

Harvard Human

Resources

Guidelines & Best Practices

GUIDELINES FOR USING SOCIAL MEDIA

Harvard University recognizes the importance and benefits of communicating through social media. Social media is a powerful vehicle through which Harvard may disseminate relevant news to the Harvard community, listen to voices and perceptions about Harvard, and connect with our audiences online.

Harvard supports the use of social media to share news and engage in conversations with a variety of audiences around the world, and encourages schools, departments, programs, offices and units to evaluate which, if any, social media platforms are appropriate for supporting their overall communication goals, and how they will handle challenges unique to this new medium.

Social media brings with it changing behavioral norms. These norms include publishing speed, 24/7 connectivity, and a desire for two-way conversations rather than one-way promotion. Navigating the world of social media can also be confusing with constant changes in platforms, technologies, and communities. This can pose a challenge for traditionally organized departments within higher education.

These guidelines are intended to provide individuals with the tools to speak effectively through social media on behalf of the University and its schools and units. However, existing legal responsibilities and University policies remain in place when Harvard employees use social media, and these guidelines do not supplant or restrict any policy in force.

INDIVIDUALS COVERED BY THESE GUIDELINES

Individuals authorized to speak on behalf of the University's Central Administration.

Local leadership is encouraged to adopt and adapt these guidelines, as local needs dictate, for individuals authorized to speak on behalf of individual schools or units.

Note that although these guidelines cover the appropriate use of social media by individuals authorized to speak for Harvard, the use of social media by other employees remains subject to Harvard policies governing employee conduct.

REASONS FOR THESE GUIDELINES

To provide members of the Harvard community with contemporary guidance for using social media to communicate about the University.

To clarify work-related and personal uses of social media.

To clarify the relationship between existing University policies and contemporary uses of social media.

GUIDELINES

These Guidelines will provide information for Harvard community members who are authorized to speak on behalf of the University through social media. Social media forums can include blogs, wikis, social networks (e.g., Facebook, Twitter, YouTube, LinkedIn, Instagram, Tumblr, etc.), personal web sites, and other media yet to be developed in a dynamic communications field.

Community members may find that many of these Guidelines can be helpful when thinking about personal social media accounts. However, these Guidelines are not intended to govern or restrict personal presence on the web, nor are these guidelines intended to restrict employee rights to engage in concerted, protected activity with fellow employees over the terms and conditions of employment (see Staff Personnel Manual for further information about your employee rights under the National Labor Relations Act). Nevertheless, Harvard encourages staff to direct complaints or concerns about your job or working environment to supervisors, local or University administrators and human resources officers or your union representative using established processes.

Similarly, these Guidelines are not intended to abridge or otherwise restrict principles of academic freedom, as described in the <u>University-Wide Statement on Rights and Responsibilities (1970)</u> and the <u>Statement of the President and Deans on University Rights and Responsibilities (2002)</u>.

It is also important to note that this will be a living document, which will reflect Harvard's current needs and adjust to future changes in social media.

GETTING STARTED

First, review the Social Media section at Harvard.edu/guidelines with your local leadership to determine if a social media account is necessary and beneficial for your communications strategy. Creating a social media account requires approval of your local leadership. Next, identify a manager for the social media account. It is important to have at least one dedicated employee whose job responsibilities include overseeing the day-to-day operation of the account, so that the account does not become inactive or inaccessible. This individual should also identify back-up personnel with account access (see Access & Security section below).

For areas within Central Administration: Once a manager is established, but before the account has been created, contact Harvard Public Affairs & Communications (HPAC) Digital Strategy at digitalcomms@harvard.edu to:

- identify the individual's role in managing the social media account
- briefly explain the purpose of the account
- join a community of peers to share social media best practices

Failure to contact Digital Strategy before creating a social media account for a department within Central Administration may result in delay, further review and, in extreme cases, removal of the social media account. Digital strategy will make reasonable attempts to contact local leadership and discuss any issues before taking corrective action.

Account Agreements: Social media services typically require the user to accept Terms of Service or other contractual terms and conditions, which are referred to here as the "account agreement." Account agreements are legally binding contracts. They should only be entered into – whether by "clicking through" or other means – by someone authorized to sign contracts of this sort for your department or unit. Typically, that is the director of the department or unit, or someone specifically authorized by the director to act in this regard. Before entering into an account agreement, the person acting for the department or unit should:

- Make clear in the registration process that the account is being established, and the account agreement is being entered into, by the specific department or unit in question – for example, "the Harvard University Office of Public Affairs and Communications"; and
- Read the agreement both to determine that there are no terms that are unacceptable and to identify any terms that the department or unit will need to take steps to comply with.

Note: Before posting on social accounts that act as the "voice" of a Harvard school, department, or office, please consult with your local leadership on proper messaging, and your account's role in the event of an emergency. Consult the **Transparency** section below for further guidance.

Once a social media account is created and active, email <u>Digital Strategy</u> to add the account to the University's <u>Social Media Directory</u>.

PRINCIPLES

With these parameters in mind, here are some principles to guide individuals authorized to use social media to speak on Harvard's behalf:

Confidentiality – Do not post confidential or proprietary information about Harvard, its faculty, its students, its schools and units, its alumni or its employees.

University and local policies, applicable federal and state laws and regulations such as the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the Family Educational Rights Privacy Act (FERPA) (among others), and your supervisors should be consulted for guidance on restrictions related to the release of confidential information.

Privacy – Do not post anything that you would not present in any public forum. In particular, do not discuss a situation involving named or pictured individuals on a social media site without their knowledge or permission.

<u>Permanence</u>: Remember that whatever you share (either on the University's behalf or your own personal account) may be public for an indefinite period of time, even if you attempt to modify or delete it.

Audience: Be careful what personal information you share online. Many social networking websites are not secured and information is available to anyone with access to a computer and the internet.

Association: Keep in mind that on many social networking websites, your name and photo/icon appear next to the content that you post and will be associated with you or with the University when you are representing Harvard or its schools and units on the web in an official capacity.

"Do No Harm" – Harvard encourages the use of social media to enhance its education and research through collaboration, communication, and promotion of research and programs. You must ensure that your authorized use of social media does not harm or otherwise injure the University, its faculty, its students, its alumni, or its employees.

Here are some examples of situations where using social media can create unintended harm to Harvard or a member of the Harvard community, or may violate laws, regulations or Harvard policies:

<u>HIPAA/FERPA violation</u>: You are a staff assistant in University Health Services, and you use your cell phone camera to take a picture of some colleagues in your workspace and post the picture to the Department's Facebook page. However, the picture contains the image of a student receiving medical services in the background, and some confidential medical documents are legible on your desk area. In this situation, you should have taken steps in advance to prevent the exposure of confidential medical or student information.

Activist Groups: You "retweet" a Twitter message posted by an activist group using your Department's official Twitter account. However, the tweet contains a link to an outside website that disparages University leadership. In this situation, you should have taken advance steps to ensure that material you posted to authorized social media accounts at the University did not contain material that reflects negatively on the University or members of the University community.

Anonymous Comment Boards: You are a senior administrator in one of Harvard's graduate schools. You read a story on The Harvard Crimson website about a new University policy and post an assumed "anonymous" comment questioning the policy's goals. However, you did not realize that you were logged into the Crimson website with your personal screen name when you posted your comment, and subsequent viewers were able to see your name and make assumptions from your position as a senior administrator that your school would not support the new policy. In this situation, you should have taken steps to ensure that you were transparent in stating your authority to speak on behalf of the institution and whether the comments were limited to your personal views on the matter.

Access and Security – As with maintaining any digital property, it is vital to educate yourself and your team on the importance of strong security measures.

<u>Password guidelines</u>: It is important to use strong, unique passwords when establishing social media accounts. Online tools, like <u>The Password Meter</u>, help to show you the strength of a password. Be sure to use a password that does <u>not</u> match other account passwords, like your personal email account.

At the time of publishing Version 2.0 of these guidelines, contemporary best practices suggest changing your access password(s) every three (3) months.

Social media account access: Digital Strategy recommends that a minimum of three staff members have access to the login information and/or administrator access to a social media account. If individuals will have access to your official social account(s) on mobile devices (through apps like Twitter), it is imperative that you can clearly distinguish personal posts from posts to Harvard accounts (see **Personal Responsibility and Liability** section below).

Digital Strategy recommends that individuals use different apps for each account — one for a personal account (if applicable), and one for a Harvard

account. A number of 'accidental' Tweets sent by companies were due to employees mistakenly posting from corporate accounts instead of their own personal accounts. Individuals should always check which social media account they are actively logged into before posting.

Personal Responsibility and Liability – Communications made via social media are not exempt from the expectations and obligations set forth in Harvard's policies or from the laws and regulations that govern personal liability across general and traditional forms of communication. You are responsible for what you post on your own site and on the sites of others, and should only post on behalf of Harvard or its schools and units in an official capacity where you have been explicitly authorized to do so. Nothing in this policy shall be read to restrict your ability to engage in concerted, protected activity with your fellow employees regarding the terms and conditions of your employment.

Here are some practical tips for representing Harvard online and in an official capacity:

Affiliation: Disclose your affiliation if you talk about work related matters that are within your area of job responsibility.

Be sensitive about confidentiality: Do not post confidential or proprietary information about the University, and be aware of non-disclosure agreements.

Accuracy: Take a moment to think about what you are posting (both personally and professionally) before you hit the publish/post button. Think about the content: is it relevant and topical? Are you reviewing and maintaining the content you provide through social media on a regular basis? Proofread for spelling and grammar.

Be aware of what you say and of your connections in social media networks. For example, a comment you make on a colleague's Facebook wall is visible to anyone that person is connected to, but you might not be connected to those individuals and therefore unable to control access or anticipate further distribution of your comments. Be thoughtful and discreet.

Avoid infringement: You should only include in your posts material that you have written or created or that you otherwise have the right to use in this way. For example, be wary about incorporating third party photographs or video that Harvard does not own and that you have not obtained permission to use, because doing so could infringe the third party's copyright. If you wish to point people to third party content, it is generally better to link to it, rather than copying it yourself. Also bear in mind that most social media account agreements require that the account holder grant the service a broad license to redistribute content posted by the account holder. Material you have created, as well as third party material you have incorporated, may end up being used in ways you did not originally foresee.

Transparency and Endorsement – To both protect the Harvard name and build trust with users, social media such as blogs, Facebook pages, Twitter feeds, etc. that are established on behalf of Harvard entities should be explicit and accurate regarding their relationships with Harvard. As a social media representative of the University, you should clearly state your position within the University and the limits of your authority to speak on behalf of the University. Similarly, in keeping with Harvard's non-profit status, social media should not be used to promote or

transact any third-party commercial business, including revenue from advertising, nor should any staff with administrative responsibilities realize any personal monetary profit from Harvard-related social media.

Your social media profile should include descriptions of the mission/work of the Harvard entity, as well as the kinds of information one can expect to receive by "liking" or "following."

"Liking" or "following" sites or feeds should reflect the opinions of Harvard. Refrain from "liking" or "following" sites or feeds for personal interest or communication.

When sharing information from other users via links or "retweeting," making sure that the information is relevant to the audience.

When sharing via links, "retweets" or blog posts, avoid promoting vendors or other commercial operations not related to Harvard entities or activities and bear in mind that under the primary principle of its Endorsement Guidelines, Harvard (including its schools and units) does not endorse the products or services of third-parties with which it has, or has had, business relationships.

Use of the Harvard Name – In meeting the requirements set forth in the University's policy on The Use of Harvard Names and Insignias, there are unique challenges associated with using the Harvard name in social media, such as the potential need to (accurately) abbreviate the name of a Harvard program or entity for a Twitter account. When addressing challenges of this nature, please keep the following points in mind:

When bearing the Harvard name, the name of a Harvard Program or entity must always accurately represent the program or entity and its relationship with the University – and, by extension, any variations of the name of a Harvard Program or entity, including abbreviated names, must also serve as accurate representations of the program or entity and its relationship with the University.

Use of the Harvard shield is not permissible as a profile photo or on a blog unless express written permission is granted by the Harvard Trademark Program and neither is the use of a School or Unit shield (or logo) without the express written permission of the School or Unit to which the initiative/office/department reports.

The Harvard Trademark Program administers Harvard's "Use of Name" policies, which were established by the University to ensure that Harvard's various trademarks (names and insignias) are used appropriately and accurately by the Harvard community and in accordance with the principles and standards contained in the policies. Questions about the policies should be submitted to the Trademark Program's email account at trademark program@harvard.edu. In addition, HPAC Digital Strategy can assist with social media naming conventions; contact digitalcomms@harvard.edu and review harvard.edu/guidelines for further assistance.

Accessibility - Harvard University is committed to ensuring effective access to communications materials for all members of the University community, including individuals with disabilities.

Individuals who are blind or have low vision or other disabilities may confront significant barriers when accessing certain information through social media. Accordingly, individuals that maintain social media on behalf of the University should take steps to reduce barriers to access for individuals with disabilities.

For example, screen reader compatibility, captioning and descriptive tags on images can help reduce barriers to accessing information for individuals with disabilities. Most major social media platforms (including Facebook, YouTube and Twitter) provide access solutions for individuals with disabilities, including application programming interfaces (API) that enable the ability to create applications that enhance accessibility of content.

It is important, however, to keep in mind that APIs do not eliminate or resolve all accessibility challenges. For additional and more current resources on improving access to Harvard-related social media and Harvard websites for individuals with disabilities, please contact Digital Strategy.

For Recruiters – While Social Media continues to evolve and develop as an effective tool for advertising positions at the University and for recruiting candidates, it does not replace or otherwise eliminate the need to use the University's existing recruitment systems and processes for posting positions, collecting applications, conducting background checks, making offers of employment and other related activities. In addition, Social Media should be used in keeping with the University's affirmative action obligations.

All applicants must apply through the ASPIRE system in order to be considered an applicant for a job. Social Media cannot replace the University's existing applicant tracking system.

Offers of employment should only be extended through existing and accepted processes, and should not be communicated through social media.

Incidental Personal Use – Harvard understands that employees utilize social media and the web for personal matters in the modern workplace. While Harvard reserves the right to monitor use of its computer systems, employees may engage in incidental personal use of social media in the workplace so long as such use does not consume significant time or resources, interfere with operations and productivity, and does not violate other University policies (see RELATED POLICIES AND REGULATIONS, below) or the policies of an employee's local unit. A disciplinary or other review may be initiated if an employee's online activity violates law or Harvard policy, or if the employee's non-official or unauthorized online activity otherwise subjects the University to liability for such acts.

<u>Clearly identify your institutional communications</u>: In some cases, individuals maintain several social media outlets, with some for personal use and others for official Harvard business. Individuals must use care to separate the two uses and avoid using Harvard outlets to distribute personal communications. Unless specifically authorized to speak on behalf of Harvard or a University department, school or unit, you must state that the views expressed are your own. On Twitter, for example, you might consider

using a disclaimer in the account profile's "Bio" section: "Tweets are my own and do not reflect the views of my employer."

RELATED POLICIES AND REGULATIONS

Staff Personnel Manual

Important Notice About Employee Rights Under the National Labor Relations

Act (external link to National Labor Relations Board website content)

Conflicts of Interest or Commitment (Staff)

Information Security and Privacy Policy

Reaffirmation of the University's Policy Concerning Affirmative Action and

Equal Employment Opportunity by the President and Fellows of Harvard College

<u>Jollege</u>

Procedures to Resolve Work-Related Problems

Office of the Vice Provost for Research - Policy & Compliance

Information Privacy

Harvard Human Resources (HHR) - Practitioners' Toolkit

Pre-Employment Screening

Office of the Provost - Policies and Guidelines

Enterprise Information Security Policy

Endorsement Guidelines

Federal Trade Commission (FTC) - Revised Endorsement Guides

(16 CFR Part 255) - Frequently Asked Questions

The use of Harvard Names and Insignias

Use of Harvard's Name in Internet Addresses, Domain Names, Web

Sites and Other Electronic Contexts

Sites and Other Electronic Contexts

Domain name request form (for harvard.edu)

Email Alias Request Form (for @harvard.edu)

University Faculty Financial Conflict of Interest Policy

Harvard Privacy Policy (Information Security & Privacy)

Academic Freedom

University-Wide Statement on Rights and Responsibilities (1970)

Statement of the President and Deans on University Rights and

Responsibilities (2002)

Harvard Public Affairs & Communications (HPAC)

Social Media Guidelines

Office of the General Counsel (OGC)

Copyright Resources

Other related local policies

Harvard Business School

HBS Social Media and Blogging Policy (access restricted)

ADDITIONAL RESOURCES

Have questions? Contact the following offices with questions about these guidelines and best practices.

Local Human Resources representatives

Office of Labor & Employee Relations

University Place, Suite 480 South (124 Mt. Auburn St., Cambridge) (617) 495-2786

http://hr.harvard.edu/labor-and-employee-relations-department

Contact Information for Campus Unions

http://hr.harvard.edu/campus-unions

Office of the Provost

Individual School Contacts for Name Issues

Harvard Public Affairs & Communications

http://news.harvard.edu/gazette/contact-us/

Digital Strategy

Maintains the University's <u>Social Media Directory</u> and can provide guidance on best practices for social media account maintenance and interactions. Contact HPAC Digital Strategy at <u>digitalcomms@harvard.edu</u>.

Harvard University Information Technology (HUIT)

If you have security concerns, questions about publishing Harvard information, or questions about the definition of 'confidential information' please contact the HUIT Security Unit at ithelp@harvard.edu or (617) 495-7777.

Harvard's Center for Workplace Development

Harvard's Center for Workplace Development (CWD) offers a wide range of courses designed to increase your knowledge, skills, and overall success, including frequent courses on social media best practices for personal and professional use. Access the full roster of CWD courses by clicking the link above or by visiting http://hr.harvard.edu/files/humanresources/files/cwd_courses.pdf. CWD also produces a series of Eureka online training modules, including this 10-minute tutorial on these Guidelines for Using Social Media. Access the Eureka tutorial by clicking <a href="https://herea.com/herea

What's New in Version 2.0 (effective August 18, 2014):

- 1. The Guidelines now rise to the level of Policy for Central Administration and are recommended as a basis for creating local social media use policies.
- 2. New sections:
 - a. Getting Started (p. 2): standardizes protocols for opening new social media accounts
 - b. Access and Security (p. 4): strengthens guidance on maintaining secure communications via social media
 - c. Avoid Infringement (p. 5): guidance on avoiding copyright issues
- 3. Revisions:
 - Use of Harvard Name (p. 6): Trademark Office and legal input to align Guidelines with related policies

b.	Incidental Personal Use (p. 7): strengthens advice on incidental use in the workplace and recommended steps to avoid conflicts