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## **GBS Social Media Policy**

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<b>Oversight Committee</b>	Academic Board
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#### Related policies

- GBS Acceptable Use Policy
- GBS Access Control Policy
- GBS Data Breach Policy
- GBS Data Classification and Handling Policy
- GBS Data Protection Policy
- GBS Anti-Harassment and Anti-Bullying Policy
- GBS Equality and Diversity Policy
- GBS Student Code of Conduct
- GBS Student Charter
- GBS Safeguarding and Prevent Policy

#### External Reference

1. Information Commissioner's Office, Accessed online at: <https://ico.org.uk/>
2. UK Public General Acts, *Data Protection Act 2018*, Accessed online at: <https://www.legislation.gov.uk/ukpga/2018/12/contents/enacted>

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## **Global Banking School Social Media Policy**

### **1. Introduction**

- 1.1. Global Banking School (GBS) recognises that the Internet provides unique opportunities to participate in interactive discussions and share information on topics using a wide variety of social media platforms such as Facebook, Flickr, Twitter, Instagram, YouTube and LinkedIn and all other social networking sites, and all other internet postings, including blogs. The internet has become an important part of everyday life for many people and social media provides valuable opportunities for networking, marketing, and an exchange of ideas. However, the widespread use of social media sites and the possibilities of inappropriate use, which may bring GBS into disrepute or compromise a member of staff, means that a policy is required which sets out the GBS' position on the use of social media for both students and staff.
  
- 1.2. It is also noted that the use of social media can in some instances transgress legal and social expectations in terms of accessing, distributing, or participating in networks that may establish or enhance activities that may be deemed unacceptable or offensive. It is of particular importance that the requirements of the GBS Safeguarding and Prevent Policy are built into this social media policy, to combat the accession or distribution of extremist or terrorist views and objectives.
  
- 1.3. This policy sets out GBS's expectations and general principles for the usage of social networking services, including those which are accessed via the internet. Social media is a term used to describe tools and platforms that enable individuals to share ideas and content quickly, easily and for the purposes of fulfilling their work and/or studies.

### **2. Scope and Purpose**

- 2.1 This policy applies to all use of social media by GBS students and staff in any role, on a permanent, temporary, casual, or fixed term basis. GBS Social Media policy provides:
  - Guidance concerning the use of social media through GBS computer network, systems, or equipment and/or the use of social media to represent or discuss matters related to GBS and/or members of GBS community, including all staff, students, and alumni.
  - Sets forth guidelines for the administration of GBS social media website sites.

- Acknowledges that unauthorised use of the wi-fi facility within GBS is difficult to track, and that the use of personal devices accessing wi-fi can only be broadly monitored; awareness of this level of threat to inappropriate, offensive, or extremist activity is highlighted within this policy

2.2 It applies to the use of social media for both business and personal purposes, whether during office hours or otherwise. The policy applies regardless of whether the social media is accessed using GBS IT facilities and equipment or equipment belonging to members of staff.

2.3 GBS recognises that staff may work long hours and occasionally may desire to use social media for personal activities at the office or by means of GBS computers, networks and other IT resources and communications systems. GBS authorises such occasional use so long as it is reasonable, during an authorised break and does not involve unprofessional or inappropriate content and does not interfere with employment responsibilities or productivity.

2.4 While using social media at work, circulating chain letters or other spam is never permitted. Circulating or posting commercial, personal, religious, or political solicitations or promotion unrelated to GBS business are also prohibited.

### **3. Role and Responsibilities**

3.1 All social media users are responsible for ensuring that their use of social media is appropriate and fully compliant with this policy. Roles and responsibilities include:

- **GBS Senior Management Team:** Responsible for ensuring that their staff are made aware of this policy and that breaches are dealt with appropriately and developing and encouraging good information handling practices within their areas of responsibility.
- **GBS Marketing Team:** Responsible for the maintenance of GBS social media sites including Facebook, Twitter, Instagram, YouTube, and LinkedIn etc. These are within the jurisdiction of the Marketing Department. Postings made by Marketing, Admissions, and other areas within GBS should be approved by the Managing Director.

- **GBS Academic Standards and Quality Office (ASQO):** Responsible for reviewing this policy and can be contacted on [asqo@globalbanking.ac.uk](mailto:asqo@globalbanking.ac.uk).
- **Line Managers:** Responsible for ensuring that their staff are made aware of this policy and any reports of breach are dealt with appropriately.
- **GBS Staff and Students:** Responsible for complying with the Social Media Policy. They must ensure that they are accessing social media sites, internet etc. in line with GBS policies and requirements.

3.2 It is important to recognise that the use of social media concerning GBS is governed by the same laws, policies, rules of conduct and etiquette that apply to all other activities at GBS. Activities of a private nature conducted away from GBS may result in disciplinary action or termination of contract for staff and deregistration or expulsion for students if these activities create reputational damage for GBS or interfere with the conduct of GBS' business. This also applies to research activity, whether legitimate or private, when it impacts upon the well-being of staff and students.

#### **4. Guidelines for use of Social-Media**

4.1 Access to social media sites using GBS computers and network systems is allowed, however, GBS reserves the right to block such access if interference with day-to-day duties is evident. All GBS staff, students and visitors must ensure that access adheres to this policy and does not interfere with work or academic duties. GBS staff, students and visitors should never:

- Post or send abusive, defamatory, or distasteful messages or post photographs, videos or other media which could be considered in breach of the guidelines given in this social media policy.
- Publish personal, identifiable information concerning or about GBS employees, students, or alumni.
- Express opinions that profess to represent the views of GBS unless authorised to do so.
- Post a comment about GBS that purports to represent the views of GBS, unless approved by the Managing Director.

- Create corporate accounts under names such as GBS and other names associated with GBS that could detract from or attempt to impersonate any of GBS' main accounts.
- Harassment or bullying via social media will not be tolerated. Evidence of harassment using social media will be investigated and may result in disciplinary procedures.

4.2 When posting content on any GBS' social media sites, through personal accounts, mobile phone, computer, or other device without using the GBS network or equipment, the following 'dos and don'ts' should be followed.

#### 4.3 Do

- Remember that UK laws and GBS policies governing inappropriate conduct such as sexual (or other) harassment, bullying, discrimination, defamation, infringement of copyright and trademark rights, and unauthorised disclosure of student records and other confidential and private information apply to communications by GBS' students and staff through social media.
- Adhere to the Prevent Duty guidance.
- Make sure that you accurately disclose your relationship to GBS when endorsing GBS. When using GBS campus facilities or acting within the scope of your GBS responsibilities, you may only endorse GBS, its programmes, or its services if you have been authorised to do so by the Managing Director.
- Carefully consider the accuracy, clarity, length (brief is better) and tone of your comments before posting them. Postings on social media sites should protect GBS' institutional voice by remaining professional in tone and in good taste. Remember, your postings may be on social media site for a long time.
- Sign your posting with your real name and indicate your relationship to GBS. Do not use aliases or post anonymously.
- Respect the views of others, even if you disagree.
- Be truthful, accurate and complete in describing GBS' programmes and services.
- Strive to be accountable to GBS audiences via regular updates and prompt responses when appropriate.
- Obey the Terms of Service of any social media site or platform in which you participate.

- Where appropriate, link back to information posted on GBS website instead of duplicating content. When linking to a news article about GBS, check first to determine whether you can link to a release from GBS' website rather than another media outlet.
- Whenever you utilise social media as a means of student participation in course work, be sure to also provide a practical and appropriate alternative for students who may be unable or reluctant to utilise that particular social media (for example, some students may not be comfortable with opening a Facebook account).

#### **4.4 Do not**

- Use social media to harass, threaten, insult, defame or bully another person or entity; to violate any GBS policy; or to engage in any unlawful act, including but not limited to gambling, identity theft or other types of fraud.
- Do not promote extremist or terrorist views.
- Post or store content that is obscene, pornographic, defamatory, racist, excessively violent, harassing, threatening, bullying or otherwise objectionable or injurious. In addition, do not attempt to compromise the security of any GBS' social media site or use such site to operate an illegal lottery, gambling operation, or other illegal venture.
- Post copyrighted content (such as text, video, graphics, or sound files) without permission from the holder of the copyright. Remember, even information that is widely available to the public (such as text, photographs, or other material posted on the Internet) may be subject to copyright restrictions that prohibit unauthorised duplication or dissemination.
- Use GBS' name, logo or trademarks for promotional announcements, advertising, product-related press releases or other commercial use, or to promote a product, cause, or political party or candidate.
- Disclose confidential GBS information, non-public strategies, student records, or personal information concerning (past or present) staff, students, or alumni of GBS without proper authorisation.
- Make false claims or representations about GBS' programmes or services. Do not speculate or guess if you do not know the information.
- Spread gossip, rumors, or other unverified information. Do not assume that everything posted on a social media site is true.



- Spend time using social media for personal purposes during working hours or use any GBS social media sites, networks, equipment, or peripherals for unauthorised personal or commercial purposes.
- Transmit chain letters, junk email, or bulk communications.
- Be rude or argumentative or use inappropriate language. Correct factual inaccuracies, however, avoid negative exchanges whenever possible.
- Be careless with spelling, grammar, or syntax, or use language that may easily be misunderstood.
- Post a person’s photograph or video image without first obtaining written permission from anyone depicted in the photograph or video. The written permissions should be kept on file as a record after being signed. Note: photographs posted on social media sites can be easily appropriated by visitors. Consider adding a watermark and/or posting images at 72 dpi and approximately 800x600 resolutions to prevent copying. Images at that size are sufficient for viewing on the web, although not suitable for printing.
- Represent your personal opinions as institutionally endorsed by GBS. If you are not authorised to post specific content on behalf of GBS, then the following disclaimer should appear in your posting: *These are my personal opinions and do not reflect the views of the GBS.*
- Expect that your posted content will remain private or that dissemination will necessarily be limited to your intended audience, even if you are accessing your own private social media account over GBS network or using GBS equipment or peripherals.
- Attempt to mask your identity or attribute your comments to another person (real or fictitious).
- Insult, disparage, disrespect, or defame GBS or members of staff or students.
- Discuss legal issues or risks, draw legal conclusions, on pending legal or regulatory matters involving GBS.

4.5 If you become aware of objectionable content posted on GBS’ social media sites or objectionable comments concerning GBS that are posted on an unaffiliated site, please notify the Managing Director in the first instance.

## **5. Business Use of social media and Recruitment**

5.1 If staff are required to speak on behalf of GBS in a social media environment, staff must still seek approval for such communication from the Marketing & Communications department, who may require staff to undergo training before they do so and impose certain requirements and restrictions regarding their activities.

5.2 If staff are contacted for comments about GBS for publication anywhere, including in any social media outlet, you must direct the inquiry to the Marketing and Communications Department and you should not respond without written approval.

5.3 GBS may use internet searches to perform due diligence on candidates during recruitment. In this situation, GBS staff must act in accordance with data protection law and equal opportunities obligations.

## **6. Posting to Social Media Sites**

6.1 GBS is aware that its staff and students may wish to express their personal ideas and opinions through private social media that are not administered by GBS.

6.2 GBS reserves the right, under circumstances it deems appropriate and subject to applicable laws and regulations, to impose disciplinary measures, up to and including deregistration (student) from GBS or termination of employment or contract (staff), upon students, staff and others related to GBS who use private social media sites or communications resources in violation of this policy or in ways that reflect poorly on GBS or are deemed to interfere with the conduct of GBS business.

6.3 In appropriate cases, such conduct may also be reported to law enforcement authorities.

### **6.4 Site approval, administration, and requirements**

6.4.1 With appropriate authorisation, GBS social media sites may be administered on behalf of:

- GBS as an institution
- Individual campuses, programmes of study and departments
- Members of staff, in connection with a specific programme
- Student organisations.

- 6.4.2 Unauthorised use of GBS' name, logo, or trademarks without the express permission of an authorised official (Managing Director) of GBS is strictly prohibited.

### **6.5 Authorisation of social media sites**

- 6.5.1 Any person or organisation who seeks authorisation for a new social media site will be expected to provide a rationale and justification for the proposed new social media site and produce a plan for managing its content.
- 6.5.2 Social media sites administered by members of staff in connection with specific programmes and/or units must be authorised in advance by the Managing Director.

### **6.6 Site Administration**

- 6.6.1 Each authorised GBS social media site must have a designated administrator approved by the Managing Director. Staff and/or students at GBS should be informed concerning the name of the site administrator and how to contact the person.

### **6.7 Site Registration**

- 6.7.1 The Head of Marketing or a person delegated by the Head of Marketing may review site content. If by doing so they become aware of content posted on an GBS social media site in violation of this Social Media Policy, the Head of Marketing or person delegated by the Head of Marketing must promptly take appropriate action. This may include notifying the site administrator, the person who authorised the creation of the site, and/or other GBS staff, and then removing the offending content and/or closing the site.

### **6.8 Site requirements: terms and conditions of use, privacy policies, and disclaimers**

- 6.8.1 **Terms and Conditions of Use** – All GBS social media sites shall clearly set forth Terms and Conditions of Use applicable to the site, which shall incorporate the appropriate sections of this Social Media Policy.

**6.8.2 Acknowledgement and Agreement** - The Terms and conditions of use must also include the following Acknowledgement and Agreement:

- *In connection with the use of this site and as a condition of such use, the user expressly acknowledges and agrees that any use of the site is subject to these Terms and Conditions of Use; that these Terms and Conditions of Use may change without notice and continued use of the site constitutes acceptance of such changes; that GBS neither endorses nor shall be held liable for the content of any postings that are not made by authorised GBS personnel or that are in violation of this policy; and that the user shall protect GBS, its associates, and their respective officers, directors, trustees, employees, agents and representatives from any and all expenses and liabilities, including but not limited to reasonable legal fees, resulting from any content posted by such user or any violation of these Terms and Conditions of Usage.*

**6.8.3 Disclaimer-** Every GBS social media site shall include a disclaimer stated as follows:

- *Content posted to this site represents the views of the individuals who post it and, unless stated otherwise, neither represents the views of GBS and is not endorsed by GBS.*

## **7. Breach**

7.1 The inappropriate use of social media web sites may lead to disciplinary action resulting in termination of contract for staff and deregistration from the programme for students; this is particularly the case where there are sensitive issues being debated, or links being created to sites that feature extremist or terrorist activity, or in any way contravene the requirements of GBS Safeguarding and Prevent Policy.

7.2 Staff may be required to remove internet postings which are deemed to constitute a breach of this policy. Failure to comply with such a request may in itself result in disciplinary action.

## **8. Monitoring and Review**

8.1 The contents of GBS's IT resources and communications systems are GBS' property. This includes files, data, document, facsimile, telephone conversation, social media post conversation or message, or any other kind of information or communications transmitted to, received, or printed from, or stored or recorded on GBS' electronic information and communications systems.

8.2 GBS reserves the right to monitor, intercept and review, without further notice, staff activities using GBS IT resources and communications systems, including but not limited to social media postings and activities, to ensure that GBS's rules are being complied with. This policy may be amended by GBS at any time. GBS will regularly test our systems and processes to monitor compliance. Any issues related to the monitoring and review of this policy, please contact [asqo@globalbanking.ac.uk](mailto:asqo@globalbanking.ac.uk).

8.3 Any questions regarding site administration or usage may be addressed to the Head of Marketing. Questions regarding copyright, privacy, advertising, and other legal requirements may be addressed to the Managing Director. GBS will support and cooperate with appropriate agencies where investigations are taking place relating to content on social media sites.

## **9. Data Protection and Confidentiality**

9.1 GBS is registered with the Information Commissioner's Office as a Data Controller. Details of the School's registration are published on the [Information Commissioners website](#). GBS as a Data Controller shall implement appropriate technical and organisational measures to ensure that processing of personal information is performed in accordance with the UK General Data Protection Regulations (UK GDPR) and under the Data Protection Act 2018 (DPA).

9.2 GBS takes compliance with this policy very seriously and therefore any cases relating to the breach of this policy will be treated with the strictest of confidence.

9.3 GBS may store copies of such data or communications for a period of time after they are created and may delete such copies from time to time without notice.

## **10. Alternative Format**

10.1 This policy can be provided in alternative formats (including large print, audio and electronic) upon request. For further information, or to make a request, please contact:

- **Name:** Welfare Management Team
- **Position:** Welfare Officer/Manager
- **Email:** [welfare@globalbanking.ac.uk](mailto:welfare@globalbanking.ac.uk)