Student Social Media Procedure (Personal Accounts): Version 1.0

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 August 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 approach to governing social media	PRC	8 July 2025

1. Purpose

The University recognises that social media is an important part of everyday life for many students; it can bring real benefits and is a valuable means of communication. Through social media activity and engagement, students can enrich not only their personal lives, but also their learning and career opportunities.

Along with these many benefits come the risks inherent in using something that is dynamic, unlimited in scale and can blend personal and professional roles. These include:
- The reputational consequences for users (students)
- The risk of breaking copyright law
- The risk of behaving in a way that constitutes Misconduct as defined in the *Student Disciplinary Regulations, and/or the Sexual Misconduct Procedure and/or the Harassment and Bullying Procedure and Academic Freedom and Freedom of Expression Policy*
- Threats to the security of commercially-sensitive or confidential information e.g. information relating to a Human Resources matter

The purpose of this Procedure is to help and encourage students who are using social media in a personal capacity to develop an online social media presence that is ethical and legal. It seeks to protect students, the University and its staff and Surrey Students' Union (SSU) from the Misuse of social media and clarify where, and how, existing University procedures and guidelines apply to social media.

The Procedure should be read alongside the University's Freedom of Speech Code of Practice. Other supporting materials can be found in our Social Media Toolkit including Inclusion and Accessibility Guidance.

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. Its scope extends to all students who create or contribute to blogs, social networks, apps, forums, virtual worlds, or any other kind of social media. The Procedure extends to students' use of social media in a personal capacity, where this impacts the University, its students, staff or the wider community, for example, where a student has misused social media by behaving in a way that breaches the University's Harassment and Bullying Procedure and/or Sexual Misconduct Procedure.
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.

A separate Procedure refers to 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) and can be found on the University's website.

2.2 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 and Surrey Students' Union Society Code of Conduct.

2.3 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.

2.4   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.

2.5   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.

2.6   The activities of students taking place away from University sites will also fall within the Procedure's scope if they are undertaking activities that are, or could reasonably be perceived to be, associated with the University. This includes students on a work placement (PTY or equivalent) and international exchange.

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 a Personal Social Media Account e.g. a personal Instagram account used by an individual student to connect with family, friends and other followers.

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 [Sexual Misconduct Procedure](#);
- Is unlawful, for example by constituting Sexual Misconduct, Harassment or Bullying; breaches copyright (for example, uses someone else's image or written content without their permission; failing to give acknowledgement where permission to reproduce something has been obtained);
- Reveals confidential information about the University, its students or staff on social media.

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 (Students) 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 Personal Account – used by an individual primarily for non-study purposes.

4.2.1 Compliance

4.2.1.1 The University recognises that many students will make use of social media in a personal capacity. Students using social media in a personal capacity should make sure that their communications do not do any of the following, if they wish to avoid facing potential disciplinary action:

- **Behave in a way that constitutes misconduct as defined in the** *Student Disciplinary Regulations* and/or *Sexual Misconduct Procedure.*
- **Behave in a way that constitutes discrimination, bullying, or harassment** as defined in the Harassment and Bullying Procedure.
- **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.
- **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.
- **Breach or contravene any applicable law** (including but not limited to those referred to in section **5.4.1**).
- **Post, download or share 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.

4.2.1.2 When undertaking a Professional Training Placement or working with a third-party organisation as part of their studies, students should familiarise themselves and comply with their employer's social media policy in addition to the University's social media procedure.

4.2.1.3 Students taking a course which will result in a professional qualification (such as teaching, medicine or law) should read the social media guidance provided by the national professional body to ensure they meet the expected standards of behaviour. Examples include the Health and Care Professions Council and the Nursing and Midwifery Council.

4.2.1.4 If social media is used as part of a research project, the ethical requirements and considerations of the University and course, as outlined in the Ethics for Teaching and Research Procedure and Academic Regulations, should be adhered to.

4.2.1.5 Students who undertake paid duties as an employee of the University must also comply with the Social Media Procedure (Staff).

4.2.1.6 When utilising a personal social networking site, students should not declare, imply or indicate that their content or views are representative of those of the University or the Students' Union. If the University can be identified, you should make it clear that you are speaking on your own behalf. You should note that the presence of a disclaimer will not necessarily mean that disciplinary action cannot be

taken.

4.2.2   Good Practise

4.2.2.1 Students should assume that everything they post online will be public and permanent, regardless of the privacy settings that are applied. They should be aware that social media content may easily become available to the public, including employers or prospective employers, professional bodies, academic institutions and the media, and that inappropriate use could damage their reputation.

4.2.2.2 Students are encouraged to familiarise themselves with privacy settings for each social media platform and choose a privacy level that they consider to be appropriate. Full information on how to choose and amend privacy settings is clearly signposted on each social media platform. When selecting privacy settings, students should consider how much of the information on their social media profiles will appear in the public domain and the impact this may have, particularly when applying for jobs and placements.

4.2.2.3 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. Discuss with your lecturers and personal tutors how you can keep in touch.

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

4.3.3   Branding

4.3.3.1. 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.

4.3.3.2 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.

4.4.4   Complaints

4.1.4.1 Official complaints made by students regarding social media usage should be made using the official complaints channels of either the University or the Students' Union, depending on the context of the complaint. Guidance for students on the use of these channels can be found on the [University of Surrey](#) and [Surrey Students' Union (SSU)](#) websites. Any complaints received from students via social media will be directed to this guidance.

4.5   Procedures

4.5.1   Where it is found that a student has misused social media in contravention of the Harassment and Bullying Procedure and/or sexual Misconduct Procedure, it may be regarded as a disciplinary offence in accordance with the Student Disciplinary Regulations. Misuse is defined in **3.2** of this Procedure.

4.5.2   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 the University's external website and linked to on the University's student website, MySurrey, the Students' Union website, and communicated via internal communications channels including:

- MySurrey Student newsletter
- Student induction
- All-student email
- Surrey Staff Briefing newsletter for all-staff
- SurreyNet article for staff
- Linked to in the staff social media toolkit
- 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 Students includes:
- 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)
- Inclusion and Accessibility Guidance (General)

5.3. Review
5.3.1 This procedure 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 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.

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 *Harassment and Bullying Procedure.*

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	30/06/25	Emma Rowsell, Acting Chief Student Officer
Governance	Review of Procedure V1.0	N	27/6/2025	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 V1.0	N	02/07/2025	Thomas Brown, Interim Head of Information Security
H&S	Review of this	N	20/06/2025	Matt Purcell,

	Procedure V1.0			Director of Health and Safety
Sustainability	Review of Procedure V1.0	N	01/07/2025	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, Surrey Students' Union

Others consulted
- Glenn Moulton, Head of OSCAR
- Helen Litvak, Director of Marketing and 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).