



# University of South Wales

## Social Media Policy

### 1 Introduction

The university recognises the right of freedom of expression and academic freedom in the support of the University Mission. The internet provides unique opportunities for members of the University i.e. (it's employees, contractors, students, and third-party contractors associated with the University of South Wales) to participate in interactive discussions and share information on particular topics using a wide variety of social media. "Social media" is a category of online media that support people talking, participating, sharing, networking and bookmarking online. Common social media platforms include, but are not limited to, online social networks such as Twitter, LinkedIn and Facebook, blogs, podcasts, discussion forums, RSS feeds, and content sharing sites such as Instagram and YouTube.

The University actively encourage its members to use these mediums, but we also recognise that use of social media can potentially pose risks to the University's confidential information and reputation and can jeopardise its compliance with legal obligations. Indeed, such freedoms are not absolute and are subject to legally, ethical and contractually imposed limits to protect the rights and freedoms of the university and others.

This policy applies to professional and personal use of social media by employees, contractors and other people who undertake paid or voluntary work on behalf of the University and students.

To minimise these risks, to avoid loss of productivity and to ensure that University Information and Communications Technology (ICT) systems are used only for appropriate purposes, we expect all members of the University to adhere to this policy both on the University's premises and in their own time. Indeed, It is the responsibility of each user to adhere to this policy. Where inappropriate use of social media may constitute an offence under criminal law, **referral will be made to the appropriate authorities**. In addition, users in breach of the policy **will be liable to disciplinary action** under relevant University procedures.

#### 1.1 Purpose

The purpose of the Social Media Policy is to:

- Encourage **good practice**.
- **Protect** the University and its employees.
- **Protect and safeguards** its students, visitors and guests.
- Specific guidance on the use of social media for **group work in an academic setting**.
- Clarify where and how **existing policies** apply to social media.
- **Promote effective and innovative use** of social media as part of the University's activities.
- **Protect our intellectual property rights**, information assets, financial interests and competitive edge;
- Maintain our **reputation**;
- **Confirm what is acceptable** and what is unacceptable behaviour in terms of social media usage;
- **Comply with the law** and help defend the University and its employees against legal action.

## 1.2 Scope

This policy applies to the use of social media for both business, academic and personal purposes, whether during University hours or otherwise, working independently or in group work situations and regardless of whether the social media is accessed using University ICT equipment, public equipment or personal equipment.

Breach of this policy may result in disciplinary action up to and including dismissal or expulsion. Disciplinary action may be taken regardless of whether the breach is committed during University hours, and regardless of whether University equipment or facilities are used for the purpose of committing the breach. Any member of the University suspected of committing a breach of this policy will be required to co-operate with the University investigation, which may involve handing over relevant passwords and login details.

Members of the University will be required to remove internet and/or social media postings which are deemed to constitute a breach of this policy. Failure to comply with such a request may result in disciplinary action.

## 1.3 Definitions

**Members** includes employees, contractors, students, and third-party contractors associated with the University of South Wales.

## 1.4 Roles and Responsibilities

Responsibility for monitoring and reviewing the operation of this policy, making recommendations for change to minimise risks and ensuring that the policy meets legal requirements and reflects best practice lies with the Vice-Chancellor's Executive Board (VCEB) ICT Sub-Group.

All members of the University are responsible for the success of this policy and should ensure that they take the time to read and understand it.

Any misuse of social media or breach of this policy should be reported to the University Secretary's Office via: [appeals.complaints@southwales.ac.uk](mailto:appeals.complaints@southwales.ac.uk).

The University will ensure this policy is accessible to all members and incorporate in induction information. Similarly, students will be guided of their responsibilities via student inductions.

The University will periodically review and update the policy and any significant changes will be communicated accordingly.

## 2 Policy Statement

Members should note the following regulations on personal internet presence:

- Use a personal email address and not your University email address.
- You are reminded to set your personal settings on social media sites to ensure inappropriate information is not put into the public domain by mistake.
- You should not use your site to attack or abuse colleagues, students or 3rd party organisations with whom the University is actively engaged. You should respect the privacy and feelings of others and be aware that making comments about certain personal characteristics could constitute harassment under the Equality Act 2010 and that you could face prosecution under that or other legislation.
- You should not include contact details or pictures etc. of other members without their prior permission. Remember that if you break the law on your site (for example by posting something defamatory), you will be personally responsible.

All Line Managers have a responsibility to ensure that their staff members are aware of this policy and take action if they become aware of any breach.

## 2.1 Posting Content to Social Media Sites

Members should presume that everything they post online will be public and permanent, regardless of the privacy settings they assume are applied.

Members should be aware that social media content forms part of a member's digital footprint and may easily become available to the public, including the University, students and the media. Inappropriate use could damage their reputation and career prospects, especially for students studying courses leading to a professional qualification. The University reserves the right to act on any information obtained from online sources if it indicates that a member is in breach of the Code of Conduct for staff, student or other University policies.

Members should familiarise themselves with the terms and conditions of any social media site that they use and note that many companies that operate social media platforms specify that, by posting on their sites, the company is granted irrevocable, perpetual, non-exclusive license to use and distribute content for any purpose, commercial, advertising, or otherwise.

When using a personal social media account, members should consider including, where appropriate, a disclaimer stating that the views expressed are not necessarily those of the University

## 2.2 Posting Guidelines

- You must take personal responsibility for your social media content. If you can be identified as working for the University, you must make sure your profiles, and anything you post, are congruent with how the University expect you to present yourself to colleagues and students. You must be mindful that even if you do not name the University as your employer, people who know you and where you work may still make an unwelcome association with the University. If you are in any doubt about what is and is not acceptable, this must be discussed with your line manager.
- You must protect the University's interests and you must not publish anything that could directly or indirectly damage these or compromise the University's reputation. You must always show respect to others when using social media.
- You must never criticise or make defamatory comments about the University, students, your colleagues or anybody else you come into contact with professionally.
- You must **NEVER** use social media to
  - post threatening, obscene or profane comments
  - express or support sexist, racist, sectarian or homophobic views
  - express support for illegal activities or organization
  - disseminate misleading information
  - view or distribute sexually explicit or offensive content
  - infringe or violate someone else's rights
  - post personally identifiable information that could be used to locate any individual without that person's written permission
  - post content that could create a security risk for the University or its members
  - In any way which may be unlawful
- You must not do anything that could be considered discriminatory against, or bullying or harassment of, any individual, for example by:

- a. making offensive or derogatory comments relating to age, disability, gender reassignment, marital or partnership status, race, religion/belief or non-belief, sex or sexual orientation, or any other distinction;
  - b. use social media to bully another individual (such as an employee or student of the University) or;
  - c. post images that are discriminatory or offensive or links to such content.
- If you think something on your site gives rise to concerns about a conflict of interest and, in particular, concerns about impartiality or confidentiality this must be discussed with your line manager.
  - Do not reveal confidential information about the University, its members or its intellectual property. This might include aspects of University policy or details of internal discussions. Consult with your manager if you are unclear about what might be confidential.
  - If someone offers to pay you for site content this could constitute a conflict of interest and you must consult with your line manager. Do not forget that you are required contractually to obtain permission to undertake paid or unpaid work outside the University.
  - If someone from the media or press contacts you about posts on your site which relate to the University you should discuss it with your line manager and the Corporate Communications Team - USW's Media Policy.
  - Whereby you have political views, the University has a policy on visits, media and activity involving political parties and candidates - USW's Political Policy: In particular, note section 19 – Campaigning by USW Colleagues: Colleagues are free to express political views in support of and against particular parties and to engage in political campaigning providing that:
    - a. Any social media posting makes it clear that such views are their own personal opinions and not the position of the University. Where a reasonable person might infer USW support, particularly for example from a colleague whose role or seniority is such that they speak for USW in public, colleagues are advised to use their best judgement in the context of the University's social media policy and to err on the side of discretion in their public social media comments.
    - b. Such activity does not take place in work time or using University resources, including but not limited to computer equipment, social media feeds, or email addresses.
    - c. The University's member communications channels, including The Hub, are not used to disseminate such political views.
  - You should not update your personal site during paid working time, unless such activities form part of a work related activity.

## 2.3 Encouraged Practice

The University supports members using social media where it adds value to existing services, for instance for the purposes of:

- Academic uses – The University recognises that social media has the potential to support and advance learning opportunities and encourages its use in this way. Where existing supported learning technologies, e.g. Virtual Learning Environment, offer equivalent functionality, consideration should be given to the most effective medium.
- Collaborative uses – The University supports both internal (cross Faculty / Department) and external collaboration and recognises that social media can provide opportunities to support this work.

- Communications and External Relations uses – The University recognises the opportunity to communicate with prospective and existing customers through social media.
- Student uses – Prospective and existing students, along with others who have an interest in the University, are active in social media, e.g. setting up Facebook groups and blogging. Marketing and Student Recruitment may look at these sites, if appropriate, to get further insights into the needs of University customers. Possible responses to any contentious issues identified in any unofficial social media sites should be referred to the Communications Working Group via the Corporate Communications Team in the first instance.
- Alumni uses – The University recognises the opportunity to communicate with existing students and alumni through social media to develop an on-going relationship with them. Overall responsibility for alumni relations lies with the Alumni Relations and Development Office in Research and Business Engagement.
- Students' Union uses – The University understands that the Students' Union will want to use social media to maximise the exposure of its services and the associated societies to existing and prospective students. These uses are the responsibilities of the Students' Union.
- Welsh Language uses – Social communication should be made in both Welsh and English.

## 2.4 Staff Recruitment

The University is committed to fair, open and accountable employee recruitment and selection procedures. The University reserves the right to review public social media profiles as part of the recruitment process. However, any such searches must comply with Equality, Human Rights and Data Protection laws.

Hiring Managers may use social media to promote advertised posts to potential applicants and to identify potential candidates. However, in doing so, particular care must be taken to avoid unconscious bias. The University will also use other channels to publicise vacancies to avoid excluding potential applicants who do not use social media. Hiring Managers who wish to use social media such as LinkedIn to advertise a vacancy need to ensure the link to the vacancy on university website is included and that their message is consistent with the criteria set out in the website posting.

Where the post advertised requires the successful candidate to demonstrate evidence of effective public engagement using social media, or an established research profile, evidenced by online publications and citations, the hiring manager must ensure that the job advertisement asks applicants to cite examples and links e.g. Google Scholar profiles or h-indexes and informs potential candidates that these will be reviewed as part of the selection process.

If the hiring manager reviews social media profiles as part of the recruitment process they must:

- ensure they have fully documented a specific and justified purpose for doing so
- not use the review to exclude applicants from interview; unless evidence of online public engagement or research publications is an essential criterion for the role
- review the social media profile after the short-listing process unless evidence of online public engagement or research publications is an essential criterion for the role

If a search of an applicant's public social media profile reveals information about the individual that presents serious legal or reputational concerns for the University, the hiring manager must seek advice from the HR Recruitment Consultant or another member of the Human Resources team.

## 2.5 Other Potential uses

- The University will not refer to social networking sites when assessing student applications unless such sites are specifically highlighted in the application. Should an individual's site be viewed, any information pertaining to a Protected Characteristic will not influence any decisions.
- The University may refer to social networking sites when investigating breaches of discipline or grievance cases, e.g. harassment, anti-social behaviour.
- The University may monitor member's use of social media, along with their wider use of Company IT resources, to make sure members are complying with this Policy. Whenever members use our IT resources and systems, they give us their consent to monitor their activities.
- The University may monitor forums and blogs to gain indirect feedback on University services and facilities. The University may post replies on forums and blogs to answer queries or address factual corrections, but would generally take a cautious approach before getting involved in any contentious issues.
- The University reserves the right to take any necessary steps to protect its facilities and members from malware (malicious software) including blocking sites where this is an issue.
- If a complaint is received that a student or employee is being bullied or harassed via social media, then the University's 'Dignity at Work Policy' or 'Dignity at Study Policy' may be invoked.

## 2.6 Use of University Affiliated Social Media Sites / Social Media Site Creation

A University affiliated social media site is defined as any site that could reasonably be perceived to be associated with or representative of USW. This includes support sites, Twitter account and faculty / department-based sites, along with any social media sites that, by their content or look, could be perceived as being associated with USW.

Anyone wishing to create a University affiliated social media site must obtain approval from their Head of School or Director. Any queries relating to the establishment of a University social media site should be emailed to [content@southwales.ac.uk](mailto:content@southwales.ac.uk).

USW reserves the right to monitor any social media sites that affiliate themselves with the University and, where necessary, to request the removal of sites that reflect negatively on the University or the removal of content that infringes on the University's copyright or implies an unauthorised association.

### 2.6.1 Identification of University social media accounts

All University social media accounts must be clearly identified as such, using the University branding and logo in the manner set out in the University Style Guide, which is available from Marketing and Communications.

### 2.6.2 Security of University social media accounts

Colleagues who manage University social media accounts are responsible for ensuring that passwords and other access controls are of adequate strength and kept secure. All official University accounts should be set up to be managed jointly by nominated staff using an account with shared login credentials specific to the account, using a strong password, so that authorised colleagues can add content in the absence of the main content provider. Under no circumstances should passwords for individual member accounts be shared with others. Accounts should not be left open and unattended for any period. Anyone using a personal device to manage University social media accounts is responsible for ensuring that its operating system and anti-virus software are up to date and that the device is encrypted, and doubly protected by a strong password/encryption key in case of loss.

### 2.6.3 Responsibilities of Site Administrators

If you set up a University affiliated social media site, you effectively become the administrator for that site on behalf of the University and are responsible for maintaining the site and moderating content. It is important that at least one other member shares administrator responsibilities for the site and has access to the login details in order to ensure continuity and to assist with moderation.

Care should be taken when naming accounts to maintain consistency and to ensure accounts can be easily identified as University affiliated accounts.

Site administrators must have an understanding of the basic principles and etiquette associated with the management of an effective social media site.

An administrators of University social media sites must adhere to the following:

- Ensure that the site complies with the terms and conditions of the social media platform used
- Ensure that the site does not compromise University branding guidelines Secure permission prior to posting, sharing or distributing copyrighted materials
- Only link to legal content and view any content before linking to it
- Ensure that content and commentary do not damage the University's reputation
- Ensure that content does not include confidential or proprietary information about USW's or its students, employees or alumni.
- Avoid using social media in teaching or research in a way that may be detrimental now or in the future to participants
- Manage the site in an effective manner to ensure timely feedback and support, where required.
- All communication on such sites must be bilingual; Welsh and English.

Where social media sites are used to explore controversial content as part of a course of academic study, administrators must ensure that appropriate context and disclaimers are provided and, if possible, take any reasonable measures to restrict access to the content.

Comments made by users are their property and should not be reused without their permission.

Social media platforms should not be used to collect personal information about users.

### 2.6.4 Moderating Content

University social media sites should encourage users to share their views by commenting on content within the following guidelines:

- Comments must be relevant to the topic being discussed
- Comments should be constructive and absent of expletives, obscenity and vulgarity
- Posts that are off-topic, abusive, contain profanity, are threatening in tone or devolve into personal attacks should be deleted immediately and reported, if necessary
- Posts with links that are determined to be spam or sales and advertising, or infringe copyright, should be removed immediately

Where possible, guidelines for posting content should be prominently displayed on the social media site, along with a statement that site administrators reserve the right to review all comments and posted materials and remove such materials for any reason.

Where possible, complaints should be dealt with via direct message or email, not on a public forum.

University affiliated social media sites should be monitored and updated on a regular basis.

Where a user's post raises a duty of care issue, site administrators should seek advice from the appropriate unit.

## 3 Policy Audit

### 3.1 Compliance

Failure to comply with this policy may result in disciplinary procedures.

### 3.2 Related Policies and Regulations

Members of the University should familiarise themselves with key University policies including:

- ICT Computing Regulations
- Data Protection Statement
- Records Management Policy Statement
- Dignity at Work Policy
- Student Code of Conduct
- Safeguarding Vulnerable Groups Policy

Further guidance can be found at <https://its.southwales.ac.uk/policies-and-regulations/>

### 3.3 Review Plan

Policy Owner: Susanne Smith

Review Period: Every 2 years

### 3.4 History

| Date          | Version | Author                                     | Approved by | Comments                          |
|---------------|---------|--|-------------|-----------------------------------|
| December 2012 | 1.0     | Policy set                                 | AD          |                                   |
| April 2013    | 1.1     | Rebranding to University of South Wales    | AD          |                                   |
| December 2013 | 1.2     | Minor textual updates                      | AD          |                                   |
| November 2015 | 2.0     | (University name, staff intranet name)     | JR          | For approval at VCEB ICT 04/12/15 |
| February 2016 | 2.1     | Revised Policy                             | JR          | Release                           |
| March 2020    | 3.0     | Revised Policy                             | Steve Lake  | Amended prior to release          |
| March 2020    | 3.1     | Susanne Smith<br>Head of Customer Services |             |                                   |