



Ku-ring-gai Council

# Policy

## Social Media Policy

Version Number 1

Adopted: 9 August 2023

Effective: 9 August 2023



# Social Media Policy

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## Controlled Document Information

### Authorisation Details

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<b>Controlled Document Number:</b>	198	<b>TRIM Record No:</b>	2023/173665
<b>Controlled Document Type:</b>	Policy		
<b>Controlled Document Name:</b>	Social Media Policy		
<b>Version Number:</b>	1		
<b>Department:</b>	Community		
<b>Distribution:</b>	Internal and External		
<b>Review Period:</b> Max < 4 years	4 years	<b>Next Review Date:</b>	2027
<b>Document Status:</b>	Adopted		
<b>Approval Type:</b>	By Council resolution		
<b>Version Start Date:</b>	9 August 2023	<b>Version End Date:</b>	8 August 2027

### Related Document Information, Standards & References

<b>Related Legislation:</b>	Local Government Act 1993	
<b>Related Policies (Council &amp; Internal)</b>	Code of Conduct Complaints Management Policy Council's Privacy Management Plan Councillor Interaction with Staff and Access to Information Policy Media and Communications Policy Privacy and Personal Information Protection Act 1998 Staff Personal Use of Social Media Policy (internal)	
<b>Related Documents</b>		
<b>Other References</b>	Model Social Media Policy (Office of Local Government)	

### Version History

Version Number	Version Start Date	Version End Date	Author	Details and Comments
1	9 August 2023	8 August 2027	Virginia Leafe	First version

## Policy

### Purpose and Objectives

The objective of this Social Media Policy is to establish guidelines and principles for the use of social media platforms by staff responsible for social media known as authorised officers in this policy and Councillors, in an official capacity or in connection with their role as Council representatives.

The policy provides an administrative framework for the creation and maintenance of Council's social media platforms. It also outlines the standards of conduct expected of authorised officers and Councillors, the process of content moderation, and the procedures for addressing concerns or complaints related to social media use.

By adhering to this policy, authorised officers and Councillors can effectively engage with the community, promote transparency and maintain a positive online presence.

### Scope

This policy applies to Council social media pages and Councillor social media pages.

### Responsibilities

The key stakeholders in the policy are:

- **Social Media Coordinator (SMC):** Overall responsibility for ensuring compliance with the Social Media Policy rests with the SMC. Responsible for approving and removing staff members' status as authorised users, maintaining a register of authorised users, moderating social media platforms, ensuring compliance with record keeping obligations and complying with social media platform rules.
- **Authorised Users:** Members of Council staff authorised by the SMC to upload content and engage on social media on the Council's behalf. They must ensure accuracy of content, moderate discussions if required, keep platforms up to date, and comply with record keeping obligations.
- **Councillors:** Responsible for the administration and moderation of their own social media platforms, compliance with the record-keeping obligations, and adhering to the guidelines in this policy and rules of the platform.

## Policy Statement

### Introduction

The Social Media Policy is structured as follows:

- **Part 1:** Sets out the principles of social media engagement for Councils
- **Part 2:** Contains an administrative model
- **Part 3:** Details the administrative framework for Councillors' social media platforms
- **Part 4:** Prescribes the standards of conduct expected of authorised officers and Councillors 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 Councils' social media platforms should be used during emergencies
- **Part 7:** Contains information about records management and privacy requirements relating to social media
- **Part 8:** Provides information about where concerns or complaints about a Councils' or authorised officers and Councillors' social media platform(s), or the conduct of authorised officers and Councillors on social media, can be directed.
- **Part 9:** Definitions

### Enforcement

Clause 3.1(b) of the *Model Code of Conduct for Local Councils* in NSW provides that authorised officers and Councillors must not conduct themselves in a manner that is contrary to a Council's policies. A breach of the policy will be dealt with in accordance with the Code of Conduct Administrative Procedures

### Concerns or complaints

Concerns or complaints about the administration of Council's social media platforms should be made to the Council's Social Media Coordinator in the first instance. Complaints will be handled in accordance with Council's *Complaint Management Policy*.

## Part 1 – Principles

**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:

- Facebook
- Instagram
- Twitter
- LinkedIn
- Youtube
- Nextdoor

### Establishment and deletion of Council social media platforms

2.2 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 Social Media Coordinator (SMC).

### Role of the Social Media Coordinator

2.3 The Manager of Corporate Communications holds the role of Social Media Coordinator (SMC).

2.4 The General Manager may appoint more than one SMC.

2.5 The SMC’s role is to:

- a) approve and revoke a staff member’s status as an authorised user of a Council social media account
- b) develop and/or approve the training and/or induction to be provided to authorised users
- c) maintain a register of authorised users
- d) maintain effective oversight of authorised users
- e) moderate the Council’s social media platforms in accordance with Part 5 of this policy.
- f) ensure the Council complies with its record keeping obligations under the *State Records Act 1998* in relation to social media (see clauses 7.1 to 7.4 of this policy)
- g) ensure the Council adheres to the rules of the social media platform(s)



h) coordinate with the Council's Information Management department 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 SMC may delegate their functions under paragraphs (e) and (f) of clause 2.5 to authorised users.

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

### **Authorised users**

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

2.9 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.

2.10 SMC will appoint authorised users when required.

2.11 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.

2.12 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 accurate
- b) correct any inaccuracies in Council generated content as soon as possible
- 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
- e) where authorised to do so by the SMC:
- f) moderate the Council's social media platforms in accordance with Part 5 of this policy
- g) ensure the Council complies with its record keeping obligations under the *State Records Act 1998* in relation to social media (see clauses 7.1 to 7.4 of this policy)

2.13 When engaging on social media on Council's behalf (such as, but not limited to, on a community social media page), an authorised user must identify themselves as a member of Council staff but they are not obliged to disclose their name or position within the Council.

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

### **Administrative tone**

2.15 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.

2.16 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**

2.17 The SMC will maintain a register of authorised users. This register is to be reviewed annually to ensure it is fit-for-purpose.

### **Ceasing to be an authorised user**

2.18 The SMC may revoke a staff member’s status as an authorised user, if:

- a) the staff member makes such a request or leaves the organisation
- b) the staff member has failed to comply with this policy
- c) SMC is of the reasonable opinion that the staff member is no longer suitable to be an authorised user.

## 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.

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 record 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, moderates, or uploads content onto their social media platform.

3.4 The Mayor may have a separate Councillor Facebook page which they manage independently but must comply with Part 3 of this policy.

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

### Induction and training

3.6 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

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

*Councillor / Cr “First Name and Last Name”.*

3.8 A Councillor’s social media platform must include a profile photo which is a clearly identifiable image of the Councillor.

3.9 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 two weeks of a change in circumstances. The social media page should also remove “Councillor/Cr” from the profile name.

### **Other general requirements for Councillors' social media platforms**

3.10 Councillor social media platforms must specify or provide a clearly accessible link to the 'House Rules' for engaging on the platform.

3.11 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".*

3.12 Despite clause 3.12, media releases and other content that has been authorised according to the Council's media and communications protocols may be uploaded onto a Councillor's social media platform.

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

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

### **Councillor queries relating to social media platforms**

3.15 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 SMC in the first instance, in accordance with Council's Councillor request protocols.

### **Other social media platforms administered by Councillors**

3.16 A Councillor must advise the SMC of any social media platforms they administer on which content relating to the Council or authorised officers and Councillors is, or is expected to be, uploaded. The Councillor must do so within:

- a) two weeks of becoming a Councillor, or
- b) two weeks of becoming the administrator.

## Part 4 – Standards of conduct on social media

4.1 This policy only applies to authorised officers and Councillors' 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 Authorised officers and Councillors must comply with the Council's code of conduct when using social media for personal use, in an official capacity or in connection with their role as a Council official.

4.3 Authorised officers 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
- 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 the Council to ensure workplace health and safety
- e) contains content about the Council that is misleading or deceptive
- f) divulges confidential Council information
- g) breaches the privacy of other authorised officers and Councillors 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 *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 the Council where they have not been authorised to make such comment
- j) commits the Council to any action
- k) violates an order made by a court
- l) breaches copyright

m) benefits financially or politically by advertises, endorses or solicits commercial products or business

n) constitutes spam

o) is in breach of the rules of the social media platform.

4.4 Authorised officers and Councillors 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 Authorised officers and Councillors should exercise caution when sharing, liking, retweeting content as this can be regarded as an endorsement and/or publication of the content.

4.6 Authorised officers and Councillors should 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:** Councils and Councillors 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.

5.1 Authorised officers and Councillors 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. For Council platforms, authorised users should get approval from the SMC before taking this action. 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 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
- b) the process by which a person can be blocked or banned from the platform
- c) when the platform will be monitored (for example weekdays 9am – 5pm, during the Council’s business hours)

5.5 For the purposes of clause 5.4(b) (relating to the process where a person can be blocked or banned from the platform), 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
- 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) contains content about the Council, Councillors or members of the public that is misleading or deceptive
- e) breaches the privacy of authorised officers and Councillors 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 Procedures for the Administration of 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 The following applies to social media pages administered by Council. It should also be used as a guide for Councillors to follow at their discretion:

- a) 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.
- b) Prior to removing or 'hiding' the content, the moderator must make a record of it (for example, a screenshot).
- c) 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.
- d) A person may request a review of a decision by a moderator to remove or 'hide' content.



## **Blocking or banning**

5.7 The following applies to social media pages administered by Council. It should also be used as a guide for Councillors to follow at their discretion:

- a) 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 the platform 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.
  
- b) Where a determination is made to block or ban a person from a social media platform, the person must, where practicable, be notified in writing of the decision and the reasons for it.

## **Part 6 – Use of social media during emergencies**

6.1 During emergencies, such as natural disasters or public health incidents, the Emergency Control Organisation (ECO) will support affected business areas and Corporate Communications for the management of content on the Council's social media platforms.

6.2 To ensure consistent messaging both during and after an emergency, authorised users and authorised officers and Councillors 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 authorised users and Councillors.

## Part 7 – Records management and privacy requirements

### Records management

7.1 Social media content created, sent and received by authorised officers and 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 Councillor Interaction with Staff and Access to Information Policy*.

7.2 You must not destroy, alter, or remove social media content unless authorised 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 requirements of the *State Records Act 1998*.

7.3 When/if a Councillor's term of office concludes, the Councillor must contact the Council's records manager and SMC 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, authorised officers and Councillors 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 content<sup>1</sup>.

### Privacy considerations and requirements

7.5 Social media communications are in the public domain. Authorised officers and Councillors should exercise caution about what personal information, if any, they upload onto social media.

7.6 *The Privacy and Personal Information Protection Act 1998* applies to the use of social media platforms by the Council and Councillors. Authorised officers and Councillors must also comply with *Council's Privacy Management Plan*. To mitigate potential privacy risks, authorised officers and Councillors will:

- a) advise people not to provide personal information on social media platforms
- b) inform people if any contact details they may provide on social media platforms are to be used for official purposes
- c) moderate comments to ensure they do not contain any personal contact details.
- d) advise people to contact the Council or Councillors through alternative channels if they have

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<sup>1</sup> See State Archives and Records Authority of NSW 'Government Recordkeeping / Advice and Resources / Local Government' and 'Social media recordkeeping for Councillors'

personal information they do not want to disclose in a public forum.

7.7 Authorised officers and Councillors must ensure they comply with the *Health Records and Information Privacy Act 2002* when engaging on and/or moderating social media platforms. In fulfilling

## Part 8 – Concerns or complaints

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

8.2 Complaints about the conduct of authorised officers and Councillors on social media platforms may be directed to the general manager.

8.3 Complaints about a general manager’s conduct on social media platforms may be directed to the mayor.

8.4 Alternatively, Council has a Complaints Policy and Feedback Form, which can be found on Council’s website [krg.nsw.gov.au/policy](http://krg.nsw.gov.au/policy).

## Part 9 - Definitions

Term / Abbreviation	Definition
<b>Authorised user</b>	Members of Council staff who are authorised by the General Manager or SMC to upload content and engage on the Council's social media platforms on the Council's behalf
<b>Minor</b>	For the purposes of clause 4.4(b) of this policy, is a person under the age of 18 years
<b>Personal information</b>	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.
<b>SMC</b>	The Manager of Corporate Communications holds the role of Social Media Coordinator (SMC).
<b>Social media</b>	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, LinkedIn, YouTube, Instagram and Nextdoor.