



No. 903-AR

RADNOR TOWNSHIP
SCHOOL DISTRICT

ADMINISTRATIVE
REGULATION

IMPLEMENTATION DATE:
April 13, 2018

903-AR. COMMUNICATIONS

General Philosophy

The chief responsibility of ensuring a viable communications system lies with the District's Communications Department.

Under the direction of the Director of Communications, guided by the Superintendent, the Communications Department strives to develop and maintain a positive relationship with the community by using various forms of media to share information with stakeholders and encourage two-way communication.

The Communications Department shall identify, provide and maintain appropriate channels for the dissemination and receipt of communication, thereby ensuring that staff and community members are accurately informed on the planning, policies, programs, issues and accomplishments of the District, its schools and its students.

All District staff members are responsible for appropriately acquainting parents, guardians and residents with the work of the schools and students; giving courteous and thoughtful consideration to inquiries and suggestions; making volunteers and visitors feel welcome in District schools, buildings and classrooms; cooperating with parent and other community groups; maintaining inter-staff relations conducive to high morale; maintaining positive, cordial communications with all members of the Radnor Township community and the public at large; representing the District to the best of their abilities; answering questions about the schools and/or District on the basis of fact; and avoiding conjecture or encouragement of rumors about the District.

Types of Media Available for District and School Communications/Promotions

- District Website (www.RTSD.org)
- District E-Newsletter (The Radnor Reader)
- District Email System (Microsoft Outlook)
- District Teacher-Parent Communication System (Teacher Access Center)
- District Emergency Notification System (SchoolMessenger)

- District Learning Management System (Schoology)
- District, School and Staff Social Media Accounts (See Policy 815.1: Social Media – Employee and Student Use and Policy 911.1: Social Media for District Use)
- Print Materials (Flyers, Posters, Lawn Signs, Etc.)
- Video (Recorded Video Productions and Live Streaming)

News Media Relations

The Superintendent delegates the responsibility of interfacing with the news media on behalf of the District to the Director of Communications. The Director of Communications shall:

1. Be readily available to media representatives.
2. Keep media representatives adequately and appropriately informed so that reporting will be done on the basis of truth.
3. Submit and suggest feature stories, articles or other media of interest or relevance.
4. Assist school-related groups in relations with the news media.
5. Assist the Board in preparing regular and special publications for the public and the media.

Staff members shall not give school information or interviews to external news media representatives without prior approval of the District's Director of Communications or Superintendent.

Students shall not be permitted to give school information or interviews to external news media representatives without prior approval of the District's Director of Communications or Superintendent.

All publications, releases, photographs, video and the like identifying and/or depicting District students and staff while on District property or participating in District or school-sponsored events/activities must be approved by the Director of Communications or Superintendent prior to being distributed to news media for possible publication and/or news coverage.

Permission for news media representatives to photograph or capture/stream video of staff members and/or students at District and/or school-sponsored events/activities must be authorized by the Director of Communications or Superintendent and the individuals involved or their parents/guardians. Out of respect for the privacy of all students, parents/guardians are requested to refrain from distributing online, on social media, or to the news media personal photographs they may take on District property or at District/school events of students who are not their children.

No photograph or video of a controversial nature, or one that is questionable with regard to individual rights of privacy, shall be sanctioned, as determined by the Superintendent or Director of Communications.

Primary Methods of Communication to District Families

In an effort to provide clear information to District families in a consistent format, the District supports several services teachers and staff members are able to use to communicate with students and parents/guardians.

If a teacher or staff member wishes to distribute District or school-related information to the parents/guardians of students in the teacher's class(es) or participating in activities/athletics the teacher or staff member supports, the teacher or staff member should utilize one of the following District-supported resources as the primary method of communicating that information. Using these resources to primarily communicate with parents/guardians ensures teachers and staff members have the most accurate contact information for families; adhere to parents' communication preferences; and provide families a familiar and consistent communications experience across all grade levels.

- Teacher Access Center (TAC)
 - Teacher Access Center (TAC) allows teachers to directly send messages to parents/guardians of students in their class(es). Teachers who are unsure how to utilize this feature should contact the District's Communications Department.
- District Email System (Microsoft Outlook)
 - Each District teacher and staff member has a dedicated District email address to communicate with parents/guardians and other stakeholders on a regular basis.
- SchoolMessenger
 - SchoolMessenger is the District's emergency phone, email and text message alert system. Teachers and staff members can utilize SchoolMessenger to distribute messages specific to a particular grade, grades, school, or other student or parent demographic. Teachers and staff members seeking to use SchoolMessenger for their information-sharing needs should contact their school's main office and/or the Director of Communications or designee.
- Schoology
 - Schoology is a Learning Management System (LMS) that allows students and teachers to interact online, inside and outside the classroom. Through Schoology, teachers can post course content, provide resources for students, and review assignments.

- District Website (www.RTSD.org)
 - Teachers and staff members can post their own information to their respective teacher or department webpages or submit information to the District's Communications Department for possible publication on the District's website. The Communications Department will review the submitted information and determine whether the content is appropriate to publish per the guidelines of this Administrative Regulation's "Website" section as well as the most appropriate location for the information on the website.

- The Radnor Reader
 - Teachers and staff members can submit information to the District's Communications Department for possible publication in the District's weekly e-newsletter, "The Radnor Reader." The Communications Department will review the submitted information and determine whether the content qualifies for publication per the submission guidelines found on the District's website. The submitted information may be amended to adhere to the submission guidelines.

Secondary means of communication teachers and staff members may choose to utilize after the primary methods have been utilized include a school's Parent-Teacher Organization, Booster Club, or another volunteer group's communications systems.

District Groups and Corresponding Communications

- Class A: Student Organizations and District or School-Sponsored Activities/Events
 - Upon approval of the building principal or designee, Class A Groups may distribute promotional and/or informational materials within the related school building.
 - Class A groups are permitted and encouraged to utilize the "Primary Methods of Communication to District Families" as listed under the corresponding section in this Administrative Regulation. All materials are subject to standard approval processes as outlined in this Administrative Regulation.
 - If Class A Groups maintain District-approved webpage(s) on the District website, these groups may share promotional and/or general information on the group's approved webpage(s). Content restrictions/limitations and website accessibility requirements as listed in the corresponding sections of this Administrative Regulation apply.
 - Class A Groups may request promotional and/or general information be published in more visible areas of the District's website, such as the District and school homepages. All requests should be directed to the

District's Communications Department, where the request will be reviewed. Upon review and approval of the information, the Communications Department will publish the information as appropriate on more visible areas of the District website.

- Class A Groups may request additional promotional support from the District's Communications Department, such as the creation of flyers or other print materials; the development of graphics/imagery; the posting of information to social media; outreach to the news media; or other endeavors intended to inform the public. The Communications Department will support these endeavors as appropriate and as time and resources permit, as determined by the Superintendent, Director of Communications or designee.
- Class B (District and/or School-Related Parent Groups/Organizations)
 - These organizations are District and school-related parent groups/organizations.
 - Upon prior approval by the Director of Communications or designee based on compliance with this Administrative Regulation, Class B Groups may:
 - Post promotional materials on school bulletin boards or other areas where general information is shared in the school building. These materials are subject to reasonable time, place and manner as determined by the Director of Communications, building principal or designee.
 - Share promotional and/or general information on the group's approved webpage(s), if applicable. Content restrictions/limitations and website accessibility requirements as listed in the corresponding section of this Administrative Regulation apply.
 - Request promotional and/or general information be published in more visible areas of the District's website, such as the District and school homepages. All requests should be directed to the District's Communications Department, where the request will be reviewed. Upon review and approval of the information, the Communications Department will publish the information as appropriate on more visible areas of the District website.
 - Request additional promotional support from the District's Communications Department, such as the creation of flyers or other print materials; the development of graphics/imagery; the posting of information to social media; outreach to the news media; or other endeavors intended to inform the public. The Communications Department will support these endeavors as appropriate and as time and resources permit, as determined by the Superintendent, Director of Communications or designee.
- Class C: Radnor Residents/Parents, Current District Employees and Alumni

- This classification pertains to District residents, current/former District employees and Radnor High School graduates. This classification also covers Radnor High School graduates who request use of District facilities for reunion/class-related alumni events.
- With prior approval by the Director of Communications or designee based on compliance with this Administrative Regulation and the accompanying Board Policy, Class C Groups may distribute promotional materials subject to reasonable time, place and manner restrictions as determined by the Director of Communications, building principal or designee. The only method for communicating such information shall be through posting on physical or electronic bulletin boards. Each building principal or designee shall determine the mode, length and frequency of communication, which is subject to review/modification by the Director of Communications.
- Class D: Radnor Non-Profit Community Groups
 - These organizations are those groups whose primary function is to enhance the community by providing service to Radnor Township youth and adults. The participants in activities sponsored by these organizations should predominantly reside in Radnor Township and/or actively support the students' educational program.
 - Upon prior approval by the Director of Communications or designee based on compliance with this Administrative Regulation and the accompanying Board Policy, Class D Groups may distribute promotional materials subject to reasonable time, place and manner restrictions as determined by the Director of Communications or designee.
 - The only method for communicating such information shall be through posting on physical or electronic bulletin boards.
- Class E: Local For-Profit and Other Organizations
 - These organizations or groups include private enterprise groups, business and local for profit organizations.
 - The District does not distribute information on behalf of for profit entities for their private gain.

Procedures for Requesting Distribution of Information Through District Media

Any individual organization desiring to distribute information through any District communication medium must submit a request via email or in writing to the building principal, if the request is limited to one school building; or to the District's Director of Communications, if the request is for more than one school building or for District-wide dissemination.

The request must include:

- A written draft of the information that the individual or organization would like to distribute;
- A requested distribution time period; and
- The contact information for the individual or organization.

Procedures for Obtaining Approval to Post Promotional Signage on District Property

Any individual or organization desiring to post promotional signage or similar material on District property must submit a request via email or in writing to the Director of Operations or his/her designee. The request must include:

- An image or draft of the proposed signage or other promotional material;
- A description of the purpose for the signage or other promotional material being placed on District property;
- The proposed duration of the signage or other promotional material being placed on District property; and
- The contact information for the individual or organization.

The Director of Operations or his/her designee will evaluate and either approve or deny the request with support from the Director of Communications, if necessary. No individual/organization is permitted to post signage or similar promotional materials on District property without such posting being first approved by the Director of Operations or his/her designee.

Crisis Communication

Crisis communication is a process to manage the strategy, key messages, timing, and communication channels necessary to communicate effectively with employees, families, students, community members, the media and other stakeholders during and after a critical incident. The goal is to provide timely and accurate information, facilitate the de-escalation of the crisis, and reassure the public that the District is doing everything possible to address the matter.

The Director of Communications, under the guidance of the Superintendent, will oversee the District's crisis communication response efforts, serve as an advisor to other administrators and staff members, and serve as the spokesperson in response to media inquiries. The Director of Communications will assist with developing key messages and talking points, speeches, letters, and statements for school leaders; and counsel the leadership team on crisis communication response.

Overall, the District's communication focus in a crisis response involves the following:

- Keep parents, students and other stakeholders adequately informed through various communications channels;

- Provide appropriate, timely and ongoing internal communication to staff members;
- Establish a communication command center and functions, if warranted by the circumstances;
- Ensure key messages are understandable, factual, and consistent;
- Promote trust and credibility by communicating in a manner that establishes empathy and caring, competence and expertise, honesty and openness, and commitment and dedication;
- Anticipate and meet the needs of media, including by monitoring social media discourse; and
- Ensure that inaccurate or misleading information is corrected as soon as possible.

Website

The District's website, www.RTSD.org, provides an ongoing method of communication with the public and allows for the sharing of a wide range of school and District-related information.

Relevant Definitions

"Covered Websites" means: (a) the District's website (www.RTSD.org), (b) website domains hosted by the District, (c) website domains paid for by the District, (d) websites for which the District provides website administration services, (e) websites or webpages created by District employees to which students are directed or which students are required to access and (f) websites or web pages maintained by recognized booster clubs, parent organizations and similar District-affiliated entities with the authority of the District.

"Web Content Creators" are employees and other individuals who have been granted access by the District to create and edit content on the District's website.

Content

The District's Covered Websites will include content that is of a specific interest to students, parents and the community.

Covered Websites must primarily serve the interests of the District students and community. Additionally, Covered Websites are subject to the following content restrictions, as well as those listed in the section below titled "Content Restrictions":

1. All material must relate to appropriate professional, non-profit, governmental or educational organizations. They must relate to the District, the schools within the District, or the community

2. Webpage links may not include entities whose primary purpose is political advertising or endorsement of political candidates or parties.
3. Webpage links may not convey District sponsorship or approval of commercial entities unless approved by the Superintendent or Director of Communications.
4. Students, staff, and individuals may not post personal websites to the District's website, designated server(s) or storage provided by or through the District and may not provide access to their personal pages.
5. Covered Websites may not contain or link to personally identifiable information of students or images, video or audio of identifiable students, unless the parent/guardian of each identified student (or the student if the student is at least 18 years of age) has provided written consent authorizing the publication of this information.
6. Covered Websites may not contain or link to material that:
 - a. Is harmful or prejudicial to students; for example, materials which are libelous and obscene as defined by the state or federal law;
 - b. Constitutes bullying (including cyber-bullying), unlawful harassment, or otherwise fosters disruptiveness among the students so as to interfere with the learning environment of the District;
 - c. Threatens immediate harm to the welfare of the school community or any individual;
 - d. Discriminates against any segment of the student body or interferes with another's individual rights;
 - e. Encourages, abets or permits unlawful activity, including the violation of copyright laws;
 - f. Violates the separation of church and state;
 - g. Is pornographic;
 - h. Can intentionally cause damage to hardware, software or data;
 - i. Can gain or attempt to gain access to restricted material or systems;
 - j. Promotes or permits gambling; or
 - k. Otherwise violates school rules, Board Policy or any applicable Administrative Regulation.

Concerns regarding content should be directed to the Director of Communications.

Quality and Maintenance

The District's Communications Department shall be responsible for the overall design, operation, management, maintenance and usability of the website and for working to ensure that website content remains up-to-date and accessible to District families, students, staff members and community members.

All webpages must be timely, accurate, and accessible.

1. Employees

- a. All employee Web Content Creators are responsible for following best practices in website design and keeping their assigned webpage(s) up-to-date.
- b. In conjunction with the Communications Department, individual department directors and building principals are responsible for ensuring the employee Web Content Creators within their building or department keep all their assigned web content up-to-date.
- c. The Communications Department is responsible for conducting applicable website trainings for employee Web Content Creators on best practices and other related topics.
- d. Web content created by employees in the course and scope of their employment is the property of the District, shall remain property of the District, and may not be sold, transferred, licensed, leased or otherwise distributed outside of the District without Superintendent or designee approval.
- e. Employees must warrant to the District that they secured the necessary consents, releases and licenses for the use of content, including text, pictures, audio, video, logos and trademarks (including the work of other students or employees) to copy, distribute, display and, if applicable, perform, the content over the Internet and to create derivative works. The District is not responsible for employee use of copyright materials without the appropriate consents, releases and licenses.
- f. Employees should not use personal websites or webpages, including social media accounts, as a means of communicating with students. (See Policy 815.1: Social Media - Employee and Student Use)

2. Non-Employees

- a. Parents/guardians and other non-employee stakeholders who wish to have content on the District website edited or removed shall contact the Director of Communications to discuss the circumstances surrounding such request.
- b. All non-employee Web Content Creators are responsible for following best practices in website design and keeping their assigned webpage(s) up-to-date.
- c. In conjunction with the Communications Department, individual department directors and school building principals will be responsible for ensuring the non-employee Web Content Creators associated with their building or department follow best practices and keep all web content up-to-date.
- d. The Communications Department is responsible for conducting applicable website trainings for non-employee Web Content Creators on best practices and other related topics.

The content on the District's website, other than materials marked as copyrighted by others, is the property of the District. The District reserves the right to track, log and search in order to prevent unauthorized, inappropriate or illegal activity. The District reserves the right to deny access to anyone determined to be accessing or attempting to engage in unauthorized, inappropriate or illegal activity.

No individual, agency, organization or educational institution may maintain a presence on the District website without the approval of the Superintendent or Director of Communications.

Accessibility

The District is committed to ensuring that people with disabilities have an equal opportunity to that of their nondisabled peers to enjoy the District's programs, benefits, and services, including those delivered through electronic and information technology – this includes online content and functionality under the control of the District offered through a third-party vendor or by using open sources, except where doing so would impose an undue burden or create a fundamental alteration.

The Superintendent or designee shall develop and implement regulations designed to ensure that access to the District's publicly accessible website and the information contained therein is in compliance with the District's legal obligations under Section 504 of the Rehabilitation Act of 1973, Title II of the Americans with Disabilities Act of 1990, and their implementing regulations.

With respect to access to its publicly accessible website, federal law requires the District to ensure that people with disabilities (1) be able to independently acquire the same

information, engage in the same interactions, and enjoy the same benefits and services within the same timeframe as their nondisabled peers, with substantially equivalent ease of use; (2) not be excluded from participation in, denied the benefits of, or otherwise subjected to discrimination in any District programs, services, and activities delivered online; and (3) receive effective communication of the District's programs, services, and activities delivered online.

- Measuring Criteria

The District uses the W3C's Web Content Accessibility Guidelines (WCAG) 2.0 Level AA and the Web Accessibility Initiative Accessible Rich Internet Applications Suite (WAI-ARIA) 1.0 techniques for web content as a benchmark for measuring compliance with its legal obligations described above with respect to its publicly accessible website.

- Guidelines

The District is committed to having all new, newly-added, or modified online content and functionality of the District's website be accessible to people with disabilities as measured by the criteria noted above, except where doing so would impose a fundamental alteration or undue burden, where alternate access which is as effective as that provided to individuals without disabilities has been provided, or where permission has been sought and granted from the Office for Civil Rights.

When fundamental alteration or undue burden defenses apply, the District shall take any actions that do not result in a fundamental alteration or undue financial or administrative burdens, but nevertheless ensure that, to the extent required by law, individuals with disabilities receive the same benefits or services as their nondisabled peers.

The Superintendent designates the Director of Communications, or his/her designee(s), to periodically review content published or uploaded to the District's website for accessibility compliance and respond to any complaints received regarding inaccessible content or functionality. Instances of inaccessible content on the District's website that are brought to the attention of the Director of Communications in accordance with the procedures outlined below shall be resolved in a timely manner.

- Website Accessibility Complaints

If, because of a disability, you are unable to access content on Radnor Township School District's website, have questions about the accessibility of content used by the District, and/or would like to report barriers to accessing this content, please email RTSDAccessibility@rtsd.org.

If you wish to file a formal complaint related to the accessibility or functionality of any content on the District's website, please visit <https://www.rtsd.org/Page/12375> for additional guidance on how to do so in accordance with the District's Policy on Equal Rights Opportunity.

Communications Restrictions

- Use of Logos
 - Use of District and/or school logos must be approved by the Superintendent or designee prior to use.
- Use of Images
 - Images of District students or personnel may not be utilized for non-school purposes without the prior approval of the Superintendent or Director of Communications, upon approval of the individuals involved or their parents/guardians, as appropriate and outlined above.
- Media Relations
 - All media inquiries shall be directed to the Director of Communications, as the official spokesperson for the District. Staff members are not authorized to speak on behalf of the District, and may not give information or interviews requested by news media representatives without prior approval of the Superintendent or Director of Communications.

Nothing in this section shall preclude the School Board Secretary and/or the District's Right to Know Officer from releasing matters of a routine nature which have been recorded in the minutes of Board meetings or are otherwise required to be disclosed by law, upon request of media representatives.

Content Limitations

In addition to the other limitations set forth elsewhere in this Administrative Regulation and the accompanying Board Policy, organizations and other groups covered by this Policy/Administrative Regulation may only be permitted to distribute information that:

- Does not convey political partisanship, with the intent to advocate for a particular candidate or party rather than to instruct, except at designated polling places on Election Day;
- Does not promote or denigrate a particular religion or religious practice in a manner that suggests that the District is endorsing a particular set of religious beliefs;

- Does not incite discrimination against any group or person based upon race, color, national origin/ethnicity, gender, age, disability, sexual orientation or religion of the group or person;
- Does not promote or encourage hostility, disorder, violence, or disregard for violation of legal obligations;
- Does not primarily promote commercial enterprises, except for approved advertising which otherwise complies with District Policy 913.1 “Advertising and Sponsorships, and contains the required disclaimers;
- Does not libel an individual or group, or interfere with or advocate interference with the rights of any individual or the operation of the schools;
- Does not promote use of tobacco products, alcoholic beverages, illegal substances or paraphernalia;
- Does not conflict with prevailing standards of decency;
- Does not violate applicable copyrights, trademarks and other protected interests;
- Does not run counter to the best interests of the students, staff or schools, in the opinion of the Superintendent or designee upon consultation with the Solicitor or other District legal counsel in order to ensure legality;
- Does not violate Board Policy, any applicable Administrative Regulation or applicable law.