Code:	QA617
Title:	Social Media Policy
Date:	18th February 2020
Approval:	Academic Council

1. Purpose

1.1. NUI Galway (hereafter referred to as the 'University') appreciate and recognise 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, and the sharing of links, images and other information, meaning that the lines between the expression of an individual's personal or professional views and those of the University as an institution can sometimes become blurred.

1.2. The University is conscious of the fact that a lot of the content on social media sites is user-generated, and thus, may pose legal and reputational risks for NUI Galway if such content is inappropriate or illegal. It is therefore important and expected that all employees and students follow the same behavioural standards online as they would in real life. It is also required that the University's values are always followed and respected.

1.3. The purpose of this Policy is:

- to provide guidance and direction to NUI Galway members (as defined below) when using all types of social media sites on behalf of, or in association with, the University
- to enhance and protect the University, its employees' and students' personal and professional profiles and reputations in the social media space, while ensuring that the image and reputation of NUI Galway as an institution is not compromised in any way
- to promote and respect the University values in accordance with the University's strategic plan
- to promote consistent, effective and innovative use of social media as part of the University's activities
- to ensure NUI Galway members do not compromise their information technology personal security or the security of University information assets
- to set out the responsibilities of users of corporate social media accounts
- to support users of University social media accounts to mitigate the risks associated with social media, protecting themselves as well as the University
- to clarify the expectations of staff and students using social media in an individual professional or personal capacity
- to outline channels for communication of notice of a suspected breach of this policy or of issues or concerns
- to signpost staff and students to resources which will support them in enhancing their social media presence and that of the University.

2. Scope

2.1.	This Policy applies to:

- all employees of the University, including full-time, part-time, temporary or those on fixed- term contracts of employment
- students of the University
- workers such as agency staff, casual staff, academic visitors, or contractors who are undertaking work on behalf of the University
- students and employees who operate or manage University affiliated social media sites including but not limited to NUI Galway societies and clubs
- retired employees who have access to or use University facilities (each hereafter referred to as "member" or "members").

This Policy will normally not apply to members using social media in a personal capacity subject to the University reserving the right at its discretion and in accordance with this Policy and other University policies and procedures to act in circumstances where there may be a damage to the reputation of the University. To clearly delineate use of social media in a personal capacity, employees, retired staff and students are advised that they must use a personal identity (i.e. one that does not associate them with the University). When members create personal accounts on social media sites (i.e. accounts that are not associated with their University work) members must refrain from using their official NUI Galway email accounts to do so. Members 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.

3. Definitions

3.1.	Social media is the collective term referring to forms of online electronic communication, such as websites and applications for social networking and microblogging, through which users in online communities create, consume, promote, distribute and share information, ideas, personal messages, and other content, such as videos and images for purposes that are primarily related to communities and social activities, rather than functional, task-oriented objectives.

3.2.	There are various types of social media platforms which attract specific audiences for different purposes. These include, but are not limited to:

- forums and comment spaces on information-based websites
- social networking websites, such as Facebook and LinkedIn
- video and photo sharing websites, such as Flickr, Instagram, Snapchat and YouTube
- weblogs, including corporate and personal blogs
- micro-blogging sites, such as Twitter and Tumblr
- forums and discussion boards, such as Yahoo! Groups or Google Groups
- online wikis that allow collaborative information sharing such as Wikipedia

3.3.	This Policy extends to all social media sites and incorporates any future developments of such media. The absence or lack of explicit reference to specific social media platforms or sites does not limit the extent of the application of this Policy.

4.   Legal and Policy Basis

4.1.   Information posted to social media sites must adhere to all applicable law and legislation, and also University policies and procedures as set out in clause 4.2. Particular attention must be paid to the following (each as may be amended from time to time):

- Data Protection Acts, 1988-2018
- General Data Protection Regulation, 2016
- Copyright and Related Rights Acts, 2000-2007
- Defamation Act, 2009
- Child Trafficking and Pornography Acts, 1998-2004
- Equal Status Act, 2000
- Prohibition of Incitement to Hatred Act, 1989
- Irish Human Rights and Equality Act 2014.

4.2.   This Policy must also be read in conjunction with all of the University's policies and procedures. These include, but are not limited to, the following:

- Code of Conduct for Staff
- Student Code of Conduct
- HR Policies and Procedures
- Brand Book
- University ICT Guidelines
- University Data Protection Policies and Procedures
- Staff Handbook
- Social Media Guidelines (Marketing & Communications Office)
- Staff Anti-Bullying Policy
- Staff Harassment and Sexual Harassment Policy

5.   Social Media Usage

5.1.   Members must use social media sites in a responsible manner at all times, having due regard to the rights and reputation of the University and of others including those who members interact with externally. In particular, members are required to adhere to the following when using social media on behalf of, or otherwise associating, with the University:

5.1.1. Exercise good judgement and common sense at all times
       Consider what you post, who can see it, and how that post may reflect on the University. Search engines can turn up posts years after they are created, and comments can be screenshot, copied or forwarded. If you wouldn't say it at a conference or to a member of the media, consider whether you should post it online.

5.1.2. Strive for accuracy
       Get the facts straight before posting them on social media, and review content for grammatical and spelling errors. This is especially important if posting on behalf of the University in any capacity.

5.1.3. Be respectful
       Understand that content contributed to a social media site could encourage comments or discussion of opposing ideas. Responses should be considered carefully, in terms of content and tone, on how they would reflect on the individual posting the message, and/or on the University.   Disparaging language regarding a person is not acceptable. Do not post material that could reasonably be deemed as hate speech, threatening, harassing, illegal, obscene, defamatory or slanderous towards any individual or entity.

5.1.4. On personal sites, identify views as your own

If you identify yourself as a NUI Galway employee or student member online, it should be made clear that the views expressed are personal and do not represent the views of the University (see Appendix 1). Do not use pseudonyms or seek to impersonate any other person or engage in trolling (i.e. intentionally insulting and harassing people via the internet).

5.1.5. Personal social media accounts

It is highly recommended that University social media accounts are kept separate from personal social media accounts, where possible. Further to this, where practical employees should refrain from adding work contacts to their personal social media accounts.

5.1.6. Compliance with legislation

Ensure that you are compliant with national and international legislation on data protection, NUI Galway policies and procedures, adhere to copyright laws, and secure permission prior to posting, sharing or distributing copyrighted materials.

5.1.7. Confidential information

Do not post or share information which is confidential and/or proprietary to the University. Members should not post confidential, proprietary or sensitive information about the University, its students, employees or alumni. Care should be taken to use good ethical judgement and to ensure that all University privacy and confidentiality policies are adhered to. Subject to applicable University policies and procedures and fair procedures, those who share confidential information do so at the risk of disciplinary action, up to and including dismissal.

5.1.8. Social media must not be used, under any circumstances, for any of the below reasons, which include but are not limited to:

- To breach the data protection rights of other individuals
- To post material that would reasonably be deemed inappropriate, obscene, discriminatory, threatening, defamatory or slanderous towards any individual or entity
- To bully, harass or intimidate members
- To express support for illegal activities or organisations
- To 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 the University
- To post content that could create a security risk for NUI Galway or its members.

5.1.9 University Property

Members shall respect University time and University computers and time on the job are reserved for University related business as approved by line mangers/supervisors and in accordance with University policy.

6.   University Affiliated Social Media Sites

6.1.   A University affiliated social media site is defined as any site that could reasonably be perceived to be associated with or represent NUI Galway. This includes, but is not limited to, any sites which use the logo of NUI Galway, school based sites (e.g. the NUI Galway School of Law Facebook page), and support sites, such as the @nuiglibrary Twitter account.

6.2. Any member who wishes to create and become the administrator of a University affiliated social media site must first seek approval from the Head of School, Head of Unit, or the equivalent of same. Where a member creates a University affiliated social media site, login details for that social media site and any subsequent changes must be provided to the Head of School, Head of Unit or equivalent person immediately. Individuals wishing to set up a NUI Galway affiliated social media site shall follow the guidelines issued by the Marketing and Communications Office.

6.3. Social media site administrators must have an understanding of the rules involved in maintaining and managing a social media site and shall undertake to manage the account in line with University policies and current legislation. Any individual who proposes to become a social media site administrator should attend a social media course.

6.4. The University reserves the right, at all times, to monitor and review any University affiliated social media site to ensure that the content on same is in compliance with this Policy.

6.5. The University reserves the right to request the removal of a social media site which is either inaccurate or inactive (inactive sites by their nature end up being inaccurate).

7. Third Party Social Media Sites

7.1. Third party social media sites, such as Facebook, LinkedIn, Twitter, etc., are used by employees at their own risk.

7.2. It is important that members are conscious of the fact that these social media sites are owned and operated by independent entities and accordingly, the University does not have any control over these sites and cannot take responsibility for any data stored on these sites.

7.3. Members must familiarise themselves with the terms and conditions of service and the policies of sites and networks in which they participate, and ensure that they adhere to same in conjunction with the requirements of this Policy.

8. Compliance with Policy

8.1. The University does not routinely monitor content posted on social media sites, but reserves the right to monitor, intercept and review, without further notice, the postings and activities of Members in connection with social media where there is reason to suspect that University Policy or Procedure is being breached or University values are being undermined or where deemed necessary by the University for other legitimate reasons.

8.2. The University would encourage individuals to report any inappropriate content or suspected breaches of this Policy to, in the case of an employee, their line manager who shall report it to their UMT member, as soon as reasonably possible. In the case of a student, the matter should be reported to Prof. Michelle Millar, Dean of Students.

9. Breach of Policy

9.1. The University takes a very serious view on malicious use of social media by members, particularly in circumstances where such use poses a risk to employees, students or any member of the general public, or which threatens to bring the University's reputation into disrepute.

9.2. The University operates a 'Notice and Take-Down' procedure for University operated and affiliated social media sites. Members are encouraged to be vigilant and to report any suspected violations of this Policy, and/or potentially illegal activity, immediately to their line manager who shall report it to their UMT member, who will decide, on behalf of the University, the most appropriate course of action under the circumstances. In the event that content is deemed to be potentially illegal, the University will refer the matter to the relevant legal authorities.

9.3. On receipt of notice (or where the University otherwise becomes aware) of any suspected breach of the Policy, the University reserves the right to:

- Remove, or require the removal of, any content which is deemed by the University to be in breach of this Policy. Any removal will be on a 'without prejudice' basis and shall not constitute any admission of responsibility on the part of the University or any other party.
- Disable access, pending an appropriate investigation, for any employee and block access for that employee to the University's network, systems, communications devices or equipment, pending a full investigation.
- Where applicable, initiate steps subject to applicable policies and procedures to commence the disciplinary action, up to and including dismissal or expulsion as applicable.

10. Review

10.1. The University reserves the right at any time to revise the terms of this Policy. Any such revisions will be notified to Members, and by continuing to use the relevant social media sites following such notifications, Members will be deemed to have accepted the revised terms of this Policy.

11. Responsibilities

The following roles and responsibilities apply in relation to this Procedure:

Name/Title	Roles and Responsibility
Prof. Michelle Millar, Dean of Students	Procedure Owner and Approver.
University Management Team (UMT)	Each member of UMT is responsible for ensuring compliance with this Procedure in their respective areas of responsibility. For example, subject to applicable policies and procedures, the Director of HR shall be responsible for staff discipline matters arising from a breach of this policy. Subject to applicable policies and procedures, the Dean of Students shall be responsible for student discipline matters arising from a breach of this policy. Deans of College shall be responsible for matters relating to staff and students which can be dealt with under local line or student management.
Director of Marketing	Compliance with this policy insofar as it relates to marketing and communications matters.
Internal Audit	Monitoring and reporting compliance with the Policy
Social Media Account Operators	Compliance with this Policy
Members	Compliance with this Policy
Heads of School/Unit/Project Principal Investigator	Ensuring compliance with this Policy in their respective areas of responsibility.

Appendix 1 – Sample Wording for Inclusion on Social Media Site

Disclaimer

The views expressed in the posts and comments on this post should be understood as the personal opinions of the author only. They do not reflect the views of NUI Galway or any other third party mentioned or referred to in the post.

Comment Statement

All readers are encouraged to leave comments. While all points of view are welcome on the post, only comments that are courteous and on-topic will be posted. All comments will be reviewed by the author and responded to (as needed) prior to posting. The author reserves the right to post comments at his/her discretion. Spam and comments endorsing commercial products or services will not be posted.

Contributors to this post are fully responsible for everything that they submit in their comments, and all posted comments are in the public domain.

Privacy Statement

Any email addresses, names, or contact information received through this post will not be shared or sold to anyone, unless required by applicable law.

Linking Statement

This post may contain external links to other sites. The author does not control or guarantee the accuracy, relevance, timeliness, or completeness of information on other web sites. Links to particular items in hypertext are not intended as endorsements or any views expressed, products or services offered on outside sites, or the organisations sponsoring those sites.