Social Media Policy

Owner: Executive Director of Commercial and Operations Head of Marketing and Communications	Related Strategies:
Relevant to: All staff.	

Office Use only:

Corporate Intranet Family:	Approval Board/Committee/Group:	Approval/Re-approval Date:	Implementation Date:	Next Review Date:
Marketing	Executive Leadership Team	May 2021	May 2021	May 2023

New Policy or Substantive Policy Review

Version	Date	Policy Development Agreed by *(Executive Owner)*	Policy Development Author	Draft Policy Verified by	Policy Approval	Impact Assessment *(if applicable)*
1		Executive Director of Commercial and Operations	Head of PR and Media Relations, Head of Marketing and Communications	Executive Director of Commercial and Operations	Executive Leadership Team	

Rationale for new or substantive policy review	This is a new policy.

Please make explicit if change/review relates to procedures, guidelines and associated documents only

Periodic Policy Review / Change History

Version	Date of Review / Revision	Description of Change	Reviewed By	Approved By *(Executive Owner)*

Communication
To be agreed by Executive Leadership Team

Announcement on hub	□	SLT email	□
College newsletter	□	All staff email	□
SLT meeting	□	Cascade brief	□
External website	□	Training needed (specify who)	□

1. POLICY STATEMENT

Social media enables The Sheffield College to build connections and relationships, share information quickly e.g. campus or snow updates, celebrate success, show the human side of the organisation, communicate with a wide range of audiences and stakeholders and respond to queries swiftly.

Social media is, therefore, an integral part of the college's marketing and public relations remit providing valuable channels that are also useful for communicating during an emergency or crisis when information needs to be shared quickly.

This policy provides guidance to staff of The Sheffield College and its subsidiaries on how to maximise the benefits of social media and minimise the risks. This policy is designed to help staff use these platforms responsibly so they understand the conduct expected by the college to ensure consistent high standards of social media use.

The college's Marketing Team will support any staff who need advice and guidance on how best to use social media. Email: marketing@sheffcol.ac.uk.

2. DEFINITIONS

Social media is the term commonly given to internet and mobile-based channels and tools that allow users to interact with one another and share opinions and content. As the name implies, social media involves the building of communities or networks that encourage participation and engagement.

Social media allows parties to communicate instantly or to share data in a public forum via websites or apps. This includes, but is not limited to, online forums, blogs, video-and image-sharing websites and social platforms such as YouTube, Facebook, Twitter, Instagram, SnapChat, SlideShare and LinkedIn as well as messaging apps such as WhatsApp and Facebook Messenger. The nature of social media is that it is rapidly changing and evolving and this policy is intended to cover all communication platforms, which may emerge in the future, but are not currently in existence.

3. PRINCIPLES

- The Sheffield College is committed to being a trusted and reliable source of information through its use of social media. It aims to take a strategic approach with content reflecting key priorities, has a clear understanding of the etiquette and boundaries of social media, takes both a proactive and reactive approach that enhances the reputation of the college and that reflects its values
- By being strategic and proactive, the college will ensure that it posts regular, appropriate and engaging social media content that reflects organisational priorities. By being reactive, the college aims to ensure that its point of view is accurately portrayed when it needs to respond to a situation or issue in the public interest
- The college will always convey accurate and factual information based on the best available knowledge that it has at the time of any social media query, and respond in a timely and appropriate way when there is online discussion of the college to foster an understanding of the college's actions, decisions and policies in the event of negative queries

- Content used on any account will always be authentic and an accurate representation of the college offer. It will also be consistent with the college's Equality and Diversity Strategy and approach
- Staff using college, professional and personal social media accounts to engage in college business should only comment within their area of expertise to provide individual perspectives on non-confidential activities at the college. Staff should never represent themselves or the college in a false or misleading way. Staff should always state on their social media accounts that the accounts represent their views only
- Staff should not publish or report conversations that are private or internal to the college taking into account privacy, confidentiality and legal guidelines. Where appropriate, the college reserves the right to monitor use of social media platforms and take appropriate action to protect against any misuse that may be harmful, in accordance with the law and IT regulations
- Staff should be aware that the college's appearance on social media is reputationally sensitive. If staff's use of social media is considered to bring the organisation into disrepute by, for example, being derogatory, discriminatory, bullying, threatening, defamatory, offensive, then the college may take action. This may include asking for posts, such as comments, videos or photographs posted about the College, students, work colleagues, to be removed, as well as activating disciplinary procedures

4. SCOPE AND LIMITATIONS

This policy covers how the college uses social media and what it expects from staff. It also cross references to other policies including media relations, photo consent, acceptable use of photographs, videos and media and mobile devices. See the links in section 8.

5. RESPONSIBILITIES

The Executive Director of Commercial and Operations and the Head of Marketing and Communications are the owners of this policy.

6. IMPLEMENTATION ARRANGEMENTS

The roles and responsibilities of staff in implementing this policy and procedures are set out in the guidelines section. All new staff should be made aware of the policy during their induction and training sessions. Staff have access to this policy on the college intranet.

7. MONITORING AND REVIEW

The Executive Leadership Team will review this policy every two years.

8. SUPPORTING/RELATED DOCUMENTS

This policy should be used with the following documents:

The Sheffield College

- Media relations policy: Click here
- Acceptable Use of Photographs, Videos and Media Policy: Click here
- Acceptable Use of Bring Your Own Device Policy: Click here
- Photographic consent forms for individuals: Click here
- GDPR: Click here
- Code of Conduct: Click here

9. GUIDELINES

9.1. Authorisation of social media accounts

The Sheffield College's Marketing Team is the lead account holder for all of the college's official social media accounts. The team manage the official social media accounts and provide guidance to college departments on best practice to ensure a strategic approach, consistency of style and messaging, appropriate high quality content and tone of voice in line with the college brand.

A social media presence becomes part of an organisation's legacy. Posts, pictures, images, tweets and content in general can stay online for a long time. The Marketing Team are best positioned to think ahead and decide which messages to share via social media channels given their lasting legacies for the college.

The Marketing Team will recommend the suspension or deactivation of any accounts, which have remained inactive or dormant for an extended period of time. The team can also direct secondary social media accounts in the event of an emergency or crisis, providing content to be posted if there is a need for emergency-related information and updates.

9.2. Account security

Social media accounts are at risk of hacking. This can cause significant reputational damage and potentially serious misinformation for stakeholders.

In maintaining the master list of all official college social media accounts, the Marketing Team keep the login details for continuity and security reasons.

Passwords are saved in a password encrypted file and stored in a shared folder where only the relevant people have access. These are also changed periodically for security purposes. The Marketing Team Leader is responsible for sharing passwords with relevant people and updating as people leave the organisation.

9.3. Active College social media accounts

As of May 2021 there are 22 official college social media accounts on Facebook, Instagram, LinkedIn, Twitter, Snapchat and YouTube, which aim to provide a regular flow of engaging content and respond to enquiries.

The recognised official accounts are listed below. These are managed directly by the Marketing Team, or in some cases e.g. The Silver Plate, the nursery and the Students' Union, in conjunction with the Marketing Team.

The Sheffield College

Facebook	• The Sheffield College www.facebook.com/thesheffieldcollege • Students' Union https://www.facebook.com/sheffcolSU • The Silver Plate https://www.facebook.com/thesilverplaterestaurant/ • Revive Hair and Beauty https://www.facebook.com/reviveatsheffcol/ • Sheffield Sixth Form https://www.facebook.com/TheSheffieldSixthForm/ • The Nursery at The Sheffield College https://www.facebook.com/Sheffieldcollegenursery
Twitter	• The Sheffield College www.twitter.com/sheffcol • Students' Union www.twitter.com/shefcolsu • The Silver Plate https://twitter.com/TheSilverPlate • Revive Hair and Beauty https://twitter.com/ReviveSheffCol • Shefcolemployer https://twitter.com/ShefcolEmployer *Please note this is in the process of being rebranded to Apprenticeships+ • Sheffcolcareers https://twitter.com/SheffcolCareers • Sheffield Sixth Form https://twitter.com/Sheff6thForm
Instagram	• The Sheffield College https://www.instagram.com/sheffcol/ • Sheffield Sixth Form https://www.instagram.com/thesheffieldsixthform/ • The Silver Plate https://www.instagram.com/thesilverplate_/ • Students' Union https://www.instagram.com/sheffcolsu/ • Revive Hair and Beauty https://www.instagram.com/revivesheffcol/ • MSK Ingredients Employer Skills Academy https://www.instagram.com/msksheffcol/
Linkedin	• The Sheffield College https://www.linkedin.com/school/the-sheffield-college/
Snapchat	• The Sheffield College @sheffcol
Youtube	• The Sheffield College https://www.youtube.com/channel/UCSyeHFmunbmBgVwzF0kvWDw

The creation of any new social media accounts must be approved by the Marketing Team and the college's name should not be used without approval. Email: marketing@sheffcol.ac.uk.

The college aims to respond to social media queries and complaints as soon as possible - within 24 hours – where appropriate. In the event of negative posts, the Marketing Team will cross reference to other departments, such as the complaints process, before determining the most appropriate response to ensure a considered, consistent and informed response.

On occasions, the college may need to block or report an individual if their behaviour breaches the College's social media disclaimer – please see section 9.5. - or, for example, Facebook's Community Standards: https://en-gb.facebook.com/communitystandards/

The Marketing Team will not automatically delete negative comments on social media channels, recognising that to do so is contrary to the spirit of these platforms and could cause reputational damage to the college.

There are two exceptions to this:

1. If a post contravenes the college's disclaimer in section 9.5. or the terms and conditions of the social platforms themselves, for example, removing a racial hatred comment on a Facebook page. In some cases, it is possible to contact the platform to request material is removed where it contravenes their own guidelines – for example, Facebook and Google reviews, which are beyond the control of the College
2. Trolling - if negative comments are posted on adverts and the College is being trolled on content that it is paying to boost, it will delete the comments.

9.4. Social media content

All posts from corporate social media accounts represent the college. It is vital that posts are carefully considered, appropriate and do not damage the reputation of the college or bring it into disrepute.

The Marketing Team is responsible for creating social media content for the college's official accounts and can provide guidance to secondary account holders. Any secondary accounts have agreed users and log ins/access should not be shared more widely than this.

Staff should not use their personal accounts or create unauthorised accounts to communicate with students or applicants. All enquiries should come through the college's official social media accounts managed by the Marketing Team.

Safeguards should be put in place to minimise the risk of communication errors via social media, including checking content with a colleague before publishing. Posts must be in line with the values of the college and all relevant policies.

Content posted or promoted on corporate accounts must be respectful of others and courteous. Corporate accounts must not be used to criticise or argue with colleagues, students or competitors.

Content must be accurate and should not commit to something that the college does not intend to deliver. If a mistake is made, the college will be transparent and update the page with a correction.

Staff are expected not to be involved in any social media activity or comment which is malicious or deliberately damaging to the college. Those staff using official social media accounts **must not** post content that:

- Harasses, bullies or intimidates or incites others to do so.
- Is intended to incite violence or hatred.
- Is abusive about an individual's age, disability, gender reassignment, marriage/civil partnership, pregnancy/maternity, race, religion or belief, sex or sexual orientation.
- Includes confidential information about an individual or organisation.
- Discusses the college's internal workings.
- Discusses future plans not yet communicated to the public
- Uses someone else's images or written content without their permission and/or without acknowledgement.
- Content that is politically sensitive, unless the college has published an official position on this.
- Content that is commercially sensitive.

9.5. Thirty party behaviour and social media disclaimer

The college will not tolerate inappropriate behaviour by others on its social media channels. This includes students and third parties. The college reserves the right to delete posts or block individuals, where their behaviour breaches this policy, and to raise an issue internally with college managers so that it can be addressed offline.

The college will post the following disclaimer on its social media channels as follows, clarifying its position and rationale in the event such action is needed:

The College's social media sites are places where we encourage interaction and discussion between students, staff, alumni and in anyone interested in the college. If you post a question to this site, we will respond as promptly as possible during working hours (Mon-Fri, 9am-5pm). If your enquiry falls outside of these hours, we will get back to you as soon as possible when office hours resume.

We ask that you're respectful in your comments. We reserve the right to remove any content that is: abusive or personal attacks; unlawful, obscene, defamatory, threatening, harassing, abusive, slanderous, hateful or embarrassing to any other entity; third party advertising; chain letters or 'spam'. We also reserve the right to terminate involvement by users who post such content.

The views and opinions expressed on our social media sites do not necessarily represent those of the college. Therefore, we cannot be held responsible for the accuracy or reliability of information posted by external parties. For your safety, please do not include your phone number, email, address or other personal information in a post, as your comments are visible to all.

9.6. Third party social media sites

On occasions, the college is discussed in the public domain via online channels that it does not manage. In those instances, the college will decide whether it is appropriate to:

1. Ignore those discussions.
2. Join the conversation to draw audiences back to the college's official channels.
3. Intervene to clarify or explain the college's position.
4. Alternatively, the response may combine points 2 and 3 as above.

9.7. Staff's personal and professional accounts

Social media can be an important tool for staff to raise their profile and build networks. It is recommended that staff have separate personal and professional accounts. Personal and professional accounts should not use the college's branding. If staff do discuss their work on social media, they should make it clear on their profile that the views expressed are their own and do not necessarily reflect those of the college.

All staff should consider what they are posting on their individual accounts – as per the guidance provided in this policy. The college does not monitor staff accounts. However, if a concern is raised regarding content posted on a staff member's social media account and the post is considered to be misconduct, the college has the right to request the removal of content. In addition, the matter may be addressed through disciplinary procedures.

On some social media channels e.g. Facebook, there is the option to add your job title and the company you work for. Staff should consider the impact of the content they are posting on the college reputation if they choose to list this information. If an employee posts something on their personal social media account that is generally offensive or may damage the reputation of the college, formal disciplinary action may be taken.

As stressed in 9.4, staff should also not use their personal accounts or create unauthorised accounts to communicate with students or applicants. All enquiries should come through the college's official social media accounts managed by the Marketing Team.

9.8. Photographic consent from students

All students must complete the college's photographic permissions forms before any detailed case studies, photographs and video can be published about them. Parents must complete those approvals in the case of students under 16. Further information is also available in the college's Acceptable Use of Photographs, Videos and Media Policy.

The exception to this is large events, such as open days, results days, graduation and freshers' fairs where a message should be clearly visible advising that images will be taken for promotional purposes which could include social media. This will be handled by the Marketing Team, who are responsible for the events.

Staff should seek permission from students (in the case of young or vulnerable students) before taking and sharing images of them via the college's approved social media accounts. It is recommended that staff gain written consent from students first with the College's photo consent forms, as above. As a minimum, verbal consent is recommended.

Staff should not share with anyone, including the Marketing Team, any images that consent has not been collected for.

Staff are advised not to use their personal smartphones or other devices to take photos of students or publish them via their own, personal, social media accounts. Further information is also available in the college's Acceptable Use of the Bring Your Own Device Policy.

9.9. Social media in an emergency

Social media can be a very effective tool in a crisis alongside other communication channels. At the same, crises can also start and escalate on social media.

Social media is a listening tool first and foremost. In the event of a difficult issue, the college will review and aim to understand the situation, to avoid instantly overreacting and potentially fanning the flames and escalating the situation.

The Executive Director of Commercial and Operations and Head of Marketing and Communications, must be notified immediately of a crisis and emergency, or any potential crisis. A crisis is defined as any emergency or controversy that could negatively affect the public perception or reputation of the college. Emergencies include fires, accidents, explosion, weather-related incidents and natural disasters. Please note this list is not exhaustive.

Colleagues who become aware of potential issues that could generate adverse social media enquiries for the college, should seek immediate advice from the Head of Marketing and Communications so the facts can be gathered quickly, the college position investigated and an appropriate response developed.

The Marketing Team is the authorised source for confirming the college's position on all communication platforms including the website, social media and the media on all major announcements such as, for example, campus closures due to adverse weather. This process helps consistency of messaging in communications to students and colleagues.

The Marketing Team will aim to react in a timely manner if it becomes apparent that the issue is developing into a crisis and keep concerned parties up to date with the relevant information, ensuring that this is joined up with internal and external messages to staff and external stakeholders. The Marketing Team will identify the source of the issue, understand where the crisis has originated, verify the facts and monitor channels in order to make informed decisions about how to respond.

The college, in its social media communications, is committed to being honest and clear, and making sure all messaging is verifiable, as the news media will check it. The college is also committed to ensuring that its social media audiences are aware of the action that is being taken to resolve a situation. The Marketing Team will also consider whether it needs to switch off any pre-scheduled posts.

9.10. News media enquiries via social media

Journalists will sometimes use social media, for example Twitter and LinkedIn, to request interviews rather than contacting the college's Head of PR and Media Relations**.**

These enquiries must be processed in line with the college's Media Relations Policy. Staff should not respond to any queries via social media but instead re-route the details of any such request to the Head of Marketing and Communications and Head of PR and Media Relations.

9.11. Legal considerations

A range of legislation is relevant to social media use. Staff should be mindful of the following legal considerations including ensuring that posts do not breach confidentiality and copyright or make defamatory comments. Please note the following list is not exhaustive.

Defamation
A defamatory statement is one that causes, or is likely to cause, serious harm to a person or organisation by damaging their reputation. If the defamatory statement is written down it is known as libel. If it is spoken, it is slander. There are several defences against legal action, under the Defamation Act 2013, which include truth, honest opinion, public interest, privilege and operation of websites. For more information:
https://www.legislation.gov.uk/ukpga/2013/26/enacted

Malicious falsehood
Malicious falsehood refers to untrue and damaging content, which although not defamatory, still causes damage, such as financial loss for the subject. Malice is defined as knowingly

making a false statement. For example, making a false statement about your competitors in a comparative advertisement.

Malicious communications
The Malicious Communications Act 1988 covers the sending of any direct electronic communication to someone, where the sender's intent was to cause distress or anxiety, and the content is indecent or grossly offensive, a threat or untrue information known to be false by the sender. For more information: https://www.legislation.gov.uk/ukpga/1988/27/contents

The Communications Act 2003 covers the sending of any public electronic communication message or content that is grossly offensive or indecent, obscene or menacing, and causing any such message or content to be sent. For example, this can include the sharing of such information by posting, re-posting or re-tweeting it.

General Data Protection Regulation
Organisations must set out in their privacy notices how they will use personal data in accordance with the requirements of the GDPR 2018. With social media being a direct form of communication, it is important that the College keeps social media platforms secure and handles personal data appropriately.

On social media, the moderator may suggest to a user that it is better to direct message if they wish to share their personal data rather than public message. If the user persists in sharing personal data via public messaging then in addition to the privacy notice; the moderator should use boilerplate clauses for public messages where personal data is disclosed, for example:

Thank you for your message. We care about your security and will not use any of your personal details obtained in this communication for marketing purposes. If you provide us with any contact information, it will only be used to manage your enquiry and not for any other reason. Any personal data shared in public by the user on social platforms is shared at their own risk.

Some social media campaigns may involve data collection. For example, when running a competition on a social media platform and collecting personal data for this purpose, competition entry terms and conditions must explain how the collected data will be used.

Advertising Standards Authority
The Advertising Standards Authority is the UK's independent regulator for the advertising industry. The ASA applies the codes written by the Committee for Advertising Practice (CAP). The codes of practice cover marketing communications on websites, social media channels. As a rule of thumb, all advertising content must be 'legal, decent and honest'; all claims must be qualified, and statistical data must be referenced. For more information: https://www.asa.org.uk/

Intellectual property
Intellectual property covers work created using your mind such as the names of brands and products, inventions, designs and the content that you write, make or produce. You can protect your intellectual property through copyright law, trademarks and patents. For more information: https://www.gov.uk/intellectual-property-an-overview

Copyright
Copyright covers material including photographs, literature, music, film, audio and art. Copyright is automatic and does not need to be registered – unlike trademarks, for example. The copyright owner has certain economic and moral rights – for example, the right to be credited as the creator of the material and the right to be financially rewarded if another party uses the material. In most cases, the copyright owner needs to give permission for the material to be used. For more information: https://www.gov.uk/topic/intellectual-property/copyright

Trademarks
Trademarks include logos, slogans and words, and are signs used to distinguish products or services of one company from another. A trademark owner has the right to prevent unauthorised use of that trademark. For more information: https://www.gov.uk/topic/intellectual-property/trade-marks