

SOCIAL MEDIA POLICY OPEN TRAINING COLLEGE

1. Introduction

The Open Training College (OTC) recognises the value of social media in supporting connectedness, providing information and assistance to our stakeholders, as a marketing tool, and as a valuable resource to learn and to contribute to learning communities. We recognise that social media have become increasingly important and influential communication channels that involve the expression of both personal and professional opinions, the sharing of links, images and other information, often without accompanying endorsements, meaning that the lines between the expression of an individual's personal or professional views and those of Open Training College as an institution can become blurred.

The fact that the content of such media is generated by users poses a unique set of legal and reputational risks to the College. In response, the OTC has developed this Social Media Policy and Guidelines to help clarify how best to use these new evolving tools to the professional benefit of the College, its staff and students.

2. Purpose

The purpose of this Social Media Policy is:

- to promote effective and innovative use of social media as part of the College's activities;
- to enhance and protect the College, its staff and students' personal and professional profiles and reputations in the social media space while ensuring that the image and reputation of Open Training College is not comprised in any way.

3. Scope

This policy applies to all OTC staff, students and/or external parties (each of which is defined below and are, hereinafter, collectively referred to as Users and governs the use of social media sites by Users communicating with and/or on behalf of the College. This may arise in a variety of ways including:

- a) Use of College social media sites such as:
 - social media sites created by the College (including repositories of material for staff and students); and

- College profile pages created on third party site such as Facebook, Twitter, LinkedIn, YouTube, WhatsApp, etc.;
- b) Use of personal accounts on third party social media sites using College systems and/or equipment.

For the purpose of this Social Media Policy:

- **Staff** means all full-time and part-time employees of the College, contracted Teaching and Tutorial staff, and linked providers;
- **Student** means all full-time and part-time students of the College;
- **External Parties** means all College’s contractors, researchers, visitors and/or any other parties who are granted access to the College’s IT resources and/or College social media sites/discussion forums on third party platforms.

4. What are Social Media

Social media are defined as online environments in which content is created, consumed, promoted, distributed, discovered or shared for purposes that are primarily related to communities and social activities, rather than functional, task-oriented objectives. Media in this context is an environment characterized by storage and transmission, while “social” describes the distinct way that these messages propagate in a one-to-many or many-to-many fashion.

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

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

Some channels may be more appropriate for the College’s and individual’s needs than others, particularly in relation to social networking.

5. Roles and responsibilities

The College Director has ultimate executive responsibility for the effective development and implementation of academic policies. The Head of Quality & Academic Affairs has overall delegated

responsibility of coordinating the day to day operation of the policies and the development, maintenance and monitoring of supporting procedures.

The Registration and Admission Committee has designated administration rights to three named staff members who are responsible for uploading expert subject matter and other related information for release on these sites. Programme/Programme Directors and Tutors are responsible for pursuing the implementation of this policy in relation to the activities of their programmes.

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

Academic Council:

- a) To review and approve the policy on a periodic basis.

Head of Quality & Academic Affairs:

- b) To ensure the Policy is reviewed and approved by the Academic Council as appropriate.
- c) To consult as appropriate with other members of the Directorate and Management Teams.
- d) To liaise with the College Director and or Human Resources (HR) on information received in relation to potential breaches of the policy.
- e) To ensure the appropriate standards and procedures are in place to support the policy.

Registration and Admissions Committee:

- To define and implement standards and procedures which enforce the policy.
- To oversee, in conjunction with Data Owners, compliance with the policy and supporting standards and procedures.
- To inform the Head of Quality & Academic Affairs of suspected non-compliance and/or suspected breaches of the policy and supporting standards and procedures.

College Director/HR Office:

- To follow relevant and agreed disciplinary procedures when HR or Academic Affairs Office is informed of a potential breach of the policy.
- To manage the disciplinary process.

Staff /External Contractors/Consultants:

- To adhere to policy statements in this document.

- To report suspected breaches of policy to their Programme Director or the IT/Head of E-learning.

Students:

- To adhere to policy statements in this document.
- To report suspected breaches of policy to their Tutor and/or Programme Director.

6. Legal basis of the policy

Users should be conscious that all information posted to social networking sites must adhere to the legislation in force at the time. Particular attention should be paid to the following Acts:

- Copyright and Related Rights Acts 2000, 2004, 2007 and 2019
- Data Protection Acts 1988, 2003 and 2018
- The Child Trafficking and Pornography Acts 1998 and 2004
- Defamation Act 2009
- Equal Status Act 2000
- Prohibition of Incitement to Hatred 1989

Please note that certain additional OTC standards and policies supplement this Policy and should be read in conjunction with this Policy. These include but are not limited to the following:

- Code of Conduct for students and staff.
- Intellectual Property including the use of the OTC name, logo and trademarks
- Data Protection Policy

7. Social Media Usage

Users must at all times use social media sites in a responsible manner, having due regard to the rights and reputation of the College and of others. In particular, you are required to comply with the following rules:

- Do not post material that should reasonably be deemed threatening, harassing, illegal, obscene, defamatory or slanderous towards any individual or entity.
- Do not post information which is confidential and/or proprietary to the College. Users should not post confidential or proprietary information about the OTC, its students, employees or alumni (see OTC's Data Protection Guidelines and Data Handling Guidelines). Care should be taken to use good ethical judgment and to ensure that all College privacy and confidentiality policies are adhered to. Users who share confidential information do so at the risk of disciplinary action.

- In order to avoid and minimise the need for updating, social media platforms are not to be used to post detailed policy and procedural information, e.g. programme admission criteria. For such information users should be directed to the official OTC website, electronic resource or publication.
- Do not use pseudonyms or seek to impersonate any other person.
- Do not infringe copyright and/or intellectual property.
- When posting, be mindful of the copyright and intellectual property rights – including inventions, literary (any originally created written work of any nature) and artistic works (images, videos, audio), and symbols, names, images, and designs – of others and of the College.
- For example, photographs posted on social media sites can be easily copied by visitors. OTC corporate affairs office has a policy of securing written consent from all students, alumni and other subjects (where appropriate) limited to reporting College business and the promotion of the College online and offline. Please note this consent does not extend to any purposes outside this remit.
- The Open Training College Trademarks including name and/or logos are not to be used for endorsements. Do not use the OTC name, logo or any other College images or iconography on personal social media sites. Do not use OTC's name to promote a product, cause, petition, political party or candidate.
- Do not promote or advertise a commercial product or solicit business or membership or financial or other support in any business, group or organization except those which are officially approved by OTC.
- Respect College time and property. College computers and time on the job are reserved for College – related business as approved by line managers/supervisors and in accordance with College policy.

8. Institutional Social Media sites

The College's corporate services office advises on social media planning and will maintain a register of all relevant of OTC associated sites and the site owners/administrators who have responsibility for them.

9. Compliance with the Policy

The College does not routinely monitor content posted on social media sites but reserves the right to monitor, intercept and review, without further notice, the postings and activities of staff, students and alumni in connection with social media where there is reason to suspect that this Policy is being breached or where deemed necessary by the College for other legitimate reasons.

The College operates a notice and takedown procedure. Users are encouraged to be vigilant and to report any suspected violations of this Policy and/or potentially illegal activity immediately to the Corporate Affairs Manager, who will decide, on behalf of the College, the most appropriate programme of action under the circumstances. However, please note that frivolous or vexatious complaints will not be entertained.

10. Sanctions

Breach of Policy

On receipt of notice (or where the College otherwise becomes aware) of any suspected beach of this Policy, the College reserves the right to remove, or require the removal of, any content which is deemed by the College to be in breach of this Policy. In the event that content is deemed to be potentially illegal, the College will report such content to the appropriate authorities.

Open Training College may take appropriate action against individuals when allegation of a breach has been substantiated. Any actions taken by the institution with respect to OTC staff and students will be initiated in accordance with the appropriate OTC regulations and disciplinary procedures, which may include (but are not restricted to) an of the following:

- To disable any User and block access for that User to the College’s network, systems, communications devices or equipment.
- The initiation of steps for implementation of the Open Training College disciplinary procedures.

Policy Title:		Social Media Policy
OTC Policy No		1803
Version		1.0
Date approved: October 2018	Date policy will take effect: October 2018	Date of Next Review: 3 years from date
Approving Authority:		Academic Council
Document Owner/Contact:		Registration and Admissions Committee
Supporting documents, procedures & forms of this policy:		a) Code of Conduct for Staff and Students b) St. Michael’s House Computer and Network User Policy c) GDPR Policy

Audience:	Public access
Reference(s)	<p>Copyright and Related Rights Act 2000, 2004 2007 and 2019</p> <ul style="list-style-type: none"> ▪ Data Protection Acts 1988 and 2003 ▪ The Child Trafficking and Pornography Acts 1998 and 2004 ▪ Defamation Act 2009 ▪ Equal Status Act 2000 ▪ Prohibition of Incitement to Hatred Act 1989