Email, Social Media, and Marketing Policy

1. Policy Overview

This policy covers the use of email, social media and marketing approaches/channels to enable all staff/key agents to be fully au fait with how best to use these tools to both promote UniHaven College ("the College") while simultaneously protecting themselves and the College from reputational, financial or legal harm. For the purposes of this policy the term "staff" is defined as any person in the employment of the College or any partner that subcontracts to the College or UniHaven Limited and who uses an authorised UniHaven email address.

2. Policy Statement

This policy covers the use of email, social media, and College marketing channels and approaches.

Use of Email

All messages distributed via the College email system, even personal emails sent using a "@unihaven" email address, are College property. Staff must have no expectation of privacy in anything that they create, store, send or receive on the College email system. All emails can be monitored without prior notification if the College deems this necessary. If there is evidence that any staff member is not adhering to the guidelines set out in this policy, the College reserves the right to take disciplinary action, up to and including dismissal.

Email is a business communication tool and users are obliged to use this tool in a responsible, effective, and lawful manner. Although by its nature email seems to be less formal than other written communication, the same laws apply. Therefore, it is important that users are aware of the legal risks of email as follows:

- An email message may go to persons other than the intended recipient. If it contains confidential or commercially sensitive this could be damaging to the College.

- Letters, files, and other documents attached to emails may belong to others. By forwarding this information, without permission from the sender to another recipient staff may be liable for copyright infringement.

- Email is a fast form of communication. Often messages are written and sent simultaneously, without the opportunity to check for accuracy. If emails are sent with any libellous, defamatory, offensive, racist or obscene remarks, staff and the College could be held liable.

- An email message may legally bind the College contractually in certain instances without the proper authority being obtained internally.

- Email messages can carry computer viruses. If an attachment that contains a virus is sent, staff and the College could be held liable. By opening emails and attachments from an unknown sender staff may introduce a virus into computer operations generally.

- All personal data contained in emails may be accessible under Data Protection legislation and, furthermore, a substantial portion of emails to the Government and other public bodies may be accessible under Freedom of Information legislation. Email should always be regarded as potentially public information, which carries a heightened risk of legal liability for the sender, the recipient, and the organisations for which they work.

Use of Social Media

The College understands that social media is widely used by its staff to express their personal interests and opinions. The College has its own official social media channels. However, the use of social media also presents certain risks and carries with it certain responsibilities. This policy sets out a framework for the appropriate use of social media by all College staff. All staff have a responsibility to maintain the College's image, to use these social media resources productively and to avoid placing the College at risk of legal liability based on their use.

Use of Marketing Online and Offline Methods

The College's reputation is a key component to its success. It is what gives the College an identity and separates us from other similar providers. Keeping a consistent reputation is easier said than done, especially when our staff, collaborators and stakeholders are spread across the globe or working from home. For official College logos, colours etc., branding guidelines have been set out in detail that gives everyone inside and outside of the College a document to reference if they have a question about using College brand colours, fonts and more. With well-outlined guidelines, branding mistakes from designers, creators and collaborators are eliminated and our brand will be consistent in all aspects.

3. Roles and Responsibilities

This policy applies to all staff and key regional agents and collaborators to whom we have given an email address. The Academic Director monitors the implementation of this policy in relation to College staff and the CEO for senior management and non-College staff. The Academic Director is responsible for ensuring that policies are developed and maintained, that they remain fit for purpose, that they remain in compliance with QQI guidelines, that they are updated as per agreed timetables, and that they are being implemented as intended. In the latter context, the Academic Director will inspect a sample of policies each year to check for the correct implementation and bring the findings to AC as part of the annual QA/QQI review and reporting process.

4. Policy

Guidelines for Email Use

The College considers email as an important means of communication and recognises the importance of proper email content and speedy replies in conveying a professional image and delivering good student service. Staff should take the same care in drafting an email as they

would for any other communication. Therefore, the College wishes email users to adhere to the following rules.

- The College's name is included in the heading carried with every message sent by a staff member. Emails reflect on our image and reputation. Therefore, email messages must be appropriate and professional.

- It is strictly forbidden to use the College's email system for anything other than legitimate business purposes. Therefore, the sending of personal emails, chain letters, junk mail, and jokes is prohibited. All messages distributed via the College's email system are College property.

- All emails will carry a disclaimer stating
  - How the email is confidential.
  - That it is intended solely for the recipients.
  - A request to contact the sender should have gone to someone other than the intended recipients immediately.

- Care should be taken when sending confidential or commercially sensitive information. If in doubt, please consult a Line Manager.

- Staff confidential messages should be distributed to staff only. Forwarding to locations outside is prohibited.

- Great care must be taken when attaching documents or files to an email. Letters, files, and other documents attached to emails may belong to others. By forwarding this information without permission from the sender to another recipient may lead to liability for copyright infringement. Again, if in doubt, please consult a Line Manager.

- Only send emails of which the content could be displayed on a public notice board. If emails cannot be displayed publicly in their current state, consider rephrasing them, using other means of communication, or protecting information by using a password.

- Subscription to electronic services or other contracts on behalf of the College is prohibited unless you have the express authority from a Line Manager to do so.

- If staff receive any offensive, unpleasant, harassing, or intimidating messages via email or intranet they are requested to inform a Line Manager or the People Officer immediately. It is important that such emails are traced as quickly as possible.

- A hard copy of any important or potentially contentious communication that staff have received via email should be printed and filed appropriately. Where important to do so staff should obtain confirmation that the recipient has received the email sent.

- Documents prepared by the College for students may be attached to an email however information received from a student may not be issued without the prior consent of the original sender. If in doubt consult a Line Manager or the Data Protection Officer.

- Email users must spell check all mails prior to transmission.

- The College reserves and intends to exercise the right to review, audit, intercept, access and disclose all messages created, received, or sent over the electronic mail system for any purpose. All computer logins/passwords must be provided to a Line Manager and /or the IT provider. No login/password may be used that is unknown to the company.

Notwithstanding the College's right to retrieve and read any electronic mail messages, such messages should be treated as confidential by other staff and accessed only by the intended recipient. Staff are not authorised to retrieve or read any email messages that are not sent to them.

The confidentiality of any message should not be assumed. Even when a message is erased it is still possible to retrieve and read that message. If any breach of this email policy is observed, then disciplinary action up to and including dismissal may be taken. If any staff member does not comply with this policy, they may be subject to discipline, including loss of access to College facilities. They may also be subject to legal action for damages or indemnification.

Guidelines for Social Media Use

Social media refers to websites and applications that enable users to create, share content and participate in social networking, and includes all means of communicating or posting information or content of any sort on the Internet, including to an official College platform, any staff member's own or someone else's web log or blog, journal or diary, personal web site, social networking or affinity website such as Facebook, Twitter, Instagram, Pinterest, WhatsApp, LinkedIn, YouTube, TikTok, Vimeo and Google+, web bulletin board or a chat room, as well as any other form of electronic communication.

Social media is a valuable tool for providing information, sharing views, and engaging with stakeholders and the public and is becoming increasingly common. It can help build the College's reputation and support its strategic priorities. There is an expectation that, when using social media, staff conduct themselves in a manner consistent with their function and role and in line with College values and policies.

The following policies apply, whether staff use College-owned or personal social media channels and whether for official, employment-related, or personal purposes. Official social media use refers to the use of social media to publicly communicate on behalf of the College and as authorised by the College as an employer. Employment-related social media refers to the use of social media as part of job responsibilities by staff and as authorised by the College. Personal social media use refers to any staff's use of social media for social, educational, professional development, or other purposes unrelated to their employment at the College and in their personal capacity.

- Consider all communications as public.
  - All conversations on social media networks should be considered public rather than private. Any post, photo, comment, etc. posted on any social media may be permanent, despite efforts to delete them. Staff must thus avoid posting any

communications that may cause embarrassment, harm or liability to themselves or the College.

- Always be respectful.
  - o Staff must always be fair and courteous to fellow colleagues, students, suppliers or any other third party when using social media.
  - o When posting, staff should avoid using statements, photographs, video, audio, or other media that reasonably could be viewed as malicious, obscene, threatening or intimidating, or that might constitute harassment or bullying. These include offensive posts meant to intentionally harm someone's reputation or posts that could constitute unfair discrimination based on race, gender, pregnancy, marital status, family responsibility, ethnic or social origin, colour, sexual orientation, age, disability, religion, HIV status, conscience, belief, political opinion, culture, language, birth and/or any other arbitrary ground.
  - o Although not an exclusive list, other examples of prohibited social media conduct include posting commentary, content, or images that are defamatory, pornographic, proprietary, harassing, libellous, or that can create a hostile work environment.
- Be honest and accurate.
  - o Staff must always be honest and accurate when posting information or news. Staff must refrain from posting any information or rumours that s/he know to be false and/or misleading.
- Always maintain confidentiality.
  - o Staff must always maintain the confidentiality of trade secrets and/or private and/or confidential information relating to the College, its staff, students, Higher Education Institution (HEI) partners and/or suppliers. Trades secrets and confidential information may include information regarding the development of systems, processes, products, know-how and technology, marketing campaigns, supplier lists, student information, financial statements, etc.
  - o Staff are not allowed to post confidential information, including internal reports, policies, procedures, or other internal business-related confidential

communications, on any social media platform unless pre-approved to do so as part of the College's legal and/or regulatory requirements.

- o Staff should not publicly comment on College-related financial topics, forecasts, or legal matters.

- Act as a College brand ambassador

  - o Staff can associate themselves with the College when posting, but they must brand their online posts as personal and purely their own unless formally authorised to post online as a part of their College role. The College will not be held liable for any repercussions that staff personal content may generate.

  - o Any links created to the College website(s) and social media platforms, should be of a positive nature, relevant, and strive to further the College's interests and reputation. Comments and postings must strive to enhance brand awareness and build relationships with fellow staff, students, HEI partners, suppliers, and students.

  - o Disciplinary action will be taken against any person who acts with malice or brings the College's social reputation into disrepute with any inappropriate posting.

  - o Staff must be aware that others will associate them with the College as an employer when they identify themselves as such. They must thus ensure that Facebook, LinkedIn, and such platforms, as well as related content, are consistent with how they wish to present themselves to fellow staff, students and the public at large.

- Express only personal opinions

  - o Staff may never represent themselves as a formal spokesperson for the College on official or employment-related social media unless expressly authorised to do so. All media inquiries should be directed to the CEO.

  - o If the College and/or its programme or services is the subject of the content that any staff may create in a personal capacity, staff must be clear and open about the fact that their views do not represent those of the College, its Directors, its staff, students, HEI partners, suppliers or other people associated

with the College. It is best to include a disclaimer such as "*The postings on this site are my own and do not necessarily reflect the views nor opinions of the College, its Directors, staff nor any person or entity connected to it*".

- o Staff must be aware that personal thoughts they publish online, even though the use of a personal account during or outside of working hours, may be misunderstood as expressing the positions or opinions of the College. Staff are thus advised to exercise caution and to check with their Line Manager before posting online if they are unsure whether an intended communication is appropriate.

- o Staff may never publish any derogatory comments about the College, its Directors, staff, students, HEI partners, or suppliers that can cause harm or bring the College into disrepute. Staff have ample opportunity to air their grievances and complaints as described in UDOC007 UniHaven Employee Handbook Rev 0.

- o Staff should be aware that the College may observe content and information made available by staff through social media, even when posted in their personal capacity during and/or after working hours.

- o The College reserves the right to take appropriate action when staff private posts, including photos, inappropriately associate them with the College's reputation and/or bring the College into disrepute.

- Do not use social media at work for personal purposes
  - o Staff must refrain from using social media during working hours or on equipment provided by the College for personal purposes. Online activities should never interfere with staff performing their job responsibilities and commitments. The appropriate and relevant use of social media to promote the College and to engage with students and other third parties are encouraged, but only within the framework set out in this document and in compliance with employment terms and conditions as set out in staff employment contracts and UDOC007 UniHaven Employee Handbook Rev 0.

- Refrain from using employer e-mail addresses.

- o Staff must not use College e-mail addresses to register on social networks, blogs or other online tools utilised for personal use.
- Avoid tagging.
  - o Staff must not tag others in pictures or posts unless they have been designated as official spokespersons and/or permission was obtained from the person involved. If tagged inappropriately by others, staff must take steps to have the tag removed.
- Respect other people's rights.
  - o Staff should get appropriate permission before they refer to or post images/photos of current or former staff, students, or suppliers.
  - o Additionally, staff should get appropriate permission to use a third party's copyrights, copyrighted material, trademarks, service marks or other intellectual property on social media and/or appropriately acknowledge their sources, if already in the public domain.
- Add value.
  - o The College's reputation and brand are best represented by its people and everything staff publish online on social media reflects upon it. Blogs and social networks that are hosted on College-owned channels should be used in a way that adds value to their activities. Official and employment-related social media posts should reflect College values and the Code of Conduct. All immaterial property on social media platforms vest in the company.
- Use appropriate channels to voice workplace concerns.
  - o Staff should resolve work-related complaints and/or grievances by speaking directly with their Line Manager and using procedures outlines in UDOC007 UniHaven Employee Handbook Rev 0.
- Take remedial actions, if required
  - o If a mistake was made, intentionally or negligently, it must be corrected as quickly as reasonably possible. Staff must be open about any previous posts that have been altered or deleted by immediately disclosing the same to their Line Manager. The Internet archives almost everything and even deleted

postings can be searched. Remedial actions must be taken, as appropriate in the circumstances.

- o If staff encounter a situation while using social media that threatens to become antagonistic, staff should disengage from the dialogue in a polite manner and seek the advice of their Line manager.

- Report potentially inappropriate content

- o Staff are obliged to report to their Line Manager any potential inappropriate content on social media channels related to the College that comes to their attention for investigation and remedial actions, where necessary.

- Responsibility and accountability.

- o Ultimately staff are solely responsible for what they post online. Conduct that adversely affects staff job performance, the performance of fellow staff or otherwise adversely affects students, suppliers, or any other third parties' legitimate interests, may result in disciplinary action up to and including dismissal, even when using a disclaimer. Inappropriate postings that may include discriminatory remarks, harassment, threats of violence or similar inappropriate or unlawful conduct and/or posts that bring or potentially brings the College's reputation into disrepute, will not be tolerated.

- o The College prohibits retaliation or taking negative action against any fellow staff and/or student and/or supplier and/or HEI partner and/or third party for reporting a possible deviation from this policy or for cooperating in an investigation. Any staff who retaliates against another party for reporting a possible deviation from this policy or for cooperating in an investigation will be subject to disciplinary action, up to and including dismissal.

- o The College will not be held liable for any repercussions that staff inappropriate or unlawful posts on social media may have and staff remain solely liable.

5. Procedures and Forms

This policy must be read together with other human resource-related policies as relevant to whether users are full-time staff or self-employed contractors with College email addresses, namely:

- UDOC005 UniHaven Code of Ethics Rev 1.
- UDOC006 UniHaven Supplier Code Rev 1.
- UDOC007 UniHaven Employee Handbook Rev 0.

Quality Assurance Manual (QAM) Chapter 10

Document Name	**Email, Social Media, and Marketing Policy**
Procedure Document Number	**UPOL028**
Version Reference	**Rev.1**
Document Owner	**CEO**
Roles with Aligned Responsibility	**All staff**
Approved By	**Academic Council (AC)**
Approval Date	**2.3.2023**
Date Policy Becomes Active	**1.4.2023**
Revision Cycle	**Annually**
Revision History/Amalgamation History	**Revised for text errors post programme validation**
Additional Information	**N/A**
References/ Supporting Documentation	**UDOC000 UniHaven Quality Assurance Manual Rev 2** **Statutory Quality Assurance Guidelines developed by QQI for use by all Providers (2016)** **Statutory Quality Assurance Guidelines developed by QQI for Independent/Private Providers coming to QQI on a Voluntary Basis (2016)** **Code of Practice for Provision of Programmes of Education and Training to International Learners (2015)** **UDOC005 UniHaven Code of Ethics Rev 1** **UDOC006 UniHaven Supplier Code Rev 1** **UDOC007 UniHaven Employee Handbook Rev 1**