Social Media Policy

Contents

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Purpose

1   Buckinghamshire New University (BNU) is committed to making the best use of available technology and innovation to improve communication, interaction and other needs of staff, students, partners and stakeholders. BNU recognises the benefits of using social media as an important means of communication both to enhance the profile of BNU and the professional profile of its people.

2   This policy applies to the use of social media for business and personal purposes, within and outside of agreed times of work, on University or personal computing facilities, and whether posting on social media using personal or work-related accounts. It also outlines what the University views to be an acceptable use of social media. Academic freedom and freedom of speech sit at the heart of the higher education sector. The University actively promotes and supports freedom of speech and debate to pursue new knowledge, which includes using social media to do so, so long as it remains legal and in line with the _University's DRIVE values_, _Code of Conduct for Staff_ and the _Respect, Fairness and Inclusion Policy_. The Social Media policy does not undermine the principles of academic freedom of speech.

3   BNU is responsible for maintaining the security of its systems and information and to protect its reputation. Individual staff have a contractual obligation not to misuse the University's resources and not to take action that brings BNU into disrepute. Staff also have a responsibility to ensure they do not breach the disciplinary rules of the University. Serious breaches of this policy may constitute gross misconduct and lead to dismissal. This policy is designed to assist BNU staff in ensuring that their interactions with social media, both professionally and outside work, do not inadvertently breach the expected levels of conduct or the University's policies.

4   BNU's DRIVE values of Dynamic, Responsible, Inclusive, Visionary and Empowering, and all current policies concerning BNU staff also apply to the use of social media, these include:

- _Staff Grievance Procedure_
- _Employee Disciplinary Policy and Procedure_
- _Code of Conduct for Staff_
- _Respect, Fairness and Inclusion Policy_
- _Data Protection Policy_
- _Acceptable Use Policy_
- _Email policy_
- _Bring your own device policy_
- _Monitoring Computer and Network Use Policy_
- _University's Brand Guidelines_
- _BNU Employee Network (BEN) Guidelines_.

Scope

5   This policy applies to all BNU staff working at or on behalf of BNU, including those on atypical, associate lecturer and agency contracts. It also applies to contractors, agency staff and visiting academics. In these situations, the manager responsible for the contractor, visitor or agency member of staff will be responsible for making these staff aware of the University's Social Media Policy.

6   There are specific guidelines for University colleagues who have direct responsibility for creating content for BNU's official social media channels as part of their roles. The Digital and Marketing teams lead on and have content creation responsibilities for BNU's marketing provision e.g. Open Days, applicant and course-related content; advertising campaigns. The Communications team leads on institutional content to support its responsibility for helping to raise BNU's profile role and as the guardian of the University's reputation, identifying and acting upon any content posted across BNU's channels that poses a risk to the University as well as monitoring and responding to mentions of BNU across social media platforms.

7   Social Media 'Platforms', 'Sites', 'accounts' and 'Social Networking Sites' refer to any interactive technologies that facilitate the creation and sharing of information, ideas, interests, and other forms of expression through virtual communities and networks. These include but are not limited to Facebook, X, Instagram, LinkedIn, YouTube, TikTok, WhatsApp, and other subscription-based platforms.

Policy

Guidance for staff who use social media as part of their role

8   Colleagues in Marketing and Communications teams must use only University laptops and allocated mobile devices to access BNU social media accounts. There should be no more than one allocated mobile device per team logged into the University's social media accounts. It is not permitted to use personal devices to access BNU social media. The University laptops and allocated mobile device(s) should be used to monitor and post on the University's social media channels. Colleagues are to use the allocated mobile solely for these purposes. Colleagues must not input their own personal information into a mobile device or use it for personal reasons. The relevant teams will develop and adhere to protocols to ensure the security of mobile devices and keep a clear log of which individuals are using the device and during what time periods. Colleagues must keep the work phone(s) secure with a strong password or biometric authorisation, and not share this with anyone outside of their team.

9   Academic Colleges are expected to have a presence on social media, and Marketing Business Partners and/or the Digital team will liaise with colleagues to ensure effective support of these accounts, which will include guidelines and best practices.

10   In addition to paragraph 2, all staff using social media as part of their role (including when posting about BNU on their personal social media accounts) are representing BNU and should therefore make it clear that they work at BNU, use their real name and be clear about their role. If a staff member is identified as a member of BNU, they need to ensure that their content and tone is consistent with their role at work and adhere to the University's *Staff Code of Conduct.*

11   Staff should not set up sites, accounts, groups or pages that purport to be official University sites, accounts, groups or pages or use BNU's branding without the permission of the brand, marketing and creative team, whether they are acting independently or on behalf of third parties. The team will consult the Communications team where there is potential risk to the University's reputation.

12   It is recognised that social media can enhance the work of the University if used in a reasonable and appropriate way. However, it must be remembered that any communication to a social media platform made using an official BNU account may be disclosable as part of a subject access request response.

13   Staff and students should not use or share personal data via third-party chat apps such as WhatsApp, Instagram, Facebook Messenger, or other social media/instant messaging services to discuss work-related issues with each other or with third parties that discloses confidential or sensitive business-related information. This includes any information that could be regarded as a breach of data protection legislation.

14   As with all communication made on behalf of BNU, it is expected that staff are respectful to others. Staff should therefore avoid spam or remarks that are off-topic and must not post unlawful or discriminatory comments. BNU email and MS Teams are the only approved methods of communication for staff to communicate between colleagues, between staff and between students/customers. When emailing other BNU colleagues, students, or applicants, communication should only be made from and to @bnu.ac.uk email addresses. The engagement and use of messaging services must be mutually agreed and optional for all participants. Please refer to the *Code of Conduct for Staff* and *Respect, Fairness and Inclusion Policy* for guidance and expectations.

15   All statements made on social media must be true and not misleading. If a member of staff speaks about other educational providers, they should make sure that it is factually correct and that it does not disparage the provider. Unnecessary or unproductive arguments should be avoided. If a member of staff makes an error, the mistake should be acknowledged and corrected. If a member of staff modifies content that was previously posted, for example editing a blog, they should make clear that they have done this.

16   In line with usual standards about disclosure of information, staff must not publish or report on conversations that are meant to be private or internal to BNU unless they seek prior permission. Staff must not publish or report on any items of communication about BNU, unless this is already in the public domain, without seeking prior permission from their Dean or Director.

17   BNU staff must not post any photographs of people unless they have their permission and a signed *Model Release Form* (any photographs of children and young people under the age of 16 should have parental permission). BNU holds an archive of photographs that have been approved for use and the marketing team should be contacted for further details.

18   BNU staff should not comment on anything related to legal matters, litigation, or any parties BNU may be in dispute with or upon any staff or student incident. In the event of the death of a student or member of staff, all members of BNU's community are reminded to be respectful and refrain from sharing condolences online prior to any announcement by the impacted family.

19   For clarity, BNU's virtual learning environment (VLE) is to be used as the only repository for all course materials. These materials should not be shared via social media accounts. BNU's Blackboard site provides the opportunity for staff to set up communities which enable themselves, other staff members and students to share ideas and content such as files and blogs. Staff should consider carefully whether there is need to set up networks in external social media sites, and the content needs to adhere to the University's data protection and information security policies. Official communication with current students should be made through MyBNU or by BNU email.

Using social media in a personal capacity

20   BNU staff's conduct on social media outside of work could affect their employment if their conduct could be said to bring BNU into disrepute; impact on BNU's official social media accounts; and where their conduct outside of work compromises their ability to carry out their role effectively or affects work colleagues or our students. This may apply even if they do not reference working for BNU on their personal social media. All staff must consider how their actions on social media can jeopardise both their own reputation and that of the University.

21   Anyone under contract and working for the University needs to ensure, both for the University's safety and their own, that activity on social networking sites does not bring the institution into disrepute, does not bring a member of staff into disrepute, does not expose the University to legal liability, reflects 'safer internet' practices including safeguarding, and minimises risks associated with the personal use of social media by professionals, reflecting the university's *Code of Conduct* for *Staff* and *Respect, Fairness and Inclusion Policy*.

22   Staff should not spend an excessive amount of time while at work, both in the office or working from home, using personal social media websites. They should ensure that use of social media does not interfere with their other duties as this is likely to have a detrimental effect on productivity and performance.

23   If a member of staff accesses social media at work or they use their University email account (even on their home computer) they must ensure that they comply with the University's Information Security and Data Protection Policies.

24   Data protection legislation applies to personal data posted to social media in the same way it does in other contexts. Therefore, when using social media in a personal capacity colleagues must ensure that all posts comply with the Data Protection Act 2018 and the University's Data Protection Policy.

25   BNU staff are discouraged from using social media to express discontent about work or their work colleagues. This is not appropriate as it is not a productive route to resolve any issues they may have and it may also be breaching the University's *Respect, Fairness and Inclusion Policy*. If a member of staff has a complaint they are encouraged to discuss this with their line manager or to pursue this through the University's Staff *Grievance Procedure* or *Raising Issues of Concern (Whistleblowing) Policy*

26   Staff are free to express views about the University and will not be liable to any breach of the disciplinary rules so long as they ensure that:

a.   they make it clear that they are "speaking" from a personal perspective,

b. that their statements are true and can be substantiated, and

c. they are not breaching confidentiality or other legal requirements.

27   Staff should carefully consider whether it is appropriate to refer to named persons and, if in doubt, should seek permission. Neither should they create "personas" attached to staff, students, contractors or clients where this will lead to the identification of the individual referred to. To do so may lead to complaints against the member of staff relating to a breach of data protection and/or harassment.

28   Nothing in the above guidance should be interpreted as a restriction on an employee's right to pursue action under the Public Interest Disclosure Act, commonly referred to as "whistle blowing". It should also be noted that disclosures on social networking sites are covered within the Act and therefore staff should ensure they have legal immunity prior to a post or other communication. Please refer to the University's *Raising Issues of Concern (Whistle Blowing) Policy*.

29   If a member of staff has any concerns regarding the use of social media and how this affects their employment, they should consult their line manager or People Business Partner or their trade union representative before engaging with social media content.

Cyber or Electronic bullying, Online abuse, or Digital Hate

30   Cyberbullying, electronic bullying, online abuse, or digital hate are instances whereby someone, or a group of people, threaten and/or harass someone using social media, instant messaging, email (so called 'flame mail'), text messaging or other forms of online communication. Any form of online abuse will not be tolerated at BNU, however, we understand that the source of the abuse can be external and sometimes unidentifiable, so we want to ensure our staff know where to turn to for support should they experience this.

Where staff are subject to such practice they are advised to respond as follows:

a. if the originator of the material is a BNU member of staff, colleagues should consider resolving the matter through the *Staff Grievance Procedures.* The University reserves the right to investigate and manage any complaints under the *Employee Disciplinary Policy and Procedure,* where a breach of conduct is alleged.

b. if the originator of the material is a student, colleagues should report this to their line manager and the matter will be dealt with in accordance with the *Students' Disciplinary Procedure*.

c. if the originator of the material is a contractor, client or visitor to the University, colleagues should immediately report this to their manager and/or People Business Partner.

d. if the originator of the material has no connection to the University, colleagues should consider reporting the matter to the police.

e. BNU staff can access our Employee Assistance Helpline which offers immediate access to telephone counselling, 24/7, 365 days per year. As well as counselling, they have immediate resources available to access.

General guidance

32   BNU staff should think about their own privacy and check a site's privacy statement to see what they are signing up to and set privacy settings appropriately. Social network pages, blogs

etc. are public. BNU staff should not share information they do not want others to see. Once information has been posted it can be very difficult to remove. Even if a member of staff elects to unsubscribe from a site the information may continue to remain visible for a long time.

33   Some services will ask individuals to complete a registration form before they can be used. All companies who collect personal information must state how personal information will be used. This information is contained in the website's terms and conditions. Please be aware of this along with internet cookies and phishing emails when using your @bnu.ac.uk email address on social media sites.

34   These are some of the negative mental health impacts associated with social media use that line managers should look out for in their staff, including:

- Spending more time on social media than with real world friends.
- Experiencing cyberbullying.
- Being distracted at work.
- Worsening symptoms of anxiety or depression.

Monitoring

35   The Communications and Digital Media teams monitor social media for content relating to the University in order to protect and enhance the reputation of the University and engage with the institution's stakeholders.

36   Internet and email activity, including where these are used to access social media, may be logged and monitored in line with the Monitoring Computer and Network Use Policy.

37   BNU has a statutory obligation under the Prevent responsibilities of the Counterterrorism and Security Act 2015 to have "due regard to the need to prevent people from being drawn into terrorism". Material posted on social media may form the basis of reports raised with the University.

38   The University may be required to conduct further enquiries when it is made aware of alleged inappropriate online behaviour, or where a potential breach of this policy or any other University policy is reported. This may include using comments, videos, photographs, or any other online material which have been posted or shared on social media sites as part of this investigatory evidence, and, if appropriate, any subsequent disciplinary process.

Appendix: Equality Impact Assessment

An EqIA helps us to reach better evidenced outcomes first time. They analyse how all our work might impact differently on different people.

1. What is changing and why?[i]
The Social Media Policy has changed ownership to the Human Resources Directorate. HR have updated the policy to update the BNU language, values and branding. The content has also been reviewed and updated to ensure we are in line with legislation, system changes, and our own policies and code of conduct. The policy now specifies more clearly that it applies to the use of social media for both business and personal purposes and what is and isn't acceptable without undermining the principles of academic freedom.

2. What do you know?[ii]
With 84.3% of the total population using social media platforms, the UK is one of the leading countries regarding social media usage in the world. 74% of people in the UK say their social media usage has been on the rise in the last two years. The average UK user spends one hour and 48 minutes daily on social media and have 6.3 social media platforms on average (Moneyzine, 2023). We know the COVID-19 pandemic forced people to engage with social media more to keep in touch with loved ones and complete daily activities such as shopping. With all these statistics increasing it is important for organisations to keep the Social Media policy up to date to provide robust guidance to staff to avoid potential disciplinary and grievance cases involving inappropriate use of social media.

3. Assessing the impact

	Could benefit	May adversely impact	What does this mean? *Impacts identified from what you know (actual and potential)*	What can you do? *Actions (or why no action is possible) to advance equality of opportunity, eliminate discrimination, and foster good relations*
a) How could this affect different ethnicities? *Including Gypsy, Roma, Traveller, Showmen and Boaters, migrants, refugees and asylum seekers.*	☒	☐	Discrimination and racism against different ethnic groups is being addressed by the online safety bill to fine social media platforms who do not block such content (The Guardian, 2023). We have students and staff who identify with a range of ethnicities so BNU needs to ensure discrimination is not tolerated online.	This policy makes it clear that in line with our Respect, Fairness and Inclusion Policy, and our EDI initiatives, discrimination and racism against anyone will not be tolerated. It is important with our values and EDI focus that BNU is not associated with such posts on social media.
b) How could this affect cisgender and transgender men and women (including maternity/pregnancy impact), as well as non-binary people?	☒	☐	Discrimination and sexism against users are being addressed by the online safety bill to fine social media platforms who do not block such content (The Guardian, 2023)	This policy makes it clear that in line with our Respect, Fairness and Inclusion Policy, discrimination and sexist comments against anyone will not be tolerated. It is important with our values and equal pay, EDI initiatives that

				BNU is not associated with such posts on social media.
c) How could this affect disabled people or carers? *Including neurodiversity, invisible disabilities and mental health conditions.*	☒	☐	Studies have shown the negative impacts excessive use of social media can have on mental health.	The policy provides some guidance for line managers to look out for behaviours in their staff regarding the negative impact social media can have on mental health.
d) How could this affect people from different faith groups?	☒	☐	Discrimination and racism against different faith groups is being addressed by the online safety bill to fine social media platforms who do not block such content (The Guardian, 2023)	This policy makes it clear that in line with our Respect, Fairness and Inclusion Policy, discrimination and racism against anyone will not be tolerated. It is important with our values and EDI focus that BNU is not associated with such posts on social media.
e) How could this affect people with different sexual orientations?	☒	☐	BNU undertakes a look of work and training to address unconscious bias in our day to day practices. We openly support the LGBTQ+ community and promote 'Being you at BNU' regardless of your sexual orientation. According to Stop Hate UK, 2% of all hate crimes are online, however not all online hate crimes are reported.	This policy makes it clear that in line with our Respect, Fairness and Inclusion Policy, discrimination against those with different sexual orientations is not tolerated. It is important to BNU for our staff to be themselves at work and 'Being you at BNU' is a key initiative for this. BNU need to be clear where is stands when it comes to online hate to better support victims and encourage an authentic inclusive culture.
f) How could this affect different age groups or generations?	☒	☐	The policy applies to all our staff, irrespective of age as we know that since the Covid-19 pandemic social media use has increased across all generations. Gen Z and millennials social media has a 94% usage and 74% of 'baby boomers' use social media (Statista, 2023)	The policy makes it clear to all users, irrespective of age, what is and is not considered appropriate use of social media.
g) How could this affect those who are married or in a civil partnership?	☒	☐	This policy applies to all our staff, irrespective of marital status.	The policy makes it clear that it applies to all BNU staff plus anyone associated with BNU in other capacities such as agency and contractors. This is irrespective of marital status. Any

				discrimination against this will not be tolerated by BNU.
h) How could this affect people from different backgrounds such as: socio-economic disadvantage, homeless, alcohol and/or substance misuse, people experiencing domestic and/or sexual violence, ex-armed forces, looked after children and care leavers.	☐	☒	According to Women's Aid, 16% of women in refuge services had experienced surveillance/harassment online or through social media by their abuser. Online abuse can happen over long periods and escalates over time. It can include behaviours such as monitoring of social media profiles or emails (Women's Aid, 2022)	Some of our employees who may be experiencing coercive behaviour at home may find the workplace the only safe space to check their personal social media accounts. We have ensured that we intertwine our other policies with the Social Media policy to sign post users and/or line managers to other resources. The policy ensures we are clear that we will not condone or advocate any social media misuse to promote negative views on any groups listed.
i) How could this affect people with multiple intersectional experiences?[iii]	☒	☐	We acknowledge that everyone has their own unique experiences of discrimination and need to be consistent with our approach to social media usage.	The policy is clear that it applies to all and that any misuse will not be tolerated. It does not provide an exhaustive list of what is or isn't acceptable to ensure we do not miss something in which someone may find offensive or discriminatory.

4. Overall outcome			
No major change needed ☒	Adjust approach ☐	Adverse impact but continue ☐	Stop and remove ☐

5. Details of further actions needed[iv]
Approval from LJC and UET on policy changes

6. Arrangements for delivery and future monitoring[v]

7. Completed by:	Tegan Rizzo-Naudi	HR Ops Manager	Date	07/08/2024
8. Signed off by[vi]:	Name	Position	Date	Click or tap to enter a date.

High Wycombe Campus
Queen Alexandra Road
High Wycombe
Buckinghamshire
HP11 2JZ

Aylesbury Campus
59 Walton Street
Aylesbury
Buckinghamshire
HP21 7QG

Uxbridge Campus
106 Oxford Road
Uxbridge
Middlesex
UB8 1NA

**BNU based at
Pinewood Studios**

Pinewood Studios
Pinewood Road
Iver Heath
Buckinghamshire
SL0 0NH

Missenden Abbey
London Road
Great Missenden
Buckinghamshire
HP16 0BD

Telephone: 01494 522 141

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