be created using many different types of technology. The authenticity and reliability of electronic records and signatures relating to transactions are dependent on the accompanying processes, supplemental records, and the overall context in which records are created, transferred, signed, and stored. The Board adopts the following policy with respect to the use of electronic records and signatures in connection with the transaction of district business.

Authority

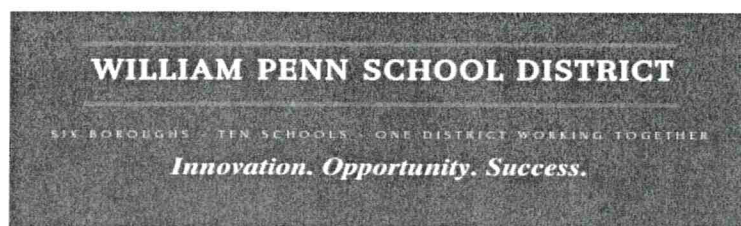
The Board authorizes the use of electronic signatures in place of manual signatures to conduct district business unless a manual signature is required by law or regulations. Electronic signatures shall have the full force and effect of a manual signature when used in accordance with this policy and applicable law and regulations.[1]

Electronic records filed with or issued by the district shall have the full force and effect of paper records when the requirements of this policy and applicable law and regulations are satisfied.[2][3][4]

This policy applies to the use of electronic records and signatures when permitted or required in connection with district programs and operations.

Definitions

Attribution - an electronic record or electronic signature is attributable to a person if it was the act of the person. The act of the person may be shown in any manner, including a showing of the efficacy of any security procedure applied to determine the person to which the electronic record or electronic signature was attributable.



Electronic record – any record created, generated, sent, communicated, received, or stored by electronic means.[4][5][6]

Electronic signature – ~~any record created, generated, sent, communicated, received or stored by electronic means;~~ an electronic sound, symbol, or process attached to or logically associated with a record and executed or adopted by a person with the intent to sign the record. More simply, it is a paperless means of committing to a contract or other document in a manner that indicates the signer's intent to bind themselves and/or the district.[5][6]

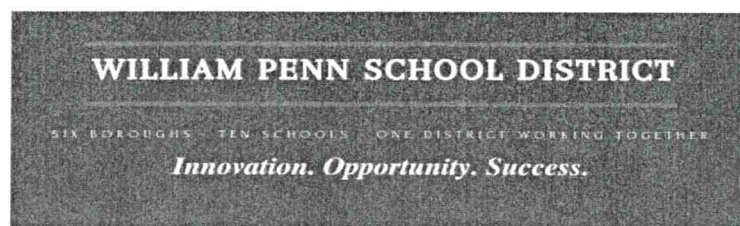
Delegation of Responsibility

The Superintendent or designee shall develop administrative regulations to direct staff on the parameters for authorized use of electronic signatures related to district programs and operations.

Guidelines

Electronic Recordkeeping

1. The maintenance of electronic records and signatures by the district shall comply with the electronic recordkeeping requirements of state and federal laws and regulations and the district's Records Management Plan.[4][7]
2. The district shall implement and maintain electronic recordkeeping systems to securely receive, store, and reproduce electronic records and signatures relating to transactions in their original form.[6][9][10]
3. Electronic records created or received by the district shall be appropriately attributed to the individual(s) responsible for their creation, authorization, and/or approval.
4. ~~The district shall utilize available technology to implement reliable methods for generating and managing electronic records. Any electronic record filed with or issued by the district shall be given full force and effect of a paper communication if the following conditions are satisfied:~~
5. The district may specify the type of electronic signature required on an electronic record, the manner and format in which the electronic signature must be affixed to the electronic record, and the criteria that must be met when an individual uses a third party to file a document if electronic records must be signed by electronic means.[8]
 - a. The communication is an electronic filing or recording and the district agrees to accept or send such communication electronically.
 - b. If a signature is required on the record or communication by any statute, rule or other applicable law or district policy, the electronic signature must conform to the requirements set forth in this policy governing the use of electronic signatures.



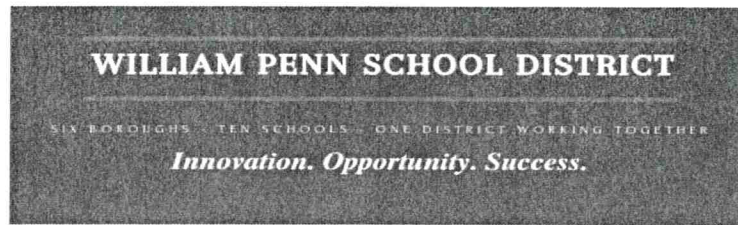
Such a system shall allow the district to implement:

1. A security procedure for the purposes of verifying that an electronic signature is that of a specific person or for detecting changes or errors in the information in an electronic record.
2. Appropriate control processes and procedures to ensure adequate preservation, disposition, integrity, security, confidentiality, and auditability of electronic records.[8]
3. A consistent manner and format in which the electronic records must be created, generated, sent, communicated, received, and stored.[8]

Electronic Signatures

An electronic signature may be used if the law requires a signature unless there is a specific law, regulation, or order that requires records to be manually signed. The issuance and/or acceptance of an electronic signature by the district shall be permitted in accordance with the provisions of this policy and all applicable state and federal laws and regulations. Such electronic signature shall have the full force and effect of a manual signature only if the electronic signature satisfies all of the following requirements:[1][2][11][12]

1. The signing employee is authorized to manually sign the document on behalf of the district.
2. The electronic signature identifies the individual signing the document by their name and position.
3. The individual signing with an electronic signature has signed a statement of exclusive use.
4. The identity of the individual signing with an electronic signature is capable of being validated through the use of an audit trail.
5. The electronic signature and the document to which it is affixed cannot be altered once the electronic signature has been affixed.
6. The electronic signature conforms to all other provisions of this policy.



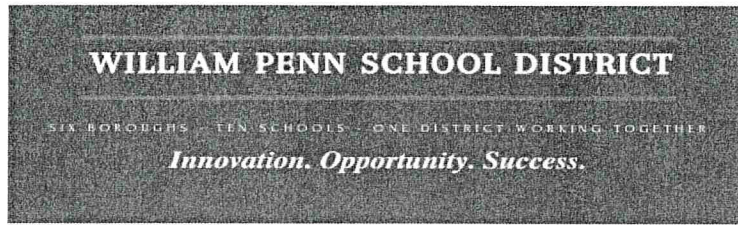
The district shall maintain a secure log of each employee authorized to utilize an electronic signature in connection with district business **along with a copy of their unique electronic signature.** [4]

Acceptance, Use and Issuance of Electronic Records and Signatures –

1. The district shall develop and maintain an electronic recordkeeping system that can receive, store, and reproduce electronic records and signatures relating to transactions in their original form. Such system shall include security procedures whereby the district can (a) verify the attribution of a signature to a specific individual, (b) detect changes or errors in the information contained in a record submitted electronically, (c) protect and prevent access, alteration, manipulation or use by an unauthorized person, and (d) provide for nonrepudiation through strong and substantial evidence that will make it difficult for the signer to claim that the electronic representation is not valid.
2. The district shall ensure that all electronic records and signatures are capable of being accurately reproduced for later reference and retained until such time as all legally mandated retention requirements are satisfied.
3. The district shall designate individuals who are authorized to utilize an electronic signature in connection with district business and shall require each designated individual to sign a statement of exclusive use.
4. The district shall maintain a secure hard copy log of the PIN/password or actual signature of any individual authorized to provide an electronic signature in connection with district business.
5. The district will receive and accept as original, electronic records and signatures so long as the communication, on its face, appears to be authentic.
6. The district will retain in its records this policy and all statements of exclusive use, until such time as all legally mandated retention requirements are satisfied.

Legal

1. 73 P.S. 2260.101 et seq
2. 15 U.S.C. 7001 et seq
3. 73 P.S. 2260.301 et seq
4. Pol. 800



5. 15 U.S.C. 7006

6. 73 P.S. 2260.103

7. Pol. 815

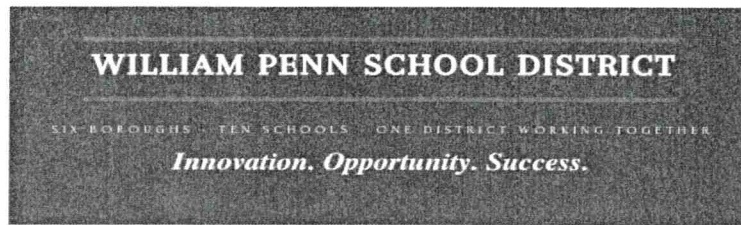
8. 73 P.S. 2260.502

9. 73 P.S. 2260.305

10. 73 P.S. 2260.306

11. 21 P.S. 483.1 et seq

12. Pol. 716



Section	Operations
Title	816 District Social Media
Code	816 Vol II 2021
Status	Draft
Adopted	TBD

Purpose

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

Definitions

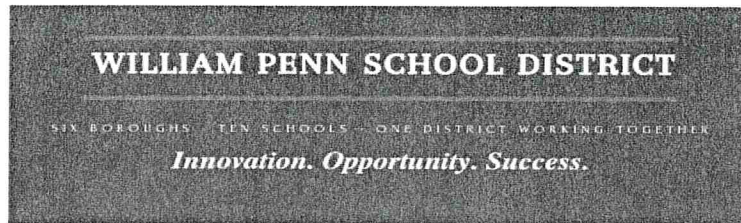
Social media - a category of Internet-based resources that integrate user-generated content and user participation to share information, ideas, personal messages and other content, including photos and videos. Social media includes **social networks**, which are online platforms where users can create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

District-owned social media account - a social media account, regardless of platform, that is approved by the ~~Board~~ **Superintendent** and operated by a designated district employee(s), and is designed to further the educational mission of the district 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 school director or student for personal use and is not approved by the ~~Board~~ **Superintendent** as an official communications channel of the district.

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

{ X } **Designated public forum** - created when a district-owned social media account is intentionally opened for use by the public as a place for an expressive activity where members of the public may communicate, post or comment on information, subject to viewpoint-neutral



rules designated by the Board. 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 district 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 district-owned social media account enables members of the public to read and receive district information, but the district has not designated an 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 district’s account for public users.

Authority

~~The Board shall~~ **The Board of Directors shall give the Superintendent and/or the Superintendent’s designee the authority to** approve all official social media accounts created and/or maintained as district-owned accounts.^[1]

{X } including social media accounts for individual schools within the district.

All district-owned social media accounts shall display the official name and

{ X} logo

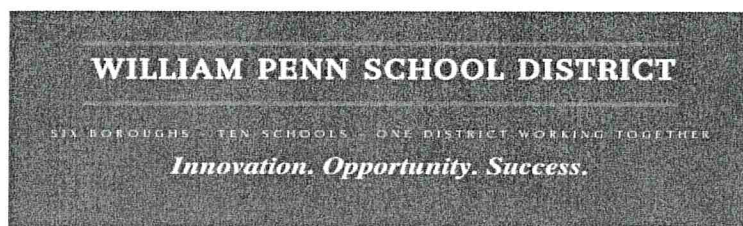
{ } seal

{ } mascot

of the district.

{ } or the individual district school.

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



{ X } The Board establishes that district-owned social media accounts may operate as a **designated public forum**, where the public may comment and interact with information posted by the district, subject to the Board's established rules.

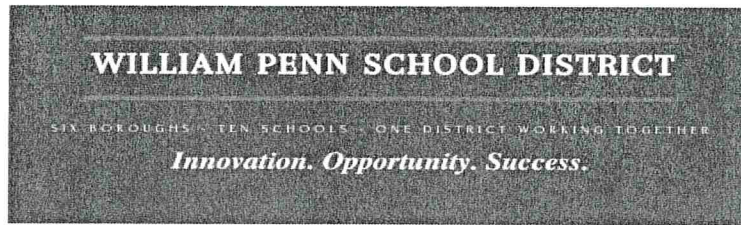
{ } The Board establishes district-owned social media accounts as a **nonpublic forum** and directs school staff to disable functions allowing public users to comment or post information on district-owned social media accounts.

[Choose this option and the listing if the district establishes one or more accounts as a designated public forum]

{X } The Board approves the following rules for public interaction with district-owned social media accounts and directs staff to post this information on the district website and all social media accounts:

The district 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 district. Questions regarding information should be directed to the building principal or to the Superintendent's office for district-wide information. The district shall review comments and may remove comments which:

1. Are profane, vulgar, harmful to minors or obscene, in accordance with Board 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, **political affiliations, religious affiliations**, 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 Board policy on discrimination and harassment.[4][5]
8. Are spamming in nature (same comment posted repeatedly).

Delegation of Responsibility

The Board designates the

{ } Superintendent or designee

{X} Communications Director

{ } Director of Technology

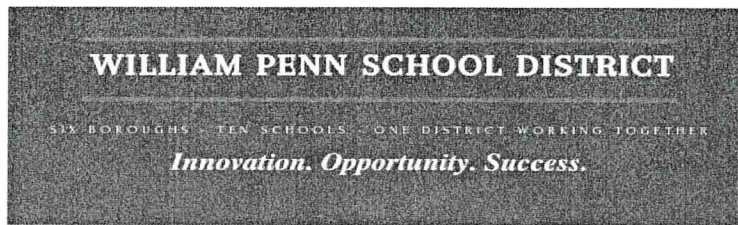
{ } Other _____

to oversee all district-owned social media accounts and serve as the primary contact person for district-owned social media accounts.

The Superintendent or designee shall notify students and staff about this policy through employee and student handbooks, posting on the district website and by other appropriate methods.

All district staff assigned to monitor and maintain district-owned social media accounts shall receive training on:

1. Regularly reviewing district-owned social media accounts, in coordination with the district'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 Board policy and administrative regulations.[7][8]



3. Monitoring content for confidentiality and intellectual property violations, documenting potential violations, and notifying appropriate district 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 district establishes a designated public forum]

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

[Choose this option if the district establishes a designated public forum]

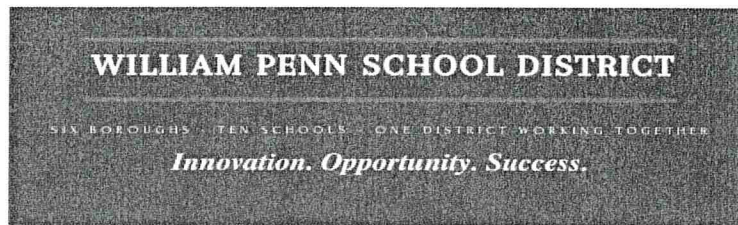
6. {X } Monitoring public comments according to the Board's ~~established~~ **approved** rules, documenting potential violations, and notifying appropriate district staff to consider further action. Staff shall be provided training to assess comments in a viewpoint-neutral manner, based on the Board's approved rules, regardless of the specific subject matter of comments.

[Choose this option if the district establishes a designated public forum]

{X } The Board authorizes designated district staff maintaining district-owned social media accounts to remove individual posts or comments by public users that violate the established social media rules of this policy. The Board 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 Board policy. Staff may consult with the Superintendent or designee and the school solicitor in determining appropriate actions. Posts and comments may not be removed solely because they are critical of the district or district 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 district establishes a designated public forum]

{X } Designated district staff may not block users from accessing or commenting on district-owned social media accounts unless the outside account is identified as a security or



system threat, spam account, **or repeated offender against established rules**. Staff may consult with the Superintendent or designee and the school solicitor in determining appropriate actions.

Guidelines

Posting of Personally Identifiable Information

The Board authorizes posting of student images in photos or videos depicting the educational process or school-related events on district-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 Board policy.[7][8][10][11]

{X } or have declined to sign and return the district's notice of photography permission form.

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

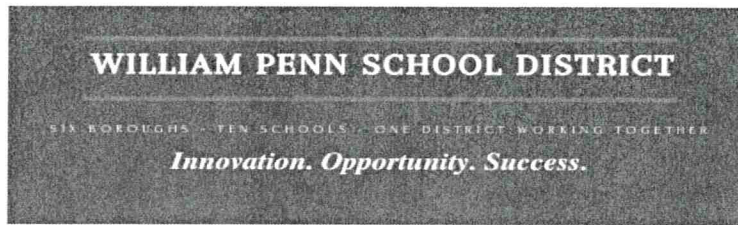
The Board prohibits posting of staff images in photos or videos when a staff member has submitted a request to the Superintendent or designee that their image not be posted publicly online.

{ X} The Board directs district 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 Board directs district staff who maintain district-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 district-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 district-owned social media accounts. All content shall be subject to copyright fair use guidelines and applicable laws, regulations and Board policy and administrative regulations.[9]

Connecting with Other Social Media Accounts

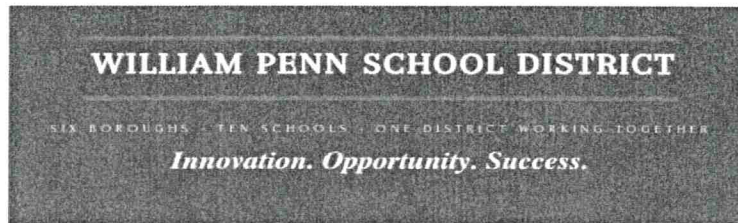
Content or information posted to district-owned social media accounts shall not be connected to other social media accounts through linking or tagging if the outside account is for a commercial application, product or service and the district or its employees would receive financial or other compensation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

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

District-owned social media accounts shall not be connected to social media accounts of individual students through linking or tagging.

{X} District-owned social media accounts may be connected through linking or tagging to social media accounts of parent-teacher organizations, district-related booster organizations or similar school-related groups when the content or information has been reviewed and approved by the district's **Superintendent or designee**.

Personal Social Media Accounts



The district shall not authorize, endorse or participate in posting on private social media accounts of individual school directors or school employees.

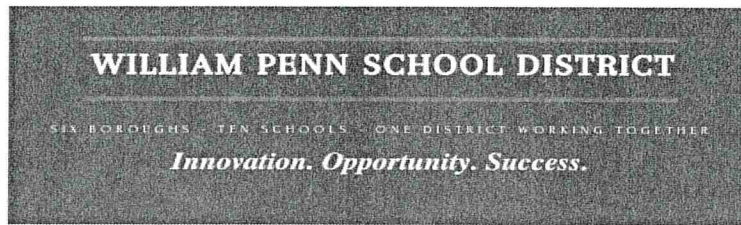
School directors and employees are strongly encouraged to use privacy settings on social media accounts and to clearly identify that it is their personal social media account and that it does not officially represent the Board or district.

In accordance with Board policy establishing professional boundaries, school employees should only communicate with students through district-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 district respects employees' freedom of expression. The district does not actively monitor personal social media accounts of current school employees; however, the district reserves the right to address employees' job-related speech or employee speech posted on social media that has the potential to affect the district'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 district establishes that the employee's expression infringed on the interests of the district in promoting the efficient and effective functioning and educational purpose of the district. If employee speech or expression would violate law or Board 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 district shall consult with the school solicitor in determining the appropriate course of action, in accordance with applicable law, regulations and Board policy.[17][18][19][20][21][22]

Student use of personal social media accounts shall be addressed in accordance with applicable Board policies and administrative regulations related to student conduct, expression and students' individual rights and responsibilities. ~~In accordance with Board policy, the district shall provide 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 district employee who violates this policy may be subject to disciplinary action, up to and including termination, in accordance with applicable law, regulations and Board policy, and administrative regulations.[16][21][29]

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