



AUDIT AND ADVISORY SERVICES

Social Media Audit Project No. 15-657

June 26, 2015

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June 26, 2015

Claire Holmes
Associate Vice Chancellor
Communications & Public Affairs

Associate Vice Chancellor Holmes:

We have completed our audit of social media as per our annual service plan in accordance with the Institute of Internal Auditors' *Standards for the Professional Practice of Internal Auditing* and the University of California Internal Audit Charter.

Our observations with management action plans are expounded upon in the accompanying report. Please destroy all copies of draft reports and related documents. Thank you to the staff of the Office of Public Affairs, Development Communications, Talent Acquisition & Employment Services, the Haas School of Business Online Marketing and Social Media Office, and Intercollegiate Athletics Marketing Office for their cooperative efforts throughout the audit process. Please do not hesitate to call on Audit and Advisory Services if we can be of further assistance in this or other matters.

Respectfully reported,

Wanda Lynn Riley
Chief Audit Executive

cc: Vice Chancellor Scott Bidy
Executive Director Digital & Marketing Communications Ram Kapoor
Senior Vice President and Chief Compliance and Audit Officer Sheryl Vacca
Associate Chancellor Nils Gilman
Assistant Vice Chancellor and Controller Delphine Regalia

University of California, Berkeley
Audit and Advisory Services
Social Media

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OVERVIEW

Executive Summary

The overall purpose of the audit was to provide management with an objective assessment of the current effectiveness of control activities related to the use of social media across campus. Based upon our preliminary assessment of the risks relevant to social media, we selected the following areas for analysis and evaluation

- strategic planning outlining social media goals and their relationship to campus and administrative unit strategic goals;
- tracking how the use of social media performs against goals; and
- listening, learning, sharing, and responding to social media conversations.

In addition, we also benchmarked campus social media guiding principles, policies, and standards to other comparable organizations.

We observed that basic elements of strategic planning, performance and usage tracking, and listening and responding to conversations were generally occurring in the units we examined. However, the use of more advanced social media management practices outlined in the external guidance and thought leadership we reviewed, varied by unit. We believe there are opportunities to improve

- strategic planning to ensure goals for using social media also are consistent with and promote achieving larger strategic objectives for unit, school, college, or the campus as a whole;
- coordinated response protocols for conversations involving topics that may progress to the point where the most relevant subject matter expert lies beyond the immediate management for the individual channels; and
- guidance available for how to address risks and issues facing social media.

These opportunities are a product of social media's origins on campus, as an organically grown grass roots effort on campus, and one that naturally occurs in a decentralized environment. We believe the evolution and maturation of social media on campus involves more central coordination and oversight to support, for example, the alignment of objectives for the use of social media with larger unit or campus objectives and consistent treatment of risk and issues.

Source and Purpose of the Audit

Audit and Advisory Services (A&AS) has completed our audit of social media as part of our annual service plan for fiscal year 2015. The overall purpose of the audit was to provide management with an objective assessment of the current effectiveness of control activities related to the use of social media across campus.

Scope of the Audit

In planning this audit, we considered management's objectives and strategic priorities for social media, significant risks innate to social media and the adequacy and effectiveness of risk management and control processes in relation to generally accepted standards and better practices. We obtained and reviewed documentation available about internal controls, laws and regulations, and prior audit reports.

Based upon our preliminary assessment of the risks relevant to social media, we selected the following areas for analysis and evaluation

- strategic planning outlining social media goals and their relationship to campus and administrative unit strategic goals;
- tracking how the use of social media performs against goals; and
- listening, learning, sharing, and responding to social media conversations.

In addition, we also benchmarked campus social media guiding principles, policies, and standards to other comparable organizations.

Audit techniques included inquiry, observation, and inspection of documentation such as strategic plans, performance reports, and publically available social media principles, policies, and standards for comparable institutions such as Harvard University, the University of Michigan, Pennsylvania State University, Walmart, Coca-Cola, and Microsoft. Our current state assessment covered practices in place on campus as of September and October 2014.

Background Information

The current role of social media varies depending upon the administrative unit and can include

- creating, sustaining, and improving brand awareness and image;
- building communities;
- communicating with the communities and stakeholders in the event of a crisis;
- connecting with alumni (e.g., for fundraising, community building, and career networking);
- marketing campus events (e.g., fundraising events, ticket sales, and creating buzz/awareness); and
- recruiting and networking with potential students, faculty and staff.

The operating model, reporting lines and assignment of authority and responsibility for the management and oversight of social media is currently decentralized. Personnel responsible for administering social media channels are not within a single administrative unit but are spread throughout the campus within various units (e.g., school, colleges, divisions, and departments).

Personnel and managers within these units report to senior management such as chairs, deans, associate or assistant vice chancellors, executive directors, and directors who have oversight responsibilities for social media in their respective organizations.

The UC Office of the President and the campus have established policy and guidance for the following topics related to using social media

- identifying and recruiting candidates for employment in staff positions,
- using computing resources belonging to the campus,
- authority, or the lack thereof, for individuals to represent campus via social networks, and
- potential negative exposures for the campus when social media is used inappropriately.

In addition to policy and guidance, those responsible for social media have to be mindful of other regulations directly or indirectly affecting the use of social media, for example

- Age Discrimination Employment Act;
- American with Disabilities Act;
- Title VII of the Civil Rights Act;
- Internal Revenue Code section 501(c)(3) regarding political activities;
- Family Educational Rights and Privacy Act (FERPA);
- Health Insurance Portability and Accountability Act (HIPAA);
- Gramm Leach Bliley Act; and
- the California Information Practices Act (Civil Code §1798 *et seq.*)

Summary Conclusion

We observed that basic elements of strategic planning, performance and usage tracking, and listening and responding to conversations were generally occurring in the units we examined. However, the use of more advanced social media management practices, outlined in the external guidance and thought leadership we reviewed, varied by unit. We believe there are opportunities to improve

- strategic planning to ensure goals for using social media also are consistent with and promote achieving larger strategic objectives for unit, school, college, or the campus as a whole;
- coordinated response protocols for conversations involving topics that may progress to the point where the most relevant subject matter expert lies beyond the immediate management for the individual channels; and
- guidance available for how to address risks and issues facing social media.

These opportunities are a product of social media origins on campus, as an organically grown grass roots effort on campus, and one that naturally occurs in a decentralized environment. We believe the evolution and maturation of social media on campus involves more central coordination and oversight to support, for example, the alignment of objectives for the use of social media with larger unit or campus objectives and consistent treatment of risk and issues.

SUMMARY OF OBSERVATIONS & MANAGEMENT RESPONSE AND ACTION PLAN

Social Media Guidance

Observation

The campus' current approach to managing social media platforms is decentralized. Individual units can and do create and manage their own social media platforms with limited central campus oversight or coordination. As such, in addition to the "official" channels operated by Public Affairs or certain central campus units, there are a multitude of other channels on social media platforms such as Facebook or Twitter operated by individual units.

We observed that basic elements of strategic planning, performance and usage tracking, and listening and responding to conversations were generally occurring in the units we examined. However, the use of more advanced social media management practices outlined in the external guidance and thought leadership we reviewed, varied by unit.

For example, we believe there are opportunities to improve the quality and effectiveness of individual unit strategic planning to ensure that their goals for using social media are consistent with and promote achieving larger strategic objectives for their unit, school, college, or the campus as a whole.

Furthermore, there are opportunities to improve coordinated response protocols for social media conversations involving topics that may progress to the point where the most relevant subject matter expertise to effectively, timely and accurately respond lies beyond the immediate management for the individual channels.

Lastly, in comparing our current social media policy and guidance to those at other comparable organizations, both inside and outside of higher education, we identified an opportunity to improve guidance from the central campus that would likely aid in addressing the scenarios described above, as well as other issues for which guidance currently is not available.

We provide examples of such opportunities of improvement in the table below, grouped by topic area.

Topic Areas	Opportunities for Improvement
1. Principles for Strategic Planning	<ul style="list-style-type: none">• Clearly identify objectives (i.e., desired outcome or target capabilities) and demonstrate how the social media strategy and objectives align with and contribute to the achievement of the unit's overall objectives.• Identify the target audiences and the social media outlets that best reach them (e.g., Facebook, Twitter, LinkedIn, etc.).• Define responsibilities for staff or students managing the social media accounts and identify the resources necessary for proper execution (e.g., tools).

Topic Areas	Opportunities for Improvement
	<ul style="list-style-type: none"> • Develop and employ key performance indicators to allow tracking of return on investment and to measure success. • Provide explicit value and benefit statements for the use of social media¹. • Analyze and address risks or challenges to achieving objectives and outcome, including the risk of <u>not</u> pursuing a social media initiative.
2. Listening, Learning, Sharing, and Responding	<ul style="list-style-type: none"> • Establish a plan for identifying conversations of a sensitive nature² and containing potential negative reputation effects, including consulting with subject matter experts outside the administrative unit. • Develop plans for identifying, remediating, and learning from expressions of frustrations or discontent with campus services within the unit. • Redirect conversations to other channels when necessary for appropriate response.
3. Use of the Campus Name and Trademarks	<ul style="list-style-type: none"> • Define what is an allowable and unallowable use of the organization's name and trademark with respect to the use of social media.
4. Principles of Personal Use	<ul style="list-style-type: none"> • Define what is appropriate for employees to post on their personal social media accounts about the unit or the campus. • Communicate that the content and views expressed are the individual's alone and not necessarily a reflection on the views of the unit or the campus due to the need to distinguish between personal and professional use.
5. Principles of Appropriate Use	<ul style="list-style-type: none"> • Advise to abstain from conversations that would <ul style="list-style-type: none"> ○ affect others privacy³; ○ appear to create the appearance of lobbying (i.e., Internal Revenue Code 501(c)(3)); ○ resemble hate speech⁴ or other speech that would be otherwise offensive; ○ create the appearance of an endorsement, promotion, or recommendation; ○ appear to be in violation of National Collegiate Athletic Association (NCAA) regulations concerning recruiting; or ○ other conversations that would be unacceptable to the campus community (e.g., inconsistent with our principles

¹e.g., how social media will lower costs relative to other communication and marketing alternatives, further revenue generating opportunities, improve productivity, and/or improve customer experience

²e.g., conversations related to disability access, discrimination, wrongful discharge, workplace health and safety, student conduct (such as hazing, bullying, sexual and physical abuse); impersonation of the campus on social media (sites that create the impression they represent the campus); and student privacy

³e.g., because of compliance obligations for FERPA, HIPAA, and the California Information Practices Act

⁴e.g., based on race, ethnicity, national origin, gender, religion, sexual orientation, and the like

Topic Areas	Opportunities for Improvement
	<p style="text-align: center;">of community).</p> <ul style="list-style-type: none"> • Understand any potential copyright protections before reproducing, adapting, displaying, or distributing content and obtain the necessary permissions of the right holder if required. • Forgo responding to posts or commentary that requires subject matter expertise unless responding with an organization-approved message for the topic. • Do not share confidential or private information about operations, products, or services.
6. Monitoring Principles	<ul style="list-style-type: none"> • Establish responsibilities to monitor social media platforms on a timely basis to be certain responses to questions and posts are responsive, timely, and accurate. • Establish responsibility (i.e., at the unit level, central level, or some combination of both) for ongoing evaluation of social media platforms to confirm that guidelines are followed and they remain active. If a social media platform becomes inactive or does not follow guidelines, the unit should discontinue use.
7. Consequences	<ul style="list-style-type: none"> • Identify when a disciplinary or other review may need to be initiated against an employee, for example, when their social media activity violates law, policy or otherwise subjects the university to liability for such acts.
8. General Principles of Community	<ul style="list-style-type: none"> • Make sure you have all the facts before you post, it is better to verify information with a source first than to have to post a correction or to withdraw the post and, if you make an error, correct it quickly and visibly. • If you feel angry or passionate about a subject, it is wise to delay posting until you are calm and clearheaded. • Refrain from following or friending others that might reflect poorly on you or your organization.

Improving the guidance available to the campus on how to employ and participate in social media platforms would likely reduce the following types of risks

- the unit or the campus fails to reach its strategic objectives for the use of social media platforms;
- objectives for the use of social media are inconsistent with larger unit, college, school, or campus objectives;
- social media conversations involving sensitive topics with the potential for negative reputational effects are not handled by designated subject matter experts;
- internal resources dedicated to managing social media platforms are inadequate;
- management cannot assess the impact of their social media efforts and the return on investment made;
- social media platforms are used to express personal views of individuals which do not necessarily reflect the position of the unit or campus; or
- stakeholders view the unit or campus as being unresponsive or uncaring to issues they have raised and feel are important.

Management Response and Action Plan

1. Professionalizing the function

Five years ago, there was no social media function at the organizational or unit level. Today, there are hundreds of social media accounts across campus with no organization or system of governance. This is a result of the way in which social media has developed organically across the world, not just at Berkeley. However, this is a good time for us to step back and review the landscape. We believe the following steps need to be taken.

- a) *Job definition and professional career growth* – Social media needs to become a specialized branch within communications with a clear definition and growth path.
- b) *Professional development* – We need to evolve the skill sets of the people who are currently managing this function across campus, many of them in a partial capacity. They need training around the systems, processes, tools and metrics that can make their work more efficient and effective.
- c) *Community of practice* – We need to build a community that shares best practice and works together to raise the general level of competence. At Public Affairs, we have started this off with partnership meetings, training workshops and our annual conference – BC2. However, for this to succeed, there needs to be a bigger push at a central campus level.
- d) *Scanning the horizon* – We need to have a team of people looking at future developments and the ways in which Berkeley can get an early start in the channels that emerge on a monthly or even weekly basis.

2. Providing the right tools

There is an urgent need to have an enterprise level listening platform (e.g., Radian 6, Hootsuite) that enables us to do rigorous and “predictive” monitoring of social media. This task is too time consuming and vital to be left to individual contributors. We need significant investment in tools and resources to run this function at the level of service needed for the rapid-fire world of social media. An example of where this is particularly important is emergency situations, which can have maximum impact on an organization’s reputational risk.

3. Social campaigns

We need to use the social media channels of all campus units to come together and amplify campaigns that are important to the mission of the university. We are beginning to see good liftoff with social campaigns run by units in the past year or two e.g., #sharecalday and #biggive. However, more training and investments need to go into this area.

The Office of Communications & Public Affairs is currently not resourced to help achieve the above functions. However, we believe they are important to do and would be happy to join any initiative that takes this forward. With this vision in mind, as a first step, we will develop guidelines in support of professionalizing social media. Furthermore, in consultation with Audit and Advisory Services, we also plan to invite participation and involvement, ideally identifying partners and stakeholders, to produce a business case for further investment in web authoring

tools⁵ accomplishing the following

- outlining the issues, risks and concerns of non-investment,
- benefits and expected value of investment, and
- to raise the issue up to campus decision makers for evaluation, prioritization, and an investment decision.

We plan to develop and post social media guidelines by January 1, 2016. We plan to have a business case for evaluation and an investment decision by June 1, 2016.

⁵ For example, for rapidly updating portions of web pages, generating and managing entire web sites (e.g., content management systems), and updating and managing social media profiles, blogging, microblogging, and photo and video sharing sites.