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# Guidelines for the use of social media at Luleå University of Technology

## 1 Introduction

There is an ongoing development of social media, new functions are added and new media emerge. Dialogue and interaction are central features. By using social media, Luleå University of Technology has the opportunity to bring the organisation closer to the surrounding world and to create new relations.

At the same time, the University, as a public authority, must consider the rules and regulations with which it has to comply, and adjust its use of social media accordingly. The University must also make efforts to present itself as a serious and reliable actor in this context.

There are numerous provisions that govern the communication in social media and must be observed, regardless of which channels the University choose to communicate by. The provisions include the following:

- The Freedom of the Press Act (1949:105).
- The Swedish Instrument of Government (1974:152).
- The Fundamental Law on the Freedom of Expression (1991:1469).
- The Archives Act (1990:782).
- The Administrative Procedure Act (2017:900).
- The Publicity and Secrecy Act (2009:400).
- The General Protection Regulation (GDPR) (EU) 2016/679 and the Act containing supplementary provisions to the EU General Data Protection Regulation (2018:218).
- The Bulletin Board System Act (1998:112).

## 2 Purpose

Ultimately, the use of social media at Luleå University of Technology is a question of disseminating knowledge and information about our research, education and other University news in the channels where the recipients are found. There is a great public interest in the University as a higher education institution. By being present in social media, we improve our services provided to students and other important target groups. The

University thus takes a favourable view of communication in social media to improve the activities and strengthen the University trademark.

The purpose of these guidelines is to provide support to management and employees, who in the course of duty use social media and thus represent the University, on how they should act when using social media and how the presence of the employees in social media may have an impact on University activities and trademark.

### 3 The social media concept

The term “social media” is an umbrella term for services and websites that are based on dialogues and enable social interaction between the users. The services offer efficient opportunities to communicate and a fast and simple way to establish relations and share information with employees, students and the surrounding world. The users themselves produce the content and comments on the content in an interactive dialogue.

Social media include social networks including Facebook, Instagram and LinkedIn; micro blogs like Twitter; and video sites such as You Tube and Vimeo. Other examples of social media are chats, for instance, Messenger, Hangouts and WhatsApp; blogs, wikis and many more.

### 4 The duty of good faith

Implicit in the employment is something that can be called “the duty of good faith”, which means that the employee must safeguard the interests of the University and must not cause damage to the University.

The duty of good faith also applies to publishing in social media, irrespective of whether the employee acts in their official capacity or as a private individual. In particular, there are high demands placed on managers and those representing the University in other ways.

The duty of good faith is not superior to the freedom of expression but constitutes a fundamental standard for an appropriate behaviour of the employees.

### 5 Freedom of expression and whistleblowing

Public sector employees, as well as other citizens, have the right to freedom of expression, that is, they have the right to provide information and express thoughts, opinions and feelings in speech, writing and images or by other means.

Whistleblowing is part of the principle of public access to official records and includes the possibility for employees to, with impunity, forward typically confidential details to be published in mass media. However, whistleblowing is subordinate to secrecy provisions, which means that if an employee would whistle-blow in an incorrect way, they can be held responsible for violation of the professional secrecy.

Whistleblowing does not ensure a general right to sharing sensitive details in social media as there are others than journalists that read these posts.

## 6 Conduct on social media

All employees who publish material in social media must comply with current provisions, the duty of good faith, the E-delegation's Guidelines for Social Media, and the University's internal rules, regulations and guidelines. Furthermore, the employees must observe the following:

- Social media to be set up must have an explicit purpose and a clear connection to the University activities, strategy and values.
- The University logotype and the web address [www.ltu.se](http://www.ltu.se) are to be included and the graphic profile must be observed whenever possible, to clarify who the sender is.
- Relevant contact details of the University must always be indicated.
- Social media cannot replace the University's website as the official external information channel presenting facts and news about the University and its activities.
- The employees who are active in our social media represent the University and should strive to ensure that the surrounding world considers the University to be a single and serious organisation. Honesty and a sense of responsibility build trust in both the employees and the University.
- Posts that the employees publish in the University's social media must be correct and reliable. Common sense is a catchword and the employees should nurture constructive communication and build relations characterised by mutual respect. The tone of the posts should be kind, and the comments should be sincere and well formulated.
- It is important that the employees are well versed in the subject on which they comment, and that the comments are of high quality. Speculations and irony must be avoided.
- An employee, as a representative of the University, who publishes incorrect information or advice must take action and immediately remove or correct the published material. The incorrect post must be archived before it is removed. In accordance with the Tort Liability Act (1972:207), chapter 3, section 3, liability for damages may be relevant if an employee provides incorrect information and advice.
- Before material is published in social media, intellectual property rights, such as copyright, trademark rights, patent rights and similar, must be secured.
- Photos in which individuals may directly or indirectly be identified may be published and used only if they do not offend an individual. To the extent possible, consent must be obtained before publishing. It must be taken into account that individuals with protected personal data may suffer serious injury from publications of pictures on the internet.

## 7 Publishing personal data

Besides offering education and conducting research, the University also has the obligation to collaborate with the surrounding world and communicate its activities via its website, blogs and presence in social media. It is recommended to avoid publishing personal data whenever possible.

Published personal data should include as few necessary details as possible to fulfil the purpose of the article or post. Any other personal data not strictly necessary must be avoided.

### Example:

If a photo from a meeting is to be published, and the article or post does not require the names of the people in the photo, the user should not name them. In this way, the minimum amount of personal data is processed and stored. However, note that the people in the photo still must consent to the publishing.

The publishing of personal data requires a legal basis. The most common legal basis for the University activities is public interest, that is, to communicate what the University does, to present current research and general University activities. The personal data is limited to what is necessary, for example, names and photos, if any, and contact details.

If there is no public interest or if other personal data is published besides name and contact details, and photos, if any, the person whose personal data will be processed must consent in writing (for example, via e-mail) to the processing. It must be specified which data is to be published in the post and which rights the person has (among them the right to have their consent revoked and their data erased).

Remember that publishing of personal data must comply with the fundamental principles in the data protection legislation. An assessment must be made for each individual case and all circumstances must be considered.

The assessment must be based on the following:

- A clear purpose and aim of the publishing.
- Which data is published.
- Where the data is published.
- The length of time that the data is published.
- The context in which the data exists.
- The dissemination that it has had or risks having.
- What the processing may result in.

The user must not publish sensitive data, as the level of protection of such personal data is considered to be higher. By law, this kind of data may only be processed in exceptional cases.

Under no circumstances may the following data be published on the Web or in social media:

- National identification number or employment number.
- Sensitive personal data (racial or ethnic origin, political opinion, religion or philosophical beliefs, union membership, and details on health status or sexual orientation).

- Information covered by confidentiality or obligation to observe secrecy.
- Integrity-sensitive information, for example, details about personal conditions of an individual or details that have a close connection with the private life of the individual. Details on infringements of law.

Persons having discovered that personal data has been published in an incorrect way on the Web, must immediately notify the data protection officer. Information that incorrectly has been published on the Web must be rectified or removed immediately.

If you have any questions related to personal data, please contact the University's data protection officer.

## 8 The University's social media

The University's social media comprise all social media and accounts created to be used in the course of duty, that is, central and specific university-wide social media.

The University is obliged by law to secure the access to all such accounts.

### 8.1 List of the University's social media

The University must have a list of all University engagements in social media. The list enables the University to supervise its actions in social media and to facilitate the search for official documents in accordance with the Archives Act and the Publicity and Secrecy Act.

All University engagements must be added to the list. The list will indicate the person responsible for the social medium, their substitute and both persons' contact details, the web address of the account, the purpose of the social medium and the target group for which the service is intended.

It is the responsibility of the head of Communications Office to ensure that the University employees know about the obligation to add University engagements to the list and that the list is updated to the required extent.

### 8.2 Central university-wide social media

Central university-wide social media are accounts related to the social media used by the University for general communication and interaction.

To represent Luleå University of Technology in important social media, for example, on Facebook and Twitter, the employee should have been given a specific task by the web master or by another member of staff, both by delegation of the Head of Communications Office.

### 8.3 Specific university-wide social media

Specific university-wide social media are accounts created by the employees to be used for a specific purpose related to their work.

Employees creating specific social media in the course of duty must add them to the University's list of social media.

## 8.4 Employees' user accounts

The term 'employee user account' includes individual accounts associated with University employees. These accounts are private and not part of social media belonging to Luleå University of Technology.

The employees must specify whether their statements are made on behalf of the University in the course of duty or are private statements. It is not permitted to use the University logotype and trademark in private contexts. The employees must use their private e-mail address when they register or in other ways identify themselves as a private individual on social media.

The private and the professional role become more and more intertwined. Therefore it is important that users learn about how social media work. They must also be aware of the fact that statements, regardless of whether they are private or related to work, are easily associated with the organisation by which the users are employed and represent. Therefore, employees must also strive to act in a confidence-building, respectful and loyal manner in their dialogues in social media, both in their official capacity and as a private individual. This to ensure that the University is considered a professional actor by the surrounding world.

## 9 Supervisory responsibility

The University must supervise its social media, in accordance with the Personal Data Act and the Bulletin Board System Act (1998:112). With this responsibility comes indemnity liability, which means, among other things, that published material must be removed and prevented from further spreading if the material includes the following:

- Agitation.
- Agitation against an ethnic group.
- Child pornography.
- Unlawful depiction of violence.
- Copyright infringement or infringement of those rights protected under the Copyright Act, chapter 5.
- Posts that entail crime or incitement to commit a crime.
- Offensive personal details.
- Confidential information.

Inappropriate posts must be removed as soon they are discovered, but no later than 48 hours. The posts must be saved and archived before being removed since they are official documents.

## Administrative management of the information flow in the University's social media

Responsible unit  
Communications Office  
Administrative officer  
Henrik Sundberg

Governing  
Date  
2018-05-21

Reg  
LTU-1595-2018

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Luleå University of Technology must notify the public about the fact that the posts will be official documents and what this means. Furthermore, the University must inform the public about which details must not be published and that unauthorised comments will be erased.

Official documents must be entered in the official records or kept in order in other ways, which requires a daily control of posts in the University's social media.

### 10.1 Publicity

The principle of public access to official records includes, among other things, everyone's right to request official documents. The public access may only be limited by confidentiality, as prescribed in the Publicity and Secrecy Act. Official documents in social media include the following:

- Posts that employees publish in the University's social media.
- Posts that persons outside the University publish in the University's social media.

### 10.2 Registration, filing and appraisal

Posts and comments listed below must be entered in the official record and filed:

- Posts that include confidential details.
- Posts that result in actions within the University.
- Posts that are relevant for the University activities.
- Posts that add factual information to a matter or that refer to an ongoing matter.

Documents that do not need to be entered in the official record, that is, documents of no or small importance, and will soon be erased must be kept in order. It must be indicated whether they have been produced by the University or sent by someone else and when this has happened.

Those who have established a social medium are responsible for ensuring that the posts are entered in the official record, filed, kept in order or erased on a regular basis in a proper way.

Provisions on information storage and filing as well as erasing are written by Archives and Registry and decided by the Vice-Chancellor.

### 10.3 Service obligation

The University is obliged to provide services to private individuals according to the Administrative Procedure Act. The service obligation means that matters and questions addressed to the University in the University's social media must be handled as soon as possible.

Matters containing details on personal or financial circumstances are not to be handled in social

media but must be referred to other channels.

## 11 Follow-ups and monitoring

Communications Office is to supervise the University actions in social media and to carry out an annual follow-up and evaluation of what the University actions in various social media look like. This is to be compiled in a written report produced by the web master by delegation of the Head of Communications Office and be forwarded to the University director.