

# **MORLEY COLLEGE LONDON**

## **Social Media Policy for Staff**

POLICY OWNER: FINAL APPROVAL BY:

Policy Category: Approved by Policy Committee: Approved by Governing Body: Review Date: Head of Marketing & Sales Policy Committee

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## 1. Introduction

Morley College London encourages the safe and effective use of social media for all students and staff.

For the purposes of this policy, social media is defined as being the interaction between individuals, using websites and web applications to create, share and exchange content, ideas, and opinions. It is one of the most popular online forms of use and has many societal benefits, allowing users to share news, information, and successes, and keep staff and students up to date with important developments.

Other recognisable and popular community instant messaging apps and platforms such as **WhatsApp, Discord, Parler, Telegram, MS Teams, Zoom or Skype** for instance, do not fall within the remits of this social media policy. A policy for safe usage of these community apps and platforms will be reviewed by the Head of Communications and Engagement separately.

As usage has grown and expanded onto new platforms, there are increasing risks associated with social media, which need to be recognised and considered. Inappropriate use can adversely impact upon staff, students, and the reputation of the college.

Social media can include, but is not limited to:

- Facebook
- LinkedIn
- Twitter
- Instagram
- Tik Tok
- Snap Chat
- Yammer
- Blogs
- Social media and video/imagery sharing (e.g., YouTube, Flickr, Vimeo)
- Collaborative projects (Wikipedia, Wiki)
- Virtual social worlds
- Virtual gaming worlds (Twitch)

#### 2. Purpose and Aims

This policy has been created to minimise the risks of social media, which can impact upon the wellbeing of students and staff and the reputation of the college, so that they can enjoy the benefits of social networking whilst understanding the standards of conduct expected by Morley College London.

This policy is designed to:

- Protect staff from the potential risks of social media
- Provide guidance to staff using social media
- Set out principles staff need to follow, when using social media for their own safety and the safety of others

This policy is applicable to all teaching staff, support staff, directors, and board members, including governors, who may be using social media/the internet to communicate:

- Content that identifies them as Morley College London employees or students
- Content relating to others within the college
- Content created in connection with their college employment or course
- Content about the college

The term 'user' in this policy applies to any individual who satisfies these criteria.

The policy applies to the use of social media both on college-issued devices and personal devices. College-issued devices can include PCs, laptops/Surfaces, tablets, iPads, and smartphones.

It also applies to the use of social media on Morley College London premises and offsite. The location of the individual positing social media content does not matter. For example, unacceptable content uploaded from a home computer is treated in the same way as unacceptable content published via a PC in the college.

This policy is also applicable to internal college IT systems that include social networking features, such as the college's primary internal communications tool (My Morley) and Yammer.

This policy should be read in conjunction with the college's policies listed on page 12 of this documentation.

## 3. Scope

The policy applies to all employees of Morley College London. It also applies to those people operating on behalf of the college, such as contractors, agency staff and visitors such as speaking guests, alumni, funders, and other academic partners/associates. In any such situations the manager responsible for the contractor, visitor or agency member of staff will be responsible for making these staff aware of the college's policy.

This policy applies to the use of social media for both business and personal purposes, whether it is in normal work time or not, on college or personal computing facilities, and whether posting on social media using personal or work-related accounts.

It also outlines what the college views as unacceptable use of social media. The policy does not undermine the principles of academic freedom.

The college allows staff open access to the internet and email whilst at work, although access for personal purposes should be kept to a minimum and should generally be made during permitted breaks from work or study, or outside of work/study times.

The use of social media to further the interest of and to support the business of the college is encouraged. However, approval should always be sought from managers where such use is proposed.

## 4. Responsible Use of Social Media and Unacceptable Content

The college has no direct control over the information employees or students choose to disclose on social networking sites. However, employees must bear in mind the need to protect the reputation of the college, their own privacy, the privacy of colleagues and students and the confidentiality of college information/data in any communications or statements they make available to the public which includes family and friends outside of Morley College London.

The college values and recognises that staff members do actively interact and engage on social media in a personal capacity, using this to positively promote the college to followers, particularly in their area of expertise. This policy does not wish to discourage this but continues to actively support and encourage those staff to do so.

The expectation of this policy will be that employees behave professionally in all situations which relates directly or indirectly to the college and should conduct themselves in a way which acknowledges the standards of behaviour expected within this and other college policies.

Everyone is personally liable and can be held accountable for the content they post.

Staff should not access the Dark Web to interact or engage and should never reference they work at Morley College London or use our name in this environment. This online environment is dangerous, contains illegal content and platforms and can put at risk individuals' personal safety as well as inadvertently place the college into the sphere of international law enforcement agencies.

Irrespective of the privacy settings applied to social media sites, users should assume that any content posted on social media is visible to the public and permanent. Users should not assume that once content is deleted it is permanently removed.

Unacceptable content includes, but is not limited to, content that is or will lead to:

- Abusive
- Commercially sensitive
- Confidential
- Defamatory
- Discriminatory
- Fraudulent
- In violation of copyright laws
- Indecent
- Bullying or victimisation
- Harassment (related to protected characteristics)
- Offensive
- Reputational damage
- Likely to identify an individual, without the permission of the individual
- Promoting violence or terrorism
- Malicious
- Misleading
- Obscene
- Offensive
- Pornographic
- Unlawful

Users must not attempt to access or use someone else's social media profile without their permission.

If a user is found to be in breach of this policy, they may be subject to disciplinary action. Please refer to the relevant disciplinary policy for more information. In more serious instances, an individual could be made subject to civil or criminal legal proceedings. Social media must never be used in a way that breaches this or any other Morley College London policy.

If during an investigation a student, employee or member of the public raises a complaint through the College Complaints Procedure, the investigating officer should familiarise themselves with this and seek advice, if necessary. Regardless of how the information becomes known, an investigation may be undertaken.

## 5. Protecting Reputation and Relationships

Disciplinary action may result if following an investigation there is evidence of damage to:

- The reputation of Morley College London
- Working relationships within the college
- Working relationships with external / collaborative partners
- Relationships with students, customers, or service providers

At a practical level, all employees are advised to avoid posting anything online that they would not wish managers or colleagues (both internal and external) or family and friends/acquaintances to see.

If a staff member becomes aware that content of this nature has been posted by someone connected to the college, they should make a line manager aware as soon as possible. If users wish to make a formal complaint about college-related social media, they should follow the normal complaints procedure.

## 6. Confidential Information

Employees must not disclose confidential information, or sensitive business-related information through social media. Additionally, employees must always pay due regard to the provisions of the General Data Protection Regulation (GDPR) and the Data Protection Act, and as such ensure that they do not disclose information that could constitute a breach of data protection law.

If, following an investigation, there is evidence of any unauthorised disclosure of confidential information, or action which leads to a potential breach of data protection law, this could also lead to disciplinary action for the employee concerned.

## 7. General Guidance on the use of Social Media

Employees should always remember that any information disclosed through personal accounts on social networking sites is disclosed in a personal capacity, and never on behalf of Morley College London.

Where employees disclose their association with Morley College London through social media used for personal purposes, any views they publish should be presented as purely personal views rather than being representative of the views of the college.

Staff should be transparent and state that they work for Morley College London if they are posting about the college. If staff are writing about the college, or a competitor, they should use their real name, identify that they work for Morley College London and be clear about their role. The college discourages staff from posting online anonymously or using pseudonyms. They should never impersonate another individual.

Employees must also bear in mind their audience when posting on social media sites. They should ensure that those who are able to access the information they post have a right to see it, and that it is appropriate that they see such information.

If using social media in their capacity as an employee, it is important to ensure that the college's interests are considered, where in doubt, advice should be sought in the first instance through the employee's manager or the Marketing and Engagement Team.

## 8. Account Security

Employees must always ensure that security information for personal- and work-related accounts remains confidential, and that they do not disclose log-in information, including passwords, to people who are not authorised to use those accounts.

Where unauthorised access has been gained to an account, there is the possibility of further security breaches and potential damage to personal and/or the college's reputation.

If an employee believes that unauthorised access has been gained to a work-related account, they should contact their local IT representative in the first instance for advice.

## 9. Breaches of this Policy

Social media should never be used in a way that breaches this policy, or any other college policy. If an internet posting, blog, or social media comment would breach any of the college policies in another medium, then it will also breach them in an on-line forum.

For example, employees must not use social media in a way that would:

- Breach computing regulations
- Breach social media policy
- Breach any obligations in relation to confidentiality
- Defame the college, or its affiliates, students, staff, suppliers, or other stakeholders
- Harass or bully any employee, student or third party or breach the Dignity and Respect Policy
- Unlawfully discriminate against other employees, students or third parties
- Breach Data Protection Policy.

#### 10. Personal safety

Staff should take every effort to always keep themselves safe, when using social media. Information such as postal addresses, email addresses, telephone numbers and bank details should never be posted online. Users should also be suspicious of posting personal details, photographs, or details of their current location on social media sites.

Unwanted contact can be made very easily via social media sites; users should be aware and react with due care and not accept befriending invitations from strangers.

If using a shared device, users should always check that they are logged off all social media sites before shutting down the device/s.

## 11. Online bullying, harassment and victimisation

Morley College London is committed to providing a learning environment that is free from bullying, harassment and victimisation for all students and staff. This applies to all forms of bullying, harassment and victimisation, including situations where social media is used. If users become aware that they, or others, are being bullied, harassed, or victimised through social media, they should carry out the following actions:

- Do not respond directly to the comments
- Retain evidence
- Report the situation immediately to a curriculum head or line manager

Please refer to the Complaints Policy and Procedure policy. Any examples of these behaviours taking place through social media will be dealt with through the College's disciplinary policy and procedures.

## 12. Monitoring and Privacy

Users should be aware that the college reserves the right to monitor and review all aspects of use of the college IT network/s and to keep logs of individual user activity, including use of social media sites. The user concerned will not necessarily be notified that monitoring and review is taking place.

User data will normally be treated as confidential and private. However, an investigation may take place under the following circumstances:

- Requests for access/monitoring from the policy or security services, as allowed by current legislation
- Requests made under the Data Protection Act (2018) or Freedom of Information Act (2000)
- Requests to establish facts as part of a misconduct investigation
- Requests from the employee themselves
- To facilitate the operation, repair, and essential maintenance of college IT systems

For this reason, users should not use college IT resources for any purpose they would not wish to become known to the organisation.

Please refer to the IT policy for full details of monitoring and privacy in relation to the college IT and communication systems.

## 13. College maintained social media sites

Morley College London maintains official accounts for social media including Facebook, Instagram, Twitter, Snap Chat and You Tube.

The social media estate also includes associated social media sites for Morley Radio and Morley Gallery, which are managed by the staff at each department.

Individual academic departments across the College will be responsible for the management, publishing and monitoring of content across their social media sites and blogs that fall within their own remits. These elements of the social media estate will sit outside of the authority of the Chief Marketing and Engagement Officer and their teams.

Morley College London's corporate social media sites are managed by the College's marketing team and are the preferred accounts for communicating and interacting with the college.

Responsibility for the suitability of information posted on college-maintained social media sites lies with the author, who must ensure that the material is appropriate for all users who might access it, including potentially, students under the age of 18. The college will remove any content found to be inappropriate and may block users from posting on these sites if it becomes necessary.

If users become aware of inappropriate material being posted outside normal working hours, they should report this to the site provider. Users should familiarise themselves with the terms and conditions of any social media sites they are using.

If staff or students wish to set up a social media profile, affiliated with the college, for example using the college name or branding, they must first obtain permission from the Chief Marketing and Engagement Officer. If the social media profile is affiliated with a specific course, the user must also obtain permission from the relevant curriculum head.

The Marketing and Engagement Team reserves the right to audit all channels that reference

the Morley College London brand, and to close or bring under corporate control any such channels in the wider interest of the college and its brand.

The marketing and engagement department can give specialist advice on the use of social media for the college's business.

## 14. Requests for Information

Users should not respond to requests for information from any external media outlet. Any contact made through social media from external sources regarding information relating to the college should be referred to the Head of Communications and Engagement in the first instance.

## 15. Policy History

This policy was approved on 12 October 2021 and takes effect from this date.

In the event of any significant change to legislation associated with, or affecting employee use of social media, this policy will be subject to immediate review.

In the absence of such a change, the policy will be reviewed by October 2023.

#### 16. Document Control and Review

Approval Status	
Approved by	
Date Approved	
EQIA Status	
Proposed Review Date	October 2023
Lead Department	Marketing and Engagement
Lead Officer	Chief Marketing and Engagement Officer
Board Committee	
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#### 17. References

The associated policies listed below can be read in conjunction with this policy.

- Data Protection Policy
- Equality and Diversity Policy
- Complaints Policy
- Code of Practice on Freedom of Speech and Expression
- Freedom of Information Policy
- IT Systems Acceptable Use Policy