

Social Media Policy

Policy Reference Number	879795
Responsible Department	Community Connections
Related Policies	Internet, Email and Computer Use; Behavioural Management Policy; Administrative Policy for Elected Members; Staff Conduct Policy
Related Procedures	Social Media Procedures; Introductory Guide on Social Media for Elected Members, Committee Members and Council Assessment Panel Members
Date of Initial Adoption	6 December 2011
Last Reviewed by Council	5 December 2023

1. Purpose

- 1.1. The purpose of this Policy is to provide Council's position in respect to the expectations of Council Representatives when engaging in Social Media via posting of Content, public comment and general use in both an official professional and personal capacity.

2. Introduction

- 2.1. Council (the Corporation of the Campbelltown City Council) uses a variety of Social Media platforms.
- 2.2. The Council acknowledges that Social Media is an important part of many people's daily lives, increasingly used to connect with others, as a source of news and information, and to conduct business and marketing.
- 2.3. Social Media provides a platform to connect large numbers of people at a local, national and global scale.
- 2.4. The Community has an expectation that Council will engage, work openly, be more accountable and move quickly on issues. Social Media is a powerful tool for Council to engage with residents, listen to the Community and harness local energy.
- 2.5. Social Media can:
 - Increase access to and engagement with Council
 - Increase Council's access to the wider Community and improve the accessibility of Council communication
 - Allow Council to be more active in its relationships with communities, partners and other stakeholders
 - Increase the level of trust in Council
 - Reach targeted audiences on specific issues, events and programs

- Provide effective, fast communication channels during crises
- Provide insights into how Council is perceived

2.6. This Policy does not seek to regulate personal use of Social Media except to the extent that it could be connected to the Council or could or does cause financial or reputational harm to the Council. For Elected Members of the Council, this Policy should be read in conjunction with the Council's Do's and Don'ts on Social Media (Appendix 1).

2.7. The Council requires all Council Representatives using Social Media, whether in a professional or personal capacity, to demonstrate standards of conduct and behaviour that are consistent with this Policy, and reasonable standards of acceptable behaviour.

2.8. This Policy should be read in conjunction with State Government's mandatory Code of Conduct for Elected Members and Council Policies as applicable.

2.9. Further information about the use of social media is available in Council's Social Media Procedures and Introductory Guide on Social Media for Elected Members, Committee Members and Council Assessment Panel Members.

3. Power to Make the Policy

Council is empowered to make this Policy in accordance with Section 132A of the *Local Government Act 1999*.

4. Strategic Plan Link

This Policy has the following link to Council's Strategic Plan 2024:

- Leading our People (Goal 5)

5. Principles

- Be credible; accurate, fair, thorough and transparent
- Be respectful, cordial, honest and professional at all times
- Be responsive and share information where appropriate
- Behave with honesty and integrity
- Be consistent with other Council information.

6. Definitions and Terms

6.1. Definitions

Communications Team means Council Representatives responsible for social media administration.

Content is the information that is posted onto Social Media sites (including likes, reactions, comments and shares), which includes text, audio, video, images, links, podcasts and other multimedia communications.

Council Representative means Council employees, contractors, agents, Elected Members, Independent Committee or Panel Members, and volunteers whether on leave or otherwise and includes temporary agency Staff.

Official social media means posts undertaken by authorised Council Staff for the purpose of promoting and sharing Council projects, programs and services, and responding to Community questions and comments about Council's interests.

Official Use means the use of a Social Media account owned or administered by Council, posts made by an individual on behalf of Council, or posts approved by a Responsible Person.

Personal social media means interaction by Council representatives on social media platforms to represent their own personal interests, preferences and activities. This interaction may be separate or cross over into Council interests (eg sharing of official posts about Council events or programs on individual's social media pages).

Personal Use means any use of Social Media use that is not Official Use.

Responsible Person means the Chief Executive Officer, a member of the Executive Management Team, (or their nominee).

Social Media is the term used for various internet-based applications and platforms which allow for user participation and refers to user-generated information, opinion and other Content shared over open or private digital networks. It allows the creation and exchange of user-generated Content and enables individuals to communicate via the internet, sharing information and resources. Social media may include (but is not limited to):

- social networking sites (e.g. Facebook, LinkedIn, Twitter);
- video and photo sharing websites (e.g. TikTok, YouTube, Pinterest, Instagram);
- blogs, including corporate and personal blogs;
- blogs hosted by traditional media outlets (e.g. 'comments' made on news sites);
- Wikis and online collaborations (e.g. Wikipedia);
- forums, discussion boards and groups (e.g. Google groups);
- vod and podcasting;
- online multiplayer gaming platforms;
- instant messaging (including Snapchat and SMS);
- geo-spatial tagging; and
- live chat (including audio only platforms such as Clubhouse).

6.2. Terms

- 6.2.1. This Policy applies to any and all online activity or Content published by a Council Representative on Social Media whether it is Official Use or Personal Use in which any reasonable person might construe that the activity is made on behalf of, with the authority of, or in the employment of the Council, whether the Council is specifically mentioned or not.
- 6.2.2. Council Representatives should consider that if they are widely known to have a connection with the Council then it is likely that all content they publish (regardless of context) will carry with it a connection to the Council.
- 6.2.3. Whilst the Council support a Council Representative's rights to freedom of opinion and expression, the use of Social Media by a Council Representative must not bring the Council into disrepute, compromise effectiveness at work, express or imply the Council's endorsement of a personal view, product or service, disclose confidential information, make defamatory remarks or any claims that relate to the Council that are misleading or deceptive.
- 6.2.4. Social Media posts may remain public even after they are deleted. Council requests that Council Representative's treat any post made as permanent and public, even if it was posted privately.

7. Policy

- 7.1. This Policy outlines what is considered to be acceptable use of Social Media and is designed to assist use of Social Media, recognising the many different degrees of interaction and usage that exist amongst Council Representatives in various capacities.
- 7.2. Social Media should not be used by Council Representatives for an Official Use unless the use has been approved by the Responsible Person.
- 7.3. Council accepts that Council Representatives may wish to identify themselves on their personal Social Media accounts as Council Representatives and engage in professional social networking such as communicating with fellow employees or professional colleagues, however as a Council Representative anything published on Social Media which is attributed to the Council or appears to be endorsed by or originate from Council must first have been approved by Council or a Responsible Person. Sharing of Official Social Media in a positive manner is allowed.
- 7.4. Council Representatives must not engage in, or participate in a manner that may influence the outcome of Council's public consultation processes by using Social Media.

8. Use of Social Media

8.1. Use of Social Media – Official Use

- 8.1.1. Official Use of Social Media is when Council Representatives have been authorised or permitted by the Responsible Person to use Social Media as an official representative of Council.

8.1.2. Any Social Media accounts created for an Official Use must stipulate that it is an official account of Council in the bio or account description.

8.1.3. Council Representatives using Social Media for an Official Use must:

- 8.1.3.1. ensure they are not in breach of any other Council Policy or procedure;
- 8.1.3.2. make their affiliation with Council clear when not posting on an Official Council page;
- 8.1.3.3. where appropriate in the context, make clear that the profile is for an Official Use by using the following disclaimer, or any other disclaimer or description as approved by a Responsible Person:

'This is an official account/page for Council'

followed by a description of the purpose of the account/page.

- 8.1.3.4. only post content that is genuinely expected to be relevant and of interest to followers;
- 8.1.3.5. respond to enquiries within 24 hours (Monday to Friday) where possible;
- 8.1.3.6. keep messages simple and engage in conversations where appropriate;
- 8.1.3.7. link to more information on Council's website or relevant external websites where possible;
- 8.1.3.8. not release any CCTV footage on Council's Social Media without the permission of the Responsible Person;
- 8.1.3.9. forward any media enquiries to the Chief Executive Officer; and
- 8.1.3.10. comply with the Unacceptable Use section of this Policy.

8.2. Monitoring Official Use of Social Media

8.2.1. The Communications Team will monitor content posted on Council's official Social Media pages/sites to ensure adherence to the Social Media Policy for appropriate use, message and consistency in branding.

8.2.2. When Council Representatives or external parties (social media users) interact with Council on Social Media, Council has a responsibility to make sure it maintains a friendly and safe environment for discussion. Council will not remove legitimate concerns or complaints raised, however has an obligation to moderate and monitor content from social media users. The Communications Team may delete or hide content that:

- 8.2.2.1. breaches the law;
- 8.2.2.2. is rude, harassing, threatening, defamatory or discriminatory;

- 8.2.2.3. contains unauthorised electoral statements;
- 8.2.2.4. is persistent or repetitious, off topic or constitutes spam or trolling;
- 8.2.2.5. is inaccurate, irrelevant or otherwise misleading;
- 8.2.2.6. is otherwise offensive or likely to bring Council into disrepute.

8.2.3. Where social media users continue to breach clause 8.2.2, the Communications Team may block the user's account from interacting with Council channels and exercise any other rights or remedies available to Council at law.

8.3. Use of Social Media – Personal Use

- 8.3.1. Personal Use accounts may be set up in a Council Representative's own name or under any other name or alias.
- 8.3.2. Accounts created for Personal Use may still be affiliated with Council through some other identifier such as disclosure through their online profile, by the Content they post or share, or by virtue of the user being well known as having a connection with Council.
- 8.3.3. Where Elected Members identify themselves on their Social Media as affiliated with Council in any way (by way of including this in their bio as their place of employment for example), the following statement, or wording with substantially the same meaning, is to be included:

'This personal account is not endorsed by Campbelltown City Council.'

8.3.4. For Personal Use of Social Media, Council Representatives must:

- 8.3.4.1. ensure they know the difference between Official Use and Personal Use of Social Media;
- 8.3.4.2. be aware that although they may not be using Social Media for Official Use, the Content they post or share, or how they affiliate with or for Council on Social Media may still be seen as a representation of or on behalf of Council;
- 8.3.4.3. ensure that any online Content published is not attributed to Council or appears to be endorsed or originate from Council unless it is official Council posts or material shared or re-posted without any substantial or meaningful change;
- 8.3.4.4. make clear that any comments or views expressed on any Social Media are their own and not those of Council;
- 8.3.4.5. maintain confidentiality and privacy at all times;
- 8.3.4.6. remove and report any Content or comments on any personal account of Council Representatives (whether or not that account or Content is private) if requested to do so by the Chief Executive Officer (or nominee) if Council consider such Content or comments are or may be intended to disparage or defame Council or its

Council Representatives or associates in any way, or for any other reason Council see fit; and

8.3.4.7. comply with the Unacceptable Use section of this Policy.

8.3.5. Council respects Council Representatives right to freedom of opinion and expression as members of the Community, however Council Representatives must not:

8.3.5.1. register new social media accounts with a Council email address (except LinkedIn), unless approved by a Responsible Person;

8.3.5.2. post Official Social Media unless approved by a Responsible Person (other than sharing an Official Use post);

8.3.5.3. make any comments or posts (whether implied or otherwise) that are or could be perceived to be made on behalf of Council, rather than expression of a personal view;

8.3.5.4. disclose Confidential Information of Council or any Council Representatives or clients of Council; and

8.3.5.5. initiate direct contact (through a message, email or other communication sent to the person directly as opposed to a broad generalised communication to the public at large) in relation to Council business with rate payers not otherwise known to them, or associates of Council through Social Media unless authorised by a Responsible Person.

8.3.6. Elected Members social media pages that identify the Member as per 8.3.3 need to remain visible for all other Campbelltown City Council Elected Members and Council Employees to view.

8.4. Unacceptable Use

8.4.1. Regardless of whether or not Council Representatives use of Social Media is for an Official Use or Personal Use and whether the use is authorised or not, Council Representatives must not engage in any unacceptable use of Social Media and be aware of the consequences of breaching this Policy.

8.4.2. Specifically, Council Representatives must:

8.4.2.1. not post or endorse (which includes liking or sharing the post) material that would reasonably be considered to be offensive, obscene, threatening, harassing, bullying, discriminatory, hateful, racist, sexist, or is otherwise abhorrent;

8.4.2.2. not bring Council's integrity into disrepute or do or say anything that might harm the operations or reputation of Council or other Council Representatives;

8.4.2.3. not upload, use or disclose information of a confidential, proprietary or sensitive nature (whether intentionally or otherwise),

in relation to Council, Council Representatives or clients and associates of Council;

- 8.4.2.4. not provide any advice on behalf of Council or make comments or posts that speak or purport to speak on behalf of Council without authorisation;
- 8.4.2.5. comply with all legal or regulatory requirements and terms and conditions of each Social Media Site, and not post any content that is unlawful (including defamatory or misleading content, or any content that would infringe a third party's rights);
- 8.4.2.6. comply with any request of Council or the Chief Executive Officer to remove or modify a post where Council or the Chief Executive Officer reasonably believes a post on Social Media to be detrimental to Council's interests; and
- 8.4.2.7. ensure that any Content published that is not owned or licenced to Council is appropriately licenced and attributed where relevant.

8.5. Security risks

- 8.5.1. Social Media sites can collect a significant amount of personal information. Accordingly, it is in the best interests of Council Representatives to ensure appropriate and effective security and privacy settings are established, where available, to allow only restricted access to their accounts.
- 8.5.2. Council Representatives need to be mindful however that regardless of security and privacy settings put in place, content may still be made public or illegally accessed by cybercriminals.
- 8.5.3. Unintended invitees may gain access to a Social Media account through a linked association (e.g. a friend of a friend). Some individuals and organisations, including criminal organisations, use Social Media to mask their true identity and obtain personal information.

9. Consequences for Breach

- 9.1. Misuse of Social Media can have serious consequences for not only Council but also Council Representatives.
- 9.2. Complaints regarding an alleged breach by an Elected Member of the Social Media Policy should be referred to the Chief Executive Officer.
- 9.3. Investigations into the alleged breach will be conducted in line with Clause 6.5 (Management of Behavioural Code Breaches) of Council's Administrative Policy for Elected Members.
- 9.4. In circumstances of a breach of this Policy by Council Representatives, Council may take actions including but not limited to:
 - 9.4.1. deleting or requesting the removal of Content;
 - 9.4.2. making any necessary public comment to correct or clarify the breach

9.4.3. taking disciplinary action against the Council Representatives in breach of the Policy; and

9.4.4. exercising any other rights or remedies available to Council at law.

9.5. If any sanction is applied by a Responsible Person who is not the Chief Executive Officer, a person the subject of a sanction may by written application to the Chief Executive Officer made within 7 days of the sanction being applied seek review of that Sanction. The Chief Executive Officer may then uphold the sanction, revise the sanction, or refer the complaint to the appropriate decision making body. Any sanction that is under review remains in full effect until the conclusion of that review.

10. Responsibilities and Contact

10.1. The Responsible Person is responsible for managing and authorising the use of Council accounts and engaging with the general public, professional colleagues or associated groups of Council in an official capacity.

10.2. The Responsible Person is responsible for monitoring Official Council accounts/profiles, addressing any alleged breach of this Policy and requesting the removal or modification of any Social Media posts or comments or the reporting of those posts or comments as required (directly to the individual who posted the content, to the platform on which it was posted, or to government or law enforcement authorities as is appropriate in the case).

11. Review & Evaluation

Within twelve months of each new Council term, Council will review this policy. Following this initial review, this policy will be reviewed at least biennially by Staff with minor administrative adjustments being approved by the Chief Executive Officer.

12. Availability of the Policy

Copies of this Policy will be available at Council's principal office during ordinary business hours and at Council's website www.campbelltown.sa.gov.au.

Appendix 1

ELECTED MEMBERS DO'S AND DON'TS ON SOCIAL MEDIA

Introduction

1. This document sets out what is and is not acceptable to the Council in relation to the posting of content and general use of Social Media and public comment by Elected Members.
2. The Council acknowledges that Social Media is an important part of Elected Members' engagement with their community by networking, discussion and debate to obtain public feedback and bring that feedback to the attention of the Council.
3. This document should be read in conjunction with the SA Government's Code of Conduct for Council Members, and Council's Administrative Policy for Elected Members, Social Media Policy, Public Consultation Policy and Privacy Policy (**Council Policies**).
4. This document does not provide guidance regarding election campaign materials. Elected Members should seek advice before posting content surrounding any election or re-election bid.

Purpose of this Document

The purpose of this document is to provide Elected Members with examples of what constitutes acceptable and unacceptable behaviour on Social Media. It should, however, be recognised that there will be many instances where views on appropriateness could differ. Accordingly, if there is any concern about whether conduct is appropriate it should be referred to the Chief Executive Officer for advice.

Do's and Don'ts

The following 'Do's and Don'ts provide guidance on what is and is not acceptable use of Social Media:

When posting on Social Media using an account that has not been endorsed by the Council:

- Make clear that any comments or views expressed by you are your own and not those of the Council by using the disclaimer wording provided in the Policy.
- When using the post disclaimer it is important to remember that your post may be re-shared by others. This means you should ensure that the disclaimer is visible on any images you share, and at the top of your post (otherwise it might be hidden when your post is published or shared).
- Follow Council's own social media channels and like and share Council posts
- Remember that you are personally responsible for what third parties say on your page, or comment on your posts (including when they share them onto their own pages). You should always 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.

- Always be accurate, honest and respectful, as even when posting publicly your comments can reflect on the Council.

Things you should not do:

- use Council trademarks, images, logos and copyright material without approval.
- unfairly use your position as an Elected Member to promote or benefit a person or business.
- attribute content published by you to the Council or make it appear that the content is endorsed by or published on behalf of the Council unless the content is first approved by a Council Responsible Person in writing.
- disclose confidential information on Social Media.
- post material that is offensive, obscene, defamatory, damaging, threatening, harassing, bullying, unlawful, misleading or deceptive, discriminatory, hateful, racist or, sexist. No matter what disclaimer you use, this can always be linked back to the Council and may breach your responsibilities as an Elected Member.
- post material that infringes copyright or intellectual property rights, constitutes a contempt of court, breaches a Court suppression order, or is otherwise unlawful.
- allow offensive, defamatory or unlawful comments to remain on posts you can control.
- post content that could undermine public confidence in the system of Local Government.
- block other Elected Members and/or Council Employees from accessing your account.

Examples of acceptable conduct using an account that identifies you as being an Elected Member:

1. Sharing Council posts and encouraging participation in community engagement processes.
2. Posting a respectful comment about a decision of Council on which you had a difference of opinion.
3. Encouraging participation in Council services and events.
4. Encouraging Community support for local businesses generally through actions such as:

- 4.1 Posting content that supports Council initiatives (eg the Campbelltown Food Trail)
- 4.2 Supporting doing business in Campbelltown in general
- 4.3 Posting a photograph of you shopping locally and commenting on the benefits of doing so
- 4.4 Posting a photo with local business owners (but not praising or singling out their specific goods or services as being better than anyone else's)
5. Engaging in respectful discussion on local issues.
6. Identifying yourself as an Elected Member to encourage people in the Council area to contact you about issues of concern.

Examples of problematic conduct using an account that identifies you as being an Elected Member

1. Posts that endorse or favour an individual or business (as opposed to businesses in the Council area in general).
2. Responding to questions about Council business that you have not been authorised to respond to.

Commenting on matters of public controversy (even if they are unrelated to the Council such as anti-vaccination debates or debates of State Government policy) in a manner that impacts upon public confidence in the Council, or which fails to clearly identify the comments as being personal and not reflective of Council's position.

3. Debating other Elected Members on issues that should be discussed at Council meetings
4. Commenting on any other person's integrity (or lack of integrity).

Examples of acceptable conduct using an account that does not clearly identify you as being an Elected Member:

1. Using your own personal experience to make a recommendation in answer to a question (provided a disclaimer is used)
2. Posting general commentary on uncontroversial matters
3. Engaging in discussions with rate payers about their local Community.

Examples of conduct that is not acceptable whether you identify yourself as an Elected Member or not:

1. Posting content that personally attacks any other person (including Council Staff or other Elected Members)
2. Posting content that accuses the Council of corruption, maladministration or otherwise diminishes public confidence in the institution of Local Government¹
3. Endorsing or promoting a particular person or business whilst displaying Council logos, trademarks or other branding anywhere on the relevant social media account
4. Promoting unlawful products or services or making misleading or deceptive statements about a product or service
5. Making statements likely to bring Council into disrepute.
6. Breaching someone's copyright or privacy.

Reminders

The Council reminds Elected Members that:

1. Any posts made on Social Media remain public even after they are deleted. When posting online, you are encouraged to treat it as permanent, and public, even if you think you are posting privately.
2. When posting online, whether you intend it or not, whatever you post may still reflect on Council and your role as an Elected Member, therefore ensure that when posting you do so in a way that upholds the values and representation of Council and is consistent with Council's other policies.
3. Posting includes 'liking', 'sharing' or commenting on someone else's post.

¹ If concerns of this nature are held, Elected Members should raise them through relevant legislative channels.