



PUBLIC EXHIBITION

DRAFT POLICY – SOCIAL MEDIA

The draft Social Media has been placed on public exhibition for a period of 28 days until Thursday, 18th April 2024.

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- Email council@infogunnedah.com.au with the name of the plan, policy or item in the subject line. Please include your name and contact details.
- Complete an online form on Council's website: www.gunnedah.nsw.gov.au.
- Post your submission to Gunnedah Shire Council, PO Box 63, Gunnedah 2380 or hand it over the counter at Council's Administration Building at 63 Elgin Street, Gunnedah.

Please be aware that if you make a submission, other people may have access to your comments. This may be as a result of a report to a Council meeting or as part of an application under the *Government Information (Public Access) Act 2009*. Further details are available on request from Council.

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COUNCIL POLICY



Policy Name	Social Media
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Abstract
The Social Media Policy provides Gunnedah Shire Council with a robust framework for the administration and management of its social media platforms. It also sets standards of conduct for Council officials who use social media in their official capacity.

Dates	Policy or amendment approved	TBA
	Policy or amendment takes effect	TBA
	Policy is due for review (up to 4 years)	TBA
Endorsed by	Executive Leadership Team at its meeting held 30 January 2024	
Approved by	Gunnedah Shire Council, at its Ordinary Meeting held on TBA Resolution number: _____	
Policy Custodian	Manager Customer and Information Services	
Relevant to	Councillors, staff, contractors, volunteers, external members of Working Groups and Advisory Committees	
Superseded Policies	N/A	
Related documents	Code of Conduct Media Policy Records Management Policy	
Related legislation	State Records Act 1998	

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1. Purpose

The Social Media Policy provides Gunnedah Shire Council (Council) with a robust framework for the administration and management of its social media platforms. It also sets standards of conduct for all Council officials who use social media in their official capacity.

2. Scope

This Policy applies to all Council employees, contractors and elected representatives in their dealings with social media. The Policy also outlines the standards required from third parties who engage on Council social media platforms.

3. Definitions

Term	Meaning
Authorised user	Council staff who are authorised by the General Manager or social media coordinator (SMC) to upload content and engage on Council's social media platforms on Council's behalf.
Council official	Councillors, staff and delegates of Council (including members of committees that are delegates of Council).
Minor	For the purposes of clause 5.6 of this Policy, is a person under the age of 18 years.
Personal information	Information or an opinion (including information or an opinion forming part of a database and whether or not recorded in a material form) about an individual whose identity is apparent or can reasonably be ascertained from the information or opinion.
SMC	Council's social media coordinator appointed under clause 5.1.3 of this Policy.

Term	Meaning
Social media	Online platforms and applications - such as but not limited to social networking sites, wikis, blogs, microblogs, video and audio-sharing sites, and message boards - that allow people to easily publish, share and discuss content. Examples of social media platforms include, but are not limited to Facebook, Twitter, Snapchat, LinkedIn, Yammer, YouTube, Instagram, Flickr and Wikipedia.

4. Policy principles

Councillors, staff and other officials of Council are committed to upholding and promoting the following principles of social media engagement in accordance with our Council theme of Engaging and Supporting Our Community.

Openness: Our social media platforms are places where anyone can share and discuss issues that are relevant to our Council and the community we represent and serve.

Relevance: We will ensure our social media platforms are kept up to date with informative content about our Council and community.

Accuracy: The content we upload onto our social media platforms and any other social media platform will be a source of truth for our Council and community and we will prioritise the need to correct inaccuracies when they occur.

Respect: Our social media platforms are safe spaces. We will uphold and promote the behavioural standards contained in this Policy and our Council’s Code of Conduct when using our social media platforms and any other social media platform.

5. Policy statement

5.1 Administrative framework for Council’s social media platforms

5.1.1 Platforms

Council will maintain a presence on the following social media platforms:

Gunnedah Shire Council: Facebook, Instagram, LinkedIn

Gunnedah Shire Civic Precinct: Facebook

Gunnedah Shire Library: Facebook

Gunnedah Shire Visitor Information Centre: Facebook, Instagram

Council’s social media platforms must specify or provide a clearly accessible link to the ‘House Rules’ for engaging on the platform.

5.1.2 Establishment and deletion of Council social media platforms

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

Where a Council social media platform is established or deleted in accordance with this clause, the General Manager or their delegate may amend clause 5.1.1 of this Policy without the need for endorsement by Council.

5.1.3 Appointment and role of the Social Media Coordinator

The General Manager will appoint a member of Council staff to be Council's Social Media Coordinator (SMC). The SMC should be a senior and suitably qualified member of staff.

The General Manager may appoint more than one SMC.

The SMC's role is to:

- a) recommend the approval or revocation of a staff member's status as an authorised user
- b) develop and/or approve the training and induction to be provided to authorised users
- c) maintain effective oversight of authorised users
- d) moderate Council's social media platforms in accordance with this Policy
- e) ensure Council complies with its record-keeping obligations under the *State Records Act 1998* in relation to social media
- f) ensure Council adheres to the rules of the social media platform(s), and
- g) coordinate with Council's Communications team to ensure Council's social media platforms are set up and maintained in a way that maximises user friendliness and any technical problems are resolved promptly.

The functions under 5.1.3 (e) and (f) may be delegated to authorised users.

The SMC is an authorised user for the purposes of this Policy.

5.2 Authorised users

Authorised users are members of Council staff who are authorised to upload content and engage on social media on Council's behalf.

Authorised users should be members of Council staff that are responsible for managing, or have expertise in, the events, initiatives, programs or policies that are the subject of the social media content.

The General Manager will appoint authorised users when required.

The appointment of authorised users will occur by way of an instrument of delegation.

An authorised user must receive a copy of this Policy and induction training on social media use and Council's obligations before uploading content on Council's behalf.

The role of an authorised user is to:

- a) ensure, to the best of their ability, that the content they upload onto social media platforms is timely and accurate
- b) correct inaccuracies in Council-generated content
- c) engage in discussions and answer questions on Council's behalf on social media platforms where appropriate
- d) keep Council's social media platforms up-to-date
- e) moderate Council's social media platforms in accordance with Policy, and
- f) ensure Council complies with its record-keeping obligations under the *State Records Act 1998* in relation to social media.

Authorised users must not use Council's social media platforms for personal reasons.

5.3 Administrative tone

Authorised users upload content and engage on social media on Council's behalf. Authorised users must use language consistent with that function and avoid expressing or appearing to express their personal views when undertaking their role.

Authorised users may use more personal informal language when engaging on Council's social media platforms, for example, when replying to comments.

5.4 Ceasing to be an authorised user

The General Manager may revoke a staff member's status as an authorised user if:

- The SMC makes such a request
- The staff member has not uploaded content onto any of Council's social media platforms in the last six months
- The staff member has failed to comply with this Policy, and
- The General Manager is of the reasonable opinion that the staff member is no longer suitable to be an authorised user.

5.5 Councillors' social media platforms

For the purposes of this Policy, Councillor social media platforms are not Council social media platforms. A separate Guidance Document has been developed for elected members that provides guidance for managing social media platforms associated with their elected positions.

5.6 Standards of conduct on social media

This Policy only applies to Council officials' use of social media in an official capacity or in connection with their role as a Council official. The Policy does not apply to personal use of social media that is not connected with a person's role as a Council official.

Council officials must comply with Council's Code of Conduct when using social media in an official capacity or in connection with their role as a Council official.

Council officials must not use social media to post or share comments, photos, videos, electronic recordings or other information that:

- a) is 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 Council to ensure workplace health and safety
- e) contains content about 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 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 Council where they have not been authorised to make such comment
- j) commits Council to any action
- k) violates an order made by a court
- l) breaches copyright
- m) advertises, endorses or solicits commercial products or business
- n) constitutes spam, or
- o) is in breach of the rules of the social media platform.

Council officials must:

- a) attribute work to the original author, creator or source when uploading or linking to content produced by a third party, and
- b) obtain written permission from a minor's parent or legal guardian before uploading content in which the minor can be identified.

Council officials must exercise caution when sharing, liking or retweeting content as this can be regarded as an endorsement and/or publication of the content.

Council officials must not incite or encourage other persons to act in a way that is contrary to the requirements of this clause.

In accordance with section 232(1)(f) of the *Local Government Act 1993*, Councillors must uphold and accurately represent the policies and decisions of Council's governing body but may explain why they voted on a matter in the way that they did.

5.7 Moderation of social media platforms

Councils and Council officials should be aware that they may be considered a ‘publisher’ of any content uploaded onto a social media platform they administer, including content that:

- Is uploaded by a third party; and/or
- Appears on their social media platform because they have ‘liked’, ‘shared’, or ‘retweeted’ the content, or similar.

Council officials who are responsible for the moderation of Council’s social media platforms may remove content and ‘block’ or ban a person from those platforms. Such actions must be undertaken in accordance with this Policy.

5.8 House rules

Social media platforms must state or provide an accessible link to the ‘House Rules’ for engaging on the platform.

At a minimum, the House Rules should specify:

- a) the principles of social media engagement referred to in Clause 4 of this Policy
- b) the type of behaviour or content that will result in that content being removed or ‘hidden’, or a person being blocked or banned from the platform
- c) the process by which a person can be blocked or banned from the platform and rights of review
- d) a statement relating to privacy and personal information
- e) when the platform will be monitored (for example weekdays 9am-5pm during Council’s business hours), and
- f) that the social media platform is not to be used for making complaints about Council or Council officials, and information about Council’s complaint handling policy.

For the purposes of clause 5.8(b), third parties engaging on social media platforms must not post or share comments, photos, videos, electronic recordings or other information that:

- is defamatory, offensive, humiliating, threatening or intimidating to Council officials or members of the public,
- contains profane language or is sexual in nature
- constitutes harassment and/or bullying within the meaning of the *Model Code of Conduct for Local Councils in NSW* or is unlawfully discriminatory
- contains content about Council, Council officials or members of the public that is misleading or deceptive
- breaches the privacy of Council officials or members of the public
- contains allegations of suspected breaches of 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*
- violates an order made by a court
- breaches copyright
- advertises, endorses or solicits commercial products or business

- constitutes spam, or
- would be in breach of the rules of the social media platform.

5.9 Removal or 'hiding' of content

Where a person uploads content onto a Council social media platform that, in the reasonable opinion of the moderator, is of a kind specified under clause 5.8, the moderator may remove or 'hide' that content.

Prior to removing or 'hiding' the content, the moderator must make a record of it (for example, a screenshot).

If the moderator removes or 'hides' the content, they must, where practicable, notify the person who uploaded the content that it has been removed and the reason(s) for its removal and their rights of review.

A person may request a review of a decision by a moderator to remove or 'hide' content. The request must be made in writing to the General Manager and state the grounds on which the request is being made.

Where a review request is made, the review is to be undertaken by 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.

5.10 Blocking or banning

If a person uploads content that is removed or 'hidden' under clause 5.9 of this Policy on three occasions, that person may be blocked or banned from all Council social media platforms.

A person may only be blocked or banned from a Council social media platform with the approval of the General Manager.

Prior to blocking or banning a person from a Council social media platform, the person must, where practicable, be advised of the intention to block or ban them from all platforms and be given a chance to respond. Any submission made by the person must be considered prior to a determination being made to block or ban them.

The duration of the block or ban is to be determined by the General Manager-

Where a determination is made to block or ban a person from all Council social media platforms, the person must, where practicable, be notified in writing of the decision and the reasons for it. The written notice must also advise the person the duration of the block or ban and inform them of their rights of review.

Despite the above clauses, where a person uploads content of a kind referred to under clause 5.8, 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 immediate interim block or ban from all platforms may be imposed on the person immediately for a period no longer than 10 working days or as determined by the General Manager.

A person who is blocked or banned from all platforms must, where practicable, be given a chance to respond to the interim block or ban being imposed. Any submission made by the person must be considered when determining whether the interim block or ban is to be removed or retained.

A person may request a review of a decision to block or ban them from a Council social media platform. The request must be made in writing to the General Manager and state the grounds on which the request is being made.

Where a review request is made, the review is to be undertaken by a member of staff nominated by the General Manager who is suitably qualified and who was not involved in the decision to block or ban the person.

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. In these circumstances, no further action is required in respect of notifying the user of the block or ban.

Where engagement is reasonably judged by the SMC to be spam, a moderator may block or ban that user immediately and no further action is required in respect of notifying the user of the block or ban.

5.11 Use of social media during emergencies

During emergencies such as natural disasters or public health incidents, the SMC will be responsible for the management of content on Council's social media platforms.

To ensure consistent messaging both during and after an emergency, authorised users and Council officials must not upload content onto Council's social media platforms which contradicts advice issued by the agency coordinating the emergency response, or agencies supporting recovery efforts.

Training on social media use during emergencies should be included in training and/or induction provided to authorised users.

5.12 Records management

Social media content created, sent and received by Council officials acting in their official capacity is a Council record and may constitute open access information or be subject to an information access application made under the *Government Information (Public Access) Act 2009*. These records must be managed in accordance with the requirements of the *State Records Act 1998* and Council's Records Management Policy.

Council officials must not destroy, alter or remove social media content unless authorised to do so. Alteration or removal of social media content must be done in accordance with this Policy and comply with the requirements of the *State Records Act 1998*.

In fulfilling their obligations under this clause, Council officials should refer to any guidance issued by State Records NSW relating to retention requirements for Council's social media content.

5.13 Privacy considerations and requirements

Social media communications are in the public domain. Council officials should exercise caution about what personal information, if any, they upload onto social media.

The *Privacy and Personal Information Protection Act 1998* applies to the use of social media platforms by Council officials. To mitigate potential privacy risks, Council officials 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 Council through alternative channels if they have personal information they do not want to disclose in a public forum.

Council officials must ensure they comply with the *Health Records and Information Privacy Act 2002* when engaging on and/or moderating social media platforms. In fulfilling their obligations, Council officials should refer to any guidance issued by the Information and Privacy Commission of NSW such as, but not limited to, the Health Privacy Principles.

5.14 Private use of social media

Activities on social media websites are public activities. Even though privacy settings are available, content can still be shared and accessed beyond the intended recipients.

The terms and conditions of most social media sites state that all content becomes the property of the site on which it is posted.

What constitutes 'private' use?

For the purposes of this Policy, a Council official's social media engagement will be considered 'private use' when the content they upload:

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

5.15 Use of social media during work hours

Council staff may only access and engage on social media in their private capacity while at work during breaks.

5.16 Concerns or complaints

Concerns or complaints about the administration of a Council's social media platforms should be made to the SMC in the first instance.

Complaints about the conduct of Council officials (including Councillors) on social media platforms should be directed to the General Manager.

Complaints about a General Manager's conduct on social media platforms should be directed to the Mayor.

6. Accountability, roles and responsibilities

6.1 General Manager

The General Manager is responsible for ensuring policy implementation, compliance, monitoring, evaluation and review occurs throughout the organisation.

6.2 Social Media Coordinator

The Social Media Coordinator is responsible for carrying out the tasks outlined in this Policy.

7. Acknowledgements

This Policy is based on the Model Social Media Policy developed by the Office of Local Government in consultation with NSW councils.

8. Version control and change history

Date	Version	Approved by & resolution no.	Amendment
[xx xxx xxxx]	[Version details]	[Council: Res No.]	[Explanation for and brief description of version]

GUIDANCE DOCUMENT



Procedure Title	Social Media for Councillors
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Abstract

This Guidance Document provides Councillors with a recommended process and information for managing social media platforms associated with their elected positions.

Dates	Procedure or amendment approved	TBA
	Procedure or amendment takes effect	TBA
	Procedure is due for review (up to 4 years)	TBA
Endorsed by	Executive Leadership Team at its meeting held 28 February 2024	
Approved by	Gunnedah Shire Council, at its Ordinary Meeting held on TBA Resolution number: _____	
Procedure Custodian	Manager Customer and Information Services	
Relevant to	Councillors	
Superseded Procedures	N/A	
Related Documents	Social Media Policy	
Related Legislation	State Records Act 1998	

Contents

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2. Scope
3. Definitions
4. Procedure Principles
5. Procedure Statement
6. Accountability, Roles and Responsibilities
7. Acknowledgements
8. Version Control and Change History

1. Purpose

The purpose of this guidance document is to support the implementation of the Social Media Policy by providing information for Councillors to assist with their management of social media platforms associated with their position as Mayor, Deputy Mayor or Councillor.

2. Scope

This guidance document applies to elected representatives in their dealings with social media.

3. Definitions

Term	Meaning
Social media	Online platforms and applications - such as but not limited to social networking sites, wikis, blogs, microblogs, video and audio-sharing sites, and message boards - that allow people to easily publish, share and discuss content. Examples of social media platforms include, but are not limited to Facebook, Twitter, Snapchat, LinkedIn, Yammer, YouTube, Instagram, Flickr and Wikipedia.

4. Procedure principles

Councillors are committed to upholding and promoting the principles of social media engagement identified in Council's Social Media Policy.

5. Procedure

5.1 Administrative framework for Councillors' social media platforms

Councillors are responsible for the administration and moderation of their own social media platforms and accept all legal responsibilities for them.

Use of online and social media channels in the role of a Councillor should be consistent with Council's Code of Conduct and relevant legislation and policies.

Councillors should comply with the rules of the platform when engaging on social media.

Councillors should ensure they comply with the record-keeping obligations under the *State Records Act 1998* and Council's Records Management Policy in relation to social media. This also applies to Councillors in circumstances where another person administers, moderates, or uploads content onto their social media platform.

5.2 Induction and training

Councillors who engage, or intend to engage, on social media in an official capacity and representing themselves as a Councillor should receive induction training on social media use. Induction training can be undertaken either as part of the Councillor's induction program or as part of their ongoing professional development program.

5.3 Identifying as a Councillor

Councillors should identify themselves on their social media platforms in the following format: Councillor "First Name and Last Name".

A Councillor's social media platform should include a profile photo which is a clearly identifiable image of the Councillor.

If a Councillor becomes or ceases to be the Mayor, Deputy Mayor, or the holder of another position (for example, chairperson of a committee), this should be clearly stated on the Councillor's social media platform and updated within 10 working days of a change in circumstances.

5.4 Other general requirements for Councillors' social media platforms

Councillor social media platforms should specify or provide a clearly accessible link to the 'House Rules' for engaging on the platform. These should be consistent with clause 5.8 of the Social Media Policy.

A Councillor's social media platform should include a disclaimer to the following effect: "The views expressed and comments made on this social media platform are my own and not that of Gunnedah Shire Council."

Despite the above clause, Mayoral or Councillor media releases and other content that has been authorised according to Council's media and communications protocols may be uploaded onto a Councillor's social media platform.

Councillors may upload publicly available Council information onto their social media platforms.

Council's logo and branding must not be used on any social media sites established by a Councillor.

Councillors may use more personal, informal language when engaging on their social media platforms.

5.5 Standards of conduct on social media

Council's Code of Conduct applies to social media engagement undertaken as a Councillor.

Standards of conduct expected of Councillors when engaging on social media platforms is outlined in clause 5.6 of the Social Media Policy.

In addition to these standards of conduct, the following information is relevant:

- Councillors are personally responsible for what third parties post on their social media sites.
- Councillors should monitor posts by third parties and consider if any of those posts or comments are in breach of the Council's policies or any law or regulatory requirements, and take steps to remove or hide content that is found to be a breach. Clause 5.8 of the Social Media Policy provides guidance as to what kinds of information may constitute a breach of legislation.
- When posting online in a non-official capacity, whether intended or not, Councillors should be mindful that what is posted may reflect on Council and their role as Councillor. Posting includes 'liking', 'sharing' or commenting on someone else's post.

5.6 Councillor queries relating to social media platforms

Questions from Councillors relating to their obligations under the Social Media Policy, technical queries relating to the operation of their social media platforms, or managing records on social media may be directed to the General Manager or Director Corporate Services in the first instance, in accordance with Council's Councillor and Staff Interaction Policy.

5.7 Other social media platforms administered by Councillors

A Councillor should advise the General Manager of any social media platforms they administer on which content relating to Council or Council officials is, or is expected to be, uploaded. The Councillor should do so within:

- 10 working days of becoming a Councillor, or
- 10 working days of becoming the administrator

5.8 Records management

Social media content created, sent and received by Councillors acting in their official capacity is a Council record and may constitute open access information or be subject to an information access application made under the *Government Information (Public Access) Act 2009*. These records must be managed in accordance with the requirements of the *State Records Act 1998* and Council's Records Management Policy.

Alteration or removal of social media content should be done in accordance with the requirements of the *State Records Act 1998*.

In fulfilling their obligations under this clause, Council officials should refer to any guidance issued by State Records NSW relating to retention requirements for Councillors' social media content.

Further guidance is available from the State Records NSW website:

[<https://staterecords.nsw.gov.au/recordkeeping/guidance-and-resources/social-media-recordkeeping-councillors>]

5.9 Private use of social media

Activities on social media websites are public activities. Even though privacy settings are available, content can still be shared and accessed beyond the intended recipients.

The terms and conditions of most social media sites state that all content becomes the property of the site on which it is posted.

Due to the extent of requirements and obligations identified in the Social Media Policy and this Guidance Document for Councillors, it is recommended that Councillors maintain separate social media accounts for any 'private' social media engagement they undertake.

If a Councillor chooses to identify themselves as a Councillor, either directly or indirectly (such as in their user profile), then they are not deemed to be acting in their private capacity.

Councillors should be mindful that when they are engaging on social media on Council-related matters or are referring to content that has been acquired by virtue of their role as a Council official, this engagement is viewed as undertaken as a Councillor and not in a private capacity, regardless of what social media account the engagement is associated with.

6. Accountability, roles and responsibilities

6.1 Councillors

Councillors are responsible for ensuring that their management of social media platforms is consistent with this Guidance Document.

6.2 General Manager

The General Manager is responsible for ensuring that the reasonable provision of training, advice and information is made available in relation to this Guidance Document.

7. Acknowledgements

This Guidance Document is based on the Model Social Media Policy developed by the Office of Local Government in consultation with NSW councils and reference has also made to Campbelltown City Council's Social Media Policy.

8. Version control and change history

Date	Version	Approved by & resolution no.	Amendment
[xx xxx xxxx]	[Version details]	[Council: Res No.]	[Explanation for and brief description of version]

DRAFT