



## Social Media Guidelines

### Contents

1. Introduction .....	2
1.1 Definitions .....	2
2. Laws and regulations .....	3
2.1 Obligation to provide service .....	4
2.2 Official documents .....	4
2.3 Archiving and erasure .....	4
2.4 Individual cases .....	5
2.5 Personal data (GDPR) .....	5
2.6 The Act on Responsibility for Electronic Bulletin Boards .....	5
2.7 Tort Liability Act .....	6
2.8 Publication .....	6
2.9 Information to users .....	6
2.10 Internal rules about private accounts .....	7
3. Liability and establishing accounts .....	7
3.1 Before establishment – purpose, time and resources .....	7
3.2 Establishing an account .....	8
3.3 List of official interaction areas for Södertörn University .....	8
3.4 Information to users when establishing an account .....	8
4. Maintenance .....	9
4.1 Supervision, moderation and erasure .....	9
4.2 Style guidelines .....	10
5. Retiral, erasure and archiving .....	11

## 1. Introduction

A social media presence is a way for Södertörn University to create more opportunities for contact and dialogue with the university's target groups. The administrative policy targets adopted by the Swedish Riksdag in June 2010 include public authorities allowing private individuals greater access to information. Social media is one tool that public authorities can use for this. Social media therefore primarily deal with communication, conversation and relationship creation, and must be regarded as an integral element of general communication, providing support when appropriate.

The purpose of this document is to clarify social media use for university staff and to explain the legislation that Södertörn University, as a public authority, must comply with when social media is used.

It is important to remember that the obligation to provide service regulated in the Administrative Procedure Act also applies to social media. Questions on social media from private individuals must be responded to as soon as possible, and comments and posts must be reviewed and moderated.

Södertörn University's Social media Guidelines are based upon *Myndigheters användning av sociala medier, Riktlinjer från E-delegationen* (Public Agencies' Use of Social Media, Guidelines from the eGovernment Delegation), Version 1.0.

## How we communicate through social media

All communication must comply with the Communication Policy and be presented in accordance with Södertörn University's branding guidelines. Content must be correct, factual and objective. In addition, it is important to adapt the tone of voice to the forum being used to communicate.

## Presence and liability/responsibility

All social media presence by departments, academic schools and other units at Södertörn University must first be reported to Communication & PR. Each academic school or department's social media presence is then listed on Södertörn University's website. One intention of this list is to make easier for the public to search for official documents. Södertörn University's total social media presence is listed at: [www.sh.se/socialamedier](http://www.sh.se/socialamedier)

Each academic school/department or similar at Södertörn University is responsible for its presence on social media and for its own social media.

Communication & PR is responsible for Södertörn University's official social media presence. Responsibility entails ensuring that the use of social media complies with Södertörn University's policies and guidelines (including this document), and with relevant legislation in the area, such as copyright legislation. This responsibility also entails that each unit or academic school is the data controller for personal data published on social media by the university administration and, in principle, also for personal data that others publish on these social media. This responsibility also involves ensuring that there is no processing of personal data in a manner that violates personal integrity.

### 1.1 Definitions

"Social media" is the collective name for internet-based media or channels that create the right conditions for interpersonal communication and knowledge sharing, such as blogs, or services like Facebook and Instagram.

“Interaction areas” means services, platforms and websites that build on user participation, where Södertörn University is the sender and people other than the university’s editors can publish material. Purely technically, these interaction areas can be provided by Södertörn University (e.g. a webpage with a comment function on the university website), but the university can also establish interaction areas on external services (e.g. a Facebook group).

In these guidelines, “person with responsibility for maintenance” means the person who is responsible for monitoring an interaction area and ensuring that it functions in accordance with the applicable laws and guidelines. This person must be employed by Södertörn University. The person responsible for maintenance always has final responsibility for the interaction area, even if a student, for example, can be asked to publish material on the interaction area.

“Moderation” means making decisions about which posts will be displayed for public viewing (pre-moderation) or removed after publication (post-moderation).

An “official document” is a document that is stored at, received by or created at a public authority under Chapter 2 of the Freedom of the Press Act (1949:105).

“Archive” (noun) is the collection of documents generated in the activities of the public authority and which have been archived.

“Archive” (verb) means to add documents or information to the archive.

“Retire” means to remove documents that have already been given a fixed order to give them another order. An interaction area may be retired for data to be erased or retained.

“Retain” is to keep something for archiving.

“Erase” is to destroy official documents or information in official documents. Erasure may only be performed if there is a validated decision and it is done in accordance with the university’s information management plan.

## 2. Laws and regulations

The below items provide information about the legislation that Södertörn University must comply with when communicating via social media. The relevant legislation includes the following:

- The Archives Act – *Arkivlagen*
- The Administrative Procedure Act - *Förvaltningslagen*
- The Act on Responsibility for Electronic Bulletin Boards – *Lagen om elektroniska anslagstavlor*
- The Penal Code – *Brottsbalken*
- The Public Access to Information and Secrecy Act – *Offentlighets- och sekretesslagen*
- The General Data Protection Regulation – *Dataskyddsförordningen*
- The Data Protection Act – *Dataskyddslag*
- The Instrument of Government – *Regeringsformen*
- The National Archives’ Statute Book – *Riksarkivets föreskrifter*
- The Tort Liability Act – *Skadeståndslagen*
- The Freedom of the Press Act - *Tryckfrihetsförordningen*
- The Act on Copyright in Literary and Artistic Works – *Upphovsrättslagen*
- The Fundamental Law on Freedom of Expression – *Yttrandefrihetsgrundlagen*

Some these acts and regulations, with which Södertörn University and its employees must comply when working with social media, are covered in the section below. This section also includes the university's rules on private accounts.

## **2.1 Obligation to provide service**

Under Section 6 of the Administrative Procedure Act (2017:900), Södertörn University is obliged to ensure that contacts with individuals are smooth and simple.

Södertörn University is also obliged to handle matters and issues that are published on our interaction areas, so it is important to monitor these interaction areas and respond to any issues that arise. Monitoring must be done every working day, even during holiday periods. Incoming cases and questions must be responded to as simply, rapidly and cost-efficiently as possible, without endangering legal certainty. If a document is to be erased or retained, this must be done in accordance with Södertörn University's information management plan.

If you have questions about whether a document should be erased or retained, please contact [registrator@sh.se](mailto:registrator@sh.se).

## **2.2 Official documents**

Södertörn University is a public agency and must comply with the Freedom of the Press Act. University documents are therefore official, under the principle of public access. According to the Public Access to Information and Secrecy Act (2009:400), official documents must be kept in order and be able to be presented.

Södertörn University's posts in social media become public documents regardless of whether the university has complete control of the media itself, or whether it is supplied by a service provider (e.g. Facebook). A post made by an external party on the university's interaction areas also becomes a public document.

Södertörn University's posts on other parties' social media (e.g. another higher education institution's Facebook page or a student blog) may be a public document. If Södertörn University conducts a dialogue in another party's social medium, an external party's post may become a public document. Therefore, avoid conducting dialogues about cases in social media; see more under 2.4 Individual cases.

In other words, documents on social media may be considered official documents if they initiate a case or add factual information to an existing case.

The university is obliged to know which documents are official in the social media in which the university is active, and keep these available for the public. Some media, such as Facebook, retain posts and messages in an organised manner so they are easy to search.

If posts are not kept organised in a simple manner, specific documentation is required, such as a description that states where the documents are and how to access them.

Retain posts and messages may only be erased if there is a routine for this. For more information about erasure, see section 2.3 Archiving and erasure.

## **2.3 Archiving and erasure**

Södertörn University's information management plan, produced by the Central records Office and Archiving at University Support Services, includes implementation decisions in the

Swedish National Archives' regulations (RA-FS) for the archiving and erasure of social media. In accordance with the document management plan's implementation of RA-FS 1991:6, amended 1997:6, 2012:2, social media must be erased when no longer current. The exception to this is social media that are considered to be particularly worth preserving, such as for research needs, under Section 3 of the Archives Act. If you have questions about preserving and the preservation value of social media, contact the archivist at [arkivarie@sh.se](mailto:arkivarie@sh.se).

For information about how posts and messages on social media should be managed, see section 4.1 Supervision, moderation and erasure.

## **2.4 Individual cases**

In some cases, social media can be used as a complement when administrating cases relating to general circumstances. However, case management via social media must be avoided, particularly for issues or cases about individuals' financial or personal circumstances, or which relate to such an ongoing case. These questions should be steered away from the social medium and the person referred to the correct unit.

## **2.5 Personal data (GDPR)**

The General Data Protection Regulation, or GDPR, applies to all personal data processing at the university. Personal data processing is also processing of personal data, such as collection, registration, organisation, structuring, storage, etc.

Published information from users may never be moved to a lower level of confidentiality, for example from an interaction area that requires a login to a publicly available website, without the relevant person's permission.

Employees must pay attention to which information is published and the extent to which this information is made available to search engines. This is because search engines are efficient at indexing public websites. Names and the associated posts are easy to search for and an individual's activities on the internet can rapidly be mapped if they take place on open websites.

If you intend to publish a photograph of someone in a social medium, you must collect the correct consent in advance from the person in the photograph. Employees may only publish pictures of a living physical person if the requisite informed consent has been collected. A consent form is available on the employee web, below "Rättslig vägledning – Dataskyddsförordningen".

You can read more about personal data at IMY – the Swedish Authority for Privacy Protection.

## **2.6 The Act on Responsibility for Electronic Bulletin Boards**

Under the Act on Responsibility for Electronic Bulletin Boards, we are obliged to remove some messages that are published on our interaction areas. The Act on Responsibility for Electronic Bulletin Boards includes, among other things, child pornography, unlawful threats, incitement to ethnic or racial hatred, etc., as content that we are obliged to remove. The complete list is in Section 5 of the Act.

To discover messages that we are obliged to remove, the university must continually moderate all interaction areas for which the university is responsible. Moderation may be done in advance or afterwards, depending on what is possible in each social medium. Pre-moderation should be used if this is possible. Pre-moderation is particularly important if

posts and comments can be published anonymously. When moderation takes place afterwards, the interaction area's content must be checked every working day of the year (even during holiday periods).

Södertörn University is responsible for personal data that is published on its interaction areas. This responsibility applies to personal data that is published by Södertörn University and that published by users.

Unlike personal data that has been published on the university's Facebook page, the university is only responsible for personal data that it publishes on Twitter itself. The university is thus not responsible for personal data that other Twitter users publish. This is because Södertörn University cannot influence the publication of, or moderate, other users' tweets.

## **2.7 Tort Liability Act**

In general, public authorities can be held liable for statements that may be perceived as advice or information and which can thus have financial consequences. Note that liability also applies to all statements made using a social medium. Such issues should instead be managed via other channels/media according to Södertörn University's routines.

## **2.8 Publication**

Public authorities and individuals are both responsible for what they publish in social media. If Södertörn University uses social media where visitors can write comments and make posts, the university may be responsible for personal data that other parties publish on the interaction area. However, this does not mean that the person who published the information has no responsibility.

When Södertörn University uses social media:

- employees may not publish personal data without the support of legislation or the express informed consent of that person
- employees must not publish person information that may infringe on personal integrity
- the person with responsibility for maintenance must monitor visitors' comments to discover personal data that may infringe on personal integrity
- visitors must be encouraged to report offensive content to Södertörn University
- the person with responsibility for maintenance must remove offensive personal data. The university could be held liable for damages if the person with responsibility for maintenance does not remove personal data that may infringe personal integrity.

## **2.9 Information to users**

When the university provides an interaction area with user participation, the university must inform users about the university's identity, the extent to which incoming messages are available to other users and the approximate number of users the interaction area reaches. The university must also monitor the service to the extent that can be reasonably required, considering the scope and focus of activities.

The university may become legally liable if it does not provide the above information, remove messages or block messages.

## **2.10 Internal rules about private accounts**

Researchers' external websites, blogs, etc., with content that is directly linked to activities at Södertörn University should only include material related to these activities and must not be combined with private material.

To avoid creating official documents, employees should not make statements as representatives of Södertörn University or describe the university's activities in detail on their private interaction areas.

Employees who use Södertörn University's computers for private use, such as using social media, must be aware that this use may create official documents, such as internet history and login information.

Anyone who uses social media as part of their work must always state clearly that they are doing so as part of their work duties, in the same way as employees must be clear when they are posting on social media as a private individual. Employees should not use their personal accounts for work purposes.

Employees who use social media privately may write about university activities. Freedom of speech and the freedom to communicate information are generally applicable to information that is not confidential.

## **3. Liability and establishing accounts**

Departments, schools, research centres or other units at Södertörn University may establish interaction areas (social media accounts) that are linked to their own activities. This must be done in consultation with the relevant manager and in accordance with the routines found in these guidelines.

Södertörn University's overarching official interaction areas are administered by the Communication and Public Relations unit.

### **3.1 Before establishment – purpose, time and resources**

A unit that wishes to begin using a social medium must first establish its purpose and the routines and resources for updating and monitoring it. The following questions must be considered:

- How will using the social medium contribute to the activities of Södertörn University?
- What is the purpose of the interaction area?
- Does the university already have an account that can be used for this purpose, rather than starting a new interaction area?
- Does the interaction area follow Södertörn University's branding guidelines?
- What demands on function, technology and security does the social medium need to fulfil?
- What investments are necessary in the form of time and resources to keep the social medium under control?
- Do we have the resources to keep the interaction area updated and moderated?
- How will the interaction area be retired (closed) if it cannot be maintained or when it no longer fulfils its function?

### 3.2 Establishing an account

Employees at the unit at Södertörn University that starts to use a social medium must be familiar with Södertörn University's social media guidelines, and ensure that monitoring and moderation occur at all times when the interaction area is active. The relevant manager appoints and approves the person responsible for maintenance, who is responsible for publishing information and moderating the interaction area on behalf of Södertörn University. The social medium must be monitored daily. The person responsible for the social medium must allocate adequate resources for this and appoint substitutes for the person has day to day responsibility in their absence. Access to login details must be secured.

If an interaction area is not controlled by Södertörn University and instead requires that an agreement is entered into with a service provider, the unit must check that the terms and conditions of use do not conflict with Södertörn University's guidelines, that they fulfil the university's demands on the service and also assess the terms and conditions users encounter if they wish to communicate with us via the interaction area.

The following items must be documented when an interaction area is established:

- the name of the service
- the service's internet address
- a description of the service
- the interaction area's purpose and aims
- the unit that is responsible and the area of activities supported by the interaction area
- date of approval by the relevant manager and the manager's name
- the person responsible for maintenance
- routines for ensuring daily monitoring and monitoring in case of the absence of the person responsible
- routines for everyday work and how the medium will be filled with information
- information about how the interaction area will be evaluated, when it will be closed and how this will happen.

A form for this is available from the Communication & PR unit via [socialamedier@sh.se](mailto:socialamedier@sh.se). Completed forms must be submitted to your line manager and to the Communication & PR unit via [socialamedier@sh.se](mailto:socialamedier@sh.se).

### 3.3 List of official interaction areas for Södertörn University

If an interaction area fulfils the requirements placed in these guidelines, it is approved by the line manager. It is then listed on Södertörn University's website. The list on the website is the user's guarantee that Södertörn University is responsible for the interaction area. The list is included in the description of the public authority's public documents.

### 3.4 Information to users when establishing an account

When an interaction area on social media is established by Södertörn University, it must be made clear that Södertörn University is responsible for the interaction area. The following information must also be available alongside the interaction area:

- Information about the purpose of the interaction area.
- What function/unit, etc., is responsible for maintaining and providing information on the interaction area.
- Contact information for the person responsible for maintenance.
- Information that liability for comments published by a user belongs to the user who published the information. These posts are not to be regarded as factual information from Södertörn University, nor do they convey the opinions of Södertörn University.



- Information that the interaction area is moderated and that posts and comments may be removed.
- Information that material with content that may be interpreted as a criminal act will be immediately removed.
- Information that people who do not follow the rules may be blocked or deactivated.
- Information about who can see posts, for example whether posts are displayed to a closed group or publicly on the internet.
- If posts are displayed publicly, users must be informed that the information can be found by search engines.
- Information that published posts are official documents.
- It must be clear to visitors how they contact the person responsible for the social medium, so they can report comments or offensive content, for example. Visitors must be encouraged to report this type of content.
- Information about how to initiate a case at Södertörn University and that information relating to cases administered by Södertörn University must not be published on the interaction area.
- Information about the use of cookies, if this has not already been adequately provided by the service provider.
- If the interaction area is only for students on a particular course, for example, and is not monitored by an employee of the university, this must be clearly stated, along with the information that the interaction area is not a communication channel for Södertörn University.

Visitors who initiate or discuss individual cases on the social medium must be contacted and referred to a more appropriate communication channel.

This information can be presented as in the above points, or as part of more extensive terms and conditions, depending on the interaction area's character. This information can be published on the interaction area or in a separate document, clearly linked to from the interaction area. However, publication must take place in the clearest possible manner given the interaction area's characteristics. An example of what this text could look like is available at [www.facebook.com/sodertornshogskola](http://www.facebook.com/sodertornshogskola) below "About".

## 4. Maintenance

When an interaction area has been established, the person responsible for maintenance must check the interaction area's content every working day of the year (i.e. even during holiday periods) and ensure that the interaction area is moderated and the rules regarding erasure are followed. The person responsible for maintenance is also responsible for ensuring the interaction area is active and that new material is published regularly.

### 4.1 Supervision, moderation and erasure

As mentioned above, in 2.4 Individual cases, moderation may be done in advance or afterwards, depending on what is possible in each social medium. The person responsible for maintenance should provide moderation in advance if this possible. This is particularly important if posts and comments can be published anonymously. When moderation takes place afterwards, the interaction area's content must be checked every working day of the year, even during holiday periods.

Södertörn University strives for balanced and constructive dialogue. During moderation we must not take into account whether posts are positive or negative. Posts that are within the law, Södertörn University's policies and guidelines, any external web service's rules and guidelines and which are relevant to the context must be approved for publication. The

purpose of the interaction area determines what is to be regarded as relevant or not. The assessment is made by the person responsible for maintenance.

When moderating, it is important that posts or messages that are removed are transferred to another medium, as they are usually an official document. This is done by taking a screenshot and saving it in a file with restricted access. The following applies to moderation:

- Material that includes any of the following must be immediately moved from the interaction area: sedition, incitement to ethnic or racial hatred, child pornography, unlawful depiction of violence or contravention of copyright.
- If material that has been published may be in breach of the law, the person responsible for maintenance must also report this to the police. Before the material is removed, the person responsible for maintenance must note where and when the material
- was published and document as much as possible, such as by using screenshots. These must be appended to the police report, which is registered with the appendices. The Head of Security and Director of Communications at Södertörn University must be informed about the incident.
- Posts including serious swearing must be removed.
- Material that is not in accordance with the purpose of the interaction area must be removed, for example irrelevant posts or comments, posts that include personal attacks or discuss other people's private life or personal characteristics, or which may be damaging to an individual in any other way.

Posts and messages must be sent to the central records officer for registration and administration, if they:

- initiate a case or add information to an existing case
- contain confidential information
- contain threats.

Screenshots of posts or messages that will not be registered under the above may be erased when no longer current, under RA-FS 1991:6, amended 1997:6, 2012:2, and only if they:

- were for information purposes and no action was required
- are not needed from a legal perspective
- are questions, opinions, presentations and messages of minor importance
- are texts that are not relevant to Södertörn University's areas of activity
- are without meaning, or
- are unintelligible

#### **Checklist – remember:**

- Does the interaction area contain posts/comments/the equivalent that must be registered?
- Have screenshots been taken before posts/comments/the equivalent are removed?

#### **4.2 Style guidelines**

The Language Act (2009:600) states that language of the public sector is to be cultivated, simple and comprehensible. This also applies to Södertörn University's language in social media. In social media we may use a more personal tone than is otherwise the case. However, it is important to remember that we represent Södertörn University as a public authority and not ourselves as individuals.

Further recommendations are available in the *Klarspråk* section of Södertörn University's employee web.

## 5. Retiral, erasure and archiving

If an interaction area is no longer active or contributing to the university's activities and does not contain official documents that must be registered, it must be immediately retired and erased. In this case, fill in an erasure form and send it to the archivist. If the interaction are is considered to have preservation value for future research, it must be preserved. If you are uncertain about preservation value and erasure, please contact the archivist. Naturally, an interaction area may be preserved through web-crawling or screenshots according to the activity's needs. Contact the archivist at [arkivarie@sh.se](mailto:arkivarie@sh.se).

The responsibility for retiring the interaction area lies with the unit responsible for the interaction area and those with administrator rights to the account.

### **Checklist – remember:**

Does the interaction have preservation value for future research? If you are unsure: contact the archivist!

- Is the interaction area active? If not: ensure it is retired and erased!
- When retiring and erasing an interaction area – complete an erasure form