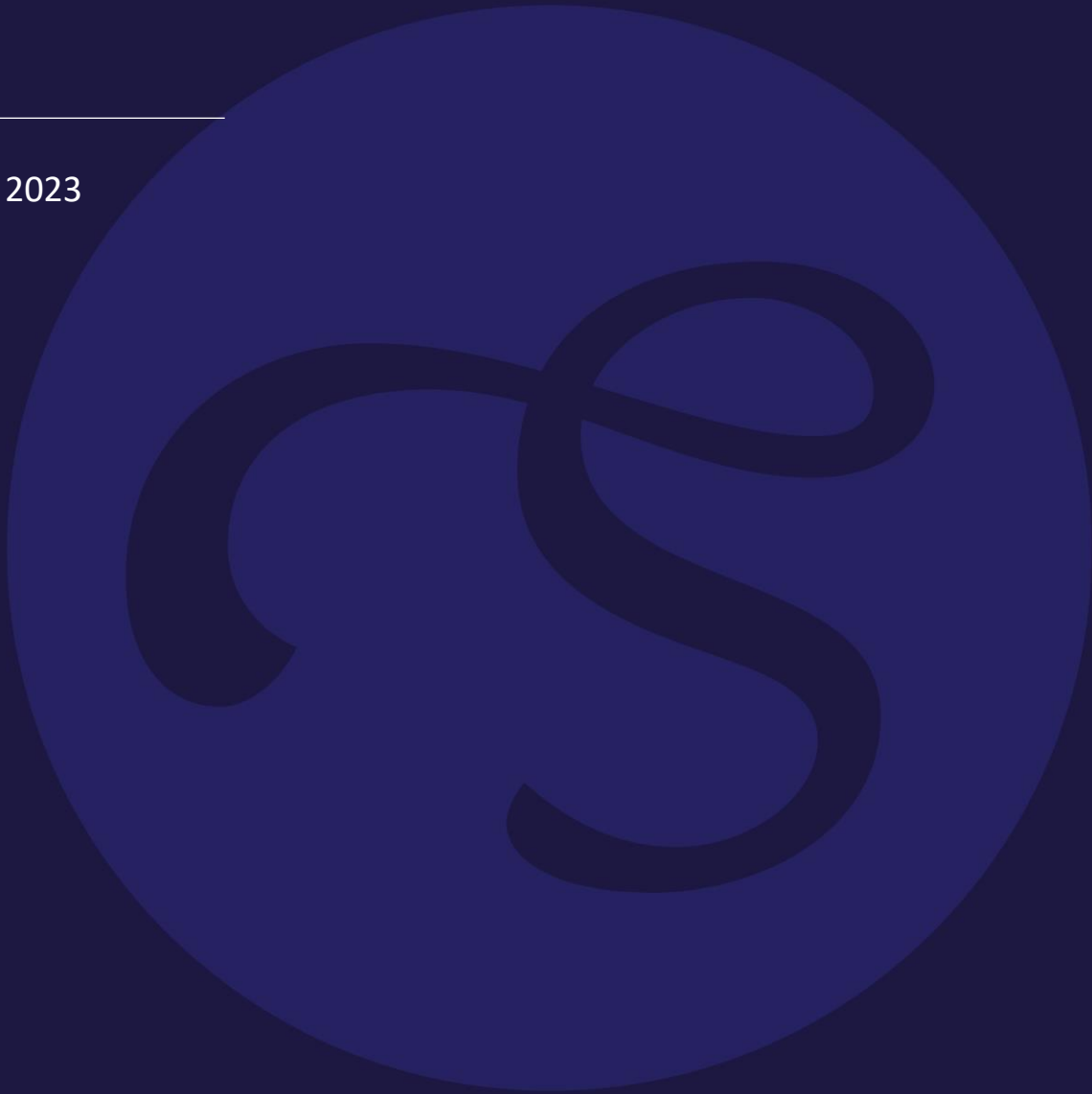


# Strathbogie Shire Council Social Media Policy

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February 2023



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## Social Media Policy

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Current Review:	August 2022
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Next Scheduled Review Date:	August 2024
Responsible Officer:	Executive Manager Communications and Engagement

## **PART 1 POLICY**

### **1. PURPOSE**

Social media, social networking and online forums are internet-based communications tools for publishing, sharing and discussing information. New technology has changed the way organisations communicate, and the range of social media sites are now part of a well-rounded communication plan, building on the traditional forms of communication.

Social media can be a powerful tool for consultation, seeking customer, community and staff views, and gauging issues and complaints about an organisation. It requires different resourcing and different methods for any organisation to receive benefits from communicating via social media.

There are inherent risks for any organisation using social media or attracting comments from external sources via social media.

Using social media to communicate, and to respond to issues or concerns expressed online must be carefully considered in each individual situation.

### **2. POLICY STATEMENT**

This policy aims to inform and guide the way Strathbogie Shire Council and its employees and contractors use social media, and to allow a broader reach of information and direct comment which is quickly available.

This policy provides a framework for social media use but does not replace assessment of individual situations and the appropriate way to respond or to not respond.

This policy aligns to Strategic Focus Area 1: Engage. Create. Unite in the 2022/25 Council Plan.

### **3. APPLICATION OF THIS POLICY**

#### **Generating Social Media Content**

Only Communications and Engagement staff are authorised to use and provide permission to use social media on behalf of Strathbogie Shire Council.

Social media content must be approved by the Executive Manager Communications and Engagement before publication.

Strathbogie Shire Council social media activities will be moderated and information on moderation will be made available to the public.

#### **Personal responsibilities using social media**

Strathbogie Shire Councillors and staff are personally responsible for content they make public in a personal capacity on any form of social media. Where staff are able to be identified as a Strathbogie Shire employee, or Councillors as a Strathbogie Shire Councillor, they must:

- Only disclose publicly available information

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- Ensure that all content pertaining to Strathbogie Shire Council is accurate and not misleading
- When using social media, Councillors, staff and contractors must adhere to Strathbogie Shire Council codes of conduct, policies and procedures and comply with relevant laws and regulations
- Adhere to the Terms of Use of the relevant social media platform/website, as well as copyright, privacy, defamation, contempt of court, discrimination, harassment and other applicable laws.
- Inform the Executive Manager Communications and Engagement immediately if you believe that your online identity or logins have been stolen or compromised.

### Responding to Social Media on behalf of Strathbogie Shire

Strathbogie Shire will delete social media posts on Strathbogie Shire 'owned sites' where posts are considered by Strathbogie Shire to be questionable, misleading, defamatory, vexatious, inappropriate or likely to negatively influence customer, community and stakeholder perceptions of Strathbogie Shire.

Factual errors noted in social media coverage should be advised to the Executive Manager of Communications and Engagement, who will determine how, when and if to respond to correct the information.

## 4. ACCOUNTABILITY AND RESPONSIBILITIES

Strathbogie Shire Councillors are responsible for the approval of this Policy.  
The Chief Executive Officer is responsible for the endorsement of this Policy.

Role	Responsibilities
Chief Executive Officer	Final authorisation of this Policy
Executive Manager Communications and Engagement	To communicate the requirements of this Policy to all Strathbogie Shire employees, Councillors and external consultants, project managers and organisations providing services to Strathbogie Shire Council

## 5. DEFINITIONS

Term	Definition
Council	Strathbogie Shire Council
Comment	The opportunity for the public to reply or leave a comment about Council matters or posts.
Community	People who live, work in or visit Strathbogie Shire
Social media	Websites or applications that provide Council with a platform to share information, images and encourage interaction, two-way dialect and freedom of speech.
Community engagement	The processes and interactions between Council, the general community, and community groups.

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Consultation	A co-ordinated interaction between the community and Council, through the provision of information and accepting and considering feedback.
Like	When members of the public show support for a post through clicking like on it.
Media	Radio stations, print newspaper, television and website forum coverage which meets standards described in the Australia Press Council's Statement of General Principles.
Post	A planned online article consisting of words and sometimes images and/ or videos. It is published on the Council Facebook page and displays information, messages and notifications on behalf of the organisation.
Share	When members of the public wish to share a post that is of interest to them, as well as other individuals with whom they are connected.

The Communications and Engagement team will provide advice on the most appropriate sites and types of social media available.

### 6. REPORTING

To measure the success of Council's social media channels, the Executive Manager Communications and Engagement will report to the Executive Leadership Team (ELT) every quarter.

### 7. GOVERNANCE

#### Record-keeping of social media posts

As per the *Public Records Act 1973 and Local Government Act 2020* and other relevant legislation and council policies outlined under Documents, Strathbogie Shire Council is obligated to record all staff emails, correspondence, advertising, project information, workflow, events, images and council notices provided to the community by staff and/ or Councillors.

The Communications and Engagement team currently register social media posts and media activity.

### 8. RELATED POLICIES AND LEGISLATION

This policy is intended to support and align with other Acts, Legislation and Regulations, and relevant Council Policies and Procedures.

Relevant legislation	<ul style="list-style-type: none"><li>• <i>Australian Human Rights Commission Act 1986</i></li><li>• <i>Age Discrimination Act 2004 Commonwealth</i></li><li>• <i>Copyright Act 1968 Commonwealth</i></li><li>• <i>Crimes Act 1958 Victoria</i></li><li>• <i>Defamation Act 2005 Commonwealth</i></li><li>• <i>Disability Discrimination Act 1991 Commonwealth</i></li><li>• <i>Equal Opportunity Act 2010 Victoria</i></li><li>• <i>Fair Trading Act 1999 Victoria</i></li><li>• <i>Fair Work Act 2009 Commonwealth</i></li><li>• <i>Freedom of Information Act 1982 Victoria</i></li><li>• <i>Information Privacy Act 2000</i></li></ul>
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	<ul style="list-style-type: none"><li>• <i>Local Government Act 2020 Victoria</i></li><li>• <i>Occupational Health and Safety Act 2005 Victoria</i></li><li>• <i>Racial and Religious Tolerance Act 2001 Victoria</i></li><li>• <i>Racial Discrimination Act 1975 Victoria</i></li><li>• <i>Privacy and Data Protection Act 2014 Victoria</i></li><li>• <i>Public Records Act 1973 Victoria</i></li><li>• <i>Spam Act 2003 Commonwealth</i></li><li>• <i>Sex Discrimination Act 1984 Commonwealth</i></li><li>• <i>Wrongs Act 1958 Victoria</i></li></ul>
External sources and standards	<ul style="list-style-type: none"><li>• The Australian Press Council Standards of Practice</li><li>• Australian Local Government Association (ALGA)</li><li>• Municipal Association of Victoria (MAV)</li><li>• Local Government Standards Panel 2007</li></ul>
Council policies	<ul style="list-style-type: none"><li>• Councillor Code of Conduct</li><li>• Staff Code of Conduct CEO Directive</li><li>• Media Policy</li><li>• Information Security Policy</li><li>• Training and Development CEO Directive</li><li>• Complaints, Grievances and Dispute Resolution Guideline CEO Directive</li><li>• Workforce Diversity CEO Directive</li><li>• Recruitment, Selection and Appointment CEO Directive</li><li>• Work from Home CEO Directive</li><li>• Disciplinary CEO Guideline</li><li>• Disciplinary CEO Directive</li><li>• Unsatisfactory Performance Management CEO Guideline</li><li>• Respectful Workplaces CEO Directive and Guideline</li><li>• Occupational Health and Safety CEO Directive</li><li>• Staff Health and Wellbeing CEO Directive</li></ul>

### 9. POLICY REVIEW

This policy will be reviewed biennially and may change at any time, subject to a Council resolution.

### 10. CHARTER OF HUMAN RIGHTS AND RESPONSIBILITIES ACT 2006 AND THE EQUAL OPPORTUNITY ACT 2010

The Council acknowledges the legal responsibility to comply with the Charter of *Human Rights and Responsibilities Act 2006 and the Equal Opportunity Act 2010*. The Charter of *Human Rights and Responsibilities Act 2006* is designed to protect the fundamental rights and freedoms of citizens. The Charter gives legal protection to 20 fundamental human rights under four key values that include freedom, respect, equality and dignity.

## PART 2 PROCEDURES

This Procedure applies to:

- All Strathbogie Shire Council employees including continuing, fixed term, casual and contract staff
- Strathbogie Shire Councillors
- External consultants, project management and special project providers (during their time providing services to Council and after their departure)

### 11. DEFINITIONS

**Council** means Strathbogie Shire Council.

**Social Media** includes internet-based communication tools used by family, friends, work colleagues and the wider community to share, inform and consume information. This procedure applies to those digital spaces where people may comment, contribute, create, forward, post, upload and share content.

It is not possible to expressly refer to or list the specific sites or kinds of social media outlets. The absence of a reference to a particular site or social media activity does not limit the application of this procedure.

### 12. PROCEDURE

#### Compliance

Depending on the circumstances, non-compliance with this Procedure may constitute a breach of employment or contractual obligations, misconduct, bullying, sexual harassment, discrimination, or some other contravention of the law.

Those who fail to comply with this Procedure and the Council Social Media Policy may face disciplinary action and, in serious cases, termination of their employment or engagement.

An alleged breach may result in an investigation in line with Council's Complaints, Grievances and Dispute Resolution Guideline CEO Directive, The Local Government Guidelines and Staff and Councillor Codes of Conduct.

#### Professional use of social media

- Becoming authorised to comment
- Before engaging in social media as a representative of Council, you must become authorised to comment
- You may not comment as a representative of Council unless you are authorised to do so
- Employees, contractors or Council Committee members are not permitted to make comment or discuss policy, policy development or Council's public position on issues that have not been authorised or that exist in the public realm
- To become authorised to comment in an official capacity, you must:
- Gain approval from the CEO and from the Executive Manager Communications and Engagement

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- Undertake training as detailed by the Communication and Engagement Division
- A register of authorised persons will be held by the Communication and Engagement Division
- Following a decision by Council, a Councillor may make comment on behalf of their ward, but not criticise the Council decision and/or to make a personal attack on the process and/or another Councillor.

### 13. RULES OF ENGAGEMENT

Once authorised to comment as a Council representative, you must:

- Disclose you are an employee/contractor of Council, and use only your own identity, or an approved official account or avatar
- Disclose and comment only on information classified as public domain information
- Ensure that all content published is accurate and not misleading and complies with all relevant policies
- Ensure you are not the first to make an announcement (unless specifically given permission to do so)
- Comment only on your area of expertise and authority
- Ensure comments are respectful of the community in which you are interacting online
- Adhere to the Terms of Use of the relevant social media platform/website, as well as copyright, privacy, defamation, contempt of court, discrimination, harassment and other applicable laws

If you are authorised to comment as a Council representative, you must not:

- Post or respond to material that is offensive, obscene, defamatory, threatening, harassing, bullying, discriminatory, hateful, racist, sexist, infringes copyright, constitutes a contempt of court, breaches a Court suppression order, or is otherwise unlawful
- Use or disclose any confidential or secure information
- Make any comment or post any material that might otherwise cause damage to Council's reputation or bring it into disrepute
- Employees may not publicly disagree with any Council policy, position, program or operational activity. Staff may hold these views in private however they must remain the private activity of an employee
- Comment on individual customer dealings.
- Moderation of Council produced social media

The site owner must ensure a moderation policy is clear when inviting comments from the public on a Council website or social media platform. All Council website activity (including any social media) must be approved by the Communications and Engagement Division.



## 14. PERSONAL USE OF SOCIAL MEDIA

### Overview

Council recognises that you may wish to use social media in your personal life. Council's Social Media Policy and this Procedure are not intended to discourage nor unduly limit your personal expression or online activities.

However, you should recognise the potential for damage to be caused (either directly or indirectly) to Council in certain circumstances via your personal use of social media when you can be identified as a Council employee. Accordingly, you should comply with this policy to ensure that the risk of such damage is minimised.

You are personally responsible for the content you publish in a personal capacity on any form of social media platform, particularly so when commenting on any area of Council business/activity. When in doubt, you should seek guidance from the Communication and Engagement Division on how to comply with the following obligations.

Where your comments, profile, hash tags or other identifiers can identify you as a Council employee:

*You must:*

- Only disclose and discuss publicly available Council information where authorised to do so
- Ensure that all content published pertaining to Council is accurate, not misleading and complies with all relevant policies
- Expressly state on all postings (where you may be identified as a Council employee) that stated views are your own and are not those of Council or the government
- Be polite and respectful to all people you interact with
- Adhere to the Terms of Use of the relevant social media platform/website, as well as copyright, privacy, defamation, contempt of court, discrimination, harassment and other applicable laws
- Inform the Executive Manager Communication and Engagement immediately if you believe that your online identity or logins have been stolen or compromised.

*You must not:*

- Post material that is offensive, obscene, defamatory, threatening, harassing, bullying, discriminatory, hateful, racist, sexist, infringes copyright, constitutes a contempt of court, breaches a Court suppression order, or is otherwise unlawful
- Imply that you are authorised to speak as a representative of Council or the government, nor give the impression that the views you express are those of Council or the government
- Use your Council email address or any department or Victorian Government logos or insignia that may give the impression of official support or endorsement of your personal comment
- Use the identity or likeness of another employee, contractor or other member of Council

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- Use or disclose any confidential information or personal information obtained in your capacity as an employee/contractor of Council
- Post material that is, or might be construed as, threatening, harassing, bullying or discriminatory towards another employee/contractor of Council
- Make any comment or post any material that might otherwise cause damage to Council's reputation or bring it into disrepute
- Publish content in exchange for reward of any kind
- Seek to buy or recompense favourable social media commentary
- Endorse any political affinity, allegiance or policy platform pertaining to Council business
- Post or publish when inebriated, irritated, upset or tired.

### 15. REASONABLE / UNREASONABLE PERSONAL USE

When accessing social media via Council's Internet, intranet and extranet systems, you must do so in accordance with Council's Acceptable Use of Assets – Standard Requirements, which requires you to use these resources 'reasonably', in a manner that does not interfere with your work and is not inappropriate or excessively accessed.

Examples of reasonable use include:

- Sharing content from the Council Facebook account on your own Facebook account
- Updating Facebook status and posting messages during a lunch break
- Council resources should not be used to access or post any material that is fraudulent, harassing, threatening, bullying, embarrassing, sexually explicit, profane, obscene, racist, sexist, intimidating, defamatory or otherwise inappropriate or unlawful
- You should not use Council's Internet and computer resources to provide comments to journalists, politicians and lobby groups other than in the course of your official duties and then only when authorised to do so.

### 16. RESPONSIBILITIES

Who	Responsibility
CEO	<ul style="list-style-type: none"><li>• Endorse the procedure</li><li>• Make decisions when required</li><li>• Comply with the procedure at all times</li></ul>
Executive Manager Communications and Engagement	<ul style="list-style-type: none"><li>• Be responsible for staff awareness of the Social Media Policy and Procedure</li><li>• Provide advice to staff and Directors</li><li>• Investigate inappropriate use of social media</li><li>• Ensure this Procedure is adhered to</li></ul>
Communications and Engagement Team	<ul style="list-style-type: none"><li>• Provide advice and assist with the development of communication plans using social media</li></ul>

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	<ul style="list-style-type: none"> <li>• Educate Directors, staff and contractors about this Procedure and their responsibilities when using social media</li> <li>• Maintain a register of social media used for conducting Council business</li> <li>• Monitor social media accounts/tools/sites registered for conducting Council business</li> <li>• Seek legal advice where appropriate if an issue is likely to be contentious or may create legal risk for Council</li> </ul>
Executive Managers and Managers	<ul style="list-style-type: none"> <li>• Contribute to a culture that supports the implementation of this procedure</li> <li>• Create an awareness of this procedure</li> <li>• Report suspected breaches of this procedure to the Executive Manager Communications and Engagement or Executive Manager People and Culture</li> <li>• Comply with the procedure at all times</li> </ul>
Council Staff and Council Committee members	<ul style="list-style-type: none"> <li>• Seek approval from relevant manager for any official communiqué</li> <li>• Seek authorisation from the Communications and Engagement Team on using social media and developing a communications plan to support a business strategy</li> <li>• Seek approval for Council branding on social media</li> <li>• Register business social media account/tools/site with Communications and Engagement Team</li> <li>• If authorised to use for business purposes, attend training and development prior to using social media</li> <li>• Understand and comply with the provisions in this Procedure and the relevant internal procedure</li> <li>• Seek advice from the Communications and Engagement Division on the provisions of this Procedure</li> <li>• Ensure contractors are provided with a copy of the Council Social Media Procedure</li> </ul>
Councillors	<ul style="list-style-type: none"> <li>• Seek assistance from the Communications and Engagement Team on using social media and developing supporting images and tiles.</li> <li>• Assist in sharing Council's messages through content provided by the Communications and Engagement Team.</li> </ul>

### 17. PROCEDURE REVIEW

This procedure will be reviewed biennially and may change at any time, subject to a Council resolution.