Guidelines on the Use of Social Media and Internet Searches in Recruitment

Effective October 19, 2020

1. **Introduction.** The University recognizes that social media and internet searches may be useful tools in the process of recruiting for staff and faculty positions. However, social media and internet searches also present some risks and limitations. Not every search process will utilize these tools. When the department and/or search chair decides, in consultation with their recruiter or HR representative, that social media and/or internet searches may be an appropriate tool to use, these guidelines will help to ensure that the search process remains fair, that all applicants have equal opportunity to be considered based on their experience and qualifications, and that the University continues to meet its affirmative action obligations.

2. **Definition.** For purposes of these Guidelines, *social media* includes but is not limited to social media platforms such as Facebook, LinkedIn, Twitter, Instagram, etc. and searches of internet content.

3. **Advertising.** Social media sites must not be the sole source for advertising open positions, as doing so may adversely impact the diversity of the applicant pool. Social media sites may be used to post and share University position announcements as part of the overall advertising strategy. As with all advertising methods, the hiring department should retain a copy of the job posting for record-keeping purposes.

4. **Sourcing.** Social media sites may be one method for identifying potential applicants and may be particularly useful for hard-to-fill positions. However, social media must not be the sole method for sourcing candidates as this may adversely impact the diversity of the applicant pool. If a hiring department decides, in consultation with their recruiter or HR representative, that sourcing via social media may be useful, the recruiter will be the individual responsible for searching for candidates. Sourcing activities that utilize social media sites and/or internal or external resume databases must be documented as described in the accompanying Practice and Recordkeeping Requirements document. Before initiating any such sourcing activities, the recruiter should consult with Talent Acquisition about appropriate procedures for doing so.

5. **Candidate screening.** Social media content review will not be appropriate for most searches but in some situations, where there is a nexus to the position, the search chair may decide it would be useful to do so. The following steps outline the parameters for utilizing social media during the candidate review process:

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a. The search chair and Senior HR Leader or designee will decide at the outset of the search process whether social media content will be reviewed. Considerations in making that decision include but are not limited to:
    i. Is social media related to the job responsibilities?
    ii. Does the role represent the UI in a high-profile public setting (e.g., coaches)?
    iii. Does the role set policy for the institution (e.g., leadership)?
b. Applicants must be notified that applicants' social media and/or internet content may be reviewed during the screening process. If social media/internet content will be reviewed, the following notification should be displayed prominently in the job posting. This gives applicants an opportunity to remove content if they desire to do so.

   Review of Applicant's Internet Presence. As a part of the University of Iowa's review of your application and consistent with its policies and practices, the University may access and/or view information about you that is job-related and publicly available on the internet, including but not limited to information on social media sites. The access, viewing and/or use of such information is governed by the University's Policy on Human Rights, as well as state and federal law.
c. The search chair will review these guidelines with search committee members when the search is initiated so that committee members understand the roles and parameters of this process.
d. The review will be limited to professional and business-related sites and internet content that is job-related. For example, purely personal social media sites (such as personal Facebook or Instagram pages) are not job-related, but a Facebook page for a business could be job-related; LinkedIn and other professional sites are typically considered to be job-related.
e. Social media/internet content must be job-related to impact the evaluation of an applicant.
f. The recruiter or HR representative will conduct the review. These individuals will receive guidance and/or expectations about the types of content that are relevant and what information may be shared with the search chair. For example, identifying information about an applicant's race, color, religion, national origin, sex, sexual orientation, gender identity, disability, or other protected characteristics is not job-related and will not be shared with decision-makers.
g. The social media review will be conducted after finalist interviews have been completed, for all applicants who remain under consideration following the interview. An exception may be made on a case-by-case basis in consultation with a Senior HR Leader and the Office of General Counsel to allow review of social media prior to interviews based on a strong nexus between social media usage and the position.

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h. Social media/internet content that is more than 7 years old should not be considered. Content that was posted before the individual was 18 years of age will not be considered.

i. When the recruiter/HR representative discovers content that may impact the evaluation of the applicant, the content will be shared with the Senior HR Leader for the college/org, who may consult other campus offices as needed, to evaluate the nexus to the position responsibilities.

j. When content that may impact the evaluation of an applicant is found and is determined to be job-related, that information must be shared with the applicant and the applicant must be given an opportunity to respond to the information prior to a decision being made about their candidacy.

k. The content that may impact the evaluation of an applicant must be retained in the recruitment file, along with the applicant's response.

l. Lack of social media accounts, or having social media privacy settings that do not allow public access, will not be considered negatively in the evaluation process.

m. Applicants will not be asked to provide their login and password information to their social media accounts.

6. **Reference checks and background checks.** Reviewing social media is not a substitute for reference checks or background checks. Reference checks and background checks must be completed as required by University policies.

Practice and Recordkeeping Requirements When Sourcing Job Candidates Using External or Internal Resume Databases or Other Social Media Sites

If recruiters desire to proactively source for job candidates using external or internal resources, such as external job boards/databases, external social media sites, or internal databases of current employees or furloughed UI staff, there are specific federal and university requirements for documentation of the sourcing activity that they will need to follow. The following list highlights the required practices for sourcing from such resume databases/websites and notes where there are differences between sourcing from external and internal sources.

Required Documentation:

- A record of the position for which each search of the database was made (i.e., Req. # if applicable, copy of the job listing or position description);

- The substantive search criteria used for each search;

- The date each search was made;

- The name of the individual conducting the database search;

- A listing which identifies the job seekers who were contacted regarding their interest in the position; and

- The **resumes** (for *external* database searches) or **the list of names** (for *internal* database searches) of any job seekers who 1) met the *basic qualifications* for the position and 2) were *considered* by the employing unit. For example:

  > A recruiter performs an external database search that returns 500 resumes. Next, the recruiter uses neutral search terms based on the position's basic qualifications to further reduce the pool to 50 resumes. The recruiter then reviews the 50 resumes individually to further limit the pool and must retain all 50 of those resumes for the retention period.

Required Record Retention Period

- Retain the required documentation for 5 years following closure of the search or the search of the database, whichever is later.

Definitions:

Basic Qualifications:	Qualifications (e.g., skills, experience, attributes) a job applicant must possess. The *basic qualifications* for the position or job must be in writing, objective, noncomparative, and job-related. The university department or unit must include the *basic qualifications* in the job listing or advertisement, if they exist. Not all jobs will have qualifications that meet the definition of *basic qualifications,* such as jobs that have entirely subjective required qualifications.
Considered:	The university department or unit "considers" an applicant for a job or position by **reviewing** the application, resume, or profile for substantive information, **and assessing** that information in light of the qualifications associated with the position.
External Databases:	Online resume databases maintained by external companies or organizations such as CareerBuilder, Indeed, Monster, Dice, LinkedIn, Recruit Military, abilityJobs, and ZipRecruiter.
Internal Databases:	A database maintained by the university containing resumes or profiles of current or furloughed UI employees who are interested in being considered for other internal job opportunities. The resumes/profiles are not tied to a specific job requisition at the time they're added to the internal database.

Social Media: Websites and applications that enable users to create and share content or to participate in social networking.

Sources:
1. UI Records Management, Recruitment Records, Retrieved 5-27-2020 at https://fmb.fo.uiowa.edu/recruitment-records.
2. Code of Federal Regulations, 41-CFR, 60-1.12 Record Retention, OFFICE OF FEDERAL CONTRACT COMPLIANCE PROGRAMS, EQUAL EMPLOYMENT OPPORTUNITY, DEPARTMENT OF LABOR. Retrieved 6-23-2020 at https://www.govinfo.gov/content/pkg/CFR-2011-title41-vol1/pdf/CFR-2011-title41-vol1-sec60-1-12.pdf.

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