

AP 328 – SOCIAL NETWORKING PROCEDURE

Associated Board Policy: 328.00 – Social Networking Policy for Employees

Procedure Owner: Director for Marketing

Related Procedures: 111.00 Faculty and Staff Code of Conduct, 143.00 Technology Use by Employees, 206.00 Academic Freedom

I. Procedure Scope and Purpose

This procedure will address the use of social media for marketing, employee and public use.

Cowley College recognizes that social networking has three primary functions: to inform, to share and to entertain. The college also recognizes that social media including postings on public forums, blogs, wikis, video, live streams or picture sharing sites, and other interactive sites can be leveraged to build relationships with our constituents, further develop the college's brand, inform the public about educational opportunities and promote the college's community involvement. The practice of social media marketing (SMM) is encouraged and supported. Cowley College also recognizes that proprietary and confidential information about the college, its employees and students must remain protected.

This Social Networking Procedure is not to be construed as any attempt to restrict any employees' legal rights to discuss wages, terms of employment or conditions of work, during non-working hours and in non-working areas. Cowley College recognizes the First Amendment rights as well as the responsibilities of all employees, including faculty and staff, to speak on matters of public concern as private citizens, if they choose to do so, including through social media. In general, for both faculty and staff, any communication via social media that is protected by the First Amendment and that is otherwise permissible under the law is not precluded by this procedure. Cowley College also strongly supports the principle of academic freedom. The college supports the following statement from the Kansas Board of Regents:

"College and university teachers are citizens, members of a learned profession, and officers of an educational institution. When they speak or write as citizens, they should be free from institutional censorship or discipline, but their special position in the community imposes special obligations. As scholars and educational officers, they should remember that the public may judge their profession and their institution by their utterances. Hence they should at all times be accurate, should exercise appropriate restraint, should show respect for the opinions of others, and should make every effort to indicate that they are not speaking for the institution."

This procedure shall be construed and applied in a manner that is consistent with the First Amendment and academic freedom principles.

Guidelines for the use of personal social networking sites or communications by students are outside the scope of this procedure.

The college recognizes the need to manage user-generated content hosted on approved Cowley College social media. See Appendix I: Social Networking Policy for Public Use.

The Internet and the use of social networking have presented challenges and opportunities to Cowley College. While conducting marketing efforts and communications with the public, it is necessary to control the college's branding on various social media as information pertains to the college and its constituents. The college recognizes the benefits of social networking platforms and other internet communications as valuable, supplemental forms of communications for the purposes of recruiting students, enriching academic programs, recruiting athletes, promoting student activities, distributing information about the college's programs and services and networking alumni.

For the purposes of this procedure, social media means any facility for online publication and commentary, including without limitation blogs, wiki's, and social media platforms (e.g. Facebook, Instagram, TikTok, Twitch, LinkedIn, X – formerly known as Twitter, and YouTube). This procedure is in addition to and complements any existing or future procedures regarding the use of technology, computers, e-mail and the Internet. These controls apply to employees who post and contribute to these sites for both professional and personal use. Since user-generated internet communications such as blogging, social web-applications and social media platforms may be created and published by faculty and staff of Cowley College that are not the designated publishers of internet communications for the college, all employees of Cowley College should understand and follow all guidelines that follow.

II. Definitions

Avatar: Graphic representation of a computer user, not necessarily an image of a person.

Blog: Website for posting information on specific topics to a targeted audience. Allows public comments if enabled.

Social Networking: Connecting people with common interests or backgrounds via web-based services. Forms online social communities with specific purposes. Methods include status updates, micro-blogging, instant messaging, polls, etc.

Social Media: Mediums facilitating social networking. Includes websites and technologies like mobile apps.

Social Media Platform: Software allowing community building, user interaction, and content creation. Enables sharing of various content types.

App: Software linking users to goods, services, media, social platforms, etc.

Wiki: Web-based tool for collaborative document development. Allows adding, removing, editing, and changing content. Can link to other web pages.

Pseudonym: Fictitious name or social media profile. Used to prevent connection of personal profile to company credentials.

III. Procedure

A. Appointed Users & Approved Sites

The Administrative Council designates the responsibilities of managing the college's social media presence to the Director for Marketing. The Director for Marketing should be trained to address the risks associated with social media and able to identify and report on issues surrounding the college's social networking involvement. In addition, the Marketing Advisory Council has been formed to provide consultation and assistance to the Director for Marketing in planning, execution and oversight of Cowley College's social media presence.

To execute institutional social media management activities, the Director for Marketing may grant authority to selected college employees or students. These appointed users will be granted access to social media platforms, and will be selected based on their knowledge of the college's programs and activities as well as their knowledge of proper use of the social media platforms.

Written requests from faculty or staff for permission to create, publish and maintain a social media site that represents the college's organizations, athletic programs, clubs, workgroups and academic departments must be submitted to the Director for Marketing. See Appendix II: Application for Approved Social Media. Once submitted, the faculty or staff will execute the following steps:

1. Meet with the Director of Marketing to discuss their goals, target audience(s) and explain the types of content that they want to post (entertaining, educational, inspiring) in a variety of different formats (stories, video, posts, carousels).
2. Discuss the posting frequency and time commitment and use an online calculator to estimate how much time they would need to dedicate on an annual basis to manage their account on a platform of choice based on platform and industry standards.
3. If they find this reasonable, ask them to provide two weeks of ready-to-publish content, and once received we will test it on our flagship accounts

If the purpose of a social media site is to provide instructional materials, the approval of the Vice President of Academic Affairs is also required.

The Director of Marketing and the Vice President of Academic Affairs have the authority to approve or deny the request on a case-by-case basis. If the request is denied, all references to Cowley College must be deleted from all content and publications associated with the social networking site that was denied. Once approved, the employee (hereto after referred to as owner) submitting the request will assume responsibility and liability of the site. If a student is a contributing editor, the responsibility and liability of the site remains with the owner.

The Director for Marketing will provide creative direction towards development of approved social media sites and ongoing content to ensure the Cowley College brand is represented.

Owners may use a pseudonym on social networking sites to protect their real identity. These should be tasteful and used consistently.

Owners of approved Cowley social media Must provide Admin access and/or log in credentials to the Director for Marketing. An exemption is granted to college media outlets (i.e. the Cowley Press Media Group).

If the owner of an approved social media site decides to abandon a site for any reason, the Director for Marketing must be informed.

To monitor effectiveness, engagement and compliance, the Director for Marketing will periodically review approved social media sites. An annual review will be reported to the Marketing Advisory Council.

On an ongoing basis, if published content on approved social media sites is found to

(1) be inconsistent with the Cowley College brand as identified on the college intranet or (2) violate the terms of this procedure, the Director for Marketing will consult with appropriate Administrative Council members to determine a course of action. (See Section H -Administrative Enforcement)

B. Employee Code of Conduct

When engaging in social networking, employees should consider the appropriateness of posts in context with other Cowley College procedures including without limitation:

111.00 Faculty and Staff Code of Conduct, 143.00 Technology Usage by Employees, 206.00 Academic Freedom, 125.00 Use of Tobacco on Campus, 127.00 Drug Free Workplace, 128.00 Harassment and Discrimination, and 140.00 Exemption from Alcoholic Beverages Procedure.

The Director for Marketing will identify authorized representatives who may post and comment on behalf of Cowley College. Employees who are not specifically authorized are not allowed to post in any way that suggests they are doing so on behalf the college keeping the following in mind:

1. Employees must protect the privacy, confidentiality, and interests of the college, its members, and stakeholders, while maintaining professionalism in interactions with competitors.
2. They represent Cowley College online and should exercise discretion and responsibility on personal social media accounts.
3. Before posting on approved sites, employees must assess the suitability of content and its potential impact on the college's reputation.
4. Factors such as academic freedom, position, use of college branding, timing, and equipment usage are considered in evaluating social media use.
5. Discipline may result from defamatory, pornographic, harassing, or discriminatory content, even if posted outside of work hours.
6. Employees are accountable for online content and must refrain from sharing confidential college information without authorization.
7. Any uncertainty about public release of information should be directed to the Director of Marketing.
8. Employees are encouraged to interact with Cowley College's social media within established guidelines and without altering content.
9. Social networking activities should not impede job responsibilities.

C. Confidentiality

Cowley College respects the privacy of its students and strictly follows the Family Educational Rights and Privacy Act (FERPA) guidelines.

No personally identifiable or confidential information will be posted without prior approval of the individual to whom that information applies. A person's date of birth, address and Social Security number, and similar data should never be posted. If the user is able to post and provides this type of information, it should be removed.

An acceptable example of this includes a photograph of a student with an executed media release after being recognized at a college or community function. An unacceptable example would be responding to a student's inquiry for their account balance with that balance.

D. Brand Identities and Standards

An approved social networking publication should adhere to branding standards that ensure a consistent and professional publication of information and images. Social networking content should also reflect the college brand pillars which align with the institutional mission of providing opportunities for learning excellence, personal achievement, and community engagement with the institutional vision of championing the relevance of two-year colleges in higher education through holistic learning and workforce development.

The brand pillar terms are opportunity, family, inclusivity, and community, and align with institutional values. Additional details regarding brand pillars and philosophies can be found on the college intranet.

Other important standards include:

1. Use or alteration of the college logo and trademarks requires permission from the Director of Marketing to prevent misrepresentation and safeguard the Cowley College brand.
2. Authorized representatives may use the logo as an avatar.
3. The Director of Marketing facilitates the creation of logo images, banners, and icons for social media use upon request.
4. Proper grammar and spelling are expected on Cowley College's institutional and approved social media sites to uphold the college's brand and reputation.

E. Copyrights and Intellectual Property

Copyrights and intellectual property laws will be respected by the college and its representatives. The

Director for Marketing reserves the right to determine if the use of copyright material is acceptable according to the copyright laws published by the U.S. Copyright Office and the college's Music Performance Agreements keeping the following in mind:

1. Use of copyright material on Cowley College-associated platforms requires purchase or permission from the copyright owner, or compliance with fair use laws (up to 10%).
2. Quoting external content should be limited to short excerpts, with proper attribution and, when applicable, a link to the original source.
3. Content created for Cowley College social media becomes the college's intellectual property, even if unpublished.
4. Approved social media sites can use Cowley College's official website content without explicit permission. The marketing department provides royalty-free music for employee presentations and videos; requests for use should be directed to the Director of Marketing.

F. Diversity, Discrimination

Readers of the college's social media posts, employees, and students represent a diverse community and include many different customs, values and interests. All posts should be respectful and in no way indicate any discriminatory practice toward anyone on the basis of race, color, religion, sex, national origin, age, disability, veteran status, sexual orientation, genetic information, marital status, political affiliation or other legally protected category.

G. Disclaimers

If a reasonable reader could confuse a personal post with an official statement from Cowley College, a disclaimer should be included. Examples could include posts on a personal or public site concerning matters of public opinion or posts that could be interpreted as professional advice. Any implicit or explicit references to the college should include a statement by the employee identifying themselves as a Cowley College employee and a disclaimer.

Disclaimers to be used in the appropriate context:

1. The opinions expressed are my own and are not necessarily those of Cowley College.
2. Cowley College and I are not providing opinions of law, and these comments should not be construed as legal advice. The opinions expressed are my own.
3. The opinions expressed are my own and are not necessarily those of Cowley College. These comments should not be construed as medical advice.
4. The opinions expressed are my own and are not necessarily those of Cowley College. These comments should not be construed as financial advice.
5. This page is not sponsored by Cowley College. Cowley College does not take responsibility for the contents of this page or any material accessible from this page.

H. Administrative Enforcement

The college has the authority to make use of disciplinary measures up to and including suspension, dismissal or termination, with respect to any faculty or non-student staff member who is found to have made an improper use of social media. The Administrative Council is the final authority on these matters. The existing college grievance and review processes shall apply to any such action. After content is reported to be potentially harmful to the institution, the following steps will occur:

Step 1: The Director of Marketing will reach out to the faculty or non-student staff to request that the content be deleted, unpublished, or unlisted until the subsequent steps can be completed.

Step 2: The content will be reviewed by the Marketing Advisory Committee to determine if the post constitutes improper use using the following ideals: academic freedom principles referenced in section I, the employee's position within the college, whether the employee used or publicized the college name, brands, website, official title or school/department/college or otherwise created the appearance of the communication being endorsed, approved or connected to the college in a manner that discredits the college, whether the communication was made during the employee's working hours and whether the

communication was transmitted utilizing college systems or equipment.

Step 3: If deemed necessary by the Marketing Advisory Committee, the content will be reviewed by Administrative Council to determine if the content in question requires a meeting with the direct supervisor of the employee.

Step 4: If necessary, the Human Resource Director, the direct supervisor and the employee will meet to review the reasoning that the content was deemed improper and also review the contents of this policy and procedure to reeducate the employee. The employee will be asked to take the content down and/or add a disclaimer providing clarification that the expressed opinions in the post are not that of Cowley College. At this time disciplinary action will be implemented if warranted.

I. Reporting

The Director for Marketing will submit a report on at least an annual basis to the Administrative Council regarding the:

1. The effectiveness of marketing through social media
2. Risks (including reputation) that emerge through postings
3. Direct follow-up (if any) to specific postings
4. References to complaints and inquiries that are received

IV. Effective Dates

This procedure first became effective: May 17, 2010

Revised: May 21, 2024

This procedure will be reviewed on an annual basis. Updates will be presented to the Administrative Council for adoption.

V. Signature and Title

This procedure is implemented by: _____ Jennifer Searle _____

Title: _____ Director of Marketing _____

APPENDIX I – Social Networking Policy for Public Use

The procedure below is for the college's website and is for the college's disclosure to the public. Whenever practical, this will also be posted on social media sites.

Cowley College's Social Networking Policy for Public Use

Access to the college's social networking pages may be terminated if a user uploads or otherwise makes directly accessible content which infringes on any other party's copyrights or intellectual property, is considered offensive, off topic, spam, a personal attack, threatening, derogatory, non-constructive, political or religious in nature. This includes text, links, photos and images. The content will be removed upon discovery and users will be warned. Cowley College may remove repeat offenders' access to the Cowley College's social networking sites.

No confidential or personal information should be shared on social networking sites and will be removed upon discovery by the Cowley College. Examples of personal private information are date of birth, address and Social Security number.

Cowley College does not endorse any comments made by its faculty or staff, unless they are an authorized representative of the college. All statements and viewpoints expressed in the comments are strictly those of the commenter alone, and do not constitute an official position of Cowley College unless they are posted by an authorized representative of the college acting in their official capacity.

Employees of the college must identify themselves in all posts. This fact may be material to other readers.

APPENDIX II – Application for Approved Social Media

The purpose of this application is to identify objectives and establish a plan for a Cowley College approved social media site. This should be completed by the owner of the proposed site (must be a Cowley College faculty or staff member).

- I. **Goals:** What are your goals in establishing this site?
- II. **Purpose:** Please describe the function of your desired site. Are you representing a particular group/club/organization, etc.?
- III. **Platform:** What social media platform have you chosen and why?
- IV. **Profile:** What have you selected for the title and URL for your site?
- V. **Administration:** Other than yourself, will you have any other users (please identify them by name)? How will your administrative rights and responsibilities be assigned?
- VI. **Management:** How are you planning on maintaining your site on an ongoing basis? Will you be maintaining the site year round?
- VII. **Budget/Software/Hardware:** Is your site free, or is there a cost to subscribe/participate? What software or hardware is required to maintain the site?
- VIII. **Control:** How do you plan to monitor the effectiveness of your site?
- IX. **Signature and Date:**

Name (Please Print): _____ Date: _____
- X. **Approval:**

Director for Marketing: _____ Date: _____

VP of Instruction: _____ Date: _____
(If necessary)

APPENDIX III – Best Practices for Social Media Management

These guidelines will help authorized users of social media that represent Cowley College make appropriate decisions. Postings may include public forums, blogs, wikis, video or picture sharing sites, and other interactive sites, or in responding to comments from posters either publicly or via email.

I. Establishing a Social Media Account

Whenever possible, accounts established for the purpose of developing Cowley College sponsored social media should be separate from personal social media accounts. These accounts, including user name and password will remain the property of Cowley College and will be managed by the Director for Marketing.

Social media identities, login ID's and user names may not use Cowley College's name without prior approval from the Director for Marketing. Passwords used for any social media account should not be the same password as used to login to college systems.

Owners may choose to use a pseudonym on social networking sites to protect their real identity. These must be tasteful and used consistently. Owners may also choose to use their real name and photograph.

Owners should work with the Director of Marketing in the development of the site and associated profiles to optimize branding.

II. Posting Guidance

Posts should be reviewed prior to sending the content to the social media site. Depending on the content, the post should be reviewed for:

- A. Spelling
- B. Grammar
- C. Content accuracy
- D. Photo releases
- E. Compliance with applicable laws and regulations including those pertaining to human resources and the college's procedure
- F. Social media optimization

If an error is made in a post, correct it as quickly as possible. If a post is modified, make it clear that this was done. If a claim is made that a post was improper (such as the post is that persons copyrighted material or is defamatory comment), address these concerns quickly. It is better to remove it immediately to lessen the possibility of a legal action.

Responses to inquiries or posts should be handled in a timely manner. To facilitate a prompt response, exempt employees are allowed to post after business hours and outside of the work place. Non-exempt employees should only post during normal work hours and using Cowley College computer systems. Owners should use discretion to respond publicly or privately, considering the guidelines of this procedure.

Any photos that could potentially identify the subject should not be published without an executed media release. Public events in which participants are depicted in the background or in

a crowd of people are allowed. To best meet the guidelines established in the Children's Online Privacy Protection Act (COPPA), pictures of minors appearing to be under the age of 13 should not be published in any circumstance without the signed consent of a parent or guardian.

If a student is responsible for generating or posting content to a Cowley College sponsored site, the owner of the site assumes liability for that content. Owners should provide mentorship and training on an ongoing basis to student representatives. It is recommended that content be reviewed by a site owner prior to being posted by a student. Owners assume the risk if a review is not conducted, and should review postings to their site on a routine basis.

III. Disclaimers

When applicable, utilize the disclaimers listed in the Social Networking Procedures.

If a post requires a disclaimer because of the subject matter, but there is insufficient space for the disclaimer, the post should not be made. In its place the post may offer contact information so that a more detailed response may be offered via the telephone, secured email, postal mail, etc.

IV. Review

To monitor effectiveness, engagement and compliance, the Director for Marketing will periodically review approved social media sites. Testing of the college's social media efforts will be conducted on at least an annual basis by the Marketing Advisory Committee. This review will be to ensure compliance with procedures and to ensure that necessary follow-up activities are conducted in a timely manner.

If a site is found to be inactive or ineffective upon review, the Director for Marketing will meet with the owner to develop an agreed upon strategy. If the owner of an approved social media site decides to abandon a site for any reason, the Director for Marketing must be informed in writing.

V. Do's and Don'ts

DO post frequently. Best practices for effective social media marketing is to post three to five times daily. If your page is not updated on at least a weekly basis, you will not engage your followers. If your page goes dormant during certain seasons, notify your followers.

DO use external content. Share news articles relevant to your page, quotes, and retweet or share posts from cohorts. DON'T claim the content as your own, and DON'T repost without verifying the information is from a reputable source.

DO use pictures. Posts with graphics are proven to have higher engagement and reach. However, a variety of content should be used on sites that support multi-media.

DO support institutional marketing efforts. Direct traffic back to www.cowley.edu or www.cowleytigers.com whenever possible and share the content generated through institutional social media sites.

DO follow brand identity standards. Official Cowley College logos are located at <http://www.cowley.edu/cowleyintranet/intranet/marketing/logos.html>. Cowley uses certain PMS (Pantone Matching System) colors. The official PMS colors for Cowley are Black and PMS 021 Orange. Accent colors used are white and PMS 419 Grey. The sole use of these PMS colors is not required. If using these colors, please match the PMS.

DO use proper spelling and grammar. You represent higher education. Enough said.

DO update your profile. Keep it fresh! Update photos and profile information regularly.

DO validate friend/follower requests. DON'T accept just anyone. This is how phishing or catfishing scams start.

DO include the Public Use Policy (Appendix 1) on your page or provide a link to its location on www.cowley.edu.

DON'T make it all about you. Make it about them. Engage your friends/followers by highlighting content about them!

DON'T delete negative posts, UNLESS they violate our Public Use Policy. Address the issue or resolve the problem effectively instead.

NEVER post personal private information, about a friend/follower that has not already been made public. DON'T upload anything you wouldn't want EVERYONE to see. Don't fool yourself into thinking that only your group or followers have access.

VI. Signature and Date:

I have read these guidelines and agree to comply as a condition of my ownership of a Cowley College sponsored social media site.

Name (Please Print): _____

Signature: _____

Date: _____