October 2022 Ordinary Meeting of Council Item 6.6 Attachment - Draft Social Media Policy



WALCHA COUNCIL

ADMINISTRATION POLICY

DRAFT Social Media Policy

Applicability

All Councillors and Council Staff

Publication Requirement

Internal and External

Assigned Responsible Officer

General Manager

Document Status

Versio	on	Date Reviewed	Prepared by	Endorsed	Approved (date)
1.0			Director Community & Tourism		
1.1		24 August 2022	General Manager	Resolution: 24/20222023	31 August 2022

Amendment Record

Amendment Version #	Date Reviewed	Description of Amendment	



Table of Contents

INTRODUCTION	4
Social Media – Opportunities and Challenges	4
Social Media and Local Government in NSW	4
The Development and Intent of this Policy	5
Content of the Model Social Media Policy	5
Adoption	6
Enforcement	6
Concerns or Complaints	
Acknowledgements	7
PART 1 – Principles	7
PART 2 – Administrative Framework for Council's Social Media Platfor	ms. 7
Platforms	7
Establishment and Deletion of Council Social Media Platforms	
The Role of the General Manager	
Authorised Users	8
Administrative Tone	
Register of Authorised Users	9
Ceasing to be an Authorised User	9
PART 3 – Administrative Framework for Councillors' Social Media	
Platforms	9
Induction and Training	10
Identifying as a Councillor	10
Other General Requirements for Councillors' Social Media Platforms	10
Councillor Queries Relating to Social Media Platforms	10
Other Social Media Platforms Administered by Councillors	10
PART 4 – Standards of Conduct on Social Media	11
PART 5 – Moderation of Social Media Platforms	12
House Rules	12
Removal or 'Hiding' of Content	13



Blocking or Banning	. 14
PART 6 – Use of Social Media during Emergencies	15
PART 7 – Records Management and Privacy Requirements	15
Records Management	15
Privacy Considerations and Requirements	15
PART 8 – Private Use of Social Media	16
What Constitutes 'Private' Use?	16
Use of Social Media During Work Hours	16
PART 9 – Concerns or Complaints	17
PART 10 – Definitions	17



DRAFT Social Media Policy

Our Ref: WINT/2022/05407

INTRODUCTION

Social Media – Opportunities and Challenges

Social media is at the heart of modern communication. Since its inception, social media has grown in popularity and influence and is now fundamental to not just how people interact with one another, but also to how we work, play and consume information and ideas.

Social media can be 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 content¹. Significantly, one of social media's key features is its unprecedented reach and accessibility, in that anyone with a computer or mobile device can use social media to generate content which has the potential to be viewed and shared by hundreds of millions of people worldwide.

Despite its obvious benefits, social media also presents a variety challenges and risks. These include:

- the emergence of new, harmful forms of behaviour, such as cyber-bullying and trolling;
- maintaining the accuracy, reliability and integrity of information disseminated from multiple sources;
- organisations can be held liable for content uploaded onto their social media platforms by third parties²;
- content uploaded in a person's private capacity can adversely affect their employment and cause significant reputational damage to colleagues and employers; and
- rapid innovation can make it difficult to keep pace with emerging technologies and trends.

In addition, potential corruption risks may arise due to social media use. These include:

- customers, development proponents / objectors, tenderers, or other stakeholders grooming public officials by behaviours such as 'liking' specific posts, reposting content, or sending personal or private messages;
- public officials disclosing confidential or sensitive information;
- using social media for sponsorship opportunities, which may unfairly advantage one sponsor over another and lack transparency; and
- public agencies or officials promoting certain businesses by behaviours such as 'following' them, 'liking' content, or making comments, which may result in those businesses being favoured over others.

Social Media and Local Government in NSW

As in the Federal and State jurisdictions, social media has become an important tool in government and political discourse at the local level. In the context of NSW Local Government, social media has two primary functions:

¹ NSW Department of Education. Social media policy: Implementation procedures – November 2018

² As confirmed by the High Court of Australia in *Fairfax Media Publications Pty Ltd v. Voller, Nationwide News Pty Limited v. Voller,* and *Australian News Channel Pty Ltd v. Voller,* 8 September 2021.



Our Ref: WINT/2022/05407

- a) it is used by Councils to interact and share information with their communities in an accessible and often more informal format.
- b) It enables Councillors to promote their achievements and address their constituents directly about community issues and events in ways that either complement or bypass traditional news and print media.

In addition, many Councils use social media as the platform through which they webcast their meetings. This increases transparency by providing visibility of Council decision making in real time.

However, Councils and Councillors are not immune from the challenges associated with social media, which can pose a significant risk both in a legal sense, and in terms of a Council's ability to operate in a unified and coordinated way. It is therefore vital that Councils have the right policy settings in place so that both Councils and Councillors can realise the full benefits of social media whilst mitigating risk.

The Development and Intent of this Policy

The Model Social Media Policy has been developed by the Office of Local Government (OLG) in consultation with Councils. It is applicable to Councils, County Councils and Joint Organisations.

The Model Social Media Policy sets out an exemplar approach by incorporating examples of best practice from the social media policies of a diverse range of NSW Councils, as well as from Commonwealth and State Government agencies.

The Model Social Media Policy provides Councils, County Councils and Joint Organisations with a robust framework for the administration and management of their social media platforms. It also sets standards of conduct for all Council officials who use social media in their official capacity. It has been developed to be fit-for-purpose in a digital age where innovation and emerging trends are the norm.

The Model Social Media Policy recognises that Councils use social media differently depending on factors such as a Council's size and resources, the demographics of a local government area, and Council's willingness to engage with their community in this way. For these reasons, the Model Social Media Policy ensures a degree of flexibility by including optional and adjustable provisions which enables each Council to tailor the policy to suit its own unique circumstances.

Content of the Model Social Media Policy

At the heart of the Model Social Media Policy are the four 'Principles' of social media engagement. They are:

- Openness
- Relevance
- Accuracy



Our Ref: WINT/2022/05407



Respect

These principles, which are expanded upon in Part 1, should underpin every aspect of a Council's social media activity and all Councils and Council officials should commit to upholding them.

Except for Part 8, this policy applies to Council social media pages and Councillor social media pages. The Model Social Media Policy is structured as follows:

Part 1	Sets out the principles of social media engagement for Councils
Part 2	Contains two administrative models that Councils can adopt in relation to the management of their social media platforms
Part 3	Details the administrative framework for Councillors' social media platforms
Part 4	Prescribes the standards of conduct expected of Council officials when engaging on social media in an official capacity or in connection with their role as a Council Official
Part 5	Provides a framework by which Councils can remove or 'hide' content from their social media platforms, and block or ban third parties.
Part 6	Prescribes how Council's social media platforms should be used during emergencies
Part 7	Contains information about records management and privacy requirements relating to social media
Part 8	Relates to personal use of social media by Council officials
Part 9	Provides information about where concerns or complaints about a Council's or Council officials' social media platform(s), or the conduct of Council officials on social media, can be directed.
Part 10	Definitions

Adoption

While not mandatory, the Model Social Media Policy reflects best practice and all Councils, County Councils and Joint Organisations are encouraged to adopt it. In doing so, they are free to adapt the policy to suit their local circumstances and operating environments or to supplement it with their own provisions.

Enforcement

Clause 3.1(b) of the Model Code of Conduct for Local Councils in NSW provides that Council officials must not conduct themselves in a manner that is contrary to a Council's policy. If adopted



DRAFT Social Media Policy

by a Council, a breach of the policy will be a breach of the Council's code of conduct.

Concerns or Complaints

Concerns or complaints about the administration of a Council's social media platforms should be made to the Council's General Manager in the first instance. Council's should provide clear information about where any concerns and complaints can be directed in Part 9 of this Policy.

Acknowledgements

The Office of Local Government wishes to thank Local Government NSW, Councils, the Independent Commission Against Corruption, the Information and Privacy Commission of NSW, the NSW Ombudsman, Resilience NSW, and the State Archives and Records Authority of NSW for their invaluable assistance in drafting this model policy.

PART 1 – Principles

We, the Councillors, Staff and other officials, including any and all volunteers, of Walcha Council are committed to upholding and promoting the following principles of social media engagement:

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

PART 2 – Administrative Framework for Council's Social Media Platforms

Platforms

- 2.1 Council will maintain a presence on the following social media platforms:
 - Walcha Council Facebook page
 - Walcha Council Library Facebook page
 - Walcha Council Library Instagram page





DRAFT Social Media Policy

- Walcha Visitor Information Centre Instagram page
- 2.2 Council's social media platforms must specify or provide a clearly accessible link to the 'House Rules' for engaging on the platform.

Establishment and Deletion of Council Social Media Platforms

- 2.3 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.
- 2.4 Where a Council social media platform is established or deleted in accordance with Clause 2.3, the General Manager or their delegate may amend Clause 2.1 of this Policy without the need of endorsement by the Council's governing body.

The Role of the General Manager

- 2.5 The role of the General Manager is to:
 - a) approve and revoke a staff member's status as an authorized user
 - b) develop and/or approve the training and/or induction to be provided to authorized users
 - c) maintain a register of authorized users
 - d) maintain effective oversight of authorized users
 - e) ensure the Council adheres to the rules of the social media platform(s)
 - f) coordinate with the Council's Administrator Liz Hobbs to ensure the Council's social media platforms are set up and maintained in a way that maximises user friendliness and any technical problems are resolved promptly.
- 2.6 The General Manager is an authorized user for the purposes of this Policy.

Authorised Users

- 2.7 Authorised users are members of Council Staff who are authorized by the General Manager to upload content and engage on social media on the Council's behalf.
- 2.8 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.
- 2.9 The General Manager will appoint authorized users of social media accounts when required. The Authorised Social Media Officers (ASMO) Register document is WINT/2020/02137.
- 2.10 An authorized 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.
- 2.11 The role of an authorized user is to:
 - a) ensure, to the best of their ability, that the content they upload onto social media platform is accurate



DRAFT Social Media Policy

- b) correct inaccuracies in Council generated content
- c) engage in discussions and answer questions on Council's behalf on social media platforms
- d) keep the Council's social media platforms up to date
- 2.12 When engaging on social media on Council's behalf (such as, but not limited to, on a community social media page), an authorized user must identify themselves as a member of Council staff but they are not obliged to disclose their name or position within the Council.
- 2.13 Authorised users must not use Council's social media platforms for personal reasons.

Administrative Tone

- 2.14 Authorised users upload content and engage on social media on the 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.
- 2.15 Authorised users may use more personal, informal language when engaging on Council's social media platforms, for example when replying to comments.

Register of Authorised Users

2.16 The General Manager will maintain a register of authorized users. This register is to be reviewed every twelve (12) months to ensure it is fit-for-purpose.

Ceasing to be an Authorised User

- 2.17 The General Manager may revoke a Staff member's status as an authorized user, if:
 - a) the Staff member makes such a request
 - b) the Staff member has not uploaded content onto any of the Council's social media platforms in the last six (6) months.
 - c) the Staff member has failed to comply with this Policy
 - d) the General Manager is of the reasonable opinion that the Staff member is no longer suitable to be an authorized user
 - e) at the General Manager's discretion.

PART 3 – Administrative Framework for Councillors' Social Media Platforms

- 3.1 For the purposes of this Policy, Councillor social platforms are not Council social media platforms. Part 2 of this Policy does not apply to Councillors' social media platforms.
- 3.2 Councillors are responsible for the administration and moderation of their own social media platforms (in accordance with Parts 3 and 5 of this Policy) and ensuring they comply with the recording keeping obligations under the *State Records Act 1998* (see Clauses 7.1 to 7.4 of this Policy) and Council's records management policy in relation to social media.
- 3.3 Clause 3.2 also applies to Councillors in circumstances where another person administers,



DRAFT Social Media Policy

moderates, or uploads content onto their social media platform.

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

Induction and Training

3.5 Councillors who engage, or intend to engage, on social media must 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.

Identifying as a Councillor

3.6 Councillors must identify themselves on their social media platforms in the following format:

Councillor "First Name and Last Name"

- 3.7 A Councillor's social media platform must include a profile photo which is a clearly identifiable image of the Councillor.
- 3.8 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 must be clearly stated on the Councillor's social media platforms and updated within five (5) working days of a change in circumstances.

Other General Requirements for Councillors' Social Media Platforms

- 3.9 Councillor social media platforms must specify or provide a clearly accessible link to the 'House Rules' for engaging on the platform.
- 3.10 A Councillor's social media platform must 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 the Council."

- 3.11 Despite Clause 3.10, Mayoral or Councillor media releases and other content that has been authorized according to the Council's media and communications protocols may be uploaded onto a Councillor's social media platform.
- 3.12 Councillors may upload publicly available Council information onto their social media platforms.
- 3.13 Councillors may use more personal, informal language when engaging on their social media platforms.

Councillor Queries Relating to Social Media Platforms

3.14 Questions from Councillors relating to their obligations under this 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.

Other Social Media Platforms Administered by Councillors

3.15 A Councillor must advise the General Manager of any social media platforms they



DRAFT Social Media Policy

administer on which content relating to the Council or Council officials is, or is expected to be, uploaded. The Councillor must do so within:

- a) Immediately on becoming a Councillor; or
- b) One (1) day of becoming the administrator.

PART 4 – Standards of Conduct on Social Media

- 4.1 This Policy only applies to Council official's 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.
- 4.2 Council officials must comply with the Council's Code of Conduct when using social media in an official capacity or in connection with their role as a Council official.
- 4.3 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 Walcha Council's *Model Code of Conduct for Local Councils in NSW*, or is unlawfully discriminatory
 - d) is contrary to their duties under the *Work Health & 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 Walcha Council *Procedures for 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 authorized 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
 - n) constitutes spam
 - o) is in breach of the rules of the social media platform.

DRAFT Social Media Policy

Our Ref: WINT/2022/05407

- 4.4 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.
- 4.5 Council officials must exercise caution when sharing, liking, retweeting content as this can be regarded as an endorsement and/or publication of the content.
- 4.6 Council officials must not incite or encourage other persons to act in a way that is contrary to the requirements of this Part.
- 4.7 Councillors must uphold and accurately represent the policies and decisions of the Council's governing body but may explain why they voted on a matter in the way that they did. (See section 232(1)(f) of the *Local Government Act 1993*).

PART 5 – Moderation of Social Media Platforms

NOTE: Council officials should be aware that they may be considered a 'publisher' of <u>any</u> 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.
- 5.1 Council officials who are responsible for the moderation of the Council's or Councillors' social media platforms may remove content and 'block' or ban a person from those platforms. Such actions must be undertaken in accordance with this Part.
- 5.2 For the purposes of this Part, 'social media platform' and 'platform' means both the Council's and Councillors' social media platforms.

House Rules

- 5.3 Social media platforms must state or provide an accessible link to the 'House Rules' for engaging on the platform.
- 5.4 At a minimum, the House Rules should specify:
 - a) the principles of social media engagement referred to in Clause 1.1 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 (see Clause 7.4 of this Policy)
 - e) when the platform will be monitored (for example weekdays 9am 5pm, during the Council's business hours)



DRAFT Social Media Policy

Our Ref: WINT/2022/05407

- f) that the social media platform is not to be used for making complaints about the Council or Council officials. A link to Council's Complaints Handling Policy will be provided in the House Rules.
- 5.5 For the purposes of Clause 5.4(b), third parties engaging on 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 *Walcha Council's 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 other 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 *Walcha Council Procedures for 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

- 5.6 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 5.5, the moderator may remove or 'hide' that content.
- 5.7 Prior to removing or 'hiding' the content, the moderator must make a record of it (for example, a screenshot).
- 5.8 If the moderator removes or 'hides' the content under Clause 5.6, 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.
- 5.9 A person may request a review of a decision by a moderator to remove or 'hide' content under Clause 5.6. The request must be made in writing to the General Manager and state the grounds on which the request is being made.
- 5.10 Where a review request is made under Clause 5.9, the review is to be undertaken by the General Manager 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.



DRAFT Social Media Policy

Our Ref: WINT/2022/05407

Blocking or Banning

- 5.11 If a person uploads content that is removed or 'hidden' under Clause 5.6 of this Policy that person may be blocked or banned from all social media platforms.
- 5.12 A person may only blocked or banned from a Council social media platform with the approval of the General Manager. This Clause does not apply to blocking or banning a person from a Councillor's social media platform.
- 5.13 Prior to blocking or banning a person from a 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.
- 5.14 The duration of the block or ban is to be determined by the General Manager, or in the case of a Councillor's social media platform, the Councillor.
- 5.15 Where a determination is made to block or ban a person form all 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 which social media platforms they are blocked or banned from and the duration of the block or ban and inform them of their rights of review.
- 5.16 Despite Clauses 5.11 to 5.15, where a person uploads content of a kind referred to under Clause 5.5, 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 all platforms may be imposed on the person immediately for a period no longer than (Council to specify time period).
- 5.17 A person who is blocked or banned from all platforms under Clause 5.16 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 under Clauses 5.11 to 5.15.
- 5.18 A person may request a review of a decision to block or ban then from a 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.
- 5.19 Where a review request is being made under Clause 5.18, the review is to be undertaken by the General Manager who is suitably qualified and who was not involved in the decision to block or ban the person. Where the decision to block or ban the person was made by the General Manager, the review must be undertaken by another senior and suitably qualified member of staff who was not involved in the decision.
- 5.20 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, Clause 5.11 to 5.19 do not apply.



DRAFT Social Media Policy

PART 6 – Use of Social Media during Emergencies

- 6.1 During emergencies, such as natural disasters or public health incidents, the General Manager, Local Emergency Management Officer and Executive Assistant to the Mayor and General Manager will be responsible for the management of content on the Council's social media platforms.
- 6.2 To ensure consistent messaging both during and after an emergency, authorized users and Council officials must not upload content onto the Council's or their own social media platforms which contradicts advice issued by the agency coordinating the emergency response, or agencies supporting recovery efforts.
- 6.3 Training on social media use during emergencies should be included in training and/or induction provided to authorized users and Councillors.

PART 7 – Records Management and Privacy Requirements

Records Management

- 7.1 Social media content created, sent and received by Council officials (including 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 the Council's approved records management policies and practices.
- 7.2 You must not destroy, alter, or remove social media content unless authorized to do so. If you need to alter or remove social media content, you must do so in accordance with this Policy, and consult with the Council's records manager and comply with the requriements of the State Records Act 1998.
- 7.3 When/if a Councillor's term of office concludes, the Councillor must contact the Council's General Manager to manage/transfer records of social media content created during their term of office and comply with the requirements of the State Records Act 1998.
- 7.4 In fulfilling their obligations under Clauses 7.1 to 7.3, Council officials should refer to any guidance issued by the State Archives and Records Authority of NSW relating to retention requirements for Councils' and Councillors' social media content³.

Privacy Considerations and Requirements

- 7.5 Social media communications are in the public domain. Council officials should exercise caution about what personal information, if any, they upload onto social media.
- 7.6 The *Privacy and Personal Information Act 1998* applies to the use of social media platforms by the Council and Councillors. To mitigate potential privacy risks, Council officials will:
 - a) advise people not to provide personal information on social media platforms

³ See State Archives and Records Authority of NSW 'Government Recordkeeping / Advice and Resources / Local Government' and 'Social media recordkeeping for councillors'





DRAFT Social Media Policy

Our Ref: WINT/2022/05407

- 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
- d) advise people to contact the Council or Councillors through alternative channels if they have personal information they do not want to disclose in a public forum.
- 7.7 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.

PART 8 – Private Use of Social Media

NOTE: 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 posted⁴.

What Constitutes 'Private' Use?

- 8.1 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, the Council, any other Council officials, contractors, related entities or any other person or organization providing services to or on behalf of the 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.
- 8.2 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.

Use of Social Media During Work Hours

- 8.3 Council Staff may only access and engage on social media in their private capacity while at work during breaks.
- 8.4 Council Staff who access and engage on social media in their private capacity during work hours must ensure it does not interfere with the performance of their official duties.

⁴ Social Media: Guidance for Agencies and Staff (Government of South Australia) – page 9



DRAFT Social Media Policy

Our Ref: WINT/2022/05407

PART 9 – Concerns or Complaints

- 9.1 Concerns or complaints about the administration of Council's social media platforms should be made to the General Manager in the first instance.
- 9.2 Complaints about the conduct of Council officials (including Councillors) on social media platforms may be directed to the General Manager.
- 9.3 Complaints about a General Manager's conduct on social media platforms may be directed to the Mayor.

PART 10 – Definitions

In this Social Media Policy the following terms have the following meanings:

Authorized user	Members of Council Staff who are authorized by the General Manager or SMC to upload content and engage on the Council's social media platforms on the Council's behalf
Council Official	In the case of Walcha Council – Councillors, members of Staff, volunteers and delegates of the Council (including members of Committees that are delegates of the Council).
Minor	For the purposes of Clause 4.4(b) 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	Is a Council's social media coordinator appointed under Clause 2.7 of this Policy
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, Flicker and Wikipedia