



CUMBERLAND
CITY COUNCIL

Social Media Policy

AUTHORISATION & VERSION CONTROL

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SUMMARY

Social media is an integral marketing and communications tool for Cumberland City Council to promote, engage with, respond and listen to the diverse needs and aspirations of the community. Due to the public nature of social media, it is essential to adopt a policy that governs the acceptable use of social media and clarifies the responsibilities of Council officials in both their personal and official use of social media.

This policy supports Council's mission to "Build a unified organisation while continuing to do great work with our community" by promoting guidelines and procedures that encourage responsible use of social media that mitigate reputational risk to Council, Councillors and staff.

As this policy is aligned to the Code of Conduct, failure to adhere to these guidelines prescribed may give rise to disciplinary action.

In addition to this policy, the Social Media Procedure document provides instructional information for establishing and managing a social media channel on behalf of Council.

This Policy will be reviewed bi-annually.

PURPOSE

This policy promotes a governance framework for communicating and engaging on social media on behalf of Council and provides acceptable standards of personal use to mitigate risk to Council, its constituents and staff.

The purpose of this policy is to:

- Outline the process for managing Council's use of social media.
- Inform and guide Council officials on engaging in online conversations in a personal and official capacity.
- Ensure Council's social media activities are consistent, effective and transparent across the organisation.
- Protect the online reputation of the Council, its brand and staff.

SCOPE

This policy applies to all Council officials which includes Councillors and Council staff (permanent, temporary or casual), volunteers, contractors, Council committee members, conduct reviewers and delegates of Council. This policy governs social media use on Council or personal devices, either during operating hours or outside of these hours including:

- In a work-related capacity, where Council officials are accessing Council's social media channels.
- When representing Council or making a personal reference on behalf of Council.
- When used in a personal or official capacity reflects on their position as a Council official.

DEFINITIONS

- **Authorised administrator:** A Council staff member who has the authority, in accordance with their delegations, to represent Cumberland City Council on social media. The Strategic Communications Group approve authorised administrators.
- **Avatar:** The profile image or profile name displayed on the social media account to identify ownership.
- **Council officials:** All Councillors, Council employees, volunteers, contractors, Council committee members, Administrators, Council advisers, conduct reviewers and delegates of Council.
- **Director:** A Division's senior member who has the authority to approve or deny staff from using social media for official use. The Director may also request the development of new social media accounts.
- **Moderator:** A designated Council employee who monitors online communications. The moderator may also answer general questions via the channel and respond to complaints. A moderator is also an authorised administrator.
- **Official Council Accounts/Pages:** Social media pages labelled 'Cumberland City Council', which are managed by the Strategic Communications Group.
- **Personal use of social media** means **you are not identified** as a Council employee when participating on social media. Staff are bound by the Code of Conduct.
- **Professional use of social media** means **you are authorised** to comment as a Council representative and your participation on social media is on behalf of Council.
- **Social media:** The collective of online communication channels dedicated to community-based input, interaction, content-sharing and collaboration. These channels allow users to transfer text, video, audio, images and general information easily and, often, instantaneously among social media users. These sites include, but are not limited to:
 - Facebook
 - Twitter
 - YouTube
 - Pinterest
 - What's App/Messenger
 - Instagram
 - LinkedIn
 - Snapchat
 - Flickr
 - Blogs
- **Social media account:** Refers to a page or profile created within a social media channel to promote a brand or service e.g. *Cumberland Library Service*.

- **Social media channel:** Refers to the specific social media platform or service used e.g. Facebook, Twitter.

CODE OF CONDUCT

Social media use by Councillors or Council staff must be done in accordance with this policy and the Code of Conduct. Any behaviour online that damages the Council's reputation or commercial interests may constitute a breach of Council's Code of Conduct. Any behaviour online that brings Council or holders of civic office into disrepute may also constitute a breach of Council's Code of Conduct.

Council officials must not discuss personnel, confidential legal advice, commercial-in-confidence matters or any matters that are in contravention of the *Government Information (Public Access) Act 2009 NSW* or fall under the provisions of the *Privacy and Personal Information Protection Act 1988 NSW* on social media.

PRINCIPLES

In support of the Code of Conduct principles, social media usage on behalf on Council must:

- Strengthen the public's trust and confidence in the integrity of Council. (*Leadership*)
- Be made in the public interest and not in order to gain financial or other benefits for yourself, your family, friends or business interests. (*Selflessness*)
- Be credible, accurate, fair and transparent. (*Impartiality*)
- Apply appropriate record keeping to ensure accountability for decisions and actions made. (*Accountability*)
- Be responsive and share accurate information within the requirements indicated in this policy. (*Openness*)
- Be respectful, cordial, thorough and professional at all times. (*Respect*)
- Demonstrate honesty and integrity, ensuring any actual or potential conflict of interests relating to your social media interactions are declared and taking steps to resolve any conflicts in such a way that protects the public interest and Council's. (*Honesty*)

PROFESSIONAL SOCIAL MEDIA USE

Using social media in a professional capacity includes interactions made on behalf of Council. Only authorised administrators can engage on social media in a professional capacity (*see definitions*).

Account management

The Strategic Communications Group is primarily responsible for the management of Cumberland City Council official social media pages (*see definitions*). Other Council staff

members may be delegated as authorised administrators if they are experts in the field for dedicated service-delivery social media pages e.g. Cumberland Library Service.

Social media accounts are administered by the Strategic Communications Group to ensure consistency of tone, voice and brand. However, additional approved moderators may post on Council's behalf.

Council is not responsible for any unauthorised comment on websites or social media sites that are not under the direct control or management of Cumberland City Council.

Authorised administrator approval

Staff must be approved as an authorised administrator in order to participate on social media on behalf of Council and manage Council social media channels.

For approval:

- Executive Managers must delegate this responsibility to a staff member.
- The *Authorised Administrator* form (*See procedures document*) must be signed by the Director and the authorised administrator and sent to the Manager Strategic Communications to review.
- Approvals will be granted if forms have been fully completed and the Social Media Policy, Code of Conduct and the Media Policy have been read and acknowledged and the case for access endorsed by the Manager Strategic Communications.

Using social media as an approved administrator

Authorised administrators must be aware that they will be publicly representing Council to a broad audience including, but not limited to, residents, media, government agencies and other external stakeholders. Council considers posting information on social media platforms the same as distributing information or providing comment to the media.

Professional social media users must:

- Disclose themselves as an employee of Council in conversation by either their name, the team they represent or through the page avatar (*see definitions*) and use only an approved social media account (*see social media procedures*).
- Obtain prior approval by their before a request is made to the Manager Strategic Communications to have content uploaded to Council's social media accounts.
- Disclose and comment only on information classified as 'information in the public domain'.
- Ensure content is objective and non-political in nature unless stating an authorised resolved position of Council.
- Ensure they are not the first to make a Council announcement unless specifically authorised to do so.
- Seek advice and approval from the respective Divisions when preparing responses to comments made by the community regarding Council initiatives.

- Adhere to the terms of use of the relevant social media platform/website, as well as copyright, privacy, defamation, contempt of court, discrimination, harassment and other applicable laws.
- Respect copyright laws and fair use of third-party material and attribute work to the original author/source.
- Sign the written consent form/s authorising the use of a photo and/or video prior to uploading and/or linking the photo and/or video on the social media channel.
- Disclose to their relevant Director any engagement online with an external client, former external client, or their family and friends where there may be a real, potential or perceived conflict of interest.
- Not refer to themselves as a Council official when expressing a personal opinion or participating in public debate.

COUNCILLORS AND MAYOR

The Mayor and Councillors are personally responsible for the content they publish on social media. Social media sites are in the public domain and it is important that Councillors and the Mayor ensure they are confident of the nature of the information they publish and are aware that any social media activity, either official or personal, is permanent, traceable and easily distributed.

Councillors and the Mayor are advised to make use of the stringent privacy settings to avoid their personal social media accounts to be accessed by the press or public.

The Mayor and Councillors:

The Mayor is Council's official spokesperson on all policy matters and key decisions made by Council. The Mayor may nominate another Councillor to speak on a particular matter.

In their capacity as a Council official, the Mayor and Councillors:

- Have a right to express a personal opinion on any issue, speak on behalf of the community they represent, whether or not that opinion or proposal reflects Council's official position. Councillors must carefully identify the role in which they speak or write.
- Must make it clear they are speaking for themselves when publicly express their own opinions.
- May issue official media releases on his/her personal social media sites.
- Must not publish content or interact in a way that compromises their capacity to perform their official duties in an unbiased manner.
- Should understand that 'shares', 'likes' or 'retweets' may be viewed as an endorsement of the original post.
- Must not make comments or speak on behalf of Council, commit to any actions or communicate materials that are offensive, obscene, pornographic, threatening, harassing, abusive or defamatory.
- Must not make negative references to Cumberland City Council, other Council officials, services or any business-related individual or associated organisation.

- Must not post confidential unauthorised information, or release misleading or pre-empt Council announcements that may be deceptive and impact Council or damage Council's reputation.
- Maintain responsibility for the preparation, posting and management of their own content on their personal social media channels.
- Must not breach the privacy of Council, its officials and staff.

Councillors, consistent with the Code of Conduct (see 6.2), may express their personal view on social media on matters relating to Council policy and other matters of public interest, however this should be clearly identified as the personal view of a Councillor and not an official Council position or policy and must not bring the Council, Council decisions or civic office into disrepute.

Councillors should also be mindful of their obligations under Council's Code of Conduct and that they are responsible for content they publish on any form of social media. Any breaches may be referred to the General Manager and may be dealt with under Council's Code of Conduct.

PERSONAL SOCIAL MEDIA USE

Council recognises that staff may wish to use social media in their personal life. This policy does not limit usage of social media for personal expression or discourage activities that are not associated with their employment or civic responsibilities. Individuals are responsible for content published in a personal capacity on any form of social media channel – whether it is their own or someone else's account.

Posting about Council on social media is permitted by staff but care must be taken to minimise the potential for damage to be caused (directly or indirectly) to Council's reputation.

Staff using social media in a personal capacity must:

- Only disclose or discuss publicly available information.
- Ensure all content is accurate and complies with all relevant Council policies.
- Not imply that they are authorised to speak as a representative of Council or give the impression that the views expressed are those of Council.
- Not use a Council email address or any Council logos or insignia.
- Not make negative references to Cumberland City Council, other Council officials, services or any business-related individual or associated organisation.
- Not use the identity or likeness of another employee, contractor or member of Council.
- Should understand that 'shares', 'likes' or 'retweets' may be viewed as an endorsement of the original post.
- Not post material that is offensive, obscene, pornographic, threatening, abusive, harassing or defamatory.
- Not make comments, use location-based services (e.g. check-in) or post any material that might otherwise cause damage to Council's reputation.

Council staff and contractors should avoid engaging with clients with whom they conduct direct business as friends on their personal social media accounts. LinkedIn is an exception as it is considered a professional social networking channel. On LinkedIn, Council staff and

contractors may add business-related clients to their network but should not conduct business through the channel.

Council staff should be aware of their obligations under Council's Code of Conduct and that they are responsible for content they publish on any form of social media. Any breaches may be referred to the General Manager and may be dealt with under Council's Code of Conduct.

CONTENT

Comments or posts by third parties on Council social media pages containing any of the following will be removed including:

- Comments not topically related to the particular article.
- Defamatory, abusive, discriminatory or unlawful comments.
- Content that infringes or threatens the privacy of others.
- Spam or content that contains profane language or material.
- Content which is a personal comment or attack made about Council staff or Councillors.
- Content which advertises, endorses or solicits commercial products or commerce.
- Content which breaches copyright.
- Content which discloses confidential information.
- Content that relates to legal matters involving Council.
- Content which is offensive, demeaning or bullying in nature.
- Content which impersonate other people, including other participants.
- Comments in support of or opposition to political campaigns.
- Content which is considered pornographic or contains links or content sexual in nature.
- Content which relates negatively to religious, political or cultural beliefs.

Ongoing abuse or 'spamming' of Cumberland City Council social media pages will result in the user/subscriber being removed and permanently blocked from Council social media sites. Council reserves the right to remove/block any third-party user or subscriber to its social media activities at any time without consultation.

MONITORING SOCIAL MEDIA

The Strategic Communications Group will monitor content posted on official Council accounts (*see definitions*) to ensure appropriate use, messaging and consistency in branding. Content relating to Council that is posted on the internet by Councillors, staff, residents and other community members or organisations will be monitored by the Strategic Communications Group through the use of Google Alerts and other applications.

If a negative comment or serious matter is published via social media, authorised administrators should consult with their Director and the Manager Strategic Communications to see what action is appropriate and required.

Responses should encourage the issue to be taken offline and handled via phone, email or in person. Details of these conversations should be recorded appropriately for future reference.

RECORD KEEPING

Complaints about Council use of social media should be kept as a record for seven years. Social media posts are not required to be recorded.

PRIVACY

Given that social media involves posting and sharing information on a public domain, users should take the position that privacy is non-existent. Councillors and Council staff should only use personal information obtained in the course of employment/engagement with Council in a manner consistent with the Code of Conduct. Councillors and Council staff should not publish or report on conversations or information that is deemed confidential or classified or deals with matters that are internal in nature.

Personal details cannot be provided to third-parties without the explicit consent of the owner. The email addresses of Council staff and other identifiable information must be treated with discretion and care. Council staff must not upload department contacts when using or prompted by external social networking sites.

REVIEW AND EVALUATION

The Social Media Policy will be reviewed bi-annually by the Manager Strategic Communications to ensure that it remains relevant and current. If legislative requirements alter, this policy will be accordingly reviewed to address any changed requirements.

RELATED LEGISLATION

- *Local Government Act 1993 NSW.*
- *Independent Commission Against Corruption Act 1988 NSW.*
- *The Government Information (Public Access) Act 2009 NSW.*
- *Anti-Discrimination Act 1977 NSW.*
- *Sex Discrimination Act 1984.*
- *Privacy and Personal Information Protection Act 1998 NSW.*
- *Work Health and Safety Act 2011 NSW.*
- *Model Code of Conduct for Local Councils in NSW 2015.*
- *Procedures for the Administration of the Model Code of Conduct for Local Councils in NSW 2013.*
- *Copyright Act 1968 Cth.*
- *Copyright Amendment (Digital Agenda) Act 2000 Cth.*

RELATED DOCUMENTS AND COUNCIL POLICY

- Cumberland City Council Social Media Guidelines.
- Cumberland City Council Media Policy.
- Cumberland City Council Code of Conduct.
- Cumberland City Council Disciplinary Action Guidelines.

- Cumberland City Council Public Interest Disclosures Policy.
- Cumberland City Council Community Engagement Policy.
- Cumberland City Council Records Management Policy.