

GOUCHER | college

POLICY ON STUDENT SOCIAL MEDIA PRIVACY

I. PURPOSE

This policy recognizes the importance of privacy in a student's personal activities involving the use of social media. It also recognizes that the use of social media by college employees plays a valuable and appropriate role in academic, athletic, career-based and other college activities to the benefit of students. The purpose of this policy is to set forth appropriate rules to protect student privacy interests while permitting the use of social media for academic, athletic, career-based and other college activities.

II. DEFINITIONS

- A. "Non-Public Access Information" refers to the security information required to access a Social Media account. Examples include: usernames, passwords, log-in information or other private and confidential information required to gain access to a Personal Social Media account.
- B. "Personal Social Media Account" refers to a Social Media account that allows social interaction with and dissemination of information to others, created and maintained by a student, prospective student, or applicant in whole or in part for private use. It does not include an account on a social media platform owned or provided by the college or a social media account created by a student, prospective student, or applicant specifically for academic, athletic, career-based or other college or activities.
- C. "Social Media" are internet-based applications that enable users to participate in social networking by exchanging content with other users. Examples of Social Media include, but are not limited to, LinkedIn, Facebook, Twitter, Snapchat, YouTube, Flickr, Instagram, Tumblr, and Vine.

III. SOCIAL MEDIA PRIVACY POLICY

- A. College employees shall not require, request, suggest, or cause a student, prospective student, or applicant to disclose, grant access to, or allow

observation of Non-Public Access Information pertaining to a student's Personal Social Media account.

- B. College employees shall not require that a student, prospective student, or applicant change the privacy settings on a Personal Social Media Account.
- C. College employees shall not require a student, prospective student, or applicant to designate a College employee or agent of the College as a "friend" a "follower" or any other designation that would afford the employee or agent access to a Personal Social Media Account.
- D. College employees shall not require a student, prospective student, or applicant to log onto any Personal Social Media account in the presence of a college employee or agent of the college.
- E. College employees shall not require that a student, prospective student, or applicant provide names of the Social Media platforms that he/she employs.
- F. College employees shall not suspend, expel, discipline, penalize, or threaten to take any of the aforementioned actions against any student, prospective student, or applicant for refusing to provide information in response to a request that is prohibited under Section III of this Policy.

IV. PERMITTED ACTIONS

- A. This Policy does not prohibit college employees from requiring a student to provide access to a Social Media account provided that:
 - 1. The student has the option, at his or her own election, to complete the assignment or activity by using an existing Personal Social Media Account, by creating a generic Social Media account, or by using a Social Media account provided by the college;
 - 2. access is limited to individuals involved in the same academic, athletic, career-based or other college activity;
 - 3. the student is not required to provide Non-Public Access Information;
 - 4. the academic, athletic, career-based or other college activity is designed and administered in a manner that is consistent with the college's FERPA obligations.

- B. College employees may access Personal Social Media Account information that has been voluntarily provided to them by a student, prospective student, applicant, or third party.
- C. College employees may access publicly accessible information relating to a student, prospective student, or applicant's Personal Social Media Account.

Questions about this policy should be directed to the General Counsel.