

Social Media Policy

1.0 Policy statement

1.1 St Aloysius (Deemed to be University), Mangaluru-India recognises and embraces the benefits and opportunities that media can bring as a tool. It can be used to share news, information and successes, keep staff and students up to date with important developments and promote academic freedom through healthy debate about research and matters of public interest. There is, however, an inherent risk involved in using social media, in that it is an instantaneous and far-reaching form of communication. The University encourages engagement, collaboration and innovation through social media; however all must be aware of the potential impact that inappropriate use can have on staff, students and the reputation of the University.

1.2 This policy will be a part of the employee's contract of employment and student's contract with the University and it may be amended from time to time, whenever found appropriate. The Head of Public Relations has overall responsibility for this policy, which will be reviewed annually.

2.0 Scope of the policy

2.1 For the purpose of this policy, social media is defined as any online interactive tool that encourages participation, interaction and exchanges. New forms of media appear on a fairly regular basis; at the moment, examples of popular platforms include Facebook, Instagram, TikTok, Snapchat, Twitter, YouTube, LinkedIn, WhatsApp and many more, as well as blogs, discussion forums, instant messaging and any website that allows public commenting or posting. These examples will be updated from time to time, but this policy applies to all social media use whether or not expressly listed in this paragraph.

2.2 This policy is intended to cover the use of all and any media/social media platforms used by staff or students of the University, subject to the limitations mentioned below.

2.3 The University acknowledges that some of its staff and students use social media as a form of professional communication, through official University websites and accounts and/or **by using the University name and logo**. Further guidance on the use of social media to represent oneself or one's work in a professional context can be given by the Digital Campaigns and Monitoring Team. For the avoidance of doubt, **all communications are within the scope of this policy**. All staff and students

establishing a social media account or desirous of presence for work-related content **should seek prior advice and approval of intended content from their Public Relations Officer/Digital Campaigns and Monitoring Team.**

2.4 Professional communications for the purposes **of 2.3** include staff and students using official University / affiliated accounts and those referencing or communicating on behalf of an official University account.

2.5 The University acknowledges that its staff and students may use social media in their private lives and for personal communications. Personal communications include those made on, or from, a private social media account, such as a personal page on Facebook, a LinkedIn profile or a personal blog. It may be possible from those accounts to identify you as associated with the University, so that in some cases your activity may fall under the scope of this policy.

2.6 In all cases where a private social media account is used that identify the University, it must be made clear that the views expressed on or through that social media account do not represent the views of the University. Your accounts should include an appropriate disclaimer such as: "The views expressed here are my own and in no way reflect the views of the University."

3.0 Freedom of Speech and Academic Freedom

3.1 Nothing in this policy is intended to have the effect of limiting either freedom of speech or academic freedom within the law.

4.0 Using social media as a teaching and learning tool

4.1 Social media (in the same way as other apps and software) may only be used as a teaching and learning tool if and once the proposed tool has been approved for use by the University. If you wish to use a social media tool, you should check if it has been approved (for example with your DTS Business Partner) and if it has not you should seek approval through the normal routes via your DTS Business Partner. All instructions issued by the University on the use of such tools must be adhered to and staff must ensure that the terms and conditions of the social media platform are consistent with the University's intellectual property policy (see section 6).

4.2 All students must read, understand and agree to the terms of use of the social media website and the University's terms and conditions relating to the use of social media in this context before accessing and posting content on social media in a teaching and learning context.

4.3 If a student does not have and/or does not wish to create an account on the social media platform that the staff member wishes to use, the staff member must make the content available in another format so the student can access it or enable participation in another way. The staff member must also ensure any content shared on social media is accessible. More information about inclusive learning practice is available at Guide to policy and procedures for teaching and learning and Accessible teaching and learning materials.

5.0 Expected standards of behaviour

5.1 Staff and students are personally responsible for what they communicate and share on or through social media and they must adhere to the standards of behaviour set out in this policy and any related policies.

5.2 All communications on social media must be professional and respectful at all times and in accordance with this policy. Use of social media must not infringe on the rights or privacy of staff or students, and staff and students must not post content or make comments about other staff, students or third parties that are unlawful or discriminatory, constitute harassment, breach University policy or otherwise bring the University into disrepute. More information about expected standards of staff and student behaviour can be found at Code of Good Practice (Valuing Ourselves and Others).

5.3 All use of social media must comply with the University's policies in relation to:

- (a)** Academic freedom
- (b)** Code of Good Practice
- (c)** Copyright
- (d)** Data protection
- (e)** Equal Opportunities
- (f)** Harassment & Bullying
- (g)** Information security
- (h)** Intellectual property
- (i)** IT user regulations

5.4 Staff and students may also need to comply with social media guidance issued by relevant regulatory bodies, for example, the Law Society or the Royal Pharmaceutical Society and, where applicable, must familiarise themselves and comply with such guidance.

5.5 Social media should not be used for the purposes of recruitment or selection of staff or students, other than to advertise positions and programmes at the University and to deal with enquiries from prospective staff and students through official University websites and accounts. Appropriate endorsements on professional sites such as LinkedIn are permitted.

5.6 Staff and students must not provide references for other individuals on social media and/or professional networking websites, as such references, whether positive or negative, may be attributed to the University and may create legal liability for both the author and the University.

5.7 Social media content must not refer to, or include, information that is in conflict with or jeopardises the University's interests, is in any way inconsistent with an individual's duties to the University or breaches the rights of others. The following are examples of content that are considered to be of an unacceptable nature and should never be posted:

(a) Any confidential information about the University (including subsidiary companies and trusts) and its students, research and collaborative partners, suppliers and customers;

(b) any commercially confidential or sensitive information (which may include research not yet in the public domain, indications of forthcoming developments or funding bids, data or software code, non-public or not yet approved documents, minutes, news or information or other information you have been told or which it is clear is confidential);

(c) Official material that has not first appeared on the University website, in private emails, or main University social media channels;

(d) The work of someone else without obtaining permission to do so and, where appropriate, crediting the author;

(e) Business strategy, intellectual property or plans for innovation or commercialisation;

(f) Details of legal proceedings;

(g) Details relating to formal complaints that are under active investigation by the University;

(h) Personal or confidential information about another individual (including students and colleagues), including contact information;

(i) Material that could be deemed to be threatening, harassing, discriminatory, illegal, obscene, defamatory or libelous towards any individual or entity; and

(j) Comments posted in breach of the terms of use of the platform, including using names or accounts that may mislead other users of social media about your identity or association with the University or another organisation. This does not prevent the use of an anonymous username provided the rest of this policy is followed.

5.8 Staff and students should be aware that innocently intended comments posted on social media may be misconstrued. Staff and students should be aware that any communication they make may not remain private and should not be assumed as such.

5.9 The University has well-established ways for staff and students to raise any dissatisfaction or concerns that they may have, including:

(a) Public Interest Disclosure ('Whistleblowing') Policy and Procedures

(b) Employee Grievance Procedure

(c) Student Appeals and Complaints Policies

All concerns should be raised through such procedures, not on social media (**see section 11.2**).

6.0 Intellectual Property

6.1 All staff and students must ensure that they have permission to share any third party materials, including all images, photographs, text and videos, before uploading them to or linking to them via social media and, where sharing is permitted, should ensure that such materials or shared links are credited appropriately.

6.2 In addition, all staff and students must check the terms and conditions of a social media account and/or website before uploading material to it; by posting material to social media accounts and/or websites, ownership rights and control of the content may be released. For this reason, caution must be exercised when sharing all information, particularly if the information or intellectual property is owned by the University, a grant funding body or any other third party.

6.3 The University is not responsible for any content posted by its staff or students, other than content posted by staff using University accounts, or in the course of their duties, as a form of professional communication and in communication with this Policy.

7.0 Roles and responsibilities

7.1 All staff and students are responsible for:

- (a)** Ensuring that any use of social media is conducted in line with this and other relevant policies;
- (b)** Ensuring the University's Digital Campaigns and Engagement team is informed and has approved when an account representing a function of the University is to be created;
- (c)** Regularly monitoring, updating and managing content they have posted;
- (d)** Managing security and passwords of institutional accounts, including handovers to relevant staff as required;
- (e)** Reporting and escalating matters as appropriate;
- (f)** Adding an appropriate disclaimer to personal accounts when the institution is named or identifiable (see further section 2.5, above); and
- (g)** Reporting any incidents or concerns in line with section 11.

7.2 The Marketing, Communications and Engagement team is responsible for:

- (a)** Authorising the use of relevant social media for marketing purposes by those representing a part of the University; and
- (b)** Supervising the process of securing and sharing access to institutional accounts that are directly managed by the Digital Campaigns and Engagement Team, including handovers to relevant staff as required.

8.0 Monitoring

8.1 The University does not directly monitor student and staff social media accounts as part of its own social media activities. However, the University does monitor mentions of the University and other topics of relevance, so that it can respond directly to those raising questions or concerns about the University. Activity by staff and students or any other affiliations may appear as part of this monitoring. The University may also use Twitter lists and keyword searches to identify posts from University departmental or staff accounts with a view to helpfully supporting those posts via institutional accounts.

8.2 The University reserves the right, within the law, to monitor, intercept and review, without further notice, staff and student activities using its IT resources and communications systems, including but not limited to social media postings, for legitimate purposes which include the investigation of alleged illegal or inappropriate online behaviour, or where a potential breach of this policy or other relevant University

policy is reported, and compliance with its legal obligations. Accordingly, any use of the University's IT Facilities and Systems (including where these are used to access social media) may be monitored by the University in accordance with the Regulations for the Use of the IT Facilities and Systems.

8.3 The University's duties under the Prevent strategy include responding to and investigating instances where individuals may be at risk of being drawn into terrorism, and material posted on social media may form the basis of reports raised with the University.

8.4 Where personal use of social media during working hours is suspected of interfering with employment duties, the University may take further action.

8.5 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 or Regulation 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.

9.0 Data Protection and Freedom of Information

9.1 The General Data Protection Regulation and Data Protection Act 2018 ("DP Law") applies to personal data posted to social media as it does in other contexts, whether public or private accounts. You must ensure that all posts comply with DP Law and the University's Data Protection Policy.

9.2 Consent may be required when taking and using photographs and video for social media. This may involve release forms. More information can be found at Data Protection Considerations for Images.

9.3 Staff and students should not post personal data about staff and/or students and/or a third party on social media without the agreement or knowledge of the person to whom it relates. Some exceptions to this may apply for academic, literary and journalistic purposes, for example, colleagues posting to and commenting on an academic paper.

10.0 Incidents and response

10.1 Any staff or student may raise a concern or make a complaint/raise a grievance if they consider that a breach of this policy by a member of staff or a student relates to

them, and it will be considered in the usual way. Please see section 5.9 for more information on how to raise concerns.

10.2 Where repeated concerns about the same or similar subject matter are raised, they may not be progressed by the University unless they relate to new incidences of breach of this policy or agreed actions arising from the original complaint have not been implemented.

10.3 Where a member of staff or a student has any queries about the application of the policy and how to use University social media, they can approach the University's Head of Digital Campaigns and Engagement.

11.0 Consequences of a breach of this policy

11.1 Any breach of this policy may result in disciplinary action up to and including dismissal for staff or withdrawal/termination of registration for students.

11.2 Disciplinary action may be taken regardless of whether the breach is committed during working hours and regardless of whether any University equipment or facilities are used in committing the breach.

11.3 Any member of staff or student who is suspected of committing a breach of this policy will be required to co-operate with any investigation.

11.4 The University has the right to request the removal of content from an official social media account if it is deemed that the account or its submissions pose a risk to the reputation of the University, or a risk to the reputation or safety of any of the University's community.

11.5 Where conduct is considered to be illegal, the University may report the matter to the Police. Beyond that, any member of staff, student or third party may pursue legal action against the individual, if they choose to do so.

12.0 Review and reporting

13.1 This policy will be reviewed and updated every three years.

The university authorities reserve the right to modify, update, or add new conditions to this policy as needed, in response to evolving technological, legal, or institutional requirements.

Rev Dr Praveen Martis, SJ

Vice Chancellor