



POLICIES AND PROCEDURES FOR SOCIAL MEDIA

2015

Given privacy risks, the University of Alberta, as a public body, has to consider a number of issues when participating on social media sites. The U of A is committed to protecting the privacy of its students, faculty, staff, and alumni in accordance with university policies and with relevant legislation such as Canada's Anti-Spam Legislation and Alberta's Freedom of Information and Protection of Privacy Act (FOIP).

- The University of Alberta will only create official social media channels that have a privacy policy or statement and reputation that is reasonably consistent with the Fair Information Practices reflected in Alberta's FOIP legislation.
- The University of Alberta will promote the protection of citizens' and visitors' privacy by including in its content links to the university's Information and Privacy Commissioner (IPC) or other information about how to protect privacy when using social media.
- The University of Alberta will use available web tools or services to obtain non-identifying anonymous, aggregate, or statistical information concerning its programs, services, or marketing efforts from social media sites.
- While the University of Alberta may scan or monitor published information available on social media sites, it will not seek to obtain or collect an identifiable individual's personal views, actions, or comments or take steps to identify the specific author or contributor of unpublished information or content unless authorized or permitted by law to do so.
- The University of Alberta will only advertise its programs and services on social media sites in a responsible manner and in accordance with the university's social media guidelines. If any official university content includes personal information, the use and disclosure of that personal information must be permitted under the FOIP Act. The university will not collect personal information about individuals who are registered with these sites unless it is authorized under the FOIP Act.
- The collection of identifiable personal information from a social media site and the subsequent use, disclosure, and management of that information by university employees is subject to the privacy protection provisions of Part 2 of the FOIP Act.
- Personal information provided or posted directly by individuals to an official university social media page, channel, or site, or that is posted to another site, must only be collected for reference or subsequent use if that information is necessary for an operating program or service of the university, or the collection is otherwise authorized or required by law.
- Personal information that is posted or shared on social media sites must only be collected by the university in accordance with the indirect collection rules of section 34 of the FOIP Act. However, an author's views and other personal information published in a social media context (e.g., a popular or widely read blogger's posting) may be collected and used in a manner consistent with a journalist or reporter's information published in traditional media outlets.

- All university social media channels that are intended to collect personal information about visitors or contributors for program purposes must display a notice of collection, in accordance with section 34 of the FOIP Act. The notice must inform an individual of the purpose and legal authority for the collection and the contact information of an employee who can answer questions about the collection. Personal information collected from a social media site must be managed and protected in accordance with the provisions of sections 35 to 40 of the FOIP Act.
- All records concerning university content posted to, or obtained from, any social media page or site are subject to the access to information provisions of the FOIP Act. Third-party sites hosting university content and comments, however, are not subject to the FOIP Act in any way.

Important Links

Provincial/Federal Regulations

- **Alberta Freedom of Information and Protection of Privacy Act (FOIP)**
- **Canada Copyright Act**
- **Canada's Anti-Spam Legislation (CASL)**

University of Alberta Policies

- **Code of Student Behaviour**
- **Discrimination, Harassment and Duty to Accommodate**
- **Information Technology Use and Management**
- **Information Access and Protection of Privacy**
- **Website Privacy**
- **Use of Copyright Materials**
- **Visual Identity**
- **Trademarks and Licensing**

Guidelines/Forms/Resources

- **University of Alberta Information and Privacy Office Guidelines**
- **University of Alberta Information and Privacy Office Forms**
- **CASL Information and FAQ**

Definitions

1. **Confidential Information:** Includes, but is not limited to, personal information as defined by the Alberta Freedom of Information and Protection of Privacy Act (FOIP), proprietary information of a non-public nature that may be of use to competitors of the university or may be harmful or prejudicial to the university or its stakeholders if disclosed, as well as all legal information and advice that are not public knowledge. Examples of this would include but are not limited to:
 - Legal matters that are not public knowledge
 - Financial information that would not be available in the annual report
 - Business processes
 - Contractual agreements with vendors, third parties, or consultants
2. **Copyright:** Has the same meanings, definitions, and restrictions as defined by the Canadian Copyright Act. In relation to a work, this means the sole right to produce or reproduce the work or any substantial part thereof in any material form whatever, to perform the work or any substantial part thereof in public or, if the work is unpublished, to publish the work or any substantial part thereof in any format.
3. **Personal Information:** Information about an identifiable individual as defined in section 1(n) of FOIP. In a social media context this would include the individual's name and other information such as their email address or username if it includes the individual's name or a portion of their name, or is otherwise identifying in nature or is a pseudonym that is attributable to an identifiable individual by using other readily available information.
4. **Published Information:** Personal commentary or other information or content posted to a website that is intended to be accessible to a wide community of followers or the public at large without the need for, or reasonable expectation of, direct or indirect familiarity, association or relationship (e.g., weblog or "blog" postings and comments). This does not include information posted to personal online diaries or information intended or believed to be communicated only between known "friends" or a broader, but still limited, circle of acquaintances.
5. **User-Created Content (UCC):** Comments, ratings, reviews, tags, opinions, or responses provided by an individual or a group on a social media site concerning content posted on the site, or a topical issue, or the individual's original non-professional creative or modified content that has been posted or published to a site. This type of content is also known as user-generated content (UGC) or consumer-generated media.