



Social Media Policy

Version 1

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1. Background

Social Media platforms have become an increasingly vital means of communication with our community, which now holds heightened expectations regarding the way they receive news.

Social Media allows Latrobe City Council to reach many people quickly and efficiently, update critical information live and interact directly with members of the community to raise awareness and understanding about Council policies and City activities.

Social media tools offer an opportunity for Council to connect with residents and stakeholders to communicate the positive work of the organisation, share in good news stories, find out what's happening in our region, keep in touch with changes and make enquiries.

2. Objectives

This policy outlines the proper use of social media and aims to provide a framework for use that protects the reputation and integrity of each individual, and Latrobe City Council by guiding the appropriate use of social media platforms and tools by Council staff, contractors, agents and volunteers who use social media on behalf of Latrobe City Council. This policy also applies to agencies and individuals who provide services to Latrobe City Council.

3. Scope

This policy applies to all social media communications made by Council staff, contractors, agents and volunteers who are authorised to make, or be construed to make, representations on behalf of Latrobe City Council.

The policy outlines requirements for compliance with regards to confidentiality, governance, legal, privacy and regulatory parameters when using social media to conduct Council business.

It aims to inform appropriate use of social media tools for Latrobe City Council, promote effective communication through social media, minimise miscommunication or mischievous or damaging communications and ensure that only accurate information is shared on social media platforms.

The policy applies to those digital spaces where people may comment, contribute, create, forward, post, upload and share content. The policy applies to those digital spaces where people may comment, contribute, create, forward, post, upload and share content, including blogs; bulletin boards; citizen journalism and news sites; forums and discussion boards; instant messaging facilities; microblogging sites (e.g. Twitter, Tumblr); online encyclopedias and wikis (e.g. Wikipedia); podcasts and video podcasts; social networking sites (e.g. Facebook, LinkedIn, Twitter, Instagram, TikTok, Messenger, WhatsApp, Snapchat, YouTube, Vimeo); video and photo sharing sites (e.g. Flickr, Pinterest, Periscope); emarketing software (Mailchimp or

other), third-party event builders (Eventbrite or other) and any other websites that allow individuals to use simple publishing tools or new technologies emerging from the digital environment. The absence of a reference to a particular site or type of social media activity does not limit the application of this policy.

4. Principles of Management

Online Conduct

The behaviour of official users should be in line with the Latrobe City Council Staff Code of Conduct and Councillor Code of Conduct and the same disciplinary measures are applicable. Users are expected to demonstrate a sense of empathy and decorum with regards to all conduct online.

Personal users must not:

- Represent or speak on behalf of Latrobe City Council on any social media channel.
- Create social media assets (pages / profiles / sites / blogs) that represent an affiliation with Latrobe City Council.
- Speak inappropriately or negatively about Latrobe City Council or any staff or member of Council.

This policy is not intended to cover personal use of social media where:

- The author publishes information in their personal capacity and not on behalf of Latrobe City Council.
- No reference is made to Latrobe City Council, its Councillors, staff, policies and services, suppliers or other stakeholders or council related issues.

Official User Responsibility

The Customer Focus and Engagement Team manage and operate Council branded 'Latrobe City Council' social media channels and sub-brands accounts, including business areas, projects and interests (such as to promote Council's leisure centres, tourism and creative arts).

Authorised staff who have editor or administrative responsibilities for any of Latrobe City Council's social media channels must adhere to Council's codes of conduct, policies and procedures as relevant for internal and external communication.

Official users of social media for Latrobe City Council are required to act in the following way:

- Adhere to Latrobe City Council codes of conduct, policies and procedures.
- Ensure any information about Latrobe City Council is accurate and factual.
- Reference only publicly available information such as information that is already found on Latrobe City Council's website or publications.

- Ensure you have adhered to any internal approval procedures prior to posting on any channel.
- Act responsibly when communicating as Council or a Council representative in community Facebook groups.
- Ensure you have read and understand the Latrobe City Council Staff Social Media Guidelines.
- Ensure any information about Latrobe City Council is not disparaging of the organisation, its Councillors, staff, volunteers, contractors, agents and their respective assignees and insurers.
- Ensure material that is obscene, defamatory, threatening, harassing, discriminatory or hateful to another person or entity is not posted or reposted (shared), or is removed as soon as reasonably practicable if posted by a user.
- Consider if comments on a post may be harmful to the reputation of Council and if warranted, remove comments or moderate as necessary in line with the rules of Council's social media channels.
- Comply with relevant laws and regulations.
- Direct individuals to official communication channels to make a request or complaint.
- Ensure you have two-factor authentication turned on for your social media accounts and the emails you use to manage them.

Latrobe City Council staff will not assist in the administration of Councillors' personal social media pages unless approved by the Chief Executive Officer. Councillors are expected to manage their personal social media channels in accordance with the Councillor Code of Conduct and Councillor Social Media Guidelines. This policy does not apply to personal social media channels, and Councillors do not require permission to post on their personal social media pages.

The Policy will apply to Councillors where they respond to posts or comments in which they have been tagged on Latrobe City Council-owned social media channels or where they choose to comment on Latrobe City Council-owned social media channels, in this instance the Social Media Policy and Councillor Code of Conduct will apply.

Councillors may choose to include a Declaration and Disclaimer on their personal social media accounts to inform users that their views are their own and do not necessarily represent the organisations they are affiliated with.

Where the Councillors personal page **does not note** they are a Councillor -

The views and opinions expressed on this social media account are my own and do not represent the official stance or views of any organisation I am professionally or personally affiliated with.

Where the Councillors personal page **notes they are** a Councillor, this includes the name / handle of the account noting Cr (full name and/or full name and Ward) -

The views and opinions expressed on this social media account are my own and do not represent the official stance or views of Latrobe City Council.

The following content is not permitted under any circumstances:

- Abusive, profane or sexual language.
- Content not relating to the subject matter of that channel or website.
- Content which is false or misleading.
- Announce new information unless authorised to do so.
- Comment outside their area of expertise.
- Make personal comments about a Council or organisational policy.
- Commit the City to actions or undertakings unless authorised to do so.
- Publish content in exchange for reward of any kind.
- Endorse any political affinity or allegiance.
- Confidential information about Council or third parties.
- Copyright or Trademark protected materials.
- Content that uses Council brands, logos or identifiers without permission from the Customer Focus and Engagement Team.
- Discriminatory material in relation to a person or group based on age, colour, creed, disability, family status, gender, nationality, marital status, parental status, political opinion/affiliation, pregnancy or potential pregnancy, race or social origin, religious beliefs/activity, responsibilities, gender or sexual orientation.
- Illegal material or materials designed to encourage illegal activity.
- Materials that could compromise Council, staff or system safety.
- Materials which would breach applicable laws (defamation, privacy, trade practices, financial rules and regulations, fair use, trademarks).
- Material that would offend contemporary standards of taste and decency.
- Material which would bring the Latrobe City Council into disrepute.
- Personal details or references to Councillors, Council staff or third parties, which may breach privacy laws.
- Spam, meaning the distribution of unsolicited bulk electronic messages.
- Statements which may be considered to be bullying or harassment.
- Council staff using their personal online profiles to comment or provide negative or trolling feedback on social media content about Council's community consultation, projects, works or Council issues.
- Fake Council or staff profiles used to distribute or comment on Council content, or content related to a Council decision.
- Personal social media accounts linked to staff email addresses or similar.

- Posts to social media groups on behalf of Council. If a member of staff wishes to post to a local community group, they should seek approval from the Customer Focus and Engagement Team.

Creating Content

While social media content may be informal in tone as befits the medium, it is still considered official Latrobe City Council communication and must be held in the same high regard. This includes ensuring posts have gone through the appropriate levels of approval, which will differ depending on the sensitivity of the content.

Content should be developed with respect to Council brand and ‘voice’ as outlined in Council’s social media strategy.

Content posted to social media must have permissions and legible, high quality imagery suitable for online purposes. Logos or other authorised imagery requires permission from the third-party business or organisation.

Council staff can make a request for online or social media promotion directly to the Customer Focus and Engagement Team.

Community Management and Moderation

Social media channels are monitored and updated by the Customer Focus and Engagement Team during normal business hours or as reasonably required to respond to constructive queries in a timely manner and mitigate the risk of errant commentators.

Council expects participants who enter two-way communication on social media platforms to behave in a respectful manner and has the right to turn off the comment functionality.

Latrobe City Council reserves the right to hide comments, and permanently block or ban access to anyone who violates Council’s social media terms and conditions. Abusive, obscene, dishonest, exploitative or illegal behaviour will not be tolerated on Latrobe City Council’s channels. Content in breach will be hidden or removed in a timely manner, and those responsible warned or blocked. Records will be kept detailing the content and user in breach, and actions taken.

These guidelines relate to all social media platforms used by Latrobe City Council. Account administrators review all postings to ensure they follow the below guidelines:

- **Be tolerant:** Respect the opinions of others and don't take disagreements personally. Don't harass, abuse, troll or threaten users on our page. Behave

with courtesy, honesty and respect. Do not post repeat comments continuously.

- **Keep it clean:** Don't post sexually explicit material or obscene language.
- **False information:** We will hide or delete any information that we deem false or misleading.
- **Be respectful:** We will not tolerate any comments that denigrate a person or group based on their ethnicity, religion, gender, sexuality, or age or share personal details or make reference to Councillors, Council staff or third parties. Do not troll or deliberately disrupt conversation.
- **Stay on topic:** To make conversations easy to read for everyone, we ask that you keep your comments relevant to the content we share. This includes business or commercial advertisements or solicitation of donations. We may remove comments that are off topic. If you wish to raise a different matter with us, you can always contact Customer Service on 1300 367 700 or message us directly.
- **Make it legal:** We will immediately remove any comments we believe could be defamatory, incite violence or lawlessness, or encourage others to do so, including violation of Copyright laws.
- **Respect the privacy of others:** Do not post personal information of yourself or others such as addresses, email addresses or phone numbers anywhere on this page, or share other people's full names without their consent. If you need to provide your address or phone number, please do so via direct message. This includes posting photos without the permission of the photographer or people in them, and information that could compromise Councillor or Latrobe City Council staff safety, including their personal details. Doing so could be a breach of privacy related legislation. View our privacy policy online.
- **Spam ban:** We will ban spammers immediately.

Personal Social Media Use

Latrobe City Council recognises that Councillors and members of staff use social media in their personal lives.

This policy is not intended to discourage Councillors and staff from expressing their personal views or engaging in online activities. However, Councillors and staff should recognise the potential for damage to be caused (either directly or indirectly) to Latrobe City Council in certain circumstances via Personal Use of Social Media when they can be identified as a Latrobe City Council staff member whether that be by name or photo. Accordingly, staff should comply with this policy to ensure that the risk of such damage is minimised.

Where a member of staff negatively refers to Council activities, issues, policy or Council decisions in their personal use of social media, Latrobe City Council will

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consider whether the staff member in doing so has breached Latrobe City Council's Staff Code of Conduct. This policy should be read in conjunction with other relevant policies and procedures of Latrobe City Council.

In order to maintain the same integrity online and offline, staff must not disclose any private or confidential information gained in the course of their employment. This includes any comments outwardly or anonymously on any matters related to Latrobe City Council, its staff, Councillors, residents or stakeholders.

Staff are reminded of the following when using social media:

- Staff are personally responsible for the content they publish in a personal capacity on any form of Social Media platform.
- Content published on Social Media is public and potentially permanent regardless of privacy settings. Deleting material posted in a relatively secure setting on a personal Social Media account does not guarantee that it has not been copied and reproduced elsewhere on the internet.
- In the event that the Latrobe City Council is the topic of online discussion, staff must ensure that when engaging in Personal Use of Social Media, they do not:
 - Imply they speak as a representative of Latrobe City Council or that the views expressed are those of Latrobe City Council.
 - Make any comment or post that may cause reputational damage to Latrobe City Council, Staff or Councillors.
 - Disclose personal details or references to Councillors, Staff or third parties, which may breach privacy laws.
 - Use fictitious names or identities that deliberately intend to deceive, mislead or lie.
 - Participate anonymously or covertly via a third party or agency.
 - Disclose any confidential information obtained in the course of their employment at Latrobe City Council.
 - Disclose any internal Latrobe City Council discussions or decisions.
 - Disclose material which could compromise Latrobe City Council, staff or system safety; or post or 'like' material that is offensive, obscene, defamatory, threatening, harassing, bullying, discriminatory, hateful, racist, sexist, infringes copyright or is otherwise unlawful.
- This includes, but is not limited to, situations where reference is made to Latrobe City Council, its Councillors, Staff, projects, strategies, policies and services, suppliers and other stakeholders or Council related issues.
- Members of staff must ensure they do not utilise any of Latrobe City Council logos or trademarks on their personal Social Media accounts.
- Staff must not register personal Social Media accounts using their Latrobe City Council email address.

- Staff are encouraged to like or share content from a Latrobe City Council account to their own personal accounts.

Personal use of social media sites during working hours should be kept to a minimum. Although limited personal use is allowed, staff should not monitor or continue to update a personal social media site during working hours. No use of social media sites should ever conflict with the staff member's primary business or with applicable laws and regulations. The use of social media must not interfere with the duties of employment or expose Council to significant cost or risk of liability.

Please also refer to the IT Policy and Staff Code of Conduct.

5. Definitions

Social Media

For the purposes of this policy, we refer to the Office of the Australian Information Commissioner's definition:

“Social media refers to any online social network. An online social network is a website or app that allows a user to create and share content online, for example, Facebook, Twitter or LinkedIn. This often involves sharing personal information, comments and messages, and photos and videos.”

Latrobe City Council and its divisions use several social media channels in the course of marketing, communicating and customer service. These include, but are not limited to LinkedIn, Facebook, Messenger, Instagram, Twitter, YouTube and online blogs.

Council also contributes to third-party social media channels, Facebook groups, podcasts and other online channels.

Authorised User means a member of staff (employee) who has been authorised by the Engagement and Customer Focus Team to engage with the community on social media as a representative of Latrobe City Council.

This not only refers to staff, but contractors or volunteers who engages (with permission and official responsibilities) on or on behalf of a social media site that is owned or managed by Latrobe City Council. If you have not been given this responsibility as part of your role, all your social media use, with respect to this policy, is deemed personal use.

Councillors are also considered an official user when interacting with Latrobe City Council owned social media channels.

Councillor means the individuals holding the office of a member of Latrobe City Council.

Staff means staff, students, agents, and volunteers engaged directly by Latrobe City Council as well as all contractors either engaged by Latrobe City Council or by an authorised contractor of Council.

Personal Use means using a personal Social Media account belonging to or operated by an individual staff member in their personal capacity, whether during business hours or outside of business hours. This includes a staff members personal Facebook account or their non-Latrobe City Council related business account.

Professional Use means using Social Media when acting as a representative of the Latrobe City Council.

6. Legal Considerations

Records Management

Official users should conduct all social media activities in accordance with the Records Management and Recordkeeping Responsibilities Operational Frameworks under the Victorian *Public Records Act 1973*. Approved recordkeeping steps for social media are to be included in social media procedures. This policy will be reviewed in line with the adoption of technologies that are implemented to support the effective management of social media records.

Privacy and confidentiality

Official users should respect the privacy of residents and not disclose their details on social media websites, as outlined in the *Privacy and Data Protection Act 2014 (Vic)* and the *Local Government Act 2020*. Users should not publish or report on conversations or information that is deemed confidential or classified or deals with matters that are internal in nature. Users should also monitor social media platforms for the publication of potentially private or confidential information by visitors.

Latrobe City Council social media channels will be managed with consideration of the Office of the Victorian Information Commission's (OVIC) Guide for Social Media and Privacy.

Defamation

Official users must refrain from publishing material that may cause injury to another person's, organisation's, association's or company's reputation and should seek further guidance if unsure if the material could be viewed as defamatory.

Copyright

Respect copyright, privacy and other applicable laws when publishing on social media platforms. Official users should attribute work to the original author/source wherever possible.

Breach of operational framework

A breach of this policy, including conduct which brings Latrobe City Council into

disrepute, will be dealt with in accordance with the Counselling and Discipline Operational Framework and Staff Code of Conduct.

Councillor related use will be managed through the Councillor Code of Conduct.

7. Accountability and Responsibility

Accountability and responsibility for this policy is outlined below:

7.1. Councillors

- Responsibility for the decision to approve this policy.
- Comply with frameworks and procedures developed to achieve compliance with this policy.
- Participate in training provided by Council.

7.2. Chief Executive Officer

- Responsibility to ensure this Policy is consistent with Latrobe City Council Strategic Direction and other Latrobe City Council Policy.
- Responsibility for the decision to approve this policy.
- Overall responsibility for the implementation of this policy.
- Assist Councillors in understanding their roles and responsibilities.

7.3. General Manager

- Responsibility for compliance with this policy.
- Responsibility for enforcing accountability.
- Responsibility for providing resources.
- Responsibility for performance monitoring.

7.4. Manager

- Develop frameworks and procedures in compliance with this policy.
- Enforce responsibilities to achieve compliance with frameworks and procedures.
- Provide appropriate resources for the execution of the frameworks and procedures.
- Provide advice in relation to matters covered by this policy.

7.5. Staff, Contractors and Volunteers

- Participate where required in the development of frameworks and procedures in compliance with this policy.

- Comply with frameworks and procedures developed to achieve compliance with this policy.
- Participate in related training provided by Council.

8. Evaluation and Review

This policy will be reviewed in the event of significant change in Latrobe City Council's Executive team, significant changes to legislation applicable to the subject matter of the policy or, in any other case, during each Council term (generally four years).

9. Related Documents

- Community Engagement Policy
- Media Policy
- Staff Code of Conduct
- Councillor Code of Conduct
- IT Policy

10. Reference Resources

- *Public Records Act 1973*
- *Privacy and Data Protection Act 2014*
- *Copyright Act 1968*
- *Local Government Act 2020*