

#### Social media policy for employees

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Amendments	Added LSHTM values and internal social media platforms.
	Updated following Higher Education (Freedom of Speech) Act 2023
Related Policies & Procedures	<ul> <li>Social media best practice guidance (LSHTM Intranet)</li> <li>Anti-bullying and Harassment Policy</li> <li>Information Management and Security Policies</li> <li>Copyright guidance (LSHTM ServiceDesk)</li> <li>Disciplinary and Dismissals Policy and Procedure for Professional Support Staff</li> <li>Disciplinary and performance for academic staff - policy and procedure</li> <li>Code of Practice on Free Speech</li> <li>Whistleblowing Policy</li> <li>Prevent Duty</li> <li>LSHTM Values</li> </ul>

## 1. SCOPE

- 1.1. This policy applies to all staff at the London School of Hygiene & Tropical Medicine (LSHTM), including staff at the MRC Units.
- 1.2. This policy applies regardless of the social medium being used. For the purposes of this policy, social media is defined as any online interactive communication tool or platform that encourages participation and exchanges. Common examples include: Twitter, Facebook, YouTube, Instagram, TikTok, LinkedIn and Yammer.

#### 2. PURPOSE AND OVERVIEW

- 2.1. LSHTM appreciates the benefits of social media and the valuable opportunities it provides to engage with a range of audiences and communities. It enables us to develop relationships, raise the profile of the organisation, generate interest in our research and education and have two-way discussions with our audiences.
- 2.2. LSHTM encourages staff to use social media in a positive manner to engage and collaborate with others.
- 2.3. As with any communications, there can be risks involved in using social media, and inappropriate use can impact on staff, students and LSHTM's reputation.
- 2.4. LSHTM is committed to freedom of expression and to academic freedom. This commitment

to freedom of speech includes staff being able to query the positions and views of others and to put forward new and possibly radical ideas within the boundaries of the law. Staff are expected to use a common-sense approach to social media and their entitlement to freedom of thought, opinion, conscience and religion. This includes ensuring that while exercising their freedom of expression their actions comply with LSHTM policies and relevant laws.

- 2.5. This policy is in place to support staff to minimise exposure to reputational risks to them individually or to LSHTM as an institution, by providing guidance to ensure social media engagement is safe and responsible, so that staff can enjoy the positive benefits it brings.
- 2.6. All LSHTM staff are required to adhere to the expectations set out in this policy, and other policies relating to staff conduct.

## 3. USING SOCIAL MEDIA

- 3.1. LSHTM has a number of official social media accounts. These are accounts which use LSHTM's name, or the names of its faculties, MRC Units, departments, research Centres, groups or projects, or affiliated networks.
- 3.2. 'Centrally managed' official accounts are those managed by the Communications & Engagement team and 'locally managed' accounts refer to those managed by staff elsewhere in the organisation.
- 3.3. In order to ensure we are using social media most effectively as an organisation, any staff member wishing to establish an official social media account that expresses the views of part of the organisation (as noted in 3.1) must first seek approval from the Communications & Engagement team via comms@lshtm.ac.uk (see section 4 for more information).
- 3.4. When engaging through an official LSHTM account, staff are acting as a voice for the organisation and so are expected to act in LSHTM's best interests.
- 3.5. LSHTM respects privacy and understands that staff may use social media in their private lives. Personal social media use which is not associated with or impacting on LSHTM is largely outside the scope of this policy, however LSHTM encourages all staff to act with respect and in line with LSHTM values when using social media in a personal capacity. Staff should be particularly mindful of negative posts or views expressed on personal social media accounts, and specifically those that may risk causing any type of reputational damage to individuals or to LSHTM. While entitled to exercise their freedom of speech within the law, staff should be aware that as part of LSHTM's values no form of harassment or bullying will be tolerated within our School community, including that relating to religion or similar belief and political or other protected characteristic.
- 3.6. When posting in a personal capacity, staff should be mindful that it is still possible they may be identified as an LSHTM staff member and their views associated with LSHTM.
- 3.7. When posting as an individual on internal LSHTM platforms such as Yammer, staff must ensure all comments are appropriate and respectful, and in line with our values.
- 3.8. Staff using social media in a personal capacity should familiarise themselves with sections of this policy on security and data protection (section 5) and incidents and response (section 6) as these may have implications for their own use.
- 3.9. Use of LSHTM's official social media platforms is entirely separate from personal social media accounts, and staff should not use official LSHTM accounts for personal use or gain

#### 4. ROLES AND RESPONSIBILITIES

## The Communications & Engagement team is responsible for:

- 4.1. Maintaining a directory of official LSHTM central and locally managed social media accounts (as per 3.1). This directory is populated via search results from LSHTM's social media monitoring tool as well as manually including new accounts as they are approved (see 4.2). The Social Media Coordinator will additionally maintain a log of administrator and access details to ensure access does not become lost if/when staff responsible for the accounts change this will be checked annually.
- 4.2. Approving the creation of all new official LSHTM social media accounts (the team also has the authority to refuse creation if not deemed to be appropriate, for example if there is lack of resource to appropriately locally manage the account, or potential for reputational risk).
- 4.3. Overseeing an annual audit of all official LSHTM locally managed accounts, to determine if an account should continue or be closed (for example, if inactive or causing reputational damage).
- 4.4. Delivering strategic and branding guidance on social media.
- 4.5. Reviewing and updating best practice social media guidelines and providing training as required.
- 4.6. Paid promotion of corporate social media content.
- 4.7. Advising on reputation management.
- 4.8. Investigating reported incidents involving damaging social media communications from an official LSHTM account and advising on response, or responding directly, where necessary.
- 4.9. Removing material posted that may impact LSHTM's reputation, that is damaging to an individual or in breach of policies relating to staff conduct.
- 4.10. Monitoring social media for content about LSHTM and resolving or escalating issues where appropriate.
- 4.11. Providing support to staff who are experiencing harassment about their research on social media, and escalating these issues as required (as well as directing to other relevant support options available at LSHTM).

# Staff members responsible for official LSHTM locally managed social media accounts are required to:

- 4.12. Request and receive approval from the Communications & Engagement team (via comms@lshtm.ac.uk) before establishing a social media account that expresses the views, or is perceived to express the views, of part of the organisation (as per 3.1). Staff may be required to undertake social media training and provide a social media plan and/or strategy including evaluation framework to demonstrate relevant skills and value for money for the proposed account.
- 4.13. Ensure they have read and understood all LSHTM's relevant policies and best practice guidance before accessing and posting content via LSHTM accounts, and that social media use is carried out in line with this.
- 4.14. Have a strategy/plan in place to ensure the use of the social media platform

supports the strategic aims and objectives of the department/Unit/Centre, group, project, network or School.

- 4.15. Ensure they have a sign-off process agreed within their team for posting content.
- 4.16. Regularly monitor, update and manage content posted via their account.
- 4.17. Conduct an annual audit of the account in line with guidance from Communications & Engagement.
- 4.18. Ensure account passwords are of adequate strength and are kept securely and be aware of process for logging all users out of relevant social media accounts in case of a security breach.
- 4.19. Ensure they have the required security settings enabled on any devices they are using to access work social media accounts (eg mobile phones, laptops).
- 4.20. Inform the Communications & Engagement team if the member of staff responsible for an official LSHTM account changes (password should be changed if responsible staff member leaves LSHTM, and new password shared with Communications & Engagement team).
- 4.21. Ensure that there is at least one other staff member who can edit, post and delete content in their absence.
- 4.22. Immediately seek advice from the Communications & Engagement team if content has the potential to be viewed as damaging to LSHTM's reputation, or that of its staff or students.
- 4.23. Report any incidents in line with the 'Incidents and response' section of this policy (section 6)

# 5. INFORMATION SECURITY, DATA PROTECTION AND COPYRIGHT

- 5.1. Staff should familiarise themselves with the terms of use, privacy policies and other policies of the social media sites they use. Appropriate levels of security should be set on all social media accounts.
- 5.2. When using social media, staff should be aware of security threats such as phishing attempts or malware distribution.
- 5.3. Staff should not share sensitive confidential information about LSHTM on public social media channels.
- 5.4. Personal data is any information that can be used to identify a living individual. Personal data should not be shared on social media without consent unless covered by relevant exemptions. GDPR and LSHTM's Data Protection Policy apply to social media use.
- 5.5. Staff should be aware of rules surrounding copyright and intellectual property. You should hold copyright for a work or have permission of the copyright holder to publish it online.
- 5.6. Social media use (including use of personal devices to access official LSHTM social media accounts) must comply with LSHTM's policies relating to Information Management and Security.

# 6. INCIDENTS AND RESPONSE

6.1. The Communications & Engagement team should be notified immediately where it appears that a breach of this policy has taken place. They will advise on the most appropriate course of action and escalate this issue to senior management as required.

- 6.2. If staff running official accounts become aware of any issues on social media which could affect LSHTM's reputation, they should notify the Communications & Engagement team.
- 6.3. The Communications & Engagement team will provide guidance to staff and students who are experiencing harassment on social media, and will escalate issues where necessary. Where staff members are in receipt of offensive, unacceptable content via social media, this should be reported to their line manager and to the Communications & Engagement team.
- 6.4. In cases where an employee's use of social media is found to be discriminatory, displaying bullying/harassment behaviours, threatening, illegal, damaging, not in line with LSHTM's values or in any other way deemed to bring LSHTM into disrepute, LSHTM may consider disciplinary action in line with relevant policy and procedures.
- 6.5. LSHTM may require employees to remove social media postings which are deemed to constitute a breach of these standards and failure to comply with such a request may, in itself, result in disciplinary action. This may also include posts/messages on personal social media accounts, where a post/message may be deemed offensive and/or has potential to bring the individual and/or LSHTM into disrepute. Where such a message is posted on an internal LSHTM platform (i.e. intranet blogs, Yammer etc), LSHTM may decide to remove/delete the message from the platform.