



# Social Media Compliance Policy

## Version 4

Approved by the Board of Governors

Last reviewed: October 2023

The following policy sets out the School's expectations regarding the use of social media by its students and staff, as well as agency staff, volunteers and apprentices.

The School respects privacy, personal boundaries and free speech, however, communications in the public domain which breach School codes of conduct, cause reputational or material harm to the School or otherwise give cause for concern about a person's suitability to study with or work for the School will be dealt with under this policy.

This Policy has been drafted with due regard for the following legislation:

- i. *Data Protection Act 2018*
- ii. *Human Rights Act 1998*
- iii. *Freedom of Information Act 2000*
- iv. *Counter Terrorism and Security Act 2015*
- v. *Equality Act 2010*

## Document Information

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\*The document owner is responsible for maintaining and updating the content of this document and ensuring that it reflects current practice at the School.

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## **1. Purpose and Scope**

- 1.1. The London School of Science and Technology (LSST)'s Social Media Policy is intended to protect the School from any financial, material or reputational harm that may result from individuals' use of their social media or other online-publication platforms. It is also designed to protect against intentional or unintentional breaches of School policies and external legislation.
- 1.2. Whilst individuals' social media activities are generally regarded as their own business, the School may nonetheless take action where an individual's use of social media should be seen to adversely affect the School, or where a public posting should give cause for serious concern about individual's integrity or their fitness to participate in the academic work of the School.
- 1.3. This Policy applies to all persons studying or working within the School, including consultants, contractors, interns, part-time and fixed-term individuals, casual and agency staff and volunteers (collectively referred to as 'individuals' herein).
- 1.4. The Policy deals mainly with online platforms where posts can be directly viewed by the public, or through which users can share posts with a network of 'connections' or 'friends', as such posts may easily become public; individuals should therefore be aware that they may be held accountable for material posted on a 'private' social media account.

## **2. Principles**

- 2.1. Individuals must ensure that their use of social media does not breach any of the School's codes of conduct or regulations; if the content of an internet posting breaches any policy in another forum, it will also breach them in an online forum.
- 2.2. The School may take action where an individual is found to have used social media to:
  - i. Defame or disparage the School or its affiliates, students, business partners, suppliers, vendors or other stakeholders;
  - ii. Publish sensitive, personal or confidential data or breach the School's Data Protection Policies in any way;
  - iii. Breach any other obligations they may have relating to confidentiality (this includes discussing the fact of or the outcome of investigatory or disciplinary matters);
  - iv. Harass, bully or victimise other persons in any way;



- v. Breach any other laws or ethical standards (for example claiming to be someone other than oneself or by making false or misleading statements).

(The above list is not exhaustive).

- 2.3. All individuals are responsible for upholding this Code and should ensure that they take the time to read and understand it. Any apparent misuse of social media should be brought to the attention of the School's authorities immediately.

### **3. Freedom of Speech and Academic Freedom**

Nothing in this policy is intended to prevent people from exercising their civil rights as citizens to exercise freedom of speech within the law, or impinge upon the principles of academic freedom which underpin the culture of the School.

### **4. Responsible Use of Social Media**

- 4.1. Where referencing the School in any way on social media or networking forums, individuals should be mindful of the context in which their statements could be taken and avoid posting communications that might be misconstrued in a way that could damage the School's business reputation, even indirectly.
- 4.2. Where a student or individual has a legitimate personal complaint or grievance with the School, this should be raised through the proper internal procedure and not posted on any social media platform.
- 4.3. Where necessary, individuals should make it clear in their social media postings that their views expressed are their own and not those of the School.
- 4.4. Individuals are not permitted to create their own LSST-branded social media pages or postings on behalf of the School without prior authorisation of content from the School.
- 4.5. Unless an individual has been authorised to officially represent the School individuals should write in the first person and use a personal email address when communicating via social media.
- 4.6. Individuals making social media posts should be aware of the potential permanence and publicity of comments made on social media platforms and how these might affect their career or personal life in the future.
- 4.7. All individuals are responsible for protecting the School's reputation; any individual who encounters content on social media that disparages or reflects poorly on the School or its



stakeholders should report this to their line manager or course leader, who will refer the matter to the appropriate persons.

- 4.8. Staff should be familiar with the privacy settings of social networking platforms and should ensure that these are appropriate for both content and the intended audience.
- 4.9. Staff and students should be familiar with and follow the terms and conditions of any social media platforms they use.
- 4.10. Staff and students should respect the dignity and privacy of others and should always consider how their online behaviour may affect others, and reflect on themselves and the School.
- 4.11. Content shared on all LSST social media platforms should adhere to the School's Copyright Policy along with UK Copyright law, data and intellectual property protection law.

## **5. Respecting Intellectual Property and Confidential Information**

- 5.1. All individuals must abide by the School's *Data Protection Policy* when posting on Social Media.
- 5.2. Individuals must refrain from posting anything relating to internal investigatory matters or the outcome of disciplinary, grievance or redundancy procedures.
- 5.3. Individuals must avoid misappropriating or infringing the intellectual property of other companies and individuals, which can create liability for themselves, as well as the School.
- 5.4. Individuals must not use the School's logos, brand names, slogans or other trademarks, or post any School confidential or proprietary information on their own social media pages without prior written permission.
- 5.5. The contact details of business acquaintances made during the course of an individuals' employment are regarded as personal information for the purposes of data protection; specifically when using LinkedIn, or other social media which provides third parties access to members' contacts (i.e. 'connections' or 'friends') list, and where individuals disclose their affiliation with the School; individuals must use privacy settings that limit third parties' access to their contact lists.
- 5.6. Individuals should refrain from disclosing any business-sensitive and/or confidential information or intellectual property through the use of social media; under no circumstances must individuals post comments relating to sensitive business matters, such as School performance, even where it is made clear that their views on such topics do not represent those of the School, as such comments may still affect public perception and overall health of the School.



## **6. Use of School-Affiliated Social Media Sites**

- 6.1. A School affiliated social media site is defined as any site that is officially associated with or representative of the School; these include Facebook groups, Instagram accounts, Twitter feeds, and website blogs.
- 6.2. School-affiliated social media sites are monitored and updated by the School on a regular basis; individuals' interactions with School Affiliated Social Media Sites will be moderated by the Marketing Team, who will ensure that the content of all such sites accords with School policies and codes of conduct.
- 6.3. All students and staff members must not exclusively employ the well-established communication channels provided by LSST to raise concerns and lodge complaints.
- 6.4. Moderation or editing of content on School Affiliated Social Media Sites will accord with the School's policy on Academic Freedom and Freedom of Speech; moderators will not seek to stifle legitimate debate or criticisms in response to a posting.
- 6.5. Any news, blogs and student success stories on LSST website are approved by a moderator within the Marketing team, who will ensure that all data protection protocols are upheld.
- 6.6. Any social media content, both posts and comments, that raises a duty of care issue, site moderators should seek advice from the appropriate unit (i.e. Quality Unit or Legal Counsel).
- 6.7. Comments posted must be relevant to the subject matter.
- 6.8. Comments may also be constructive although, void of any profanity and indecency.
- 6.9. Any social media content that is discriminatory, abusive, and derogatory or amounts to bullying and/or harassment, should be deleted immediately and reported to your line manager.
- 6.10. The School holds the right to remove or report any posts or comments and block the account responsible for posting these comments.
- 6.11. Any posts linked to sales, advertising, junk mail or breach our copyright policy should be deleted immediately.



- 6.12. Where applicable, guidelines for posting content should be visible to everyone visiting the social media platform, including a statement from the site moderator reserving the right to review all content posted and to remove them, if necessary.
- 6.13. Where applicable, complaints should never be handled over a public forum, only privately through email.
- 6.14. Any content that is both accurate and genuine but deemed negative towards the School, or its partners or affiliates, will be left online to encourage balanced debate and discussion amongst peers and to demonstrate the School's transparency and authenticity.
- 6.15. LSST promotes equality and encourages the freedom of expression but will not protect free speech that marginalises, vilifies and/or discriminates against people, in either posts or comments exhibited on social media platforms.
- 6.16. If in doubt about content that is questionable, notably anything directed at the School, or its partners or affiliates, inform our quality team by contacting [quality@lsst.ac](mailto:quality@lsst.ac) or your line manager.

## **7. Consequences of Breaching the Social Media Policy**

- 7.1. The School may, at its sole discretion decide to act where materials posted in the public domain that breach this Policy are brought to its attention.
- 7.2. Where an individual is suspected of having intentionally or unintentionally misused a social media platform in such a way as to negatively impact the School, or its partners or affiliates, the School will invoke its investigative procedures. Individuals will be required to cooperate with all internal Investigations, which may involve handing over relevant passwords and login details.
- 7.3. Individuals found by investigation to have breached this Policy and/or any other School policy by posting on social media will be subject to disciplinary proceedings, which, depending on the severity of the issue may potentially culminate in termination of employment for gross misconduct or negligence, or expulsion from a programme of study.
- 7.4. Disciplinary action may be taken regardless of whether the breach is committed during working / teaching hours, and regardless of whether School equipment or facilities were used for the purpose of committing the breach.



## **8. Social Media in the Context of the Prevent Duty**

- 8.1. LSST, in having due regard for its duty to prevent people from being radicalised or drawn into terrorism (termed the Prevent Duty) may monitor, record, and in some cases block, the use of social media sites and apps.
- 8.2. Staff and students must also be aware of their duty to exemplify the fundamental British values in their interactions on social media in the course of their studies or employment with LSST, and that posting, sharing, or downloading terrorist or extremist materials may also be a criminal offence under the *Counter Terrorism and Security Act 2015*.
- 8.3. All School Affiliated social media sites, as well as the LSST Connect VLE, will feature the “Big Red Button” to allow direct reporting of extremist content found on the social media sites to the Metropolitan Police Counter Terrorism Internet Referral Unit (CTIRU).

## **9. Review and Update of this Policy**

- 9.1. The School’s Principal and Legal Counsel shall be responsible for reviewing this Policy to ensure that it meets all applicable legal requirements and reflects best practice.
- 9.2. Changes to these regulations will be approved by the School’s Board of Governors.





## Version History

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