



TITLE: SOCIAL NETWORKING & SOCIAL MEDIA POLICY FOR STAFF

Effective Date	2 March 2022	Version	2
			Policy revised as part of the policy review cycle. Revisions include future-proofing associated documents and to include the addition of social media procedures and social media accounts register.
Approved By	Management Board	Date Approved	2 March 2022
		Review Date	2 March 2027 or <i>as required</i>
Superseded or Obsolete Policy / Procedure(s)		Owner	
1 – <i>Social Networking and Social Media Policy (Staff)</i> (5 September 2018)		Digital Communications & Marketing Office	
Initial Issue			

1. Purpose of Policy

Carlow College, St. Patrick's (hereafter Carlow College) recognises that Social Media and Social Networking are powerful tools, which have become increasingly important and influential communication platforms. These platforms involve the expression of both personal and professional opinions, the sharing of links, images and other information, often with accompanying endorsements. This can sometimes result in the lines between the expression of an individual's personal or professional views, and those of Carlow College as an institution, becoming blurred.

Carlow College has developed a *Social Networking & Social Media Policy for Staff* and associated procedures to clarify how best to use these platforms to the professional benefit of the College, its staff and learners. The *Social Networking & Social Media Policy for Staff* and its associated procedures are concerned with managing the information assets owned by the College and used by staff of the College in their official capacity.

All staff of the College using social media tools, including via personal accounts, must be aware that the same laws, professional expectations and guidelines for interacting with staff, learners, alumni, the media and other College stakeholders apply online as in the real world.

The *Social Networking & Social Media Policy for Staff* is operated in accordance with the *Prohibition of Incitement to Hatred Act 1989*, *Data Protection Acts 1988 and 2003*, the *Child Trafficking and Pornography Acts 1998 and 2004*, the *Copyright and Related Rights Acts 2000, 2004 and 2007*, and the *Defamation Act 2009*.

The objectives of the *Social Networking & Social Media Policy* are:

- to promote consistent, effective and innovative use of social media as part of the College's activities;
- to define the responsibilities of staff for the use of Social Media for College purposes;
- to protect the College, along with the professional profiles and reputations of its staff and learners, in the social media space while also ensuring that the image and reputation of the College as an institution is not compromised in any way; and
- to co-ordinate and oversee the response to violations in accordance with the requirements of Irish legislation, regulation and College policies.

1.1 Principles of the Policy

Procedures will be put in place to ensure that Social Media is used effectively and securely.

The following principles apply:

- staff of the College must be aware of best practice guidelines before using Social Media;
- staff of the College must be aware of guidelines on security and privacy settings for the use of Social Media;
- staff of the College who use Social Media for College purposes must ensure that ownership of the site is explicit and a record of the ownership is held by the Marketing Office;
- defamation of character of Carlow College staff and/or learners will not be tolerated (either through an official account or personal use);
- potential negative impacts to the reputation of the College as a result of incidents/violations through Social Media must be minimise and/or ameliorated.

1.2. Legislation and Policies that support this Policy

Information posted to Social Networking sites must adhere to current applicable legislation. Particular attention must be paid to the following:

- *Prohibition of Incitement to Hatred Act 1989*;
- *Data Protection Acts 2018*
- *General Data Protection Regulation*
- *The Child Trafficking and Pornography Acts 1998 and 2004*;
- *Copyright and Related Rights Acts 2000 (as amended)*
- *Defamation Act 2009*.

Information posted to Social Networking sites must adhere to the Carlow College standards and policies. These include but are not limited to the following:

- *Equality Policy;*
- *Dignity and Respect Policy;*
- *Code of Conduct Policy;*
- *Right to Disconnect Policy (Staff);*
- *Acceptable Usage Policy;*
- *IT Policy;*
- *Data Protection Policy;*
- *Disciplinary Policy (Staff);* and
- *Grievance Policy (Staff).*

Senior Line Managers and Line Managers are to ensure that all staff are made aware of this Policy and all other policies either currently available or that are at the developmental stages.

Information posted to Social Networking sites must also adhere to the Terms of Service when utilising Social Networking channels. Terms of Service are a set of regulations a provider attaches to a software service or web-delivered product which a user must agree to abide in order to use a service. These include but are not limited to the following:

- Facebook: <https://www.facebook.com/help/325807937506242>;
- Twitter: <https://twitter.com/en/tos>;
- Instagram: <https://www.instagram.com/about/legal/terms/before-january-19-2013/>;
- YouTube: <https://www.youtube.com/static?gl=IE&template=terms>;
- LinkedIn: <https://www.linkedin.com/legal/user-agreement>.

Content posted by Carlow College staff, learners, or representatives should not:

- be libellous;
- be indecent;
- be plagiarised;
- infringe copyright;
- incite others to hatred.

2. Definitions

2.1 Social Networking

For the purpose of this Policy, Social Networking is defined as an online service or site through which people create and maintain interpersonal relationships. The main purpose of Social Networking is to connect with other people and create mutual communication for both professional or personal purposes.

2.2 Social Media

For the purposes of this Policy, Social Media is defined as any and all online environments, in which content is created, consumed, promoted, distributed, discovered or shared. There are many different types of social media platforms which attract specific audiences for different purposes. Some channels may be more appropriate for the College's or individuals needs than others, particularly in relation to social networking. Approved College Social Media profiles are outlined in the [Appendix 1.4: Approved Social Media Account Register](#), including Profile Owners.

The Official College channels are maintained and managed by the Carlow College Digital Communications and Marketing Office. All corporate statements by the College, once approved by Senior Line Managers, must be posted by the Digital Communications and Marketing Office to official Carlow College Social Media accounts, in the first instance.

There are also numerous other Social Media accounts which represent Carlow College programmes, activities and services which are maintained by staff of Carlow College. It is mandatory that all Social Media sites either set up previously or new by staff members, must be notified to the Digital Communications and Marketing Office.

3. Scope of Policy

The scope of this policy applies to:

- all College staff, including full-time, part-time, temporary or those on fixed-term contracts of employment and
- workers such as agency staff, casual staff, academic visitors, or contractors who are undertaking work on behalf of the College.

This Policy will normally not apply to members using social media in a personal capacity subject to the College reserving the right at its discretion and in accordance with this Policy and other College policies and procedures to act in circumstances where there may be a damage to the reputation of the College. To clearly delineate use of social media in a personal capacity, staff are advised that they must use a personal identity. When staff create personal accounts on social media sites, staff must refrain from using their official College email accounts to do so. Staff are also advised that while this policy will not apply to the use of social media in a personal capacity, their use will still be subject to applicable laws and legislation. Carlow College should not and does not monitor the social media accounts of employees. However, that does not preclude such accounts being brought to the attention of the College as an employer.

4. Policy Statement

The *Social Networking & Social Media Policy for Staff* has been developed to manage the use of Carlow College's Social Media and to provide governance and structure around how the College, staff and learners are portrayed through and interact with Social Media. The *Social Networking & Social Media Policy for Staff* enables staff of the College to use Social Media platforms without compromising their personal security or the security and reputation of Carlow College. The success of Carlow College depends upon maintaining a positive reputation in the general community and amongst College stakeholders. Increasingly, Carlow College use Social Media to engage with these groups. While Social Media is a powerful communications tool, it can significantly damage the reputation of the College if improperly

used. Carlow College communications via Social Media must be managed carefully and must be consistent with College policies, commercial needs and brand.

5. Roles and Responsibilities

5.1 Staff Responsibilities

- It is the responsibility of staff to read and act in accordance with the contents of this policy
- To be personally responsible for what they communicate on or through social media and to adhere to the standards set out in this policy and all other relevant College policies.
- To notify the Digital Communications and Marketing Office of any events associated with the College so they can be managed and promoted through the College Social Media platforms.
- To notify the Digital Communications and Marketing Office of any Social Networking sites currently in operation on behalf of Carlow College.
- To be aware that any official Carlow College announcement is to be posted by the Digital Communications and Marketing Office on the official Carlow College Social Media accounts, once approved by Senior Management.
- All staff of Carlow College, who operate a Social Media account on behalf of the College have a responsibility to manage the Social Media site appropriately and be mindful of information (and its classification) that is posted.
- The integrity of information to Social Media sites must be maintained; information must also be accurate, complete, timely and consistent with other related information and events.
- Email account not to be Carlow college account

5.2 Senior Line Managers Responsibilities

- To communicate to the Digital Communications and Marketing Office with regards to any official College announcement which are to be posted on Social Media.
- To ensure that only the Digital Communications and Marketing Office are authorised to post official College announcements on Carlow College Social Media accounts.
- To instil a positive culture amongst staff to openly communicate all activities and events associated with the College to the Digital Communications and Marketing Office to ensure promotion through the College Social Media platforms.

5.3 Line Managers Responsibilities

- To communicate College policies related to the *Social Networking & Social Media Policy for Staff* and to deal with issues that may arise with regards to Social Media.
- To ensure all staff familiarise themselves with the *Social Networking and Social Media Policy for Staff*.
- To encourage staff to communicate all activities and events associated with the College to the Marketing Office to ensure the utmost promotion/PR via Social Media platforms is optimised.

5.4 Digital Communications and *Marketing Office Responsibilities*

- To provide support, advice and training to all staff on Social Media practices and procedures.
- To actively utilise all official Carlow College Social Media to engage with the general public, prospective students and stakeholders to promote all College programmes, services and events.
- To monitor the effectiveness of the *Social Networking and Social Media Policy for Staff* and to ensure that it is being implemented effectively throughout the College.

6. Associated Documentation

- Appendix 1.1: Social Media Usage (Including Personal Use)
- Appendix 1.2: Social Media Threats and Risks
- Appendix 1.3: Social Media Procedures
- [Appendix 1.4: Approved Social Media Account Register](#)
- [Appendix 1.5: Social Media Account Registration Form](#)

7. Referenced Policies

- *Equality Policy*
- *Dignity and Respect Policy*
- *Staff Code of Conduct Policy*
- *Right to Disconnect Policy (Staff);*
- *Acceptable Usage Policy;*
- *IT Policy*
- *Data Protection Policy*
- *Disciplinary Policy (Staff)*
- *Grievance Policy (Staff)*

8. Monitoring and Review

The *Social Networking & Social Media Policy for Staff* will be formally reviewed on an annual basis by the Digital Communications & Marketing Office to reflect any legislative changes. Staff will be informed through regular email communication and through the staff portal regarding any amendments to the Policy.

The College regards any breach of this Policy by any employee(s) as a serious matter to be dealt with through the *Disciplinary Policy (Staff)* and which may result in disciplinary action and summary dismissal. This Policy is supported by Carlow College policies and procedures.

Appendix 1.1: Social Media Usage (Including Personal Use)



Social Media Usage (Including Personal Use)

a) *Information and Documentation*

Staff are responsible for ensuring that information they post on social media sites is suitable for the public domain. Staff are to use good ethical and common-sense judgement when posting, and all College policies and applicable laws are to be adhered to.

Confidential business information is not to be posted online.

When posting information about individuals, it may sometimes be appropriate to acquire advance consent, and in other cases, it may be acceptable to rely on 'legitimate interests' to share information. An example of the latter might be mentioning a colleague who has a new publication or who has won an award. If you are uncertain about what to do, ask the Data Protection Officer for advice or veer on the side of caution and acquire advance consent.

Where videography, images or audio recordings are involved, the general advice is to acquire advance consent. The Digital Communications & Marketing Office is generally involved in these activities and College events, and may have protocols in place. Follow any protocols that are in place. If you are uncertain, ask Marketing staff who are involved or the DPO for advice.

In all cases, staff are to respect the privacy and dignity of all individuals they come into contact with through work. Information that is unduly 'personal' or where the individual would be surprised or distressed should not be made available via social media.

Approved Accounts, Ownership and Acknowledgement

All approved Carlow College social media accounts must be registered with the Digital Communications & Marketing Manager. Staff of the College who wish to create a social media page on behalf of a group of which they are affiliated (e.g. programme or service), should contact the Digital Communications & Marketing Team before creating a social media account. A *Register of Approved Social Media Accounts* is available here [hyperlink]

Please refer to the Digital Communications & Marketing Manager to request and/or register a Carlow College social media account.

b) *Reputation and Institutional View*

Communication via social media sites and tools must protect the College's institutional view by remaining professional in tone. Staff of the College who use personal social media accounts must not give the impression that their Social Media site represents the

explicit positioning of Carlow College and/or may cause reputational damage to the College.

This should be considered when:

- naming pages or accounts;
- selecting a profile picture or icon;
- selecting content to post;
- posting images of College grounds.

Names, profile images, and posts should all be clearly linked to the particular programme or service. All College pages must have an associated staff member who is identified as being the information asset owner and who is responsible for its official affiliation of the College. This staff member is responsible for representing official social media accounts on behalf of Carlow College when posting on a social media platform.

c) *Content Publishing*

Staff of the College who are responsible for an approved College social media account should ensure the target audience is aware of the purpose of the site and the limits of acceptable use. Staff posting to a social media site should consider their message, audience, and goals, as well as a strategy for keeping information up-to-date.

Staff must at all times use social media sites in a responsible manner, having due regard to the rights and reputation of the College and of others. In particular, you are required to comply with the following guidelines:

- Do not post material that could reasonably be deemed threatening, harassing, illegal, obscene, defamatory or slanderous towards any individual or entity.
- In order to avoid discrepancies and minimise the need for updating, social media platforms are not to be used to post detailed policy or procedural information, e.g. programme admission criteria. For such information users should be directed to an official Carlow College website, electronic resource or publication for such information.
- Do not use pseudonyms or seek to impersonate any other person.
- Do not infringe copyright and/or intellectual property. Copyright is a form of intellectual property law protecting original works of authorship including literary, dramatic, musical and artistic works. Copyright does not protect facts, ideas, systems or methods of operation, only the way these objects may be expressed. When posting, be mindful of the copyright and intellectual property rights: including literary and artistic works (images, videos, audio), symbols, names, images, and designs.
- Do not promote or advertise a commercial product or solicit business or membership or financial or other support in any business, group or organisation except those which are officially approved by Carlow College.

d) Dignity & Respect

Employees are to respect the dignity and privacy of colleagues, learners and other College stakeholders in their social media use. Employees are to obtain the permission, where appropriate, of work associates before posting images or information about them online.

e) Confidentiality

Employees are not to reveal, discuss or compromise the integrity, security or confidentiality of personal data or other information about College business obtained during the conduct of their duties in their social media use.

f) College Affiliation

Wherever possible, posts to approved College social media sites should be brief and redirect the audience to content that resides within the Carlow College website. When linking to a news article link to an official release on the College website instead of an external resource or site.

g) College Logo

Carlow College trademarks including name and/or logos are not to be used for endorsements. The Carlow College name, logo or any other College images or iconography must not be used on personal social media sites. The Carlow College name cannot be used to promote a product, cause, petition, political party or candidate unless such use is officially approved by Senior Management.

Appendix 1.2: Social Media Threats and Risks



Social Media Threats and Risks

Below is a table of examples of threats and risks associated with the use of social media:

Threats	Risks
Introduction of viruses and malware to the College	<ul style="list-style-type: none"> • Data leakage/theft • System downtime • Resources required to clean systems
Exposure of the College and its staff or students through a fraudulent or hijacked presence e.g. unofficial social media accounts	<ul style="list-style-type: none"> • Public backlash/adverse Legal action • Exposure of College information assets • Reputational damage
Unclear or undefined ownership of content rights of information posted to social media sites (copyright infringement)	<ul style="list-style-type: none"> • Public backlash/adverse legal actions • Exposure of student information • Reputational damage
Use of personal accounts to communicate College owned information assets	<ul style="list-style-type: none"> • Privacy violations
Excessive use of social media within the College	<ul style="list-style-type: none"> • Network utilisation issues • Productivity loss • Increased risk of exposure to viruses and malware due to longer duration of sessions

Appendix 1.3: Social Media Procedures



Social Media Procedures

Carlow College maintains an official presence on Social Media to support the College in accomplishing its mission and achieving its goals and objectives.

Carlow College encourages feedback and comments from prospective students, current students, alumni, staff, and members of the community. Carlow College remains committed to maintaining these sites as safe and appropriate forums for sharing information.

In an effort to maintain a positive environment for Carlow College's website visitors, Carlow College reserves the right to remove or block posts, users, or any content from all College Social Media pages.

When creating a Social Media account for programmes, activities or services, staff must be prepared to maintain the page and keep it updated. Carlow College programmes, activities or services pages on Social Media are considered to be an extensions of Carlow College's official website and Social Media sites.

These procedures are subject to change. If you have any questions or concerns about a post or comment, please contact: marketing@carlowcollege.ie

If a member of staff wishes to create a Social Media page, the staff member must follow the procedures outlined below:

Procedures

- Staff members wishing to create a Social Media page for programmes, activities or services must contact the Digital Communications & Marketing Office to schedule a meeting with the Digital Communications & Marketing Manager to discuss the purpose of the proposed Social Media page.
- Staff members must complete the [Social Media Account Registration Form](#) in order for the page to be reviewed and approved by the Marketing Manager.
- When a Social Media page for programmes, activities or services are created, the group's name should always follow this format: "Carlow College" (name of programme, activity or service)". All pages must be open so that all content is public.
- Use of the Carlow College logo as a profile photo on Social Media pages is not recommended as there is only one space for a large photo, and it could cause confusion for multiple groups to use the Carlow College logo.
- The programme, activity or service page must contain a link to the Carlow College website: <http://www.carlowcollege.ie/>
- All Facebook pages must list a member of the Digital Communications & Marketing Office as a second administrator and provide an administrator name, the URL, and the active account login and password(s) to him/her. If an administrator leaves Carlow

College, the Digital Communications & Marketing Office will remove that person as a page administrator and assign another person to this role or shut down the profile.

- The staff member who operates the Social Media profile must check their page a minimum of once a day during the normal working week. It is recommended that pages be checked a minimum of twice a day. Updates should be made two to three times a week.
- If a College Social Media profile is not updated regularly, the page will be reviewed by the Digital Communications & Marketing Manager and may be referred to Senior Management.
- The staff member who operates the Social Media page must remove any content from the pages that violates the Social Media's terms of service or College policies, including but not limited to harassing, threatening, or profane language aimed at creating a hostile or intimidating environment. If you are uncertain if content violates the Social Media guidelines and procedures, please contact the Digital Communications & Marketing Manager.
- The staff member who operates the Social Media page must block posts from followers who violate the Social Media guidelines and procedures.
- Carlow College's Social Media pages must not infringe copyright law.
- Any person who appear in a photograph or video posted on a Carlow College Social Media page must have signed a *Photograph and Videography Release Form*, available from the Marketing Office.
- All Social Media pages must list the following disclaimers:
 - The comments and postings on Carlow College Social Media pages do not necessarily reflect Carlow College opinions, strategies, or policies.
 - Carlow College accepts no responsibility or liability for any materials or content generated by users and publicly posted on this page or content on any website linked from this page.
 - By posting content on this page, you represent, warrant, and agree that no content submitted, posted, transmitted, or shared by you will infringe upon the rights of any third party, including but not limited to copyright, trademark, privacy; or contain defamatory, discriminatory, or otherwise unlawful material. Carlow College reserves the right to alter, delete or remove content without notice.
 - The content of this page is subject to copyright laws. Unless you own the rights to the content, you may not reproduce, adapt, or communicate content without the written permission of the copyright owner nor use the content for commercial purposes.
 - Any person who believes that this page includes inappropriate content should report it to the Marketing Office at: marketing@carlowcollege.ie.

Takedown Procedures

The College makes every effort to ensure material published online does not infringe any individual's rights, however, if you are concerned that you have found material online, for which you have not given permission, contravenes privacy laws, is obscene / defamatory and in terms of copyright law is not covered by a limitation or exception, please contact marketing@carlowcollege.ie

This procedure applies to all web and social media content published by Carlow College.

Please send us the following information:

- Your contact details
- Details of the material, including the URL at which it was found
- The reason for your request (e.g., copyright law, data protection, offensive material) If the request relates to copyright, provide proof that you are the rights holder and a statement that you are the rights holder or are an authorised representative.

Upon receipt of notification the 'Notice and Takedown' procedure is then invoked as follows:

1. The Digital Communications & Marketing team will acknowledge receipt of your complaint by email or letter and will make an initial assessment of the validity and plausibility of the complaint.
2. Upon receipt of a valid complaint the material will be temporarily removed pending an agreed solution.
3. We will contact the contributor who deposited the material, if relevant. The contributor will be notified that the material is subject to a complaint, under what grounds, and will be encouraged to assuage the complaints concerned.
4. All parties will be encouraged to resolve the issue swiftly and amicably and to the satisfaction of all, with the following possible outcomes: a) The material is kept online. b) The material is kept with changes or replaced. c) The material is permanently removed.
5. If the parties involved are unable to agree a solution, the material will remain unavailable until a time when a resolution has been reached.

Appendix 1.4: Approved Social Media Account Register

Appendix 1.5: Social Media Account Registration Form