

## 1. PURPOSE

This policy ensures that all interactions through social media and on behalf of The American University of Paris (AUP) represent the University's best interests. It defines the rules and procedures for the use of official University social media accounts to ensure that University-sponsored social media is both legal and in compliance with University policies.

## 2. WHO IS AFFECTED BY THIS POLICY

AUP employees, individuals representing the University in an official capacity, individuals with access to the University's official communication channels, AUP current and prospective students, alumni, parents and external users if they are communicating with the University via social media or through an official University social media account .

## 3. POLICY STATEMENT

AUP encourages the use of social media to connect with others – including prospective students, current students, employees, alumni, friends of the University, outside constituencies, and the University itself – to interact, ask questions and discuss topics relevant to the University. Social media are excellent venues to communicate and encourage engaging discussions about University current events, issues, accolades, organizations and people.

### 3.1. No expectation of privacy

Users should have no expectation of privacy with regard to any social media activity conducted using AUP's technology resources and should use personal accounts for any non-work-related social media activity and avoid using aup.edu e-mail accounts for such activity. Users should not use AUP's technology resources for any matter that users desire to be kept private or confidential from the University.

In addition, many social media activities are uniquely public and may be accessible by anyone, even if they are conducted using personal technology resources. Because of the high likelihood that social media activity will be viewed by co-workers, alumni and others, all users must act responsibly and exercise care to ensure that their activities are consistent with AUP's policies.

### 3.2. Review of content posted to social media

AUP reserves the right to monitor and review content posted through social media accounts using AUP's technology resources.

With respect to any social media accounts maintained and/or activities conducted in the name of AUP, including without limitation any and all sites and activities associated with official University social media accounts, whether or not such site or activity involves use of AUP's technology resources, AUP shall have the right to remove or cause the removal of any content (or portions thereof) for any reason, including without limitation content that AUP, in its sole discretion, deems false, misleading, obscene, defamatory, libelous, tortious, degrading, threatening, harassing, hateful, insulting, inflammatory, offensive, unlawful, fraudulent, discriminatory, invasive of the privacy or publicity rights of others, in violation of intellectual property or other proprietary rights, injurious, unlawful, illegal or otherwise in violation of this policy.

### 3.3. Creation of social media accounts that use the AUP identity

When requesting approval for the establishment of official University social media accounts, all applicants shall submit the following information to the Director of Communications and Outreach and Outreach: the account name, the desired platform, the account purpose and goals (e.g., promotion of a specific program or department, communicating with students

or alumni), a general description of content intended to be shared, and the designated University administrator of said account (i.e., the primary person responsible for maintaining and monitoring the site(s) to be associated with the official University social media account to ensure compliance with this policy) along with his or her contact information.

The Office of Communications and Outreach shall maintain a list of official University social media accounts and shall have the authority to revoke authorization for use of an official University social media account at any time and for any reason. AUP reserves the right to take the necessary actions to address inappropriate usage of its name or logo in the creation and usage of social media accounts.

### **3.4. Personal use of social media**

Even when a member of AUP's community is personally engaging on social media, an AUP affiliation on a personal profile has the ability to affect the University as a whole. If a user identifies his/her affiliation with AUP in a profile or comments, others will naturally associate the user with the University. Users should always think before posting, be civil to others and their opinions, and refrain from posting personal information about others without permission. Personal use of social media should be consistent with the Information Security, Intellectual Property, and Privacy policies of the University. In addition, any personal profiles should include a statement indicating that the views do not constitute official statements on behalf of AUP. Finally, except as permitted by law, no employee is permitted to use AUP's marks or emblem without the prior approval of the Director of Communications and Outreach and Outreach.

### **3.5. Protection of student education and medical records**

Any users of AUP social media must:

- Follow all applicable federal and University laws, faculty and staff handbooks, regulations and policies, such as FERPA and HIPAA. Any content and/or online activity created by a poster or site moderator that violates these ordinances, or contains/leads to the release of a student's private personal information, is strictly prohibited and should be removed.
- Protect confidential information by following privacy laws, especially FERPA. The Family Educational Rights and Privacy Act (FERPA) (20 U.S.C. § 1232g; 34 CFR Part 99) is a federal law that protects the privacy of student education records. The law applies to all schools that receive funds under an applicable program of the U.S. Department of Education. AUP employees or providers of work for AUP may not engage in any conversations or post any information through social media regarding student records. Some examples of student records include names, admission status, GPA, Social Security Number and any/all other information that would be covered by FERPA. AUP employees may assist students requesting help by first directing them to a secure discussion platform, such as phone or email.
- Protect confidential medical records. As specified by HIPAA: "The Privacy Rule protects all 'individually identifiable health information' held or transmitted by a covered entity or its business associate, in any form or media, whether electronic, paper, or oral." Examples of protected information include: "...the individual's past, present or future physical or mental health or condition, the provision of health care to the individual, or, the past, present, or future payment for the provision of health care to the individual, and that identifies the individual or for which there is a reasonable basis to believe can be used to identify the individual."

### **3.6. Branding for Official University Social Media Accounts**

Any official University social media account must comply with any approved applicable University branding standards. The social media icon and/or profile image can be an image related to the administrator's entity, an approved logo for that entity, or another appropriately branded image.

No official institutional representation via social media is permitted unless such representation is authorized by the Director of Communications and Outreach. Specifically, the establishment of any official University social media account must be approved, in writing, in advance by the Director of Communications and Outreach to ensure consistency and compliance with the University's Brand Guidelines and other applicable policies of the University.

### **3.7. Responsibility for Content**

Links posted on AUP social media channels should not be construed as endorsement of organizations, entities, views or content contained therein. Individuals are responsible for the content they view and post on any of AUP's social media sites. By sharing content on any of the official University social media accounts, individuals understand and acknowledge

that this information is public and that AUP may use this information for promotional purposes. Note that other participants may use posted information beyond the control of AUP. All official University social media accounts must respect intellectual property rights, copyright law and University policies, including the policy on Freedom of Expression (AA012EN).

### **3.8. Prohibited Social Media Activity**

To the full extent permitted by law, the following conduct is specifically prohibited, and constitutes a violation of this policy. This policy holds whenever a member of the AUP community participates in a social media activity, whether or not such activity involves use of AUP's technology resources or personal technology resources and/or takes place during work or personal time:

- 3.8.1. Posting content that reveals the University's trade secrets and other confidential/proprietary information, or otherwise commenting on said information. The University's trade secrets and other confidential/proprietary information must be treated accordingly and may not be jeopardized through the use of social media.
- 3.8.2. Use of the University's logos, brand names, taglines, slogans or other trademarks/service marks of the University, except where prior written permission from the Director of Communications and Outreach has been obtained. If permission is obtained, all such uses shall comply with the University's brand visual guidelines and other applicable policies; failure to comply shall constitute a violation of this policy.
- 3.8.3. Posting personal information about other individuals that may have been obtained through working at or in association with the University.
- 3.8.4. Posting content in violation of applicable laws, including without limitation posting content that includes educational records, in violation of the Federal Education Records Protection Act (FERPA).
- 3.8.5. Posting content that is false, misleading, obscene, defamatory, libelous, tortious, threatening, harassing, abusive, hateful, racially or ethnically disparaging, inflammatory, offensive, fraudulent, discriminatory, invasive of the privacy or publicity rights of others, or otherwise injurious, unlawful or illegal.
- 3.8.6. Posting content that discusses illegal activities with the intent to commit them.
- 3.8.7. Posting content in violation of another's intellectual property or other proprietary rights, including without limitation content that infringes on any patent, trademark, copyright or trade secret rights.
- 3.8.8. Impersonating any person or entity or falsely stating or otherwise misrepresenting affiliation with a person or entity.
- 3.8.9. Representation of personal opinions as if endorsed by the University or any of its organizations is strictly prohibited. AUP's name or marks may not be used to endorse any opinion, product, private business, cause, or political candidate.

## **4. RESPONSIBILITIES**

AUP's Leadership Team is the governing body with decision-making authority for web policies and programs, including social media. The Director of Communications and Outreach reviews and approves all requests for the establishment of any official University social media account and should have oversight of all social media that use the AUP name and logo, including the ability to shut down social media that is not in compliance with this policy. She or he is responsible for ensuring that any official University social media account is in compliance with the University's Brand Visual Identity and Editorial Guidelines and other applicable policies of the University. The Online Communications Manager is responsible for AUP's social media strategy, campaigns and awareness of all AUP social media accounts.

## **5. DEFINITIONS**

### **5.1. Social Media**

For the purposes of this policy, social media includes Internet-based, software-based and other electronic communications and online platforms that allow content to be generated by users, sent, posted and/or otherwise shared. Such activity may include use or participation in blogs, vlogs or microblogs (such as Twitter); personal websites or webpages; online forums or communities; message boards; wikis (such as Wikipedia); mailing lists; social or professional networking sites (such as Facebook, Google+ or LinkedIn); audio, photo or video-sharing websites or networks (such as YouTube, Flickr, Picasa or Pinterest); internal intranets or networks; and text-messaging or instant-messaging. This policy applies to social media that is currently available or emerging as well as all other online platforms or media with user-generated content that may become available after the adoption of this policy by the University.

### **5.2. Official University Social Media Accounts**

A social media account which represents the University, a department, an official program or any other entity at AUP. Any other social media account, such as an employee’s personal social media account, is NOT subject to this policy. All official University social media accounts recognized by AUP are listed on the AUP Social Media page.

### 5.3. Copyright

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.

### 5.4. AUP

The official acronym for The American University of Paris.

### 5.5. AUP name

The AUP name refers to the full name of The American University of Paris, its official acronym AUP and any other non-brand-aligned variation of the aforementioned, such as aup, AuP, American University of Paris, American University in Paris, etc.

### 5.6. University’s best interests

Responsibilities to represent the University in a fair, accurate and legal manner, while protecting the brand and reputation of the institution.

### 5.7. AUP’s technology resources

Technology provided and/or paid for by the University.

## 6. APPROVALS & HISTORY

December 13, 2017	First iteration drafted by The Manager of University Communications
April 16, 2018	Leadership Team approval.
March 2020	Annual review.
November 19, 2020	Annual review; contact information updated.
November 9, 2021	Annual review; contact information updated.
November 1, 2022	Next review.

## 7. ISSUING OFFICE AND CONTACT

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