

Student Social Media Ac Version 1.0	count Administrators (Societies, Sports Clubs, Groups):	
Enabling Policy Statement; Executive Owner; Approval Route:	Our Partners and Reputation	
Is the Procedure for internal use only (Non-disclosable)?	Disclosable	
Associated Policy Statements:	Our Data Our Students	
Authorised Owner:	Director of Marketing and Communications	
Authorised Co-ordinator:	Head of Strategic Communications	
Effective date:	1 Aug 2025	
Due date for full review:	1 Aug 2027	
Sub documentation:		

Approval History

Version	Reason for review	Approval Route	Date
1.0	Migration to POPP and review of the University's	PRC	8 July 2025
	approach to governing social media		

1. Purpose

The purpose of this Procedure is to support students who are Account Administrators for social media accounts associated with Surrey Students' Union (SSU) and/or the University of Surrey, helping them to maintain an online social media presence that is ethical and legal, while maximising the benefits of these channels when communicating with others. It seeks to protect students, the University, Surrey Students' Union (SSU) and their staff from the misuse of social media and clarify where, and how, existing University procedures and guidelines apply to social media.

The Procedure needs to be read alongside the University's Freedom of Speech Code of Practice and <u>Inclusion and Accessibility Guidance</u>.

Our <u>Social Media Toolkit</u> includes <u>Best Practice Guide for Social Media Account Administrators</u> and Social Media Post Specifications (covering asset/image sizing for social media channels).

The Procedure exists to support its Enabling Policy Statement, Our Partners and Reputation.

2. Scope and Exceptions to the Procedure

2.1. This Procedure has been produced for all University of Surrey students who use a social media account associated with a University of Surrey or Surrey Students' Union (SSU) student group or a ratified Surrey Students' Union (SSU) Society or Sports Club.

A separate Social Media Procedure for students covering the use of personal social media accounts can be found on the University's website.

In all cases, the procedure applies whether social media is accessed using the University's IT facilities and equipment, or equipment belonging to students or any other third party.

A separate Social Media Procedure (Staff) exists for University of Surrey staff. Where students undertake paid duties as employees of the University and they engage in Misuse (as defined in this procedure) in connection with those duties, the Social Media Procedure (Staff) will be applied.

In all cases where it is believed that this procedure has been breached, judgement will be exercised to consider the context behind the issue and the impact of the action. However, where it is found that a student has misused social media, it may be regarded as a disciplinary offence in accordance with the Student Disciplinary Regulations; Harassment and Bullying Procedure and/or Sexual Misconduct Procedure; Surrey Students' Union Society Code of Conduct; Surrey Students' Union Disciplinary Policy.

A separate Social Media Policy exists for Surrey Students' Union (SSU) staff.

- 2.2. Students on international exchange programmes and placements will be expected to adhere to the procedures and/or policies of both the University of Surrey and appropriate international partners.
- 2.3. Students at (Surrey International Institute) SII-DUFE are University of Surrey students and are expected to adhere to the procedures and/or policies of both the University of Surrey and, where relevant, those of Dongbei University of Finance and Economics.
- 2.4. Students who are enrolled on a Surrey Online Learning course are University of Surrey students and are expected to adhere to the procedures and/or policies of the University of Surrey.

3. Definitions and Terminology

3.1. According to the Chartered Institute of Public Relations Social Media (CIPRSM) panel, 'social media is the term commonly given to Internet and mobile-based channels and tools that allow users to interact with each other and share opinions and content'. As the name implies, "social media involves the building of communities or networks and encouraging participation and engagement." This is the recognised definition for the purpose of this document.

This Procedure refers to social media accounts associated with a ratified Students' Union Society or Sports Club, or another student Group associated with the University of Surrey or Surrey Students' Union (SSU).

Societies

A Surrey Students' Union (SSU) Society refers to any group ratified within the Surrey Students' Union (SSU). Societies are semi-autonomous and are run by student committees; both the committee members and the society members have a responsibility to each other, the Surrey Students' Union (SSU) and the University to represent themselves appropriately in their activity. Surrey Students' Union (SSU) Society Code of Conduct is published on the Union's website. Elected signatories assume ultimate responsibility for the relevant society and may be held accountable under the Students' Union's Disciplinary Policy for collective misconduct.

Sports Clubs

Sports clubs fall under the umbrella of Team Surrey. Surrey Students' Union (SSU) Team Surrey Code of Conduct is published on the <u>Union's website</u>. Elected signatories assume ultimate responsibility for the relevant Sports Club and may be held accountable under the Students' Union's Disciplinary Policy for collective misconduct.

Groups

Student groups that do not fall into the categories of Societies or Sports Clubs. Examples might include groups linked to courses or student networks.

Social networks

Social networks covered by this Procedure include but are not limited to: Facebook; X (formerly known as Twitter); Bluesky; Threads; LinkedIn; YouTube; Instagram; Tik Tok; Weibo; WhatsApp; ResearchGate; WeChat; RED (also known as Xiaohongshu and Little Red Book).

3.2 Misuse includes:

- Behaviour that constitutes misconduct as defined in the Student Disciplinary Regulations and/or <u>Sexual Misconduct Procedure</u>.
- Behaviour that constitutes discrimination, bullying, or harassment as defined in the Harassment and Bullying Procedure.
- **Breach of 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.
- Breach of 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.
- **Breaching or contravening any applicable law** (including but not limited to those referred to in section **5.4.1**).
- Posting, downloading or sharing content to, on or from social media channels that:
 - Promotes or advocates terrorist acts
 - Incites violence

- Celebrates terrorist acts
- Aims to recruit individuals to terrorist organisations or prohibited groups
- Encourages others to promote recruitment to terrorist organisations
- Promotes or advocates raising money for anyone listed on the UK Home Office list of prohibited groups and individuals.

4. Procedural Principles

4.1 Freedom of Speech

The University is committed to promoting freedom of speech within the law and the importance of academic freedom and tolerance for controversial views in an educational context or environment.

The Charter outlines requirements for academic freedom and freedom of speech as follows: "The University shall uphold the right for Staff of the University and Students to express lawful views and opinions freely, in speech or in writing, without interference." This is a core duty alongside which any allegation of a breach of the Social Media Procedure for Student Social Media Account Administrators must be considered.

Freedom of speech and expression are recognised as essential in the University's role in society and as an academic institution. Vigorous speech and comment and academic debate on social media can be distinguished from the behaviours outlined in this procedure. Whilst free speech includes speech that may be offensive or hurtful, speech that amounts to Misconduct including (but not limited to) unlawful harassment does not constitute free speech within the law and, therefore, will not be protected from disciplinary action.

4.2 Social media usage on behalf of a ratified Students' Union Society or Sports Club or other student Group associated with Surrey Students' Union (SSU) or the University of Surrey.

4.2.1 Compliance

- **4.2.1.1** All social media activity being undertaken by a Student Account Administrator on behalf of a ratified Students' Union (SSU) Society or Sports Club is subject to University of Surrey Students' Union (SSU) byelaws as set out in the Society Code of Conduct Surrey Students' Union and the Students' Union Team Surrey Code of Conduct.
- **4.2.1.2** Student Account Administrators using social media in a professional capacity on behalf of a ratified Surrey Students' Union (SSU) Society or Sports Club or a Group associated with Surrey Students' Union (SSU) or the University of Surrey are ultimately representing Surrey Students' Union (SSU) and the University of Surrey and should take care that their communications do not constitute Misuse. Misuse (as defined above) may be regarded as a disciplinary offence (see 3.2).
- **4.2.1.3** 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.
- **4.2.1.4** Inaccessible social media campaigns risk alienating audiences, reduce impact and breach key

legislation including the Public Sector Equality Duty (part of the Equality Act 2010). Students using social media on behalf of an official University of Surrey or Surrey Students' Union Society, Club or Group should read the University's Guidelines for creating accessible social media posts.

- **4.2.1.5** The posting of private, sensitive or confidential information either accidentally or intentionally may lead to a breach of information security which could carry significant legal and financial penalties (see 5.4.1 Data Protection Act 2018 and accompanying guidance in the Information Commissioner's Employment Practices Data Protection Code and Our Data Policy Statement).
- **4.2.1.6** Students who undertake paid duties as an employee of the University must also comply with the Social Media Procedure (Staff).

4.2.2 Safeguards

- **4.2.2.1** Student Account Administrators should use the same safeguards that they would with any other form of communication in the public sphere. These safeguards may include (but are not limited to):
 - Getting an appropriate person to check the content before it is published.
 - Seeking advice if unsure of the objectives or required outcomes.
 - Seeking guidance before participating in social media when the topic being discussed concerns
 commercially sensitive material. Social media activity around commercially sensitive material
 should be referred to the <u>Head of Strategic Communications</u> or the <u>Head of External Relations</u> or
 the Director of Marketing and Communications or the Students' Union Student Voice &
 Communications Manager.
 - Ensuring you have a person's consent to publish content if it features their image, voice or story on a University of Surrey account. An exception applies when sharing information that has already been published on another University of Surrey or Surrey Students' Union social media account..
 - consulting the Students' Union's Student Voice & Communications Manager or the University's
 <u>Head of Strategic Communications</u>, or <u>Head of External Relations</u> for advice if the account
 receives complaints. Complaints made about Club and Society content should be dealt with in the
 first instance through the Students' Union's Disciplinary Policy and will be referred to the
 University's Disciplinary Procedure if necessary.
 - Seeking advice from either the Students' Union's Student Voice & Communications Manager, the
 University's <u>Head of Strategic Communications</u>, the University's <u>Head of External Relations</u> or
 their reports if you are concerned that content posted on the account is:
 - An incident of Misconduct (see 3.2)
 spam or trying to sell things (examples may include assignment writing services)
 - Fraudulent or deceptive
 - In violation of any law or regulation.

Deleting posts or blocking users that could be deemed offensive or otherwise at odds with University of Surrey policies will generally not be permitted as doing so would contravene the University's duty to uphold and promote freedom of speech (3.3).

Out of hours, questions can be raised with the University's Duty Communications Officer - in an emergency, they can be reached via the <u>Campus Safety Team</u>.

- **4.2.2.2** Where a social media account for a Surrey Students' Union (SSU) Society or Sports Club or a Group associated with Surrey Students' Union (SSU) has two or more Student Account Administrators, one user should be nominated as the Lead Student Account Administrator. This person will be responsible for:
 - 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 a student leaves the Society, Sports Club or Group.
- Reporting any incidents where another person has misused the social media account by contacting the Students' Union Student Voice & Communications Manager (Surrey Students' Union) (SSU) or the Head of Strategic Communications (University of Surrey) in their absence (see 3.2).
- Ensuring that passwords and other access controls for University social media accounts are kept secure (see 4.2.3).
- Handing over their responsibilities to a replacement Lead Student Account Administrator. Where
 this is not possible, advice must be sought from the Students' Union Student Voice &
 Communications Manager (Surrey Students' Union) (SSU) or the <u>Head of Strategic</u>
 Communications (University of Surrey).
- Notifying the University's External Relations team and the Students' Union's Student Voice & Communications Manager about any enquiries or approaches from media sources (newspapers, radio, TV) (as they would if they received approaches from the media via any other channel).

4.2.3 Security

- **4.2.3.1** Student Account Administrators must keep University or Students' Union associated social media accounts secure as follows:
 - Where the social media channel allows, Multi Factor Authentication (MFA) must be used on social media platforms.
 - Where the social media channel allows, the log in details should be linked to a generic University
 of Surrey or Surrey Students' Union (SSU) email account for that Society, Sports Club or Group,
 and not to a personal email address (see 4.2.3.2).
 - Passwords for social media accounts must be different from passwords to linked email accounts.
 - Passwords must be of adequate strength. The University recommends using the "three random words" method - where you combine three random words to create a password that is long enough and strong enough to withstand attack. Passwords must not be rotated or incremented e.g. from password1 to Password2.
 - Store passwords securely in a password-protected document and restrict access accordingly.
 - Be aware of phishing campaigns with emails containing links requiring or requesting users to log into social media accounts. If in doubt, refer to the University's IT security training.
 - Under no circumstances should passwords be shared further than the accounts administrators
 without permission from the Students' Union's Student Voice & Communications Manager or the
 University's central Social Media team.
 - If the password has been shared outside of the team in agreement with the Students' Union's Student Voice & Communications Manager or the University's central social media team e.g. for an account 'takeover' by another student, the password must be changed once the temporary user has finished using it.
 - If a Student Account Administrator leaves the University, the password must be changed upon their departure.
 - Student Account Administrators should ensure that any devices that have social media login
 details stored on them are set to lock automatically after each use, with a password required. If
 any devices that contain login details are stolen or lost, the Student Account Administrator should
 change the passwords of all social media accounts that the device was connected with and notify
 other official administrators using the social media account/s.
- **4.2.3.2** All social media accounts created on behalf of a Students' Union Society or Sports Club must be linked to the official Students' Union email account for the ratified Society or Sports Club e.g. ussu.(SOCIETY/SPORTS CLUB NAME)@surrey.ac.uk. This is to ensure that the account can be recovered if the Student Account Administrators leave the University of Surrey community.
- **4.2.3.3** All social media accounts created on behalf of a Group associated with the University of Surrey

must be linked to a University of Surrey or Students' Union email address set up specifically for that Group. This is to ensure that the account can be recovered if the Student Account Administrators leave the University of Surrey community. To request a shared mailbox, contact IT Services for support.

4.2.3.4 Social media accounts for a ratified Surrey Students' Union Society or Sports Club or a Group associated with the Students' Union or the University of Surrey should not be linked to a personal email address (there are exceptions for Facebook and LinkedIn, which do not support this). If in doubt, Student Account Administrators should seek advice from the Students' Union Student Voice & Communications Manager (Students' Union social media accounts) or the Head of Strategic Communications (accounts associated with the University of Surrey).

4.2.4 Brand

- **4.2.4.1** The University prohibits the use of its name or derivatives thereof within the account name or remit statement of a social network account, by individuals or organisations 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.
- **4.2.4.2** To avoid confusing its audiences, the University prohibits using its logo(s) in or 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. All ratified Students' Union Societies and Clubs must have any social media logos approved by Surrey Students' Union (SSU), including new variations of approved designs.

4.2.5 Good Practice

4.2.5.1 The University is unable to monitor private, personal messaging apps, such as Snapchat, Facebook Messenger, WhatsApp and direct messages on Twitter and Instagram. When it comes to connecting with University staff, students should therefore avoid the use of private messaging apps and keep in contact through our many formal channels, such as University email, Microsoft Teams or face-to-face meetings.

This provision governs the manner of communication rather than the content and is not intended to limit academic freedom or freedom of expression.

4.3 Procedures

- **4.3.1** Where it is found that a Student Account Administrator of a social media account for a Surrey Students' Union (SSU) Society or Sports Club or a Group associated with Surrey Students' Union (SSU) has misused social media, it may be regarded as a disciplinary offence in accordance with the Student Disciplinary Regulations, Harassment and Bullying Procedure and/or sexual Misconduct Procedure. Misuse is defined in **3.2** of this Procedure.
- **4.3.2** 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.

5. Governance Requirements

5.1 Implementation: Communication Plan

5.1.1 This procedure will be posted onto <u>the University's external website</u> and linked to on <u>the University's student website</u>, MySurrey, <u>the Students' Union website</u>, and communicated via

internal communications channels including:

- Email to all known Students' Union Societies, Sports Clubs and Groups
- Students' Union: communications going out to signatories of Societies and Sports Clubs
- Students requesting to set up other student Groups associated with Surrey Students' Union (SSU) and the University of Surrey
- Surrey Staff Briefing newsletter for all staff (featured alongside Social Media Procedure for Students)
- SurreyNet article for staff (featured alongside Social Media Procedure for Students)
- Linked to in the staff social media toolkit (featured alongside Social Media Procedure for Students)
- Briefing of staff within the CSO Directorate and the Academic Leaders Forum.

5.2 Implementation: Training Plan

- **5.2.1.** A Social Media Toolkit for Account Administrators (Societies, Sports Clubs, Groups), including:
 - Social Media Best Practice
 - Social Media Post Specifications (asset/image sizing for social media channels)
 - Inclusion and Accessibility Guidance (Administrators of Society, Sports Club and Group accounts)

5.3 Review

5.3.1 This procedure should be reviewed every two years to keep up to date with the latest developments in social media. Changes of title or other aspects that do not change the meaning of the procedure will be carried out by the procedure owner as required, approved by Chairs' Action and published.

5.4 Legislative Context and Higher Education Sector Guidance or Requirements

- **5.4.1** Legal guidance covered by the Acts below:
 - Data Protection Act 2018 and accompanying guidance in the Information Commissioner's Employment Practices Data Protection Code
 - Data (Use and Access) Act 2025
 - 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
 - Privacy and Electronic Communication (EC Directive) Regulations 2003
 - UK General Data Protection Regulation 2016/679
 - Computer Misuse Act 1990
 - Equality Act 2010
 - Higher Education and Research Act 2017
 - Higher Education (Freedom of Speech) Act 2023.

5.3 Sustainability

- **5.3.1** This procedure supports SDG 10 reducing inequalities by enabling all students to access social media in an equitable and fair way. It further supports SDG 16 peace, justice and strong institutions by taking a lead in setting how social media should be used and the safeguards in place for students, promoting free speech and human rights, whilst addressing harassment and other activities that may exclude certain students.
- **5.3.2** The Procedure does not have an impact on energy consumption and/or associated carbon emissions.
- **5.3.3** Social media posts that mention the University brand can be used as evidence for certain rankings, including in the area of sustainability.

6 Stakeholder Engagement and Equality Impact Assessment

- **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 <u>Harassment and Bullying Procedure.</u>
- **6.2. Health & Safety:** There is potential for social media channels to be used to cause emotional harm or mental distress to others. By implementing this procedure, the University has taken positive steps to minimise any distress to its students caused by the Misuse of social media while also upholding our duty to protect freedom of speech.

There are also issues around mindful usage and the mental health of those using social media:

- Mindful usage: social media users should be mindful of the amount of time they spend on social media and take regular breaks.
- Mental health: social media users need to recognise that social media can affect mental health and be mindful of the content they consume and share.
- 6.3 An Equality Impact Assessment was completed on 01/07/2025
- **6.4** Stakeholder Consultation was completed, as follows:

Stakeholder	Nature of Engagement	Request EB Approval (Y/N)	Date	Name of Contact
Student Experience	Review of Procedure V1.0	N	01/072025	Emma Rowsell, Acting Chief Student Officer
Governance	Review of Procedure V1.0	N	26/6/2025	Ros Allen, Head of Governance Kelley Padley, Governance Officer
Information Governance	Review of Procedure V1.0	N	02/07/2025	Ewan Robson, Information Governance Manager and Data Protection Officer
IT	Review of Procedure	N	02/07/2025	Thomas Brown, Interim Head of

	V1.0			Information Security
H&S	Review of this Procedure V1.0	N	20/06/2025	Matt Purcell, Director of Health and Safety
Sustainability	Review of Procedure V1.0	N	20/07/25	Martin Wiles, Head of Sustainability
Academic Freedom/ Freedom of Speech	Review of Procedure V1.0	N	26/06/25	Joshua Andresen AFFE Committee
Students' Union	Review of Procedure V1.0	N	25/06/25	Alex McKee, CEO, Surrey Students' Union
Students' Union	Review of Procedure V1.0	N	25/06/25	Hannah Jones, Student Voice and Communications Manager, Students' Union

Others consulted

- Glenn Moulton, Head of OSCAR
- Helen Litvak, Director of Communications
- Jo McCarthy-Holland, Equality, Diversity and Inclusion Manager (Equality Impact Assessment)

Sarah Litchfield, University Secretary and General Counsel, and Katy Huetson, Associate Director (People Services) have been consulted re the procedural principle (agreed at PRC on 8 March 2025) which states that staff must not use personal social media accounts, including WhatsApp and WeChat, to contact students. Instead, they must use designated University communication channels for student contact such as email and Teams (with some exceptions).