

University of South Wales

Social Media Policy

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Change Log

Any changes that are made to the Social Media Policy will be recorded here.

Date	Change made	Reason	Change made by
May 2020	Policy Approved	New re-written policy	CIO
22.12.22	Policy Changes	To include Welsh language compliance statements and social media escalation guidance and procedures	Sera Evans, Associate Director: UK Student Recruitment, Future Students
28.01.23	Policy amended	To update guidance on University-affiliated social media accounts	Sera Evans, Associate Director: UK Student Recruitment, Future Students
06.11.23	Policy amended	To update to contain specific reference to the governments PREVENT Duty	Vaughan Rees Director of Chaplaincy Services/PREVENT Lead
21.12.23	Policy amended	To update to contain specific reference to safeguarding referrals	Sera Evans, Associate Director: UK Student Recruitment, Future Students
21.12.23	Policy amended	To update links and Welsh language information	Sera Evans, Associate Director: UK Student Recruitment, Future Students
18.6.23	Policy amended	To update information re. Welsh language compliance, and sharing 3 rd party content	Rebecca Bowen, Head of Welsh, University Secretary's Office

Introduction

The University recognises the right of freedom of expression and academic freedom in the support of the University Mission. The internet provides unique opportunities for members of the University i.e. (its employees, contractors, students, and third-party contractors associated with the University of South Wales) to participate in interactive discussions and share information on particular topics using a wide variety of social media.

‘Social media’ is a category of online media that support people talking, participating, sharing, networking and bookmarking online. Common social media platforms include, but are not limited to, online social networks such as Twitter, LinkedIn and Facebook, blogs, podcasts, discussion forums, RSS feeds, and content sharing sites such as Instagram and YouTube.

The University actively encourages its staff and students to use social media, but we also recognise that use of social media can potentially pose risks to the University’s confidential information and reputation and can jeopardise its compliance with legal obligations. Indeed, such freedoms are not absolute and are subject to legal and contractually imposed limits to protect the rights and freedoms of the University and others.

To minimise these risks, to avoid loss of productivity and to ensure that University Information and Communications Technology (ICT) systems are used only for appropriate purposes, we expect all members of the University community to adhere to this policy, both on the University’s premises and in their own time. Indeed, it is the responsibility of each user to adhere to this policy.

Where inappropriate use of social media may constitute an offence under criminal law, **referral will be made to the appropriate authorities**. In addition, users in breach of the policy **may be subject to disciplinary action** under relevant student or employment procedures. Third party contractors and/or relevant employers will be informed of any concerns relating to their employees.

This policy applies to professional and personal use of social media by employees, contractors and other people who undertake paid or voluntary work on behalf of the University and students.

Please note that the University of South Wales Students’ Union (SU) is not within the scope of this policy. As a body which is independent of USW, the SU has its own policies, procedures and governance structures. Further, the [Student Charter](#) refers to the use of social media, with the SU being responsible for its own social media use and moderation, subject to its governance framework.

Purpose

The purpose of the Social Media Policy is to:

- Encourage **good practice**.

- **Protect** the University and its employees and those who provides services to or on behalf of the University.
- **Protect and safeguard** its students, visitors and guests.
- Provide specific guidance on the use of social media.
- Clarify where and how **existing policies** apply to social media.
- **Promote effective and innovative use** of social media as part of the University's activities.
- **Protect our intellectual property rights**, information assets, financial interests and competitive edge.
- Maintain our **reputation**.
- **Confirm what is acceptable** and what is unacceptable behaviour in terms of social media usage.
- **Comply with the law including but not exclusively the Revised Prevent Duty Guidance**, and help defend the University and its employees against legal action.

Scope

This policy applies to the use of social media for both business, academic and personal purposes, whether during University hours or otherwise, working independently or in group work situations and regardless of whether the social media is accessed using University ICT equipment, public equipment, or personal equipment.

Breach of this policy may result in disciplinary action up to and including dismissal or expulsion. Disciplinary action may be taken regardless of whether the breach is committed during University hours, and regardless of whether University equipment or facilities are used for the purpose of committing the breach. Any member of the University suspected of committing a breach of this policy will be required to co-operate with the University investigation, which may involve handing over relevant passwords and login details.

Members of the University will be required to remove internet and/or social media postings which are deemed to constitute a breach of this policy. Failure to comply with such a request may result in disciplinary action.

Definitions

Members of the University includes employees of the USW and its subsidiary companies including PSS Ltd, contractors, students, and third-party contractors associated with the University of South Wales.

Roles and Responsibilities

Responsibility for monitoring and reviewing the operation of this policy, making recommendations for change to minimise risks, and ensuring that the policy meets legal requirements and reflects best practice lies with the University's Digital Steering Group.

All members of the University are responsible for the success of this policy and should ensure that they take the time to read and understand it.

Any misuse of social media or breach of this policy should be reported to the Student Casework Unit via: studentcasework@southwales.ac.uk (for students) and to hrbusinesspartner@southwales.ac.uk (for staff/colleagues).

The University will ensure this policy is accessible to all members and is incorporated in employee induction information. Similarly, students will be guided of their responsibilities via student inductions.

The University will periodically review and update the policy and any significant changes will be communicated accordingly.

Policy Statement

Members of the University should note the following regulations on personal internet/social media presence:

- Use a personal email address and not your University email address.

- Set your personal settings on social media sites to ensure that information intended for private viewing is not placed in the public domain by mistake.
- You should not use your site to attack or abuse colleagues, students or third-party organisations with whom the University is actively engaged.
- You should not post, re-post, follow or like any individuals or content, which may, under the Revised Prevent Duty Guidance 2023 or the Counter-Terrorism and Border Security Act 2019, either propagate extremism as defined in the Revised Prevent Duty Guidance, or create an atmosphere conducive to terrorism which can popularise views which terrorists then exploit. For further advice please contact prevent@southwales.ac.uk
- You should respect the privacy and feelings of others and be aware that making comments about certain personal characteristics could be interpreted as harassment under the Equality Act 2010 and or perceived as a form of 'Hate Crime' under criminal law prosecution.
- You should not include contact details or pictures etc. of other members of the University without their prior permission. Remember that if you breach confidentiality or break the law on your site (for example by posting something defamatory), you will be personally responsible.
- Any account that is linked to the University, must either be bilingual or have both a Welsh-medium version and an English-medium version. Both accounts must link to the other version. More detailed guidance on this can be found throughout this policy. Please note that the **only** exception to this is USW International.
- All Line Managers have a responsibility to ensure that their team members are aware of this policy and take action if they become aware of any breach.

Posting Content to Social Media Sites

Members should presume that everything they post online will be public and permanent, regardless of the privacy settings they assume are applied.

Members should be aware that social media content forms part of a member's digital footprint and may easily become available to the public, including the University, students and the media. Inappropriate use could damage their reputation and career prospects, especially for students studying courses leading to a professional qualification.

The University reserves the right to act on any information obtained from online sources if it indicates that a member is in breach of the Social Media Policy, Code of Conduct for staff, students or other University policies.

Members should familiarise themselves with the terms and conditions of any social media site that they use and note that many companies that operate social media platforms specify that, by posting on their sites, the company is granted irrevocable, perpetual, non-exclusive license to use and distribute content for any purpose, commercial, advertising, or otherwise.

When using a personal social media account, members should consider including, where appropriate, a disclaimer stating that the views expressed are not necessarily those of the University.

For University or University-affiliated social media accounts, all posts should be bilingual where one social media account exists, in order to comply with the Welsh Language Standards. Where both English-medium and Welsh-medium accounts exist, a link to the equivalent account in the alternative language must be included as part of the account biography. For separate Welsh-medium and English-medium accounts, posts should be published at the same time on both accounts to comply with the Welsh Language Standards. For guidance in relation to Welsh Language Standards compliance, please contact cymraeg@decymru.ac.uk. Please note that the **only** exception to this is USW International.

You are reminded of your duty of confidentiality to the University and the principles of the UK General Data Protection Regulation Data Protection Act 2018 with regard to inappropriate disclosure of information relating to individuals. This duty continues after you leave the University.

Posting Guidelines

You must take personal responsibility for your social media content. If you can be identified as working for the University, you must make sure your profiles, and anything you post, are congruent with how the University expect you to present yourself to colleagues and students. You must be mindful that even if you do not name the University as your employer, people who know you and where you work may still make an unwelcome association with the University. If you are in any doubt about what is and is not acceptable, this must be discussed with your line manager.

- You must protect the University's interests and you must not publish anything that could directly or indirectly damage these or compromise the University's reputation.
- You must not post, repost, follow or like any individuals or content, which may, under the Revised Prevent Duty Guidance 2023 or Counter Terrorism and Border Security Act 2019, either propagate extremism as defined in the Revised Prevent Duty Guidance or create an atmosphere conducive to terrorism which can popularise views which terrorists then exploit.
- You must always show respect to others when using social media.
- You must never criticise or make defamatory comments about the University, students, your colleagues or anybody else you come into contact with professionally.
- Before posting any photograph, you must check that there is no private or confidential information displayed in the background (e.g. on screens or boards). Please bear in mind that it is possible to zoom in on photographs which could reveal text even from a distance.
- If social media accounts are affiliated with the University in any way, posts must be bilingual where only one social media account exists, in order to comply with the Welsh Language Standards. This includes course- or subject-specific social media accounts which are affiliated with the University.
- Where both English-medium and Welsh-medium accounts exist, a link to the equivalent account in the alternative language must be included as part of the account biography.
- For separate Welsh-medium and English-medium accounts, all posts should be published at the same time on both accounts to comply with the Welsh Language Standards. A list of useful and commonly used phrases can be found on [Connect](#).
- Please note that the **only** exception to this is USW International.
- The University is permitted to share third party posts on its Welsh-medium or bilingual social media accounts, even if the third party does not produce Welsh content or is based outside of Wales. The post should provide further context, which explains that the information shared has been provided by a third party and is only available in English e.g. *Mae'r Brifysgol yn falch o gydweithio gyda XX. Cynhyrchwyd y cynnwys isod gan XX, ac ymddengys yn Saesneg yn unig. The University is pleased to collaborate with XX. The content below was produced by XX, and is available in English only.*
- For guidance relating to the Welsh Language Standards, contact cymraeg@decymru.ac.uk.
- You must **NEVER** use social media to:
 - post threatening, obscene or profane comments, express or support sexist, racist, sectarian, xenophobic, Islamophobic or homophobic views
 - express support for illegal activities or organization
 - disseminate misleading information
 - view or distribute sexually explicit or offensive content

- infringe or violate someone else's rights
- post personally identifiable information without a lawful basis (if posting from a University owned account)
- post content that could create a security risk for the University or its members in any way which may be unlawful.

You must not do anything that could be considered discriminatory against, or bullying or harassment of, any individual, for example by:

- making offensive or derogatory comments relating to age, disability, gender identity, gender reassignment, marital or partnership status, race, religion/belief or non-belief, sex or sexual orientation, or any other distinction;
- using social media to bully another individual or;
- posting images that are discriminatory or offensive or links to such content.

Any social media posting makes it clear that such views are their own personal opinions and not the position of the University. Where a reasonable person might infer USW support, particularly for example from a colleague whose role or seniority is such that they speak for USW in public, colleagues are advised to use their best judgement in the context of the University's social media policy and to err on the side of discretion in their public social media comments.

Such activity does not take place in work time or using University resources, including but not limited to computer equipment, social media feeds, or email addresses.

The University's member communications channels, including Connect, are not used to disseminate such political views.

If you think something on your social media platforms gives rise to concerns about a conflict of interest and, in particular, concerns about impartiality or confidentiality this must be discussed with your line manager.

Do not reveal private or confidential information about the University, its members or its intellectual property. This might include aspects of University policy or details of internal discussions. Consult with your manager if you are unclear about what might be private or confidential, as well as the University's [Information Management Policy](#).

If someone offers to pay you for site content this could constitute a conflict of interest and you must consult with your line manager. Do not forget that you are required contractually to obtain permission to undertake paid or unpaid work outside the University.

If someone from the media or press contacts you about posts on your site which relate to the University you should discuss it with your line manager and the Communications Team: press@southwales.ac.uk.

Whereby you have political views, the University has a policy on visits, media and activity involving political parties and candidates - USW's Political Policy. In particular, note section 19 and 20 regarding campaigning by USW colleagues:

19. Colleagues are free to express political views in support of and against particular parties and to engage in political campaigning providing that:

20. Any social media posting makes it clear that such views are their own personal opinions and not the position of the University. Where a reasonable person might infer USW support, particularly for example from a colleague whose role or seniority is such that they speak for USW in public, colleagues are advised to use their best judgement in the context of the University's social media policy and to err on the side of discretion in their public social media comments.

Encouraged Practice

The University supports members using social media where it adds value to existing services, for instance for the purposes of:

- Academic uses – The University recognises that social media has the potential to support and advance learning opportunities and encourages its use in this way. Where existing supported learning technologies, e.g. Virtual Learning Environment, offer equivalent functionality, consideration should be given to the most effective medium.
- Collaborative uses – The University supports both internal (cross Faculty / Department) and external collaboration and recognises that social media can provide opportunities to support this work.
- Communications and External Relations uses – The University recognises the opportunity to communicate with prospective and existing stakeholders through social media.
- Student uses – Prospective and existing students, along with others who have an interest in the University, are active in social media, e.g. setting up Facebook groups and blogging. Future Students may look at these sites, if appropriate, to get further insights into the needs of University customers. Possible responses to any contentious issues identified in any unofficial social media sites should be referred to Future Students as per the protocol in Appendix A in the first instance.
- Alumni uses – The University recognises the opportunity to communicate with existing students and alumni through social media to develop an on-going relationship with them. Overall responsibility for alumni relations lies with the Alumni Relations and Development Office in Enterprise and Engagement..
- Students' Union uses – The University understands that the Students' Union will want to use social media to maximise the exposure of its services and the associated societies to existing and prospective students. These uses are the responsibilities of the Students' Union.

Staff Recruitment

The University is committed to fair, open and accountable employee recruitment and selection procedures. The University reserves the right to review public social media

profiles as part of the recruitment process. However, any such searches must comply with Equality, Human Rights and Data Protection laws.

Hiring managers may use social media to promote advertised posts to potential applicants and to identify potential candidates. However, in doing so, particular care must be taken to avoid unconscious bias, and all posts should be Welsh Language Standards-compliant. I.e. All posts should be bilingual where one social media account exists, in order to comply with the Welsh Language Standards. Where both English-medium and Welsh-medium accounts exist, a link to the equivalent account in the alternative language must be included as part of the account biography. For separate Welsh-medium and English-medium accounts, posts should be published at the same time on both accounts to comply with the Welsh Language Standards. Please note that the **only** exception to this is USW International. For guidance on Welsh Language Standards compliance, contact cymraeg@decymru.ac.uk.

The University will also use other channels to publicise vacancies to avoid excluding potential applicants who do not use social media. Hiring managers who wish to use social media such as LinkedIn to advertise a vacancy, need to ensure the links to the vacancy in both Welsh and English on the University website is included and that their message is consistent with the criteria set out in the website posting.

Where the post advertised requires the successful candidate to demonstrate evidence of effective public engagement using social media, or an established research profile, evidenced by online publications and citations, the hiring manager must ensure that the job advertisement asks applicants to cite examples and links e.g. Google Scholar profiles or h-indexes and informs potential candidates that these will be reviewed as part of the selection process.

If the hiring manager reviews social media profiles as part of the recruitment process, they must:

- ensure they have fully documented a specific and justified purpose for doing so
- not use the review to exclude applicants from interview; unless evidence of online public engagement or research publications is an essential criterion for the role
- review the social media profile after the short-listing process unless evidence of online public engagement or research publications is an essential criterion for the role.

If a search of an applicant's public social media profile reveals information about the individual that presents serious legal or reputational concerns for the University, the hiring manager must seek advice from their HR Business Partner.

Other Potential Uses

The University will not refer to social networking sites when assessing student applications unless such sites are specifically highlighted in the application. Should an individual's site be viewed, any information pertaining to a Protected Characteristic will not influence any decisions.

The University may refer to social networking sites when investigating breaches of discipline or grievance cases, e.g. harassment, anti-social behaviour.

The University may monitor members' use of social media, along with their wider use of Company IT resources, to make sure members are complying with this Policy. Whenever members use our IT resources and systems, they give us their consent to monitor their activities.

The University may monitor forums and blogs to gain indirect feedback on University services and facilities. The University may post replies on forums and blogs to answer queries or address factual corrections, but would generally take a cautious approach before getting involved in any contentious issues and should always follow the Social Media Complaints Protocol outlined in Appendix A when doing so.

The University reserves the right to take any necessary steps to protect its facilities and members from malware (malicious software) including blocking sites where this is an issue.

If a complaint is received that a student or employee is being bullied or harassed via social media, then the Social Media Complaints Protocol outlined in Appendix A must be followed, and the University's 'Dignity at Work Policy', Staff Disciplinary Procedure or 'Dignity at Study Policy' may be invoked.

Use of University-Affiliated Social Media Sites / Social Media Site Creation

A University-affiliated social media site is defined as any site that could reasonably be perceived to be associated with or representative of USW. This includes support sites, Twitter accounts and faculty / department-based sites, along with any social media sites that, by their content or look, could be perceived as being associated with USW.

All University-affiliated social media accounts must adhere to the University's social media policy.

The University reserves the right to monitor any social media sites that affiliate themselves with the University and, where necessary, to request the removal of sites that reflect negatively on the University or the removal of content that infringes on the University's copyright or implies an unauthorised association.

Setting up New Accounts

Before approval can be given to a new, University-affiliated social media account, a plan for the use of the account must be developed, as well as a sustainable growth strategy, prepared in consultation with the relevant Future Students Business Partner for the Faculty and submitted to the Future Students Digital Team. For Professional Services accounts, please engage in the first instance with the Future Students Digital Team, by contacting content@southwales.ac.uk.

This plan must include:

- A justification for why no existing social media account can meet the requirements of the proposed new account.
- A list of the main users, including the primary contact and their responsibilities, including authorisation to post.
- A description of the content approval workflow which will be used.
- A content plan covering the first 3 months of the account operation, including a proposed publishing schedule and confirmation of how content will be sourced and the ongoing frequency of posting via the account. A [template and guidance](#) can be found on [SharePoint](#).
- How the use of the account will help towards achieving the University's strategic objectives.
- A strategy for sustainable growth in terms of audience, growth and post reach milestones. A [template and guidance](#) can be found on [SharePoint](#).

Approval Process

Following the approval of a new University-affiliated social media account, the procedures outlined below must be followed:

- i. A unique email alias will be created with the IT department. This protects the University as it is not tied into any individual user's email addresses.
- ii. In consultation with the team representing the account, the Future Students Digital Team will register the account with a handle adhering to the USW brand.
- iii. A profile image/avatar of the University raspberry logo on a white background will be uploaded to the account by the Future Students Digital Team. This should not be changed without further consultation.
- iv. Following account setup and verification, all other user accounts can be added and throughout the account's lifespan, the Future Students Digital Team must have full administrative access.

Naming Accounts

Within the profiles/biographies, all accounts should state the University's name in full as **University of South Wales**.

The name displayed publicly on accounts shall be presented as: USW followed by the faculty name, subject area or service. E.g. FBCI accounts are called "USW Creative."

Account handles must always use USW.

Identification of University-affiliated Social Media Accounts

All University-affiliated social media accounts must be clearly identified as such, using the University branding and logo in the manner set out in the University Brand Style Guide, which is available from Future Students and on [Connect](#). This will be managed by Future Students for all University-affiliated social media accounts, as outlined in point iii above.

Welsh Language Compliance

All University-affiliated social media accounts should be bilingual where one social media account exists, in order to comply with the Welsh Language Standards. Where both English-medium and Welsh-medium accounts exist, a link to the equivalent account in the alternative language must be included as part of the account biography. For separate Welsh-medium and English-medium accounts, posts should be published at the same time on both accounts to comply with the Welsh Language Standards. For guidance in relation to Welsh Language Standards compliance, please contact cymraeg@decymru.ac.uk. Please note that the **only** exception to this is USW International.

Responsibilities of Site Administrators

If you set up a University-affiliated social media site, you effectively become the administrator for that site on behalf of the University and are responsible for maintaining the site and moderating content. As noted in point i above, a unique email alias must be created with the IT department for each University-affiliated social media account. This protects the University as it is not tied into any individual user's email addresses.

The names, job titles and email addresses of each account administrator must be submitted to content@southwales.ac.uk.

It is important that at each site has a **minimum of two** administrators who take responsibility for the site and have access to the login details in order to ensure continuity and to assist with moderation. These details must be recorded on a central register within Future Students, so that they can be supplied on request in the event of a communications incident. In addition, **Future Students will also require administrative access to the account** in order to maintain security and protect the University in the event of a communications incident. This means that Future Students will have access to the unique email alias attached to the account and will also store the password securely. **If there are any changes to the administrators or account details, it is the responsibility of the account administrators to inform Future Students, who will record this on the central register.**

If a member of staff who has access to a University-affiliated social media account leaves the University, they should ensure that they have shared the password of the account with their line manager prior to them leaving the University. In this instance, the line manager, or colleague who will take future responsibility for the account, should change the password and the linked e-mail address for the account as soon as possible. Future Students should also be notified immediately so that the central database of social media accounts and associated administrators is updated, as noted above.

Site administrators must have an understanding of the basic principles and etiquette associated with the management of an effective social media site.

All administrators of University-affiliated social media sites must adhere to the following:

- Ensure that the site complies with the terms and conditions of the social media platform used
- Ensure compliance with this Social Media Policy
- Ensure that the site does not compromise University branding guidelines
- Ensure the site is compliant with the Welsh Language Standards; all communication on such sites must be bilingual; Welsh and English.
- Secure permission prior to posting, sharing or distributing copyrighted materials
- Only link to legal content and view any content before linking to it
- Ensure that content and commentary do not damage the University's reputation
- Ensure that content does not include private, confidential, or proprietary information about the University or its students, employees or alumni
- Avoid using social media in teaching or research in a way that may be detrimental now or in the future to participants
- Manage the site in an effective manner to ensure timely feedback and support, where required.

Where social media sites are used to explore controversial content as part of a course of academic study, administrators must ensure that appropriate context and disclaimers are provided and, if possible, take any reasonable measures to restrict access to the content.

Comments made by users are their property and should not be reused without their permission.

Requests under Information Rights Legislation Information Made via Social Media

Administrators must be able to identify a Subject Access Request (SAR) or a Freedom of Information (FOI) Request submitted via Social Media.

Individuals may make a SAR or an FOI request using any social media site where the University has a presence. Although this might not be the most effective way to deliver the request, there is nothing to prevent an individual from doing so.

It is important for colleagues monitoring University-owned platforms to recognise the potential for individuals to make such requests via our social media platforms and ensure that any request from an individual asking for:

- a) their own personal information (SAR) or;
- b) any information held by the University that cannot be dealt with under the normal course of business (FOI).

These requests must be forwarded to the University Data Protection mailbox (SAR) or Freedom of Information mailbox (FOI) for action.

The request does not have to make any direct reference to either Act, or be the sole or main theme of the requester's correspondence. In fact, a request buried within the text of a long piece of correspondence will be as valid as a stand-alone request.

It is not appropriate to supply information in response to a SAR via social media for security reasons.

Security of University-affiliated Social Media Accounts

University-affiliated social media accounts must be protected by strong passwords and other access controls that are changed regularly, kept secure and shared only with authorised users. Passwords should meet or exceed the minimum requirements provided by the IT department.

As noted in point i of the approval process, a unique email alias will be created with the IT department. This protects the University as it is not tied into any individual user's email addresses.

As noted above, it is important that each site has a **minimum of two** administrators who take responsibility for the site and have access login details, that is the unique email alias and password in order to ensure continuity and to assist with moderation. The administrators cannot link their own email address to the account.

The administrators contact details, must be recorded on a central register within Future Students, so that they can be supplied on request in the event of a communications incident. In addition, **Future Students will also require administrative access to the account** in order to maintain security and protect the University in the event of a communications incident. That means Future Students will have access to the unique email alias attached to the account and will also store the password securely. **If there are any changes to the administrators or account details, it is the responsibility of the account administrators to inform Future Students, who will record this on the central register.**

Under no circumstances should passwords for individual member accounts be shared with others.

Accounts should not be left open and unattended for any period.

Anyone using a personal device to manage University-affiliated social media accounts is responsible for ensuring that its operating system and anti-virus software are up to date and that the device is encrypted, and doubly protected by a strong password/encryption key in case of loss. The University's [Mobile Device Security Policy](#) should also be consulted.

Social media platforms must not be used to collect personal information about users.

Moderating Content

In the case of a complaint or defamatory comment made on a University-affiliated social media platform, the University's Social Media Complaints Protocol can be used as a guide (see Appendix A). Where possible, complaints should be dealt with via direct message or email, not on a public forum, as outlined in the above-named protocol.

Where a user's post raises a duty of care issue, site administrators should seek advice from the appropriate unit. Where a user's post raises a duty of care issue, site administrators should seek advice from the appropriate unit. For example, if the issue is concerning Mental Health (including suicide and self-harm) and relates to a USW student, urgent referral must be made to the Duty Service which is led by the Mental Health Advisers in Student Services via this link:

https://universityofsouthwales.sharepoint.com/sites/Student_Services/SitePages/en-GB/concerned-about-a-students-mental-health.aspx

If the issue is concerning Safeguarding, harassment, discrimination, gender based violence, or hate, USW Staff and students can make referrals via the Report and Support service, which can be accessed via this link:

<https://reportandsupport.southwales.ac.uk/>

In the event of an immediate safety concern, or risk of harm to yourself or others, contact the emergency services immediately on 999.

University-affiliated social media sites should encourage users to share their views by commenting on content within the following guidelines:

- Comments must be relevant to the topic being discussed
- Comments should be constructive and absent of expletives, obscenity and vulgarity
- Posts that are off-topic, abusive, contain profanity, are threatening in tone or devolve into personal attacks should be deleted immediately and reported to the social media platform, if necessary
- Posts with links that are determined to be spam or sales and advertising, or infringe copyright, should be removed immediately.

Where possible, guidelines for posting content should be prominently displayed on the social media site, along with a statement that site administrators reserve the right to review all comments and posted materials and remove such materials for any reason.

Audience Engagement

Future Students will assess if the University-affiliated social media account has a similar audience to that of the main channel. If it is deemed to be duplicate in terms of audience, Future Students will discuss this with the account lead.

It is important that any social media account operating in USW's name is active and engaging with its audience. If an account has not had any original content posted on

it for a period of 8 weeks, it is considered dormant and at risk to the reputation of the brand.

Dormant accounts will be suspended for 1 month and Future Students will assess if the account should be permanently closed or reactivated.

In order to reactivate your dormant USW social media account, you must:

- Demonstrate that the account has a unique audience and message which is not currently being met by other existing accounts. We will assess if your account has a similar audience to that of the main University social media channels.
- Demonstrate that the use of the account will help towards achieving the University's strategic objectives.
- Develop a 3-month content plan. A [template and guidance](#) can be found on [SharePoint](#).
- Have a strategy for sustainable growth in terms of audience and engagement, and post reach milestones. A strategy for sustainable growth in terms of audience, growth and post reach milestones. A [template and guidance](#) can be found on [SharePoint](#).
- Future Students is able to advise on completing the above documents where necessary. For assistance, please contact content@southwales.ac.uk.

Right of Access

The University is under a legal obligation to comply with the Subject Access provisions of the Data Protection Act 2018 and the Freedom of Information Act 2000. This means that individuals have a right to access any information held by the University (subject to exemptions)

Information may be 'held' by the University for the purpose of either Act if it is:

- within a University owned social media account (including private messages)
- within a personal social media account or private messaging platform but relates to 'official business' ([see guidance here](#))
- taken from any social media account or private messaging platform and used by the University for any purpose.

Policy Audit

Failure to comply with this policy may result in disciplinary procedures.

Related Policies and Regulations

Members of the University should familiarise themselves with key University policies including:

- [IT Computing Policies & Regulations](#)
- [Information Security Policy](#)
- Data Protection Policy
- Records Management Policy

- Dignity at Work Policy
- Staff Disciplinary Procedure
- [Welsh Language Standards](#)
- [Student Code of Conduct](#) and Student Conduct Procedure
- Staff Code of Conduct relating to Personal Relationships
- [USW Safeguarding Policy](#) and [Supporting Information](#)
- Information Management Policy

Further guidance can be found at <https://its.southwales.ac.uk/policies-and-regulations/>

APPENDIX A

University of South Wales

Social Media Complaints Protocol

Introduction and Context

Social media is commonly defined as websites, online platforms and applications that enable users to create and share content or to participate in social networking. It provides unique opportunities for enquiries, applicants and students to participate in interactive discussions and share information on key topics.

The University recognises the opportunity to communicate with enquirers, applicants and existing students through social media in order to drive recruitment and support admissions. The Social Media Team also uses social media channels to obtain further insights into the needs of our students.

We also recognise that the use of social media can potentially pose risks to the University's reputation and can jeopardise its compliance with legal obligations. Indeed, such freedoms are not absolute and are subject to legally, ethical, and contractually imposed limits to protect the rights and freedoms of the University and others. As such, the Social Media Team may also contact social media platforms to remove content that can be linked to the University, which is deemed unacceptable and defamatory.

Responding to Messages on Social Media

The Social Media Team and Enquiries & Admissions (E&A) in Future Students monitor social media activity related to University-managed accounts and social media profiles where the University is linked to and/or referenced in the public domain.

The main University social media channels are monitored and updated on a daily/hourly basis during office hours (Monday to Thursday 9am-5pm and Friday 9am to 4.30pm).

They are:

- Twitter: @UniSouthWales / @PrifysgolDecymru

- Facebook: Uni South Wales / De Cymru
- Instagram: Uni South Wales / De Cymru
- LinkedIn: Uni South Wales / De Cymru
- TikTok: Uni South Wales / De Cymru

In order to avoid erratic messaging, duplicate responses and inconsistent information, the Social Media Team within Future Students implements a social media management system. The Social Media Team and E&A teams use the programme Orlo – a collaborative digital management tool that streamlines the process of updating social media accounts. It provides a single dashboard from which to monitor comments and question and keep track of USW's mentions. It collects all social media messages in one place and alerts E&A to posts that require immediate response. This system allows each team member to see how other colleagues are responding to enquiries and messages online, as well as send internal messages and assign tasks.

Unfortunately, social media comments are not always positive. We do not erase negative comments about our programmes, campus resources, or administrative procedures. Our desire is to boost lead generation and we know that students respond well to authenticity. They are visiting our social channel pages to get a sense of USW beyond its official, promotional image. Admittedly, there are times when a grievance must be acknowledged and addressed. Those who engage with our social media channels need to see that USW cares about our students and our community, and listens to their comments – the good and the bad.

E&A is responsible for reporting and, where necessary, escalating negative comments which are posted via social media. The following details the escalation of enquiries process and outlines how to respond when contentious issues are identified.

The University welcomes correspondence in Welsh and English and corresponding in Welsh must not lead to a delay. Messages and enquiries received in Welsh must be responded to in Welsh.

Responding to Enquiries

All enquiries received via Direct Message (DM) and public comments will be:

- a) reviewed by E&A and answered
- OR
- b) reassigned to the Social Media Team via Orlo
- OR
- c) escalated to the most appropriate department via email.

A resolution is provided by E&A or the Social Media Team.

When a Complaint Is Received On A University-Owned Social Media Platform

If the complaint has been received via an inbox message or a public comment on the University-owned social media channels, E&A monitor all public comments and messages via our social media management tool, Orlo. E&A assign negative comments or complaints via Orlo. The Social Media Team is also alerted to these assigned comments and complaints. This includes direct messages sent to Twitter, Facebook and Instagram and public comments which are made on Twitter, Facebook, Instagram, TikTok and LinkedIn. It is important to note that not all comments will be responded to. For example, where trolling occurs, a response may inflame the situation, and therefore a response is not recommended. Each comment or complaint will be triaged and a decision on whether a response is warranted will be undertaken by an E&A Manager or the Digital Marketing Manager.

Understanding the complaint

It is important to be clear exactly what the complaint is about. A member of the E&A Team responding to the complaint may need to ask the complainant for more information and probe further to get a full understanding. When doing so, remain professional at all times, providing first-class customer service.

Consider whether the complaint is serious, high-risk, or high-profile. Please see below for specific guidance on assessing whether a complaint is serious, high-risk or high-profile.

Complaints which could be considered serious, high-risk, or high-profile

Although not an exhaustive list, the types of complaint which could be considered serious, high-risk, or high-profile are:

- Complaints about matters such as sexual misconduct, assault, discrimination, bullying or harassment.
- Complaints about members of the University.
- Complaints relating to the Competitions and Markets Authority.
- GDPR breaches and information security complaints.
- Complaints made by high-profile figures such as politicians, local authority members and senior HE officials.
- Defamatory, distressing, and offensive comments or complaints.
- Complaints relating to financial regulations and procedures.
- Complaints relating to non-compliance with Welsh Language Standards.

Particular caution should be exercised when dealing with these complaints, and in all instances, E&A and the Social Media Team should inform the Communications team to instigate crisis and/ or public relations mitigation if appropriate. Any complaints raised against staff/colleagues should be raised with HR in the first instance.

What does the complainant want to achieve by complaining?

At the outset, a member of the E&A Team will clarify the outcome the complainant would like to achieve. Of course, the complainant may not be clear about this, and we may need to probe further. If the complaint is straightforward, but the staff member receiving the complaint cannot deal with it because, for example, they are unfamiliar with the issues or area of service involved, they should discuss this further with an E&A Manager.

If it is not a straightforward complaint that can realistically be closed within 24 hours, this must be communicated to the complainant and kept open until the matter can be formally resolved and closed down on Orlo.

Acknowledging the complaint

Complaints must be acknowledged within 24 hours, or the next working day if the complaint is received on a non-working day, public holiday or University closure day. 'Day one' is always the date of receipt of the complaint (or the next working day if the complaint is received on a non-working day, public holiday or University closure day).

Complaints received in Welsh must be responded to in Welsh.

If a complaint is made in a public comment, we must issue the acknowledgement and take the conversation to a private message on the same social media channel where the complaint was made. This must be done through Orlo so that the conversation can be referred back to easily. The complaint must be acknowledged via Orlo using the following wording:

"Hi, <name> we have sent you a DM, thank you <your name and team>" and then the conversation is transferred to a private message.

If the complaint is made via direct message, the complaint must be acknowledged and the complainant informed that the complaint is being investigated using the following wording:

"Hi <name>, I will investigate this and update you. Thank you, <name and department>."

Where the points of complaint and expected outcomes are clear from the complaint, we must set these out in the acknowledgement, outlining the points of complaint and outcome sought.

Where the points of complaint and expected outcomes are not clear, we must query this further with the complainant to achieve clarity.

Responding to Straightforward Complaints

E&A respond to the complaint (where possible) by providing an explanation about why the issue has occurred and, where possible, what action will be taken to prevent this happening again. We may also explain that, as an organisation that values complaints and feedback, we may use the information given when we review service standards in the future.

The complaint will be resolved, or a response provided within 24 hours (or the next working day if the complaint is received on a non-working day, public holiday or University closure day).

The complaint will be acknowledged via Orlo, and the conversation will remain open until resolution. When it is resolved it will be closed down on Orlo.

Responding to Distressing, Offensive or Defamatory Comments or Complaints

If a complaint has been made publicly and it contains distressing, offensive or defamatory statements, E&A will assign to the Social Media Team via Orlo and the Social Media Team is alerted via email. The complaint or comment will be publicly acknowledged with the following holding statement:

“Hi <name>, we have sent you a DM, <your name and team>.”

It will then be reported to the relevant social media platform by the Social Media Team for removal. The complaint will still be investigated as per procedure.

Responding to and Investigating Complex Complaints

If the complaint is complex, it will be acknowledged via Orlo, and the conversation will remain open until resolution. When it is resolved it will be closed down on Orlo. If escalation is required due to the nature of the complaint being more complex, this must be initiated within 24 hours, or the next working day if the complaint is received on a non-working day, public holiday or University closure day.

Escalation Category – Determining the Level Of Escalation

Student Casework

For enrolled students who wish to lodge a formal complaint against a member of staff, or an allegation of misconduct against another student, the complainant must be notified of our [student complaints](#) and/or [student conduct](#) procedures and referred to Student Casework via studentcasework@southwales.ac.uk.

For Staff/Colleagues

For colleagues wishing to raise a formal complaint against another colleague, they should be directed to the [Grievance Procedure](#). For colleagues wishing to raise a formal complaint against a student, they should be directed to the [student conduct](#)

procedure and referred to Student Casework via studentcasework@southwales.ac.uk.

For Enquirers and Applicants

For enquirers and applicants who wish to lodge a formal complaint, they should be directed to the [Enquiries and Admissions Complaints and Appeals Process](#).

For Graduates and Alumni, Carers, Parents or Members of the Public

Such issues may arise where a student who has graduated or an alumni will air a complaint which may have happened during their time at the University. It may also be a concerned parent, carer, or family member or simply a member of the public. A public acknowledgement must be posted on the comment and a private response sent via DM as outlined above.

If the complaint is about the actions of an academic member of staff, the complaint should be assigned to the Social Media Team via Orlo. The Social Media Team will liaise with the relevant Marketing Business Partner and the Faculty.

If the complaint is about the actions of a member of staff from a professional services department, the complaint should be acknowledged and permission sought from the complainant to share their details and the details of the complaint with the relevant contact within the University department. When permission is granted, the complaint can be referred to the contact where they can reply directly, however E&A must receive an update from the contact that the matter has been resolved and details of the resolution. This ensures we can be assured that the complaint is being dealt with and will also provide further knowledge of issues which may arise in future.

Once permission has been sought from the complainant, contacting a relevant department for information and assistance about the complaint must be conducted via email, with an appropriate screenshot of the complaint and questions about how it can be resolved. This is to provide the necessary time stamp that we have opened an investigation into the complaint. Finding the right person within the department is imperative and if there is no reply within a further 24 hours, this must be escalated to their line manager via email. An update should be provided to the complainant should any delay occur.

Welsh Language

Enrolled students, staff and members of the public who wish to lodge a formal complaint regarding non-compliance with the Welsh Language Standards, should be directed to the [Complaints Procedure](#).

Resolution

E&A agree what action will be taken to resolve the complaint or to escalate to the appropriate team. They will do so via Orlo for audit purposes. Once the complaint has been resolved and a satisfactory outcome achieved, the complaint can be

closed down on Orlo. All complaints will be recorded in a [folder](#) in the Project Delivery Group managed by both E&A and the Social Media Team.

Reporting, Recording and Learning

E&A and the Social Media Team record details of all complaints, any action taken and the outcome, and the Social Media Team will use this data to analyse themes and trends. The complaints will be recorded in a [folder](#) in the Project Delivery Group managed by both E&A and the Social Media Team. Please note that any action taken against University members will not be able to be shared any wider due to GDPR considerations.

Change Log

Any changes that are made to the Social Media Complaints Protocol will be recorded here.

Date	Change made	Reason	Change made by
19.12.22	Protocol update	Updated social media escalation guidance and procedures	Samantha Ellis, Social Media Executive, Future Students and Kathryn Matthews, Head of Admissions, Future Students
04.01.22	Protocol update	Proofing and general overview	Sera Evans, Associate Director: UK Student Recruitment, Future Students
21.12.23	Protocol update	Changed Digital Marketing Team to Social Media Team	Sera Evans, Associate Director: UK Student Recruitment, Future Students
18.06.24	Protocol update	To update information re. Welsh language compliance, and sharing 3 rd party content	Rebecca Bowen, Head of Welsh, University Secretary's Office