UNIVERSITY OF HOUSTON SYSTEM ADMINISTRATIVE MEMORANDUM

SECTION: General Administration

NUMBER: 01.H.01

AREA: University Marketing, Communications and Media Relations

SUBJECT: Social Media Policy

1. PURPOSE

The University of Houston System and its institutions ("University") encourages the use of social media to connect with others, including students, employees, alumni, and fans of the University. Social media profiles are excellent venues to communicate and encourage engaging discussions about University events, accolades, organizations and people. This policy defines the rules and procedures for the use of Official University Social Media Profiles (as defined in Section 3.3) to ensure that University-sponsored social media profiles are both legal and in compliance with University policies.

2. POLICY

- 2.1. All Official University Social Media Profiles must adhere to state and federal laws and regulations and University policies. Only public information may be posted by Official University Social Media Profiles. Official University Social Media Profiles must not contain sensitive personal information as defined in <u>Texas Business and Commerce Code Chapter 521</u>, or other confidential information as defined by the Family Educational Rights and Privacy Act (FERPA), Health Insurance Portability and Accountability Act (<u>HIPAA</u>), and National Collegiate Athletic Association (<u>NCAA</u>) Regulations, as applicable. Any sensitive personal information or other confidential information posted by an Official University Social Media Profile must be removed by the profile administrator as soon as practically possible upon discovery to ensure that confidential information policies referenced in <u>SAM</u> 01.D.06 are followed.
- 2.2. The University is committed to fostering an educational environment that allows for freedoms of speech and expression in accordance with the First Amendment to the U.S. Constitution. However, the University will not tolerate any activity or posting on an Official University Social Media Profile that loses First Amendment protection such as any unlawful, defamatory or obscene (as defined by Texas and federal law) activity or posting. The University reserves the right to remove any such posting without notice. Moderation of content on Official University Social Media Profiles shall comply with guidelines posted on the University's <u>Social Media Guidelines website</u>.

- 2.2.1. Profile administrators must consult with the Office of General Counsel before taking any action against content on Official University Social Media Profiles, including content that the First Amendment may not protect. The University also reserves the right to refer Social Media activity to the applicable Social Media platform and/or authorities for appropriate action.
- 2.3. All Official University Social Media Profiles must respect intellectual property rights, federal <u>Copyright law</u> and University policies.
- 2.4. Employee Use When using Social Media as a part of their official duties and/or when presenting oneself in Social Media settings as a University representative, employees must comply with applicable University policies governing employee behavior and acceptable use of electronic and information resources.
- 2.5. Primary administrative rights for Official University Social Media Profiles will be assigned only to University employees. Official University Social Media Profiles will have a minimum of two administrators that have access to the profile's credentials to ensure that the profile is consistently managed. Should one administrator be unavailable, the second assigned administrator will manage the profile. At least two administrators should be permanent University employees. The email address on file with these accounts must be a shared department email address. For more information on complying with these guidelines, please visit the University's Social Media Guidelines website.
 - 2.5.1. For Social Media platforms that do not have passwords for each profile, such as Facebook and LinkedIn, the list of administrators with access should be reviewed at least once a year by the business owner (program, college, division, etc.).
- 2.6. All content on Official University Social Media Profiles must comply with <u>1 TAC</u> <u>206</u> and <u>1 TAC 213</u> to ensure that the information is accessible and usable by people with the widest range of capabilities possible. Accessibility requirements apply to the content on the social media tool, not the features of the tool. It is the responsibility of the Official University Social Media Profile administrator to ensure social media content is fully accessible. Accessibility practices should comply with the guidelines posted to the <u>Social Media Guidelines website</u>.
- 2.7. Records Retention Content posted by the University or the public on an Official University Social Media Profile is a state record and is subject to the State of Texas Records Retention requirements unless it is content duplicated from another source or transitory information of temporary usefulness. University profile administrators are responsible for ensuring compliance with all applicable record retention requirements for content posted on their profiles.
- 2.8. Do not make any statements via Social Media on behalf of the University. Only link to or share official University statements.
- 3. DEFINITIONS

- 3.1. <u>Social Media:</u> Forms of electronic communication (such as websites for social networking and microblogging) through which users create online communities to share information, ideas, personal messages and other content (such as photos or videos). Examples include, but are not limited to: Facebook, Twitter, Instagram, LinkedIn, YouTube and other similar platforms or applications.
- 3.2. <u>Copyright:</u> A form of intellectual property law protecting original works of authorship including literary, dramatic, musical and artistic works. A copyright does not protect facts, ideas, systems or methods of operation—only the way these objects may be expressed.
- 3.3. <u>Official University Social Media Profile:</u> A Social Media profile, page, account or community which represents a University college, department or official program. Any other Social Media profile, such as a student organization profile, a student's personal Social Media profile or an employee's personal Social Media profile, is not subject to this policy.

4. PRODEDURES

4.1. Branding for University Social Media

The branding, visual identity and configuration of all Official University Social Media Profiles should comply with the guidelines posted to the <u>Social Media</u> <u>Guidelines website</u>.

- 4.2. Content for University Social Media (does not include photo policies)
 - 4.2.1. Administrators of the profile, when in need to request authorization to hide or delete any material in violation of this policy, or to block a user from a profile, should contact the University's division or department of marketing and communication responsible for managing the institution's primary channels, who will consult with the Office of General Counsel.
 - 4.2.2. Administrators should only use Official University Social Media Profiles for University purposes and should not engage in personal or private activity under the guise of any Official University Social Media Profile.
 - 4.2.3. Only public information may be posted on Official University Social Media Profiles. Official University Social Media Profiles should not be used for the communication of business transactions, including credit card or payment information, educational records protected by <u>FERPA</u>, medical records protected by <u>HIPAA</u>, or any other confidential information.
 - 4.2.4. Social media content on an Official University Social Media Profile may sometimes include photographs, audio or video. Profile administrators are responsible for ensuring that Social Media content posted on the profile is not infringing on the intellectual property and privacy rights of others. Intellectual property rights of content shared by the public will be governed

by federal copyright law, the terms of service of the Social Media provider, and/or University policies.

- 4.2.5. Administrators are encouraged to link to source material whenever possible. This activity will reduce the spread of misinformation and drive traffic.
- 4.2.6. Administrators of University Social Media Profiles should adhere to the policies for the Social Media platforms in which they are participating. These policies are constantly changing, and it is the administrator's duty to stay up to date.
- 4.2.7. All graphics, images and videos posted by Official University Social Media Profiles must comply with any approved applicable University branding standards.
- 4.3. Photos for University Social Media
 - 4.3.1. If the administrator intends to publish a photo on an Official University Social Media Profile in which the subject can be recognized, they must comply with the University's <u>Photo Release Guidelines</u>.
 - 4.3.2. When posting non-student photos, it is recommended that the administrator obtain written permission. This written permission can be accomplished in an email or with the photo release form that is referenced in the University's <u>Photo Release Guidelines</u>.
 - 4.3.3. Administrators will not share any restricted-use photos.

5. REVIEW AND RESPONSIBILITY

Responsible Party: Vice Chancellor for Marketing and Communications

Review: Every five years

6. APPROVAL

Approved:

/*Lisa Holdeman*/ Vice Chancellor for Marketing and Communications

/Raymond Bartlett/

Senior Vice Chancellor for Administration and Finance

/*Renu Khator/* Chancellor

Date:

October 11, 2023