UNIVERSITY OF WINCHESTER

Social Media Policy

Document Title:	Social Media Policy
Responsible Role and Department:	Head of Marketing and Campaign Management Marketing, Communications and Engagement
Approving Body:	University Leadership Team
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Applies to: *(Strikethrough text, as appropriate)*	**University of Winchester** **University of Winchester Services Limited** *Note. This policy applies to all the organisations listed above, collectively known as the "University" for the purpose of this policy.*
Indicate whether the document is for public access or internal access only **Indicate whether the document applies to collaborative provision?** *(Strikethrough text, as appropriate)*	**Public Access** ~~**Internal Access Only**~~ ~~**Applies to Collaborative Provision**~~

Summary:

This policy sets out the standards expected of staff and students when using social media. It aims to protect students and staff from unlawful conduct online, including harassment, and to promote positive engagement with this critical communication tool, while securing freedom of speech within the law and academic freedom.

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1. About this policy

1.1. The University of Winchester and University of Winchester Services Ltd. ('the University') is committed to delivering a creative, engaging and strategic approach to communications. Social Media provides wide-ranging opportunities to connect, collaborate, engage and innovate across a range of platforms. However, as an instantaneous, public, and wide-reaching form of communication, there are inherent risks both to the individual and to the reputation of the University.

1.2. The University aims to use social media to engage with students (both enrolled and prospective), employees, alumni, stakeholders and the public.

1.3. The aim of this policy is to encourage positive engagement with social media and good practice in the responsible use of it. The policy sets out the University's expected standards and should be considered alongside the contents of our Social Media Guidance. This guidance outlines important information and examples of when an employee or student might be considered to misuse social media, as well as advice on how to safely use social media to maximise the benefits whilst minimizing the potential risk for both individual users and the University reputation.

1.4. The University has legal duties to protect the health, safety and wellbeing of its employees and students. These include taking all reasonable steps to prevent harassment and sexual harassment of employees, including by third parties (Equality Act 2010, sections 40 and 40A, as amended by the Employment Rights Act 2025), and preventing and responding to harassment and sexual misconduct affecting students (Office for Students condition E6). The University also has a legal duty to take reasonably practicable steps to secure freedom of speech within the law and academic freedom (Higher Education and Research Act 2017, section A1). This policy exists to minimise the risks to employees and students at the University through the inappropriate use of social media, while also ensuring that the principles of free speech and academic freedom within a higher education context are secured.

2. Scope of this policy

2.1. This policy deals with the use of all forms of social media. For the purpose of this policy 'Social Media' is defined as forms of communication through which users participate in online communities, sharing information, news, opinions, interests, celebrating success and sending personal messages. Communication on social media may include posting, commenting, instant messaging, sharing links, text, images, video and other files or reacting to another users' content.

2.2. Examples of social media covered by this policy include, but are not limited to: Instagram, TikTok, Facebook, LinkedIn, X (formerly known as Twitter), Snapchat, YouTube, Reddit, WeChat, Weibo, Pinterest and all other social networking sites, forums and blogs.

2.3. This policy applies to all staff and students at the University, including associate lecturers, casual or contract staff. It applies to all public and/or professional communications within any social media platform, regardless of location, including away from campus and on personal devices, whether to an individual directly, to a limited group or a public post, but only to the extent that they constitute unlawful behaviour.

2.4. Staff and students should be aware that no social media use is ever guaranteed to be completely private. Similarly, an individual's status as an employee of the University may be discernible even if not openly disclosed by that employee: social media posts are capable of being forwarded, reposted and commented upon. Therefore, this policy may also apply to communications that break the law even when they were initially intended to be private.

2.5. The University is committed to the protection of academic freedom and lawful freedom of expression, in line with our Freedom of Speech Code of Practice and relevant legislation. This policy shall uphold this commitment in the application of University business. Our Freedom of Speech Code of Practice, can be found on the "policies and procedures" page of our website. Where any uncertainty arises, the Code contains the institution's definitive guide to free speech for consideration under this policy.

2.6. This policy will be regularly reviewed to reflect the changing nature of social media and its use. Any changes will be agreed through the University Leadership Team.

2.7. This policy should be read alongside the advice included on the Social Media Guidance intranet pages and other University policies, including:

a) ICT Acceptable Use Policy

b) Data protection policy

c) Relationships Policy

d) Equality, Diversity and Inclusion Policy

e) Bullying, Harassment, and Sexual Misconduct Policy
f) Student Conduct and Disciplinary Policy
g) Staff Disciplinary Policy & Procedure
h) Gender Identity and Reassignment Policy
i) Freedom of Speech Code of Practice
j) Public Interest Disclosure (Whistleblowing) Policy
k) Student Complaints Policy

3. Roles and Responsibilities

3.1. All staff and students are responsible for:
a) ensuring that any use of social media is conducted in line with this and other relevant policies;
b) adding an appropriate disclaimer to personal accounts (see Social Media Guidance for example disclaimer);
c) reporting and escalating matters as appropriate.

3.2. Staff operating a social media account in an official capacity are responsible for:
a) ensuring the University's Marketing, Communications & Engagement team is informed and has approved when an account representing a function of the University is to be created;
b) regularly monitoring, updating and managing content they have posted;
c) managing security and passwords of institutional accounts, including handovers to relevant staff as required;
d) reporting and escalating matters as appropriate;
e) ensuring copyright laws are not breached by avoiding use of images or content (including music) without express permission and by giving due credit where permission has been granted;
f) obtaining consent for students, staff or other contributors that can be identified in their marketing materials, preferably through a model release form (see Social Media Guidance);
g) Completing CMA training.

3.3. All line managers and student-facing staff (e.g. personal tutor, Head of Department, Student Support and Success, housing assistants) are responsible (as applicable) for:
a) addressing any concerns and/or questions arising from the use of social media by those representing a part of the University where staff or student wellbeing is at risk, or the use is in breach of this policy. This can include queries relating to posts or comments, and support for this can be sought from line managers or the Marketing, Communications and Engagement Team.

3.4. The Marketing, Communications and Engagement team is responsible for:
a) authorising the use of relevant social media for marketing purposes by those representing a part of the University; and
b) providing guidance and templates to assist staff with the promotion of the University Courses, Services and Research.

4. Expected Standard of Behaviour when using Social Media

4.1. Staff and students are personally responsible for what they communicate on or through social media and they must adhere to the standards of behaviour set out in this policy and any related policies (see section 2.7).

4.2. Staff and students must not use social media to post, share or send content that:

a) is unlawful, including content that amounts to a criminal offence (for example threatening communications, encouraging violence or terrorism, stirring up hatred, or sharing intimate images without consent);;

b) amounts to unlawful harassment, discrimination or victimisation under the Equality Act 2010, or harassment under the Protection from Harassment Act 1997 (see section 2);

c) publishes or shares content that is defamatory, maliciously false, or otherwise intended to damage the reputation of an individual or organisation;

d) impersonates university employees, students or third parties or uses fake accounts or another person's name without their consent;

e) breaches copyright or other intellectual property rights;;

f) divulges university confidential or commercially sensitive information or divulges personal data about a university employee, student, client or customer (for example - data, contact details or photographs) without their permission or another lawful basis; or

g) expresses or purports to express opinions on the university's behalf, unless expressly authorised to do so.

4.3. The University takes complaints and concerns from students and employees very seriously. There are formal and appropriate ways for complaints to be raised (see sections 5 and 6. Breach of this policy). While a complaint, investigation, disciplinary process or legal proceedings are ongoing, staff and students must not use social media to disclose confidential information or personal data about other people involved (such as respondents, witnesses or decision-makers), or to post content that could prejudice a fair process.

4.4. The University will investigate any claims made about cyber bullying by another employee, a student or member of the public. Any student or employee who is found to be experiencing cyber bullying by another employee, a student or, in the course of their employment, by a member of the public, will have the full support of the University. In line with its duties under sections 40 and 40A of the Equality Act 2010, the University will take all reasonable steps to prevent harassment and sexual harassment of its employees in the course of their employment, including by third parties such as members of the public interacting with official University social

media accounts. (See sections 5 and 6.)

Using social media in an official capacity

4.5. The University maintains corporate accounts across most major social media channels managed by the Marketing, Communications & Engagement department. These corporate accounts have large followings and are a useful way for the University to communicate with the various groups we serve.

4.6. Other areas within the University may wish to create social media profiles, for example an Academic Department or Professional Service. Before creating a new account or when taking over responsibility for one, employees should first meet with the Marketing, Communications & Engagement department to discuss best practice for setting up and managing these accounts. Details of the account, including login details, should be maintained centrally by the Marketing, Communications & Engagement department.

4.7. All communication from University staff to students must be conducted through at least one of the following University channels: Canvas, Microsoft Teams, University email and/or the University Intranet. Employees are not required to use social media to communicate with students. If an employee does wish to use social media to communicate with a cohort of current students in addition to University communications channels listed above, or with prospective students, this should be done via official University accounts rather than their personal account. These social media accounts should make it clear that the user is an employee of the University.

4.8. If an employee intends to use social media to communicate with students, they need to register this with their Dean and the Marketing, Communications & Engagement Department.

4.9. Care should be taken not to communicate in a way that implies a social or personal relationship rather than a professional one. There is a real problem if others in the cohort feel excluded and, arising from that, perceptions of unfairness and accusations of bias.

4.10. Please refer to the University's Relationship Policy for further details about employee to student relationships.

Use of social media as a learning tool

4.11. If employees wish to use social media in addition to University Channels to communicate with students, then they should do so with entire cohorts, not selectively. The communication channel should be set up for the relevant area, with the support of the Marketing, Communication and Engagement Department, not via an employee's personal social media account. If an entire cohort cannot be communicated with in this manner, for example some students not having access to social media accounts, then an alternative should be sought.

4.12. University Channels such as Microsoft Teams, Canvas or email must be used to communicate course information to students. Social media may only be used to impart course information in addition to the formal channels. Once a

message or details have been posted on formal channels it can be shared using social media via University accounts. Personal social media accounts should not be used.

4.13. Any direct communication between employees and students should be directed through Microsoft Teams or University email and not through social media.

Community rules of engagement

4.15 Social media plays an important role in connecting the University with the groups it serves and wishes to attract. Therefore, members of the public's contributions through comments and re-posting etc. is to be encouraged as it enhances the University's online persona.

4.16 It is the responsibility of those managing official social media channels to ensure that such contributions do not breach the expected standards of behaviour outlined in 4.2. The University reserves the right to determine, at its discretion, whether a breach has been made and will hide/delete comments, and block users where appropriate.

5. Breach of this policy (Staff)

5.1. If an employee has concerns about how they, colleagues or students are being treated online they should speak to their line manager.

5.2. If an employee sees social media content that breaches this policy, they should contact their line manager.

5.3. This policy will be invoked when the University is made aware of use of social media that may breach this policy or if these channels are being used to harass or harm others.

5.4. Breach of this policy by an employee may result in disciplinary action up to and including dismissal. Any disciplinary action will be taken in accordance with the Staff Disciplinary Policy and Procedure.

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

5.6. The University reserves the right to ensure the rules relating to employee activities using its IT resources are being complied with and such activities are for legitimate purposes.

5.7. Staff (including students employed or engaged by the University) may be required to remove any social media content that the University considers to constitute a breach of this policy. Failure to comply with such a request may in itself result in further disciplinary action.

6. Breach of this Policy (Student)

6.1. If a student has concerns about the misuse of social media that breaches this policy, or how they or their fellow students or others are being treated online, please report this to an appropriate member of staff (for example personal tutor, Head of Department, Student Support and Success, housing assistants). Alternatively, a report can be made directly to the University's Complaints and Conduct team through Report and Support (https://reportandsupport.winchester.ac.uk/). Additional advice and guidance can be found on Report and Support.

6.2. The University takes complaints and concerns from students very seriously. There are formal and appropriate ways for students to raise complaints via the complaints procedures as set out in the Student Complaints Policy and the Disciplinary Procedures for Students.

6.3. Breach of this policy by a student may result in action under the Student Conduct and Disciplinary Policy which can result in action up to and including expulsion from the University.

6.4. Any staff or student suspected of committing a breach of this policy will be expected to co-operate with our investigation. In cases where criminal conduct is suspected or reported, the matter may be referred by the University to the police.

6.5. Staff and students may be required to remove any social media content that the University reasonably considers, following a fair assessment, to constitute a breach of this policy. Failure to comply with such a request may in itself result in further disciplinary action.

Support

6.6. Staff can access additional toolkits and advice on the Marketing, Communications & Engagement intranet pages, including the accompanying Social Media Guidance.

6.7. Staff seeking support for their wellbeing can visit our wellbeing intranet page, which includes access to our Employee Assistance Progarmme which they can contact any time day or night for confidential support with any issue. Students seeking support may contact the Student Support and Success Department who can provide wellbeing support and signpost the student to the relevant complaints procedure if the student wishes to pursue this.

6.8. Students can access additional examples, advice and information on online bullying on the University's Report and Support site (https://reportandsupport.winchester.ac.uk/).

Equality Impact Assessment	
Summary of process undertaken to determine equality impacts:	Review of sections 4.15 and 4.16 by staff in MCE in relation to online safeguarding.
University Committee (name/ date) where equality impacts discussed (may be Committee of approval, or another):	e.g.ULT
Has this policy been screened to ensure compliance with the University's Free Speech expectations?	**Yes**
Identified equality impact(s) on colleagues and students (i.e. any specific impacts related to this policy that may positively impact or cause disadvantage for people due to one or more protected characteristic)	
Protected Characteristic	Impact(s) identified and any action(s)/mitigation(s) to address these impact(s), as necessary.
Age	Sections 4.15 and 4.16 now empower staff to remove content, and block users, where breaches of expected standards of behaviour occur, This positively impacts those with a protected characteristic by reducing exposure to harmful content.
Disability	As above
Gender Identity	As above
Marriage/Civil Partnership	As above
Pregnancy and Maternity	As above
Race (incl. nationality)	As above
Religion and Belief	As above
Sex	As above
Sexual Orientation	As above