



ICON College of Technology and Management

Digital Marketing and Communications Policy

ICON College of Technology and Management recognises the benefits and opportunities offered by social media and other online communication platforms such as Twitter, YouTube, LinkedIn, Instagram, Facebook, Skype, Zoom as well as College-provided tools such as Microsoft Teams, and Moodle. It also recognises the benefits of online messaging channels such as WhatsApp, Facebook Messenger, and direct messaging functionality on social media platforms. These benefits include the ability to communicate in real-time with the College's community, to understand the views and opinions of its audiences, and to better promote inclusion and prevent discrimination amongst the community.

However, alongside the benefits of these social media platforms are also a number of risks, including potential legal, ethical, or reputational issues which could ultimately result in significant harm to individual members of our community, and the College and its ability to provide a safe and supportive work and learning environment. The lines between personal and professional social media usage often become unclear, and content can circulate rapidly, and quickly get out of control.

Scope

The College acknowledges the right to academic freedom and freedom of expression – indeed this is included within the College's Public Interest Governance Principle (website page: https://www.iconcollege.ac.uk/ICTM_Public_Intrest.pdf). However, conduct on social media and in online communications is treated in the same way as any other conduct for the purposes of College policies and procedures. Staff and students are expected to be aware of the standards of conduct required by the College and our community and to maintain these standards and that this applies equally to inappropriate behaviour such as posting inaccurate and misleading information through social media platforms and other online communications.

Social media and other online communications tools also present a high risk in relation to the sharing of personal data. Staff and students must ensure that their communications on these channels comply with all the legal requirements, including data protection laws, and all of the College's policies relating to our expected behaviours and the sharing and accessing of data, as well as data security and data protection.

Staff at the College may occasionally wish to use social media platforms and other online communication tools for personal use at their place of work, by means of College personal computers (PCs), networks and other information communications technology (ITC) resources and communications systems. Students may also use College PC, networks, and other ITC resources and communications systems for personal use. The use of the Internet at the College premises is guided by use of IT and Internet policy which prevent students and staff from accessing unlawful websites such as those fostering extremism or racial discrimination. This digital marketing policy applies irrespective of whether the communication is on College-owned or personal equipment, and whether staff or students are communicating in a personal or a professional capacity.

College staff may use social media and other online platforms, including the Internet for promotion and marketing purposes as well as for professional networking and to help potential students access and participate in higher education (HE). In these circumstances, it is absolutely paramount that the information presented is current, factually correct, accurate as well as not misleading. Furthermore, the College requires that when using social media and other online platforms staff comply with all legal requirements and social and ethical responsibility criteria as outlined below and ensure that the Competition and Markets Authority (CMA) guidelines on consumer protection are followed when communicating with current and prospective students (<https://www.iconcollege.ac.uk/Page/73>).

The purpose of this Policy is to establish an acceptable framework for digital marketing and communication by the College and to set the required standards of behaviour of staff and students, at all times, when using social media and other online communication tools.

Online behaviour

Personal Use: For both Staff and Students

When you are using social media platforms in a personal capacity, you should bear in mind that other users may be aware (or become aware) of your association with the College and might reasonably think that you speak on behalf of the College. You should therefore take account of any adverse impact your social media posts might have on the College's reputation or the College's business relationships even when using social media privately. You should be aware that content posted online is extremely easy to share and you should not have any expectation of privacy or confidentiality in anything you create or share on social media platforms. When you create or exchange content using social media you are making a public statement. As such, your content will not be private and can be retweeted, copied, or forwarded to third parties without your consent. You should also be aware that forwarding and sharing content is often construed as support unless you make your own views clear alongside the forwarded material. You should therefore consider the potential sensitivity of disclosing information on a social media platform. Once sensitive or confidential information (or offensive or defamatory information) has been disclosed, it cannot be recovered, and this may result in liability both for the College and also for you personally.

The College, therefore, expects you when using social media platforms for your personal use to:

- not make defamatory or disparaging statements about the College, its employees, students and/or business partners or others;
- keep your social media account details and passwords secure and not share such details with others, in order to protect both your own privacy and the confidential information of the College.
- be responsible for how you communicate online, be mindful of your language, tone and phrasing as well as comments on photographs, images, videos, or any other content;
- treat others with respect and dignity, and ensure that you avoid using language which could be deemed to harass, bully, discriminate, threaten, humiliate or otherwise offend others; ;
- not engage with, promote, encourage, create, or exchange or link to abusive, obscene, discriminatory, derogatory, defamatory, pornographic, or otherwise illegal content (including content related to extremism and terrorism);
- not infringe the College's intellectual property rights (such as the use of our ICON College logo and brand name) nor the intellectual property rights of third parties;
- not upload, post, or forward any content belonging to a third party unless you have that third party's consent and check that a third-party website permits you to link to it before including a link;
- follow College advice on avoiding phishing attempts: not clicking on links in posts, updates, and direct messages that look suspicious and looking out for URLs contained in generic or vague-sounding direct messages and reporting them if they are concerned.
- comply with social media guidance issued by the relevant social media platform and other relevant regulatory bodies;
- avoid posting in relation to or discussing topics that may be controversial, racist, sexist, or defamatory. Do not escalate any existing such discussions.
- regularly review the privacy settings as well as content on your personal social media accounts. Delete anything that could reflect negatively on you in a personal and/or professional capacity or on the College.

Professional Use: For Staff

You may use social media platforms in a professional capacity. This may be where you create a social media profile for both personal and professional use or for professional use only.

When making professional use of social media platforms, in the College's name, in addition to the general rules for personal use above, you must also:

- clearly identify who you are, including your name and job title, and include contact details as appropriate;
- ensure that all communications are of high quality (in terms of content and form) including being grammatically correct, accurate, objectively justifiable, reasonable, and appropriate for the intended audience;
- you must include in the profile details (or header or biography as relevant) a statement that your views are your own and not necessarily that of the College;
- ensure that all marketing and promotional content complies with the Advertising Standard Authority's codes and the regulations of other relevant authorities;
- not disclose the confidential information of the College;
- not provide references or recommendations for anyone else on social media platforms (whether employment or business recommendations) in any way that suggests any endorsement or recommendation by the College. If you wish to provide a reference or recommendation, you should seek advice from the line manager and ensure that any such references or recommendations can be withdrawn at any time as required by the College;
- if you become aware of adverse criticism of the College or of content you have created or shared, inform the Principal/line manager. Do not respond without their approval
- follow the College's guidance on the use of the College's brand and logo in the use of College letterheads, headers and footers, and e-mail signatures; and
- maintain good information security practices. Use strong passwords and make appropriate use of security and privacy settings on social media platforms
- Full time lecturers will communicate only with their college email and part-time lecturers will communicate with students via ICON VLE.

Breaches of the Social Media Policy

The College does not directly monitor student and staff social media accounts as part of its own social media activities. However, the College does monitor mentions of the College and other topics of relevance (search engine optimisation – SEO), so that it can respond directly to those raising questions or concerns about the College. Activity by staff and students or any other affiliations may appear as part of this monitoring. The College also uses Facebook lists and keyword searches to identify posts from College departmental or staff accounts with a view to helpfully supporting those posts via institutional accounts.

The College will be required to conduct further enquiries when it is made aware of alleged inappropriate online behaviour or where a potential breach of this policy or any other College policy or Regulation is reported. This may include using comments, videos, images, photographs, or any other online material which have been posted or shared on social media sites as part of this investigatory evidence and, if appropriate, any subsequent disciplinary process. Serious breaches may result in the potential dismissal of employees, expulsion of students or a termination of an individual's association with the College. The College may also be required to report activity to the Police.

Anyone concerned about a potential misuse of social media by a member of staff or student may report this by making a complaint to the Principal or Vice-Principal (Academic Affairs)

College Support

If students and staff are setting up a social media account, they should refer to this Digital Marketing and Communications Policy document for guidance. Whilst social media has many personal and professional benefits, unfortunately it also has the ability to cause great distress, upset, and harm to users. The anonymous nature of social media accounts often means that it's hard to identify the responsible parties, and staff and students that are subjected to hate speech, discrimination,

harassment or bullying, trolling, and other negative online communications can feel scared, isolated, and powerless. Issues can escalate quickly and can often return unexpectedly as new users see and share the content.

If students and staff become involved in an issue on social media platforms/sites, they should:

- not engage in conversation. Engaging and responding often draws more attention to the content due to algorithm design, and means more people will see and become involved;
- follow the advice in the above policy to help keep themselves safe and their data secure;
- be aware of the impact that social media can have on their mental health and wellbeing (website page <https://www.iconcollege.ac.uk/Page/55>);
- report inappropriate online behaviour to the Principal and or to relevant authorities (such as the Police, web administrators, or to the platform on which the communication occurred).;
- talk to their friends, family, and colleagues about the problem offline. The fast-paced nature of social media often leads to problems escalating quickly, and it can be hard to consider solutions to the issue in isolation.

Equality Impact Assessment

The College recognises its responsibility to ensure that no-one is discriminated against or disadvantaged in relation to a protected characteristic which include: age, disability, sex, trans, and gender reassignment, maternity, paternity, and adoption, marriage and civil partnership, race, religion or belief, or sexual orientation. For further information, please refer to the College's Equal Opportunity policy (website page: <https://www.iconcollege.ac.uk/Page/67>).