Social Media Policy

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1 Introduction

The internet provides unique opportunities for members of the College i.e. it's, learners, partners, contractors, sub-contractors and guests to participate in interactive discussions and share information on particular topics using a wide variety of social media. "Social media" is a broad term for any kind of online platform which enables people to directly interact with each other. Common social media platforms include, but are not limited to, online social networks such as Twitter, LinkedIn, Facebook, TikTok, Snapchat, blogs, podcasts, discussion forums, RSS feeds, and content sharing sites such as Instagram and YouTube.

The College actively encourages its members to use these mediums, but we also recognise that use of social media can potentially pose risks particularly around the issues of safeguarding, PREVENT, bullying, to the College'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 College and others.

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

To minimise these risks, to avoid loss of productivity and to ensure that College's Information and Communications Technology (ICT) systems are used only for appropriate purposes, we expect all members of the College to adhere to this policy both on the College's premises and in their own time where it impacts the college. 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 may be liable to disciplinary action under relevant College procedures.

2 Purpose

The purpose of the Social Media Policy is to:
- Encourage good practice.
- Protect the College and its colleagues.
- Protect and safeguard its learners, partners, contractors, visitors and guests.
- Provide specific guidance on the use of social media (see Appendix 1).
- Promote effective and innovative use of social media as part of the College's activities.
- Protect intellectual property rights, information assets, financial interests and competitive edge.
- Maintain the College's reputation.
- Comply with the law and help defend the College and its colleagues against legal action.

3   Scope

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

Professional communications are those made through official channels, posted on a course/school/department account or using the course/school/department name. All professional communications are within the scope of this policy.

Personal communications are those made via personal social media accounts. In all cases, where a personal account is used which associates itself with, or impacts on, the College, it must be made clear that the colleague is not communicating on behalf of the College with an appropriate disclaimer. Such personal communications are within the scope of this policy.

Personal communications which do not refer to or impact upon the college are outside the scope of this policy.

Academic communications with learners are also considered. Colleagues may use social media to communicate with learners via a course/school/department social media account for teaching and learning or support purposes but must consider whether this is appropriate and consider the potential implications.

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 College hours, and regardless of whether College equipment or facilities are used for the purpose of committing the breach. Any member of the College suspected of committing a breach of this policy will be required to co-operate with the College investigation.

Members of the College 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.

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

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

3.1 Definitions

Members include colleagues, learners, partners, contractors, sub-contractors, visitors and guests.

4   Organisational Control

4.1 Roles and Responsibilities

- Director of Digital Strategy and Innovation
    - Developing and implementing the social media policy.

- Line Managers
    - Making an initial assessment when an incident is reported and involving appropriate staff and external agencies as required.

- People and Culture
    - Facilitating training on social media use.

- Marketing Manager
    - Receive completed applications for corporate social media accounts.
    - Approve account creation.

- Social Media Account Administrator/Moderator
    - Creating the account following approval.
    - Storing account details, including passwords securely.
    - Being involved in monitoring and contributing to the account.
    - Controlling the process for managing an account after the lead staff member has left the organisation (closing or transferring).

- Colleagues
    - Knowing the contents of, and ensuring that any use of, social media is carried out in line with this and other relevant policies.
    - Attending appropriate training.
    - Regularly monitoring, updating and managing content they have posted via school/course accounts
    - Adding an appropriate disclaimer to personal accounts when naming the school/college

The College will ensure this policy is accessible to all members and incorporate it in induction information. Similarly, learners will be guided of their responsibilities via learner inductions.

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

4.2   Process for Creating Corporate Social Media Accounts

College members are encouraged to consider if a social media account will help them in their work. Anyone wishing to create such an account must present a business case to the marketing manager for approval which covers the following points:

- the aim of the account
- the intended audience
- how the account will be promoted
- who will run the account (at least two colleagues should be named)
- will the account be open or private/closed

Following consideration by the marketing manager an application will be approved or rejected. In all cases, they must be satisfied that anyone running a social media account on behalf of the College has read and understood this policy and received appropriate training. This also applies to anyone who is not directly employed by the College, including volunteers or parents/carers.

4.3 Monitoring Social Media Accounts

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

4.4 Responsibilities of Site Administrators/Moderators

If you set up a College social media site, you effectively become the administrator for that site on behalf of the College 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 they can be easily and clearly identified as College accounts, using the official College branding and logo or seek approval from the Marketing Department to use other branding and logo.

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

An administrator of a College social media site 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 College branding guidelines.
- Ensure that passwords and other access controls are of adequate strength and kept secure. Anyone using a personal device to manage College 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.
- Secure permission prior to posting, sharing or distributing copyrighted materials ensuring posts do not infringe upon relevant data protection laws, or breach confidentiality.

- Only link to legal content and view any content before linking to it.
- Ensure that content and commentary do not damage the College's reputation.
- Ensure that content does not include confidential or proprietary information about Coleg y Cymoedd or its learners, staff members or alumni.
- Avoid using social media in teaching in a way that may be detrimental.
- Manage the site in an effective manner to ensure timely feedback and support, where required.
- All social media posts published from official 'Coleg y Cymoedd' accounts and from School level accounts (i.e. 'The School of Sport, Travel and Public Services') must be bilingual or there must be separate Welsh and English posts. However, accounts held by individual members of staff and accounts held by a sub-group within a School (i.e. 'Sport') do not have to post bilingually.
- If anyone contacts the College in Welsh via social media–the College must answer in Welsh.

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.

4.5 Moderating Content

College 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/harassing 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. College 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 manager.

5.   Encouraged Practice

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

- Academic uses – The College recognises that social media has the potential to support and advance recruitment and encourages its use in this way. Existing supported learning technologies and platforms (e.g. Teams) are the preferred choice for direct digital communication channels with learners relating to teaching, learning, assessment, support and the dissemination of college wide information.

- Collaborative uses – The College supports both internal (cross Faculty / Department) and external collaboration and recognises that social media can provide opportunities to support this work.

- Communications, Commercial and External Relations uses – The College recognises the opportunity to communicate with prospective and existing customers through social media.

- Learner uses – Prospective and existing learners, along with others who have an interest in the College, are active in social media, e.g. setting up Facebook groups and blogging. Marketing and Recruitment may look at these sites, if appropriate, to get further insights into the needs of College customers. Possible responses to any contentious issues identified in any unofficial social media sites should be referred to the Marketing Team in the first instance.

- Alumni uses – The College recognises the opportunity to communicate with existing learners and alumni through social media to develop an on-going relationship with them. Overall responsibility for alumni relations lies with the Marketing Department.

6. Staff Recruitment

The College is committed to fair, open and accountable recruitment and selection procedures. The College 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.

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 College, the hiring manager must seek advice from the People and Culture team.

The College 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 College will also use other channels to publicise

vacancies to avoid excluding potential applicants who do not use social media. Anyone who wishes to use social media such as LinkedIn to advertise a vacancy needs to ensure the link to the vacancy on College website is included and that their message is consistent with the criteria set out in the website posting.

7.Other Potential Uses

The College reserves the right to review public social media profiles as part of the learner recruitment process. However, any such searches must comply with Equality, Human Rights and Data Protection laws.

The College may refer to social networking sites when investigating breaches of discipline or grievance cases, e.g. harassment, anti-social behaviour.

The College 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 College may monitor forums and blogs to gain indirect feedback on college services and facilities. The College 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 College 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 learner or colleague is being bullied or harassed via social media, then the College's Disciplinary, Grievance or Complaints Policy may be invoked.

9.Monitoring and Review

Coleg y Cymoedd will review policies, procedures and guides on a regular basis in order to ensure the classification status of documentation is valid.

Appendix 1 – Guidelines

Members should note the following regulations on personal internet presence:

- Use a personal email address and not your college 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 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 others 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.

1.1   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 College, learners, and the media. Inappropriate use could damage their reputation and career prospects, especially for learners studying courses leading to a professional qualification.

The College 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, learners, or other College 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 College.

1.2   Social Media Guidelines

- You shold take personal responsibility for your social media content. If you can be identified as working for the College, you should make sure your profiles, and anything you post or acknowledge online (e.g. like), are congruent with how the College expect you to present yourself to colleagues, learners, parents, and

partners. If you are in any doubt about what is and is not acceptable, this should be discussed with your line manager.

- You should protect the College's interests and you should not publish anything that could directly or indirectly damage these or compromise the College's reputation. Digital communications should be professional and respectful at all times when using social media.

- You should 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 College or its members
    - Communicate in any way which may be unlawful

- You should not do anything that could be considered discriminatory against, or bullying or harassment of, any individual, for example by:
    - Making offensive or derogatory comments relating to age, disability, gender identity, marital or partnership status, race, religion/belief or non-belief, sex or sexual orientation, or any other distinction.
    - Use social media to bully another individual (such as an employee or learner) or.
    - Post or acknowledge 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 should be discussed with your line manager.

- Do not reveal confidential information about the College, its members, or its intellectual property. This might include aspects of College 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 College.

- If someone from the media or press should contact you about posts on your site which relate to the College you should discuss it with your line manager and the Marketing team.

- You should not update your personal site during paid working time, unless such activities form part of a work-related activity. The use of social media by

colleagues while at work may be monitored, in line with college policies. The college permits reasonable and appropriate access to private social media sites. However, where excessive use is suspected, and considered to be interfering with relevant duties, disciplinary action may be taken.