



**TITLE:     *SOCIAL NETWORKING AND SOCIAL MEDIA POLICY FOR LEARNERS***

<b>Effective Date</b>	25 January 2023	<b>Version</b>	2
			This policy was revised as part of its three-year cyclical review. The most significant changes were related to the definitions section of the policy.
<b>Approved By</b>	Management Board	<b>Date Approved</b>	25 January 2023
		<b>Review Date</b>	25 January 2028 <i>or as required</i>
<b>Superseded or Obsolete Policy / Procedure(s)</b>		<b>Owner</b>	
<i>Social Networking and Social Media Policy for Learners (6 March 2019)</i>		Digital Communications & Marketing Office	
Initial Issue			

**1. Purpose of Policy**

Carlow College, St. Patrick’s (hereafter Carlow College) recognises that Social Media and Social Networking are powerful tools, which have become increasingly important and influential communication platforms. These platforms involve the expression of personal opinions, the sharing of links, images and other information, often with accompanying endorsements. This can sometimes result in the lines between the expression of an individual’s personal views, and those of Carlow College as an institution, becoming blurred.

Carlow College has developed a *Social Networking and Social Media Policy for Learners* and associated documents to clarify how best to use these platforms to the professional benefit of the College, its staff and learners. The *Social Networking and Social Media Policy for Learners* and its associated documents are concerned with helping learners to develop an online presence that is ethical and legal.

Learners of the College using social media platforms, including personal accounts, must be aware that the same laws, expectations and guidelines for interacting with staff, learners, alumni, the media and other College stakeholders apply online as in the real world.<sup>1</sup>

The objectives of the *Social Networking and Social Media Policy for Learners* are:

- to provide a definition of Social Networking and Social Media and to articulate the potential risks inappropriate use poses to the College, its staff and learners;
- to promote consistent, effective and innovative use of social media
- to define the responsibilities of learners when using Social Media as a private individual; as part of their studies; as a member of a college club or society; as a learner representative; or as an Officer of the Students' Union;
- to minimise the potential negative impact to the College, its staff and learners, and third parties as a result of incidents and violations.

### *1.1. Legislation and Policies which support this Policy*

Information posted to Social Networking/Social Media sites must adhere to current Irish and European Union legislation. Particular attention must be paid to the following:

- *Prohibition of Incitement to Hatred Act 1989;*
- *Data Protection Acts 1988 - 2018;*
- *General Data Protection Regulation ;*
- *The Child Trafficking and Pornography Acts 1998 and 2004;*
- *Copyright and Related Rights Acts 2000 (as amended);*
- *Defamation Act 2009.*

## **2. Definitions**

*Social Networking* is defined as an online service or site through which people create and maintain interpersonal relationships. The main purpose of Social Networking is to connect with other people and create mutual communication for both professional or personal purposes.

*Social Media* is defined as any and all online environments, in which content is created, consumed, promoted, distributed, discovered or shared. There are many different types of social media platforms which attract specific audiences for different purposes. Some channels may be more appropriate for the College's or individuals' needs than others, particularly in relation to social networking.

Approved College Social Media profiles, including those managed by the Carlow College Students' Union, are outlined in the *Approved Social Media Account Register*.

## **3. Scope of Policy**

The scope of this policy extends to all Carlow College learners who are registered on academic programmes, whether full-time or part-time, in their capacity as members of the Carlow

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<sup>1</sup> General Data Protection Regulation (GDPR) does not apply to the processing of personal data by a natural person in the course of a purely personal or household activity and with no connection to a professional or commercial activity. Personal or household activities could include correspondence and the holding of addresses, or social networking and online activity undertaken with the context of such activities. Carlow College should not and does not monitor the social media accounts of learners. However, that does not preclude such accounts being brought to the attention of the College under this Policy.

College community, who engage in online conversations or share content using Social Media or any other Social Networking site.

This Policy will normally not apply to members using social media in a personal capacity subject to the College reserving the right at its discretion to act in accordance with this Policy and other College policies and procedures.

#### **4. Policy Statement**

The *Social Networking and Social Media Policy for Learners* has been developed to manage the use of Carlow College's Social Media and to provide governance and structure around how the College, its staff and learners are portrayed through and interact with Social Media. Further, it enables learners of the College to use Social Media platforms without compromising their personal security or the security and reputation of Carlow College. The success of Carlow College depends upon maintaining a positive reputation in the general community and amongst College stakeholders. Increasingly, Carlow College uses Social Media to engage with these groups. While Social Media is a powerful communication tool, if improperly used it can significantly damage the reputation of the College and staff and the personal reputation and future prospects of learners.

The College regards any breach of this Policy by any learner(s) as a serious matter to be dealt with through the *Learner Code of Conduct and Disciplinary Policy* and which may result in disciplinary sanction and/or expulsion. This Policy is supported by Carlow College policies and procedures.

#### **5. Roles and Responsibilities**

##### *5.1 Officer of the Students' Union and Learner Representative Responsibilities*

- To notify the Students' Union President of any CCSU affiliated social networking/media profiles currently in operation which represent Carlow College activities.
- To submit a Social Media Account Registration Form to the Students' Union President prior to creating a CCSU affiliated social networking/media site on behalf of a group, club or society (see Appendix 1.1: *Social Media Account Registration Form for CCSU Officers and Learner Representatives*);
- To obtain the written consent of any person whose personal data they propose to publish on CCSU social media accounts (see Appendix 1.2: *Social Media Consent Form for CCSU Officers and Learner Representatives*). Completed consent forms are to be given to the Students' Union President for storage as soon as possible after completion. SU Officers and learner representatives are to take particular care and exercise discretion where it is proposed to publish special category personal data. Examples of special category data are those which may reveal racial / ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health and sex life / sexual orientation, and ensure that the consent form is completed adequately. In general, social media posts, which may include special category personal data, should not name individuals, however, they may still be identifiable/identified and such posts would therefore still constitute personal data.
- To notify the Digital Communications & Marketing Office of any events associated with the College so they can be managed and promoted through the College social media platforms.

- Officers of Carlow College Students' Union or Learner Representatives who operate a CCSU affiliated social media site have a responsibility to manage it appropriately and be mindful of information that is posted.
- Officers of Carlow College Students' Union or Learner representatives are not to share confidential or sensitive information obtained as part of their representative role on social media sites. Such sharing may be subject to disciplinary action.
- To maintain the integrity of information posted to social media sites and to ensure that such information is accurate, complete, timely and consistent with other related information and events.

In addition to the above, the CCSU President will;

- Have administrative access to all CCSU Social Media accounts and periodically monitor the page/site(s);
- Liaise with Officers of Carlow College Students' Union or Learner Representatives with regard to the management of the account(s) and the content posted;
- Inform the Digital Communications & Marketing Office and Head of Student Services of instances or concerns where best practice has not been followed with regard to posted content. Data protection concerns or complaints are to be notified to the College's Data Protection Officer;
- Store completed consent forms permitting publication of personal data on social media accounts;
- Where consent forms are not appropriately completed, to discuss with the presenting SU Officer or learner representative and request them to rectify the situation or to delete the relevant personal data;
- Operate a 'take down' procedure whereby a request by any person who wishes to have their personal data removed from the CCSU's social media accounts is acceded to without delay.

### 5.2 *Learner Responsibilities*

- To take personal responsibility for familiarising themselves with this policy and best practice guidelines.
- To act in accordance with this policy when engaging with social networking / media sites, and to treat all members of the Carlow College community with respect, at all times, as they would in the real world.

### 5.3 *Digital Communications & Marketing Office Responsibilities*

- To provide support, advice and training to Officers of the Students' Union on Social Media practices and procedures.
- To monitor, in conjunction with the Head of Student Services and Learner Resources, the effectiveness of the *Social Networking and Social Media Policy for Learners* and to ensure that it is being implemented effectively throughout the College.

## **6. Associated Documentation**

- Appendix 1: Social Media Best Practice Guidelines

- Appendix 1.1: Social Media Account Registration Form for CCSU Officers and Learner Representatives.
- Appendix 1.2: Social Media Consent Form for CCSU Officers and Learner Representatives.

## **7. Referenced Policies**

- *Equality Policy;*
- *Dignity and Respect Policy;*
- *IT Policy;*
- *Learner Code of Conduct and Disciplinary Policy;*
- *Learner Grievance and Complaints Policy ;*
- *Internet and Email Usage Policy (forthcoming);*

## **8. Monitoring and Review**

The *Social Networking & Social Media Policy for Learners* will be formally reviewed on an annual basis by the Digital Communications & Marketing Office to reflect any legislative changes. Learners will be informed through regular email communication and through the Learner Gateway regarding any amendments to the Policy.

## Appendix 1: Social Media Best Practice Guidelines



### Social Media Best Practice Guidelines

Learners 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, learners are required to comply with the following guidelines when posting content (text, video, audio, images or links) to any social media site for any purpose:

- Learners should respect the dignity and privacy of others and consider how their online behaviour may impact other users; themselves and the College. Consideration should also be given to how online behaviour may threaten their future prospects and personal reputation;
- When sharing content on a social networking/media platform as part of their studies, work placement, as a member of a college club or society, as a learner representative or Officer of the Students' Union, Learners should conduct themselves in a professional manner that fully adheres to this Policy and associated guidelines;
- When posting on social media Learners must not;
  - post material that could reasonably be deemed threatening, harassing, illegal, obscene, defamatory or slanderous towards any individual or entity;
  - post inappropriate, discriminatory or defamatory comments about other learners, staff, work placement employees or their clients/service users;
  - use social networking/media sites to bully, intimidate or harass other learners, members of staff or members of the public;
  - share confidential or sensitive information obtained in the course of their duties as a learner representative or Officer of the Students' Union;
  - post personally identifiable information that could be used to locate any individual without that person's permission;
  - post content that could create a security risk for the College, its staff or other learners;
  - infringe copyright and/or intellectual property rights in relation to literary and artistic works (images, videos, audio), symbols, names, images, and designs;
  - use pseudonyms or seek to impersonate any other person;
  - post content or spam of a commercial nature;
  - use Carlow College trademarks, including name and/or logos to endorse or to promote a product, cause, petition, political party or candidate unless such use is officially approved by the College.

- Information posted to Social Networking sites must adhere to the Terms of Service of the site. Terms of Service are a set of regulations a provider attaches to a software service or web-delivered product which users must agree to abide by in order to use the service. These include but are not limited to the following:

Facebook: <https://www.facebook.com/help/325807937506242>;

Twitter: <https://twitter.com/en/tos>;

Instagram: ; <https://help.instagram.com/581066165581870>

YouTube: <https://www.youtube.com/static?gl=IE&template=terms>;

LinkedIn: <https://www.linkedin.com/legal/user-agreement>.

- Learners should familiarise themselves with the terms and conditions of any social media site used and note that, by posting on these sites, the company is granted irrevocable, perpetual, non-exclusive licence to use and distribute content for any purpose, commercial, advertising or otherwise;
- Learners should presume that everything posted online will be public and permanent, regardless of the privacy settings applied;
- Learners should remember that anything posted online can be shared or retweeted - even a deleted post may remain online permanently;
- Learners undertaking a period of work placement should familiarise themselves and comply with their employer's Social Media Policy in addition to Carlow College's *Social Networking and Social Media Policy for Learners*;
- Learner Representatives who undertake paid duties as an employee of Carlow College, for example, Students' Union President, must also comply with the *Social Networking and Social Media Policy For Staff*;
- Officers of the Students' Union and Learner Representatives must obtain the permission of other learners, College staff or third parties, before posting images or information about them online (see Appendix 1.2 *Social Media Consent Form for CCSU Officers and Learner Representatives*). The Consent Form is not to be amended in any way without the prior written approval of the College's Data Protection Officer;
- Learners should note that all official College announcements, once approved by Senior Line Managers, can only be posted by the Digital Communications & Marketing Office to official Carlow College social media accounts.
- Learners' use of social media is subject to all current College policies including the *Learner Code of Conduct and Disciplinary Policy*.

## Appendix 1.1: Social Media Account Registration Form for CCSU Officers and Learner Representatives



### Social Media Account Registration Form for CCSU Officers and Learner Representatives

This Form enables CCSU Officers and Learner Representatives to set up a Social Media account for CCSU affiliated activities. **It must be submitted to the CCSU President prior to creating the account.**

**Account Type: Please submit a separate form for each social media account.**

Facebook       Twitter       Instagram       YouTube       Other

Proposed Social Media Name: \_\_\_\_\_

Purpose of the Account/Intended Audience: \_\_\_\_\_

Email Account Associated with Account: \_\_\_\_\_

Password Associated with Account\*: \_\_\_\_\_

\*Note: Leave this blank if setting up a Facebook account. Instead of providing a password, please set the CCSU President as a Page Administrator after the page is set up.

#### As the Social Media account administrator, I agree that:

- I have read and understood the Social Media Best Practice Guidelines and agree to abide by them.
- The CCSU President will have administrative access to this Social Media account and will periodically monitor the page/site.
- This Social Media account will be administered using my Carlow College, St. Patrick's email address as the contact email.
- A Facebook page will be a 'fan' page that allows students, staff and stakeholders to 'like' my page, rather than 'friend' my page.
- A Facebook page will not be an 'individual' or 'group' account that individual students, stakeholders or staff can 'friend'. (*Note:* This does not apply if you are registering a Social Media account that is not on Facebook).
- The account meets the Social Media provider's Terms of Service.
- I will not post or discuss identifiable student(s) data on this Social Media account without the person's consent, and will otherwise comply with Data Protection law.
- I will not post or discuss confidential, private or sensitive information about the College, staff, learners, activities or programmes, or other individuals or organisations associated with my duties.
- I will not post pictures, video or information associated with learners or other individuals on this account without their written consent.
- Where the username or password is changed, I will provide the updated information to the CCSU President.

Name: \_\_\_\_\_ Signature: \_\_\_\_\_

*(please print)*

Date: \_\_\_\_\_

Please return to: [supres@carlowcollege.ie](mailto:supres@carlowcollege.ie)



## Appendix 1.2: Social Media Consent Form for CCSU Officers and Learner Representatives



### Social Media Consent Form for use by CCSU Officers and Learner Representatives

Carlow College Students' Union (CCSU) may request to publish information about individuals, usually learners and employees of Carlow College, on its official social media accounts order to promote its services, events and activities. Where individuals are identified or identifiable, information about them may constitute personal data under the General Data Protection Regulation (GDPR). This form is used by CCSU to record consent for the publication of personal data.

**By signing this form and ticking the consent box, you give your consent to CCSU to use your personal data as specified below, and affirm that you understand and accept the following statements:**

- I understand that I may grant or refuse consent, or that I may later withdraw consent by contacting the CCSU President at [supres@carlowcollege.ie](mailto:supres@carlowcollege.ie) or 059-9153200. I understand that the lawfulness of processing of the personal data before any withdrawal of consent is unaffected.
- I consent to the publication by CCSU of the following personal data on its official social media accounts, which may include, but are not limited to Facebook, Twitter and Instagram:

\_\_\_\_\_

\_\_\_\_\_

- The personal data is in the following format (tick as appropriate):  
written material  photograph(s)  video  audio , and was created on the following date \_\_\_\_\_
- I understand that some types of personal data are considered 'special category' under data protection law. Special category data includes that which may reveal: racial/ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health and sex life / sexual orientation. If your personal data constitutes 'special category' data, please specify what it is: \_\_\_\_\_
- I understand that I may or may not be named in social media posts by the CCSU and that, in general, I will not be named where special category data applies.
- I release CCSU from all claims and liability for the use of my personal data, including my special category personal data
- I understand that CCSU social media accounts are publicly accessible on the world wide web and that CCSU postings may be reposted and appear on other websites.

**Tick the box if you agree with the publication of your personal data, including special category personal data, on CCSU social media accounts**

NAME	
SIGNATURE	
DATE	