



| Social Media Policy | |
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| Category/Business Group | Corporate Services – Sales and Marketing |
| Published Externally (Yes/No) | Yes |
| Approver | Chief Executive Officer |
| Responsible Officer | Senior Marketing Manager |
| Contact Officer | Digital Marketing Manager |
| Effective Date | 1/11/2018 |
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| Version | 1 |

Policy Approval

| Approver (Acting CEO) | Responsible Officer | Policy Officer |
|------------------------------|----------------------------|-----------------------|
| Emma Drummond | James Flannagan | Emma Drummond |
| Date:31/10/2018 | Date:31/10/2018 | Date:31/10/2018 |

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1 Background

UNSW College uses Social Media as a means to disseminate content and to facilitate communication in the delivery of programs, as well as to promote UNSW College, its activities and the activities of its Employees and Students. UNSW College also uses Social Media to communicate with Students, Prospective Students and the general public.

UNSW College recognises that its Employees and Students also use Social Media for a variety of purposes, some of which may relate to UNSW College and others which are for solely personal use.

UNSW College provides its Employees and Students with Information & Communication Technology (**ICT**) resources, which can be used to access Social Media for various purposes.

2 Purpose

This Policy provides a framework to ensure that all Social Media content generated on behalf of UNSW College is produced, delivered and managed in a way which is consistent with UNSW College's policies, and the UNSW College brand.

This Policy also aims to inform the users of Social Media on how to use Social Media within the guidelines of UNSW College's Code of Conduct and other related policies, and to ensure that Social Media is used in a legal, ethical and responsible manner.

3 Scope

This Policy applies to all users of UNSW College Social Media and all persons using UNSW College Information & Communication Technology (**ICT**) resources to access Social Media including, but not limited to:

- (a) Employees;
- (b) UNSW College Students; and
- (c) contractors, third parties, agency staff and visitors to UNSW College.

These users may represent UNSW College via Social Media, or identify themselves with UNSW College while communicating via Social Media, or use UNSW College ICT resources to access Social Media for their professional or personal use.

4 Definitions

Business Day means a day that is not a Saturday, a Sunday or a public holiday or bank holiday, as defined by the Corporations Act 2001 (Cth).

Employee means a person who carries out work in any capacity for a person conducting a business or undertaking (PCBU), including work as: an employee, contractor or subcontractor, an employee of a contractor or subcontractor, or an employee of a labour hire company assigned to work for a PCBU, an outsourced employee, an apprentice or trainee, a student gaining work experience, volunteer.

Intellectual Property Rights (IPR) means all forms of intellectual property rights throughout the world including (present and future) copyright, registered patent, design, trade mark and Confidential Information, including know-how, trade secrets, signs, distinctive marks, biological

material, devices, models, formulae, graphs, photographs, drawings, business plans, methodologies, inventions, policies, records, memoranda and notes.

Moderation means the act of reviewing and approving content before and/or after it is published on a Social Media platform.

Post means a piece of writing, image, or other item of content published online, typically on a blog or Social Media website or application.

Prospective Student means a person (whether within or outside Australia) who intends to become, or who has taken any steps towards becoming a Student or an 'overseas student' as defined by the Education Services for Overseas Students (ESOS) Act 2000.

Social Media means all internet-based publishing technologies. Most forms of Social Media are interactive, allowing authors, readers and publishers to connect and interact with one another. The published material can often be accessed by anyone. Forms of Social Media include, but are not limited to, social or business networking sites (i.e. Facebook, LinkedIn), video and/or photo sharing websites (e.g. YouTube), business/corporate and personal blogs, micro-blogs (i.e. Twitter), chat rooms and forums.

Student means all UNSW College students, including:

- (a) Students who are enrolled with UNSW College to study a program of studies which is delivered by UNSW College; and
- (b) Students previously enrolled, not currently enrolled and Students on program leave, where conduct relevant to this Policy occurred while they were enrolled, or is directly related to their enrolment.

Tweet means a message up to 140 characters and/or an image posted on Twitter.

UNSW means the University of New South Wales Sydney.

5 Policy Statement

- (a) UNSW College encourages the use of Social Media and at the same time, must ensure that its content and use enhances the reputation of UNSW College and is managed within a clear and accountable framework consistent with UNSW College policies and procedures.
- (b) The intention of this Policy is not to inhibit appropriate innovation or creativity.
- (c) Social Media can be used in three main ways at UNSW College:
 - (i) in an official capacity on behalf of UNSW College (currently limited to specific Employees within the Marketing and Communications Business Unit);
 - (ii) in a professional or personal capacity within the workplace; and
 - (iii) in a purely personal capacity, independent of the workplace.
- (d) Social Media platforms are moderated in accordance with their own terms and conditions, which may apply over and above this Policy. All Social Media users are expected to comply with these terms and conditions.

5.1 UNSW College-generated Social Media

- (a) UNSW College maintains a range of UNSW College-generated Social Media, and as such, moderates all content posted by Social Media users to those platforms. UNSW College reserves the right to edit, amend, delete or otherwise respond to any Posts published on UNSW College-generated Social Media where considered necessary.
- (b) UNSW College does not endorse nor take responsibility for content posted on UNSW College-generated Social Media by third parties.
- (c) If Employees find UNSW College-generated Social Media content interesting or entertaining or useful to their professional or personal network, they are encouraged to re-share it. It must be noted, however, that while sharing such content is highly appreciated, it is absolutely voluntary, and Employees should not feel compelled to disseminate UNSW College messages on their own Social Media accounts.

5.2 Official Use of Social Media on behalf of UNSW College

- (a) As noted in clause 5(c)(i) above, official use of Social Media is currently limited to specific Employees within the Marketing and Communications Business Unit. Official use of Social Media includes, but is not limited to:
 - (i) maintaining a profile page for UNSW College on any social or business networking sites;
 - (ii) making comments on such networking sites for and on behalf of UNSW College;
 - (iii) writing or contributing to a blog and/or commenting on other people's or business' blog posts for and on behalf of UNSW College; and/or
 - (iv) posting comments for and on behalf of UNSW College on any public and/or private web-based forums or message boards or other internet sites.
- (b) UNSW College endeavours to respond to queries posted on UNSW College-generated Social Media in a timely fashion. A response should be posted within the same Business Day, or the next Business Day if the query or comment was posted during public holidays, weekend or any other day not counted as a Business Day.
- (c) UNSW College monitors external, non UNSW College-generated Social Media and other websites in order to maintain an accurate and consistent image of UNSW College.
- (d) If UNSW College identifies a Post which is considered to depict an inaccurate, misleading or deceptive image of UNSW College, UNSW College may:
 - (i) correct the inaccurate or misleading content while responding to the Post or Tweet; or
 - (ii) request the site owner or administrator to moderate the Post or Tweet.

5.3 Professional use of Social Media

- (a) Professional use of Social Media means an Employee using a Social Media platform in a way which has a nexus to UNSW College, or is for a work-related purpose. UNSW College recognises that engaging in Social Media can be an important part of day-to day communications involving UNSW College Employees, Students, Prospective Students, suppliers and other relevant parties.

- (b) UNSW College also recognises that Social Media, by its collaborative nature, can be used as an important tool to enhance Student learning experiences.
- (c) When participating in Social Media platforms for a work-related purpose, Employees must ensure that all content:
 - (i) is in full compliance with all confidentiality and privacy obligations;
 - (ii) does not infringe any IPR of UNSW College, UNSW or of other third parties;
 - (iii) does not breach any contractual obligations;
 - (iv) does not bring the business of UNSW College or UNSW into disrepute in a manner that could reflect adversely on the business of UNSW College or UNSW;
 - (v) is not obscene, offensive, threatening, derogatory, defamatory, harassing or hateful to another person or organisation, in particular, to: UNSW College, its Employees, partner organisations (including UNSW), officers, competitors, clients and customers, suppliers and other businesses with whom UNSW College and/or its Employees have dealings or may have dealings; and
 - (vi) is otherwise accurate and is not misleading or deceptive.
- (d) In addition, Employees are reminded that when communicating for a work-related purpose they are representing themselves as Employees of UNSW College and must act in a professional manner, and should consider the following principles:
 - (i) confining comments to area/s of expertise;
 - (ii) not mixing personal communications or opinions with professional communications;
 - (iii) posting meaningful and respectful comments while keeping the language professional and courteous;
 - (iv) being open, honest and transparent;
 - (v) responding in a timely manner. If additional time is needed to research an answer, let the reader know it will take time and reply as quickly as possible;
 - (vi) checking the accuracy of all statements; and
 - (vii) keeping any response clear, appropriate and polite, even when responding to a negative or inaccurate comment.
- (e) Employees are encouraged to visit [UNSW Social Media Communication Guidelines](#) for further information regarding responsible use of Social Media channels.

5.4 Personal use of Social Media

- (a) This Policy is not intended to govern the activities of Employees and UNSW College Students using Social Media in their personal capacity, where the user makes no reference to UNSW College, its Employees, Students, products or services. Employees are permitted to have access to Social Media platforms during ordinary work hours for limited and reasonable personal use, for example, during meal breaks.

- (b) However, the Policy applies to those Employees and Students who choose to make references to UNSW College, its Employees, Students, products or services, irrespective of the Social Media platform used, the timing or the location of use.
- (c) Employees and Students who choose to make such references when using a Social Media platform in a personal capacity must refrain from posting, sending, forwarding or using, in any way, any inappropriate material including but not limited to material which:
 - (i) is intended to (or could possibly) cause insult, offence, intimidation or humiliation to UNSW College, its Employees and/or UNSW College Students;
 - (ii) is defamatory or could adversely affect the image, reputation, viability or profitability of UNSW College or UNSW; and/or
 - (iii) contains any form of confidential information relating to UNSW College or UNSW.
- (d) The UNSW College company logo, branding or other marketing or intellectual property may not be used without permission from the Marketing Communications department.
- (e) Users of Social Media are encouraged to visit the [Stay Smart Online](#) website which provides easy to understand advice on how individuals can protect themselves online as well as up-to-date information on the latest online threats and how to respond.

5.5 Use of UNSW College ICT Resources to Access Social Media

- (a) Employees and Students using UNSW College ICT resources to access or utilise Social Media must observe all applicable law and regulations and adhere to the terms of this Policy, the Acceptable Use of IT Resources Policy, the Acceptable Use of ICT Resources for Students Policy and any other relevant policies and procedures.
- (b) This obligation remains in force regardless of whether the Social Media is being used for work or study-related purposes, or for personal use.

5.6 Monitoring

- (a) UNSW College employs various measures to protect the security and privacy of its ICT resources, which includes backup, logging of activity and monitoring of general usage patterns.
- (b) UNSW College reserves the right to inspect and access all material on its ICT resources, including Social Media activity, to ensure that any use of its ICT resources complies with the law and any relevant policies and procedures.

5.7 Breach of this Policy

- (a) Breach of this Policy may constitute unsatisfactory performance, or in the case of a Student, non-academic misconduct. Depending on the nature and severity of the breach, this may result in disciplinary action in accordance with the *Code of Conduct*, *Managing Unsatisfactory Performance and Conduct Procedure* or *Student Misconduct Policy*.

- (b) If any person becomes aware of or suspects a breach of this Policy, they should contact their immediate manager, supervisor or teacher, as appropriate. Any such contact will be treated as confidential, and any information disclosed will be properly investigated.
- (c) Please refer to the case studies in the [Appendix A](#) for some examples where actions by users of UNSW College Social Media could lead to a breach of this Policy and related policies and procedures.

6 Legal and Policy Framework

6.1 Responsibilities

(a) *Approver*

The Chief Executive Officer is responsible for the approval of this Policy.

(b) *Responsible Officer*

The Senior Marketing Manager is responsible for the implementation, dissemination and review of this Policy.

(c) *Contact Officer*

The Digital Marketing Manager is responsible for the day to day implementation of this policy and is the first point of contact for all enquiries that relate to this Policy.

(d) *Policy and Compliance Officer*

The Policy and Compliance Officer is responsible for the administration and publishing of this Policy.

(e) *Staff, Supervisors and Executives*

UNSW College staff, supervisors and executives are responsible for assisting in the implementation of and adherence to this Policy.

6.2 Review

This Policy is due for review three (3) years from its date of implementation or in case of legislative or regulatory changes.

7 Related Documentation

- (a) [Appendix A: Case Studies](#)

8 Related Policies and Procedures

- (a) Acceptable Use of IT Resources Policy
- (b) IT Security Policy
- (c) Code of Conduct
- (d) Conflict of Interest Policy
- (e) Managing Unsatisfactory Performance and Conduct Procedure
- (f) Student Misconduct Policy
- (g) Student Misconduct Procedure

- (h) Acceptable Use of ICT Resources for Students Policy
- (i) UNSW Social Media Communication Guidelines

9 Version History

| Version Control | Date Effective | Approved By | Amendment Notes |
|-----------------|----------------|------------------|-----------------|
| 1 | See page 1 | Emma Drummond | |

Appendix A: Case Studies

1. Making Public Comments on UNSW College Decisions

Sarah is a UNSW College Employee. She has a personal Facebook profile but does not identify herself as working at UNSW College on her profile. Sarah recently shared articles regarding recent decisions made by UNSW College on Facebook. She added some disparaging comments about these recent decisions such as “UNSW College made some really dumb decisions”.

Sarah has set her Facebook profile up with the highest security settings and only her posts can be seen by her Facebook friends. One of her Facebook friends also works at UNSW College and took a screenshot of some of Sarah’s negative posts and shared them with a manager.

Just because Sarah has set the highest security settings, it doesn’t stop her online friends sharing and replicating her posts. There is nothing private about social media as social media platforms are public forums with the ability for what is posted to be replicated and disseminated widely. Sarah may be in breach of the Social Media Policy and the Code of Conduct and could face disciplinary action.

2. Posting about Employees

Bob is a UNSW College Student. He has an Instagram profile and posted a sarcastic image about a lack of intelligence with a comment saying “my teacher”, with the implication that the content of the image refers to his teacher. People started commenting on the image, including Fred, another student. Some of the comments Bob and Fred made about the image included “our teacher is completely incompetent”. Another student took screenshots and sent it to the teacher in question.

Bob’s posts and comments as well as Fred’s comments on Bob’s Facebook page could be seen as cyber bullying. Both Bob and Fred could face disciplinary action due to breach of the Social Media Policy and Student Misconduct Policy. In addition, the original material and the comments could be construed as defamatory and the teacher may be able to take further steps against Bob and Fred under the relevant defamation legislation.

3. Perceptions of Conflict of Interest

Rachel is a UNSW College Employee involved in procurement for UNSW College. She is friends with some suppliers on her LinkedIn profile. She regularly catches up with these suppliers outside of work and often posts photos of herself out with them at restaurants and bars.

A new supplier has recently been knocked back on a tender proposal and knows that Rachel is responsible for procurement. This supplier is a LinkedIn friend of Rachel’s supplier friends, and he has seen Rachel’s posts. He makes a complaint to the CEO alleging that Rachel is corrupt.

Rachel needs to be mindful of how her personal LinkedIn activity could be perceived as a conflict of interest due to her role at UNSW College. Rachel’s personal social media activity may lead to reputational damage both for her and UNSW College if not managed appropriately.