

# Policy



## Media and Social Media Policy

Approved by Council: xx/xx/2024

To provide a framework for engagement with the media and the use of social media that contributes to the enhancement of Council's reputation.

Safety

Teamwork

Accountability

Respect

### Background

Effective media and social media engagement can assist Council to keep the community informed, explain decisions and to promote community confidence in Council and its decisions.

However, engagement via the media and the use of social media also present a variety of challenges and risks, such as:

- maintaining the accuracy, reliability, and integrity of information
- ensuring confidential information is managed appropriately, and
- the increased exposure and risk to reputation where information is not managed appropriately.

It is therefore vital that Council has the right policy framework in place to realise the full benefits, whilst mitigating the risk of engaging with the media and social media.

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## Policy statement

### Part 1 – Principles

1.1 Council is committed to upholding and promoting the following principles of media and social media engagement:

<b>Openness</b>	<b>An open exchange of information relevant to Council, its stakeholders, and the community is promoted.</b>
<b>Accuracy</b>	Information shared <b>is a source of truth</b> and any inaccuracies are corrected as a priority.
<b>Relevance</b>	Information <b>is informative.</b>
<b>Timely</b>	Provided in a <b>timely</b> manner, and is kept <b>up to date.</b>

### Part 2 – Who can engage with the media and social media on Council’s behalf?

#### The General Manager

- 2.1 The General Manager is the official spokesperson for Council on operational and administrative matters.
- 2.2 The General Manager may delegate to other council staff authority to speak on their behalf where appropriate, (for example, where the delegated staff member has professional expertise regarding the subject matter, or the general manager is unavailable).

#### Media Coordinator

- 2.3 The General Manager will appoint members of council staff to be Council’s Media Coordinators. The Media Coordinator will be a suitably qualified member of staff.
- 2.4 The General Manager may appoint more than one Media Coordinator.
- 2.5 The Media Coordinator is the lead point of contact for all media enquiries and requests and has primary responsibility for the oversight and administration of Council’s social media platforms.
- 2.6 The Media Coordinator must undertake its key areas of responsibility in accordance with the objectives of this policy and related council procedures.
- 2.7 The Media Coordinator is an authorised user for the purposes of this policy.

#### Authorised Users

- 2.8 Authorised users are members of council staff who are authorised by the General Manager or Media Coordinator to upload content and engage on social media on Council’s behalf.
- 2.9 Authorised users must undertake their key areas of responsibility in accordance with the objectives and requirements of this policy (refer to Part 5, in particular) and related council procedures.

## Council Staff

- 2.10 Council staff must not speak to the media about matters relating to Council unless authorised to do so.
- 2.11 If Council staff receive a media enquiry or they are invited to comment to the media on a matter relating to Council, they must refer the enquiry to the Media Coordinator.
- 2.12 Council staff are free to express their personal views to the media on matters that do not relate to Council, but in doing so, must not make comments that reflect badly on Council or that bring it into disrepute, be dressed in Rous branded clothing or in Rous branded motor vehicles.

## Part 3 – Standards of conduct for Council Officials when engaging with the media

- 3.1 Council officials must comply with the Council's code of conduct when engaging with the media or social media in an official capacity or in connection with their role as a council official.
- 3.2 Council officials must not share information or make comments to the media and/or via social media through either direct or indirect mechanisms that:
  - a) are defamatory, offensive, humiliating, threatening, or intimidating to other council officials or members of the public
  - b) contains profane language or is sexual in nature
  - c) constitutes harassment and/or bullying within the meaning of the *Model Code of Conduct for Local Councils in NSW*, or is unlawfully discriminatory
  - d) is contrary to their duties under the *Work Health and Safety Act 2011* and their responsibilities under any policies or procedures adopted by the Council to ensure workplace health and safety
  - e) contains content about the Council, council officials or members of the public that is misleading or deceptive
  - f) divulges confidential Council information
  - g) breaches the privacy of other council officials or members of the public
  - h) contains allegations of suspected breaches of the Council's code of conduct or information about the consideration of a matter under the *Procedures for the Administration of the Model Code of Conduct for Local Councils in NSW*
  - i) could be perceived to be an official comment on behalf of the Council where they have not been authorised to make such comment
  - j) commits the Council to any action
  - k) violates an order made by a court

- l) breaches copyright
- m) advertises, endorses, or solicits commercial products or business.

3.3 When using social media in an official capacity or in connection with their role as a council official (i.e. excluding personal use that is not connected with a person's role as a council official), council officials must:

- a) attribute work to the original author, creator or source when uploading or linking to content produced by a third party,
- b) obtain written permission from a minor's parent or legal guardian before uploading content in which the minor can be identified, and
- c) exercise caution when sharing, liking, retweeting content as this can be regarded as an endorsement and/or publication of the content.

## **Part 4 – Administration, moderation, and use of social media platforms**

### **Establishment and deletion of Council's social media platforms**

4.1 A new Council social media platform, or a social media platform proposed by a Council related entity, can only be established or deleted with the written approval of the General Manager or their delegate.

### **House Rules**

4.2 Council's social media platforms must state or provide an accessible link to the 'House Rules' for engaging on the platform.

4.3 Third parties engaging on Council's social media platforms must not post or share comments, photos, videos, electronic recordings or other information that:

- a) is defamatory, offensive, humiliating, threatening or intimidating to council officials or members of the public,
- b) contains profane language or is sexual in nature
- c) constitutes harassment and/or bullying within the meaning of the *Model Code of Conduct for Local Councils in NSW*, or is unlawfully discriminatory
- d) contains content about the Council, council officials or members of the public that is misleading or deceptive
- e) breaches the privacy of council officials or members of the public
- f) contains allegations of suspected breaches of the Council's code of conduct or information about the consideration of a matter under the *Procedures for the Administration of the Model Code of Conduct for Local Councils in NSW*,
- g) violates an order made by a court
- h) breaches copyright

- i) advertises, endorses or solicits commercial products or business,
- j) constitutes spam
- k) would be in breach of the rules of the social media platform.

### **Removal or 'hiding' of content**

4.4 Where a person uploads content onto a social media platform that, in the reasonable opinion of the moderator, is of a kind specified under clause 4.3 and/or breaches the House Rules, the moderator may remove or 'hide' that content.

4.5 A person may request a review of a decision by a moderator to remove or 'hide' content under clause 4.4. The request must be made in writing to the Media Coordinator and state the grounds on which the request is being made.

4.6 Where a review request is made, the review is to be undertaken by the Media Coordinator or a member of staff nominated by the General Manager who is suitably qualified and who was not involved in the decision to remove or 'hide' the content.

### **Blocking or banning**

4.7 If a person uploads content that is removed or 'hidden' under clause 4.4 of this policy on more than five occasions, that person may be blocked or banned from the social media platform.

4.8 Despite the provisions of this Part 4, where a person uploads content of a kind referred to under clause 4.3, and the moderator is reasonably satisfied that the person's further engagement on the social media platform poses a risk to health and safety or another substantive risk (such as the uploading of defamatory content), an interim block or ban from the platform/all platforms may be imposed on the person immediately.

4.9 Where a person that is the subject of a block or ban continues to engage on a social media platform(s) using an alternative social media account, profile, avatar, etc., a moderator may block or ban the person from the platform(s) immediately.

### **Use of social media during emergencies**

4.10 During emergencies, such as natural disasters or public health incidents, the General Manager and Media Coordinator will be responsible for coordinating media releases/statements on behalf of the Council and managing the content uploaded to Council's social media platforms.

4.11 Council staff, authorised users, and other Council officials must not provide comment or information to the media and/or via social media that is inconsistent with official advice issued by the Council and/or any advice issued by the agency coordinating the emergency response, or agencies supporting the recovery efforts.

### **Private use of social media**

4.12 For the purposes of this policy, a council official's or a council staff's social media engagement will be considered 'private use' when the content they upload:

- a) is not associated with, or does not refer to, the Council, any other council officials, staff, contractors, related entities or any other person or organisation providing services to on behalf of Council in their official or professional capacities, and is not related to or does not contain information acquired by virtue of their employment or role as a council official.

4.13 If a council official chooses to identify themselves as a council official, either directly or indirectly (such as in their user profile), then they will not be deemed to be acting in their private capacity for the purposes of this policy.

## Part 5 – Privacy and records management requirements

5.1 Media and social media content created and received by Council and council officials, acting in their official capacity, is a council record and may be subject to information access applications made under the GIPA Act. These records must also be managed in accordance with the requirements of the *State Records Act 1998* and the Council's approved records management policies and practices.

5.2 The PPIP Act and the HRIP Act apply to the use of social media platforms by the Council. To mitigate potential privacy risks, Council will:

- a) advise people not to provide personal information on social media platforms,
- b) inform people if any personal information they may provide on social media platforms is to be used for official purposes,
- c) moderate comments to ensure they do not contain any personal information, and
- d) advise people to contact through alternative channels if they have personal information they do not want to disclose in a public forum.

## Part 6 – Complaints

6.1 Concerns or complaints about a contravention of the requirements of this policy can be made by completing the digital [Complaints and Feedback Form](#), found on Council's website, and will be handled in accordance with Council's Customer Feedback, Complaints and Unreasonable Conduct policy.

### Contact officer

Customer and Communications Manager

### Related documents

#### Policies

[Code of Conduct](#)

[Customer Complaints, Feedback and Unreasonable Conduct](#)

[Privacy](#)

## Procedures

[Code of Conduct](#)

[Customer Complaints, Feedback and Unreasonable Conduct](#)

[Data Breach Plan](#)

## Media

[Privacy Management Plan](#)

## Legislation

As outlined in the body of the policy.

## Other

[Complaints and Feedback Form](#)

## Definitions

Term:	Definition:
Council	Rous County Council
Council Official	Means an elected member of Council's governing body (often referred to as a 'councillor') and a member of any Council Committee, including the Audit, Risk and Improvement Committee.
GIPA Act	means the <i>Government Information (Public Access) Act 2009</i> as amended.
HRIP Act	means the <i>Health Records and Information Privacy Act 2002</i> as amended.
Media	means print, broadcast and online media used for communicating information to the public, including, but not limited to, newspapers, magazines, internet publishers, radio, and television broadcasters
PIPA Act	means the <i>Privacy and Personal Information Protection Act 1998</i> as amended
Social media	broadly defined as online platforms and applications - such as social networking sites, wikis, blogs, microblogs, video and audio sharing sites, and message boards - that allow people to easily publish, share and discuss content

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