

Staff Social Media Policy

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Executive Owner:	Anne Poulson
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Related documents:	Freedom of Speech - Code of Practice Data Protection Policy Dignity at Work and Study Policy Disciplinary Policy IT Acceptable Use Policy and Guidelines Accountable Information Provider Policy Monitoring and Filtering Policy

Approval History

Version	Reviewed by	Reason for review	Approved by	Date
8	Prevent Group H&S People, Culture and Inclusion Legal	To include latest CMA guidance	Lucy Evans Paul Daniells Michael Hassell Steve Allen	29 May 2019 04 June 2019 22 Jan 2019 29 May 2019
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1 Introduction

Effective use of social media can bring significant and measurable benefits to the University. These include opportunities to promote the institution's success stories, develop national and international reach, improve student engagement and attract high quality staff and students.

Social media channels can spread the University's messages across the globe quickly and to a range of audiences at little or no cost and, unlike other traditional media channels, they provide instant feedback from our audiences.

Along with these benefits come the risks inherent in managing something that is dynamic and unlimited in scale. These include the risk of reputational damage arising from misuse by staff, students or third parties, threats to the security of sensitive or confidential information, exposure to malware and a negative impact on productivity.

1.1 Purpose

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This Social Media Policy aims to mitigate the risks associated with employees' use of social media. It provides all University of Surrey staff with a clear articulation of the institution's expectations around the use of social media. The accompanying Social Media Toolkit and Blog encourages University of Surrey staff to use social media and gives guidance on how best to make the most of the key channels.

1.2 Scope

1.2.1 This policy has been produced for all University of Surrey employees. A policy for University of Surrey students will be provided separately.

1.3 Definitions

1.3.1 According to the Chartered Institute of Public Relations (CIPR), social media are: "Internet and mobile-based channels and tools that allow users to interact with each other and share opinions and content. It involves the building of communities or networks and encouraging participation and engagement." This is the recognised definition for the purpose of this document.

This policy refers to three different types of social media account:

- **Professional University of Surrey Account** – used by representatives of the University to communicate messages from a departmental, faculty or corporate perspective managed by a Professional Account Administrator (see 2.1.4).
- **Professional Individual Account** – used by an individual member of staff who actively identifies themselves as an employee of the University of Surrey through the content of their posts or their profile’s biographical information.
- **Personal Account** – used by an individual primarily for non-work activity, who is identified to be a University of Surrey member of staff, for example through provided profile information, the content of their posts, or through colleague or student identification.

Social networks covered by this policy include, but are not limited to, Facebook, Twitter, LinkedIn, YouTube, Instagram, Pinterest, Google+, Tumblr, Weibo and WeChat.

2 Policy Principles

2.1 Professional Use of Social Media

2.1.1 University of Surrey employees using social media in a professional capacity, either through a Professional University of Surrey account or a Professional Individual Account, should make sure that their communications do not do any of the following:

- **Bring the University into disrepute.** For example, hostile criticism or arguments with customers, colleagues or rivals; making defamatory comments about individuals, other organisations or groups, or the University; or posting images that are inappropriate, links to inappropriate content or using inappropriate language.
- **Breach confidentiality.** For example, revealing confidential information owned by the University relating to its activities, finances, people, or business plans, or the personal data of any individual who has not given informed consent (in writing) for their data to be published.
- **Breach copyright.** For example, using someone else’s image or written content without their permission; failing to give acknowledgement where permission to reproduce something has been obtained
- **Do anything that may be considered discriminatory against, or bullying and harassment of, any individual.** For example, making offensive or derogatory comments relating to sex, gender, race, disability, sexual orientation, religion, belief or age; using social media to bully another individual; or posting images that are discriminatory or offensive or linking to such content.
- **Breach the terms of service of the social network.** Each social network has different terms of use and community guidelines, which must be followed in order to not breach or contravene any applicable laws (e.g. in section 3.5.1).
- **Post out-of-date information about the University’s courses and offerings that contradicts the official information on www.surrey.ac.uk or the latest prospectuses.** (See 2.1.8 for more details.)

The University does, however, recognise Academic Freedom whereby staff shall have freedom within the law to question and test received wisdom and to put forward new ideas and controversial or unpopular opinions, without placing themselves in jeopardy of losing their jobs or privileges.

2.1.2 Employees using social media in a professional capacity should use the same safeguards that they would with any other form of communication about the University in the public sphere. These safeguards may include (but are not limited to):

- ensuring that the communication has a purpose and benefit to the University
- obtaining a manager's permission before starting a public social media campaign
- getting an appropriate person to check the content before it is published
- ensuring the information you provide does not contradict the authoritative information published through the main University channels
- seeking advice if you are unsure of your objectives or required outcomes.

2.1.3 There should be a clear reason or reasons to set up a Professional University of Surrey Account and processes put in place to ensure that it is monitored and updated regularly.

If you wish to set up a Professional University of Surrey Account, you must contact socialnetworks@surrey.ac.uk to ensure one is not already in existence that you could contribute to. You will receive a response to your request within two working weeks.

For detailed guidance please refer to the Social Media Toolkit (which is available on the Marketing and Communications pages of [SurreyNet](#) under the section called 'Social Media'). More information can also be found on the University's official [Social Media Blog](#).

- 2.1.4 Where a Professional University of Surrey account has two or more users, one user should be assigned the Professional Account Administrator role. This person will be responsible for:
- ensuring that the account meets brand guidelines as specified in the Social Media Toolkit
 - making sure that the login details are shared only with those who have a real need to use the account
 - revoking access to the account where necessary, such as if an employee leaves the organisation
 - ensuring that all content produced for the account is in line with this policy
 - ensuring that the account is used regularly, as outlined in the Social Media Toolkit (which is available on the Marketing and Communications pages of [SurreyNet](#) under the section called 'Getting help with social media')
 - reporting any incidents where the administrator feels that an employee has misused the social media account, including but not limited to transgression of the legislation referred to in section 3.5.
- 2.1.5 Employees managing a Professional University of Surrey account are expected to remove any comments that fit into the categories outlined in 2.1.1. Additionally, users should also remove comments that are:
- spam, or trying to sell things
 - fraudulent, deceptive or misleading
 - in violation of any law or regulation.

Employees are encouraged to think carefully before removing users' comments, to ensure that users with good intentions do not feel that we are placing an unjustified restriction on their freedom of speech.

- 2.1.6 Social media users are encouraged to regularly check their accounts for messages and respond to any enquiries that they receive in a timely fashion.
- 2.1.7 Social media users who receive enquiries/approaches from media sources (newspapers, radio, TV) are encouraged to notify the University's Communications & PR Team for guidance about how to respond (as they would if they received approaches from the media via any other channel).

- 2.1.8 To comply with applicable consumer protection laws and regulations (in doing so, having due regard to related guidance issued by the Competition and Markets Authority (CMA)), the University endeavors to ensure that relevant information a prospective student needs to make an informed decision about where they apply is provided in an accurate, complete, clear, unambiguous, up front, timely and accessible way. This applies to whoever provides the information on behalf of the University and whether it is written, visual or spoken, e.g. via website, prospectus or at open days. Therefore information written and posted on central or devolved social media accounts must not, at the time of posting, contradict the official information published in the main University channels, i.e. www.surrey.ac.uk and the latest prospectuses (if information appears to be incorrect on the website it is advisable to check with a member of the Marketing team in case it needs updating). Please refer to the Accountable Information Provider policy for further information. Particular content, such as video on YouTube, needs to be audited regularly to ensure accuracy of published information and to archive out-of-date information that could surface on websites, search engines and the YouTube channel itself.
- 2.1.9 All employees using social media in their professional role at the University of Surrey are encouraged to read the University's Social Media Toolkit – available on the Corporate Marketing and Communications pages of SurreyNet under the section called 'Social Media'. More information can also be found on the University's official [Social Media Blog](#).
- 2.2 Personal use of social media
- 2.2.1 The University recognises that many employees will make use of social media in a personal capacity. University of Surrey employees using social media in a personal capacity should make sure that their communications do not do any of the following, to uphold standards the University reasonably expects (this list is not exhaustive but indicative of the areas of concern):
- Bring the University into disrepute.
 - Breach confidentiality.
 - Breach copyright.
 - Do anything that may be considered discriminatory against, or bullying and harassment of, any individual.
 - Post incorrect or out-of-date information about the University's courses and offerings that contradict official details on www.surrey.ac.uk or the latest prospectuses. (See 2.1.8 for more details.)
 - Breach or contravene any applicable law (including but not limited to those referred to in section 3.5).
- 2.2.2 Employees who openly disclose or can be proved to be working for or otherwise associated with the University of Surrey (for example through the individual's profile information on the social media channel or through the types of content posted) should ensure adherence to 2.2.1 and include on their profile, where possible, a statement or disclaimer explaining that the views expressed are theirs alone and that they do not necessarily reflect the views of the University. However, if the content of the post is inappropriate (see 2.2.1), a disclaimer would not prevent disciplinary action.
- 2.2.3 To avoid confusing its audiences, the University prohibits using its logo(s) on social network profile pictures, background images or cover photos, without the permission of the Marketing and Communications Department. Contact socialnetworks@surrey.ac.uk to receive a response to your request within two working weeks.

- 2.2.4 Employees are encouraged to familiarise themselves with privacy settings for each social media platform and choose a privacy level that they consider to be appropriate. For more information about privacy settings, please refer to the University's Social Media Toolkit – available on the Corporate Marketing and Communications pages of [SurreyNet](#) under the section called 'Getting help with social media'. More information can also be found on the University's official [Social Media Blog](#).
- 2.2.5 Employees are permitted to make reasonable and appropriate use of personal social media from the University's computers or mobile devices. For more information, please refer to 2.3.2 below.

2.3 Procedures

- 2.3.1 Where it is found that an employee has misused social media, it may be regarded as a disciplinary offence in accordance with the University Disciplinary Policy. Examples of misuse are outlined in 2.1.1, 2.2.1, and 2.1.8.
- 2.3.2 The University reserves the right to monitor employees' internet usage in line with the [IT Acceptable Use Policy and Guidelines](#) and Monitoring and Filtering Policy. In line with this, it may instigate an investigation into an employee's internet usage where there are suspicions that the employee has been using social media excessively for personal use when they should be working, or in a way that is in breach of the rules set out in this policy. Authorisation to instigate an investigation into an employee's internet use can only be carried out by either the Director of Human Resources (or designated deputy) or the Director of IT, following consideration of a valid case for this from the individual's line manager.
- 2.3.3 The University monitors mentions of its brand name and associated terms in order to identify any risks to reputation and to gather customer feedback. Only content that is available in the public domain is subject to monitoring. Data monitored is processed for analysis purposes and could be held by the University and by external platforms. University employees are advised to read the privacy guidance provided in 2.2.4.
- 2.3.4 In the event a staff member feels that they have been harassed or victimized through social media (whether by a fellow staff member, a student or a member of the public) these concerns should normally be raised with the staff member's line manager in the first instance. In the event it is felt appropriate to escalate the issue, the matter should be raised with the local HR Manager who will then advise on the appropriate course of action and the support available. Please note that support can also be provided from the Centre for Wellbeing; the Chaplaincy; Occupational Health and/or a Trade Union Representative.

3 Governance Requirements

3.1 Implementation / Communication Plan

- 3.1.1 Once approved, this policy will be posted, along with the Social Media Toolkit, on to the University's website and communicated via internal communications channels including:
- Leaders' Alert, SurreyNet, SurreyLife and NetNews.
 - HR will be asked to include the policy in their briefing to new staff during the induction process.

Updates to this Policy and ongoing guidance relating to best practice in social media will be posted to the Social Media blog: blogs.surrey.ac.uk/socialmedia

3.2 Exceptions to this Policy

- 3.2.1 In all cases where it is believed that this policy has been breached, considerable judgement will be exercised to consider the context behind the issue and the impact of the action. However, where it is found that an employee has misused social media, it may be regarded as a disciplinary offence in accordance with the University Disciplinary Policy.

3.4 Review and Change Requests

- 3.4.1 This policy should be reviewed every two years to keep up to date with latest developments in social media. Changes of title or other aspects that do not change the meaning of the policy will be carried out by the policy owner as required.

3.5 Legislative context

- 3.5.1 Legal guidance covered by the acts below:
- Data Protection Act 1998 and accompanying guidance in the Information Commissioner's Employment Practices Data Protection Code.
 - Human Rights Act 1998.
 - Regulation of Investigatory Powers Act 2000
 - Telecommunications (Lawful Business Practice) (Interception of Communications) Regulations 2000 (SI 2000/2699)
 - Copyright, Designs and Patents Act 1988
 - Consumer protection laws and regulations, including the Consumer Rights Act (2015)
 - Counter-terrorism and Security Act 2015
 - Defamation Act 2013
 - Protection from Harassment Act 1997

3.6 Stakeholder Statements

- 3.6.1 **Equality:** There is potential for social media channels to be used for bullying and harassment of individuals. It is therefore important that the policy is considered alongside the Dignity at Work and Study Policy. The People, Culture & Inclusion (PCI) Team will include reference to this policy in induction and management training.
- 3.6.2 **Health & Safety:** There is potential for social media channels to be used to cause emotional harm or mental distress to others. By producing this policy and its accompanying toolkit, the University hopes to minimise any distress to its staff caused by the misuse of social media.