



# **Attachment 1 to Item 4.2.1**

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## **Draft Media Policy**

Date of meeting: 12 December 2023  
Location: Council Chambers  
Time: 6:30 p.m.





# Media Policy

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**DRAFT COUNCIL POLICY**

<b>Division:</b>	General Manager	<b>Policy Number:</b>	PCE0001Z
<b>Branch:</b>	Corporate Communications and Events	<b>Adopted Date:</b>	
<b>Responsible Officer:</b>	Manager Corporate Communications and Events	<b>Next Review Date:</b>	
<b>Director:</b>	General Manager	<b>Version:</b>	



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## 1. TITLE

Media Policy.

## 2. PURPOSE

We, the Councillors, staff, and other officials of Hawkesbury City Council are committed to upholding and promoting the following principles of engagement:

### **Openness**

We will ensure that we promote an open exchange of information between our Council, the media and the community.

### **Consistency**

We will ensure consistency by all Councillors and staff when communicating with the media and the community.

### **Accuracy**

The information we share with the media and the community will be a source of truth for our Council and community and we will prioritise the need to correct inaccuracies if they occur.

### **Respectful**

We will at all times act professionally and respectfully towards media organisations and their representatives and our social media followers.

### **Timeliness**

We will ensure that we respond to media and community enquiries in a timely manner.

Council is committed to open and clear communication with the local community. Similarly, Council is committed to actively engaging with the media to maximise reach and facilitate the efficient dissemination of relevant, accurate and timely information in accordance with Council's Hawkesbury Community Strategic Plan 2022-2042.

The overall purpose of this Media Policy is to provide a framework for Council's communication with the media in order to keep the Hawkesbury community informed of its activities and to ensure that Council is transparent and well connected with its community.

## 3. SCOPE

The Policy establishes Council's approach to responding to and initiating media contact. It applies to both Council's representatives/spokespersons as well as Councillors, Council staff, Council Committee members, volunteers, contractors and delegates of Council.

For the purpose of this Policy, media comprises all print, broadcast and online media as well as the management of media enquires coming into Council, public speaking engagements, social media posts and other forms of communication where it could be expected that the comments might be recorded or circulated to the wider community.

## 4. BACKGROUND

As the media landscape rapidly evolves and fragments, it is important to have a robust policy for managing the clear dissemination of information to the community to position Council as the source of truth in the Hawkesbury Local Government Area.

Council is less able to rely on traditional media and platforms to inform the community reliably and accurately regarding Council's priorities, programs and activities. This Policy seeks to strike an important



balance between print, digital and broadcast media management and Council's print and digital self-publishing activities.

## 5. POLICY DETAILS

- 5.1 To maintain relations and ensure all communication with the media and wider community is coordinated, consistent, well informed, timely and appropriate.
- 5.2 To clearly identify Council's authorised representative/spokesperson and ensure appropriate authorisation and responsibility for comments supplied.
- 5.3 To identify media opportunities, to inform the community, to promote and celebrate the achievements of Council and the local community and provide a platform for community engagement.
- 5.4 To mitigate risk and limit the possibility of miscommunication and the distribution of inaccurate information, or any other impacts on Council's reputation.
- 5.5 To provide a framework regarding the management of engagement with the community and interest groups on social media, both proactive and reactive, and provide guidance around dealing with posts that are defamatory, derogatory, bullying, vulgar, abusive and/or misleading, and those who post them.
- 5.6 The management of publishing engagement on Council-owned digital platforms such as the Corporate Website and YourHawkesbury-YourSay.



## 6. ROLES AND RESPONSIBILITY

Authorised Officer	Roles and Responsibilities
General Manager	<p>The General Manager is the official spokesperson for Council on operational and administrative matters.</p> <p>The General Manager may delegate to other Council staff to speak on their behalf where appropriate, (for example, where the delegated staff member has professional expertise regarding the subject matter, or the General Manager is unavailable).</p> <p>The General Manager will appoint the Corporate Communications and Events Manager and the Digital Communications and Engagement Officer to be Council's social media coordinators.</p> <p>The General Manager will appoint the Corporate Communications and Events Manager to be Council's Media Coordinator.</p>
Mayor	<p>The Mayor is the principal member and spokesperson of the governing body of Council, including representing the views of Council as to its local priorities (Section 226(c) of the Local Government Act 1993).</p> <p>If the Mayor is unavailable, the Deputy Mayor may act as Council's spokesperson.</p> <p>The Mayor may delegate their role as spokesperson to other Councillors where appropriate, (for example, where another Councillor is best placed to comment, because the issue is of particular interest to them, or it is within their particular area of expertise).</p>
Councillors	<p>As a member of the governing body and as a representative of the community, Councillors are free to express their personal views to the media.</p> <p>When engaging with the media, Councillors:</p> <ul style="list-style-type: none"> <li>• must not purport to speak for Council unless authorised to do so.</li> <li>• must clarify when speaking to the media that they are expressing their personal views as an individual Councillor and that they are not speaking for Council (unless authorised to do so)</li> <li>• must uphold and accurately represent the policies and decisions of Council</li> </ul>





Authorised Officer	Roles and Responsibilities
	<ul style="list-style-type: none"> <li>• must not disclose Council information unless authorised to do so, and</li> <li>• must seek information and guidance from the General Manager/Corporate Communications and Events Manager where appropriate before providing comment to the media to ensure they have the most up-to-date and relevant information and have considered reputational or other risks.</li> </ul> <p>In the interests of promoting a positive, safe and harmonious organisational culture, Councillors should endeavour to resolve personal differences privately and must not prosecute them publicly through the media.</p> <p>Where Councillors (including the Mayor) become aware of potential issues that could result in media interest, they should provide this information to the General Manager or Corporate Communications and Events Manager.</p>

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Authorised Officer	Roles and Responsibilities
<p>Corporate Communications and Events Manager</p>	<p>The Corporate Communications and Events Manager role is to:</p> <ul style="list-style-type: none"> <li>• be the lead point of contact for all media enquiries, requests for interviews, requests to film or photograph Council officials, facilities or events for news and current affairs purposes</li> <li>• be responsible for preparing all media statements prior to their release</li> <li>• liaise with relevant staff members within the organisation where appropriate.</li> <li>• ensure that media statements are approved by the Mayor and/or General Manager prior to their release</li> <li>• develop and/or approve media training and/or induction to be offered to relevant Council officials and/or Councillors</li> <li>• maintain a record of all media enquiries and responses</li> <li>• ensure that media organisations and their representatives are treated professionally, equally and without bias</li> <li>• ensure that media enquiries are dealt with promptly</li> <li>• provide guidance to Councillors approached by the media for comment to avoid communication of misinformation</li> <li>• ensure that all media releases are published on Council's website</li> <li>• approve and revoke a staff member's status as an authorised user to social media platforms</li> <li>• develop and/or approve the training and/or induction to be provided to authorised users</li> <li>• maintain a register of authorised users</li> <li>• maintain effective oversight of authorised users</li> <li>• moderate Council's social media platforms in accordance with Part 8 of this Policy*</li> <li>• ensure Council complies with its record keeping obligations under the State Records Act 1998 in relation to social media*</li> <li>• ensure Council adheres to the rules of the social media platform(s).</li> </ul> <p>The Corporate Communications and Events Manager may delegate their functions marked * to authorised users.</p>



Authorised Officer	Roles and Responsibilities
<p>Digital Communications and Engagement Officer</p>	<p>The Digital Communications and Engagement Officer's role is to:</p> <ul style="list-style-type: none"> <li>• approve and revoke a staff member's status as an authorised user to social media platforms</li> <li>• develop and/or approve the training and/or induction to be provided to authorised users</li> <li>• maintain a register of authorised users</li> <li>• maintain effective oversight of authorised users</li> <li>• moderate Council's social media platforms in accordance with Part 8 of this Policy*</li> <li>• ensure Council complies with its record keeping obligations under the State Records Act 1998 in relation to social media*</li> <li>• ensure Council adheres to the rules of the social media platform(s).</li> </ul> <p>The Digital Communications and Engagement Officer may delegate their functions marked * to authorised users.</p>

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Authorised Officer	Roles and Responsibilities
Council Officials	<p>Council officials must not speak to the media about matters relating to the Council unless authorised by the General Manager or Corporate Communications and Events Manager.</p> <p>If Council officials receive a media enquiry or they are invited to comment to the media on a matter relating to the Council, they must refer the enquiry to the General Manager or Corporate Communications and Events Manager.</p> <p>Council officials are free to express their personal views to the media on matters that do not relate to the Council, but in doing so, must not make comments that reflect badly on Council or that bring it into disrepute.</p> <p>If authorised to speak to the media, Council officials:</p> <ul style="list-style-type: none"> <li>• must uphold and accurately represent the policies and decisions of Council</li> <li>• must not disclose Council information unless authorised to do so by the General Manager or Corporate Communications and Events Manager,</li> <li>• must seek information and guidance from the General Manager or Corporate Communications and Events Manager where appropriate before providing comment to the media to ensure they have the most up-to-date and relevant information and have considered reputational or other risks.</li> </ul> <p>Where Council officials and/or staff become aware of potential issues that could result in media interest, they should provide this information to the General Manager or Corporate Communications and Events Manager.</p>

**7. STANDARDS OF CONDUCT WHEN ENGAGING WITH MEDIA**

- 7.1 Council officials must comply with Council's Code of Conduct when engaging with the media in an official capacity or in connection with their role as a Council official.
- 7.2 Council officials must not share information or make comments to the media through either direct or indirect mechanisms that:
  - a) Are 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 Council's Code of Conduct, 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 Council, Council officials or members of the public that is misleading or deceptive.
- f) Divulges confidential Council information.
- g) Breaches the privacy of other Council officials or members of the public.
- h) Contains allegations of suspected breaches of Council's Code of Conduct or information about the consideration of a matter under Council's Procedures for the Administration of the Code of Conduct.
- i) Could be perceived to be an official comment on behalf of Council where they have not been authorised to make such comment.
- j) Commits Council to any action.
- k) Violates an order made by a court.
- l) Breaches copyright.
- m) Advertises, endorses, or solicits commercial products or business.

### **Tone**

- 7.3 All media engagement by Council officials must be conducted in a professional, timely and respectful manner.

### **Process**

- 7.4 In the first instance, all media enquiries should be directed to the Corporate Communications and Events Branch. All media enquiries are to be forwarded by the media to the Corporate Communications and Events Branch in writing via email to [media@hawkesbury.nsw.gov.au](mailto:media@hawkesbury.nsw.gov.au). The Corporate Communications and Events Manager will then liaise with either relevant staff, Managers, Directors, General Manager and/or Mayor to prepare a written response to the enquiry. More complex issues may require research and discussion with other Council officers before being reported back to the media.
- 7.5 All information given to the media, especially enquiries of a potentially controversial, legal or ethical nature, require the approval of the General Manager.

### **Induction and training**

- 7.6 Council must provide training to Council officials who engage or are authorised to engage with the media.
- 7.7 Media engagement training will be offered to Councillors as part of their induction or refresher training or as part of their ongoing professional development program.

### **Councillors' questions about media engagement**

- 7.8 Councillors must direct any questions about their obligations under this Policy to the General Manager or Corporate Communications and Events Manager.

### **Media relations**

- 7.9 Council supports a robust and fair media and welcomes scrutiny of its decisions and dealings to inform and benefit the community. Council will deal fairly with the media and expects the same fair dealings in return.
- 7.10 Council's Corporate Communications and Events Branch manages all media requests from recognised media organisations. All other enquiries can be lodged via Council's Customer Experience Branch.
- 7.11 Council's Corporate Communications and Events Branch maintains a register of recognised media organisations for the purposes of sending media releases, interaction and providing responses.



7.12 Council officers will consider the adherence to the following points by media organisations as well as Council's legal and privacy obligations, and whether the response is in the community interest when responding to a media inquiry.

**Accuracy and clarity**

- a) Ensure that all material in news reports – print and online - is accurate and not misleading and is clearly distinguishable from opinion.
- b) Provide a correction or other adequate action if published material is inaccurate or misleading.

**Fairness and balance**

- c) Ensure all factual material is presented with fairness and balance and does not omit key facts. Expressions of opinion must follow the same standards.
- d) Ensure that where material refers adversely to Council, a member of staff or elected official, a fair opportunity is given to provide comment.

**Privacy and avoidance of harm**

- e) Not intrude on a staff member's or elected official's reasonable expectations of privacy.
- f) Not cause or contribute to substantial offence, distress or prejudice, or create a risk to health or safety, of staff or elected officials.
- g) Not produce content designed specifically to bully, harass, intimidate, or defame Council officials.
- h) Ensure all social media content is moderated to prevent the publication of bullying, harassing, intimidating or defamatory content or commentary.

**Integrity and transparency**

- i) Avoid publishing material which has been gathered by deceptive or unfair means.
- j) Ensure that conflicts of interests are avoided or adequately disclosed, and that they do not influence published material.
- k) Provide Council with a reasonable deadline for response.
- l) Respect Council's stated procedure to direct all media enquiries to Council's Corporate Communications and Events Branch.

**8. SOCIAL AND DIGITAL MEDIA**

**Platforms**

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

- a) Facebook
  - Corporate
  - Hawkesbury Events
  - Hawkesbury Visitor Information Centre
  - Hawkesbury Library Service
  - Hawkesbury Regional Museum
  - Hawkesbury Regional Gallery
- b) Instagram
  - Hawkesbury Events
  - Hawkesbury Visitor Information Centre



- c) Youtube
  - Corporate
- d) LinkedIn
  - Corporate

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

Council welcomes community participation on our social media accounts for genuine online engagement.

The act of Hawkesbury City Council 'liking' or 'following' or 'reacting' or 'sharing' or 'reposting' 'information' from an organisation, business, group, individual person, location, app or event through social media platforms does not indicate that Hawkesbury City Council endorses the products, views, activities or services relating to the 'liked' or 'followed' or 'shared' entity, business or group. Council will be the sole responder to comments on the Facebook sites managed by Council including the Hawkesbury City Council and Hawkesbury Events Facebook pages.

Council will be the sole responder to comments on the Facebook, Instagram and LinkedIn sites managed by Council including the Hawkesbury City Council and Hawkesbury Events Facebook pages, Hawkesbury Events Instagram and Hawkesbury City Council LinkedIn.

Council limits the information shared on the pages managed by Council to that which is provided by Government organisations, emergency services, community service organisations and Council sponsored events.

If the information to be shared relates to the activities of a political party then approval of the General Manager is required.

#### **Establishment and deletion of Council social media platforms**

8.3 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.

8.4 Where a Council social media platform is established or deleted in accordance with Clause 11.3, the General Manager or their delegate may amend Clause 8.1 of this Policy without the need for endorsement by Council's governing body.

#### **Authorised users**

8.5 The Corporate Communications and Events Manager and the Digital Communications and Engagement Officer are authorised users for the purposes of this Policy.

8.6 Authorised users are members of Council staff who are authorised by the General Manager or Corporate Communications and Events Manager or Digital Communications and Engagement Officer to upload content and engage on social media on Council's behalf.

8.7 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.

8.8 The Corporate Communications and Events Manager or Digital Communications and Engagement Officer will appoint authorised users when required.

8.9 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.

8.10 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 inaccuracies in Council generated content.
- c) Engage in discussions and answer questions on Council's behalf on social media platforms.
- d) Keep Council's social media platforms up to date.
- e) Moderate Council's social media platforms in accordance with Clauses 8.24 to 8.28 of this Policy.
- f) Ensure Council complies with its record keeping obligations under the State Records Act 1998 in relation to social media (see Clauses 11.1 to 11.5 of this Policy).
- g) Where authorised to do so by the Digital Communications and Engagement Officer:
  - i. Moderate Council's social media platforms in accordance with Clauses 8.24 to 8.28 of this Policy.
  - ii. Ensure Council complies with its record keeping obligations under the State Records Act 1998 in relation to social media (see Clauses 11.1 to 11.5 of this Policy).

8.11 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

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

#### **Administrative tone**

8.13 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.

8.14 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**

8.15 The Digital Communications and Engagement Officer 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**

8.16 The Corporate Communications and Events Manager or Digital Communications and Engagement Officer may revoke a staff member's status as an authorised 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 year.
- c) The staff member has failed to comply with this Policy.
- d) The Digital Communications and Engagement Officer is of the reasonable opinion that the staff member is no longer suitable to be an authorised user.





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**Standards of conduct on social media**

- 8.17 This Policy only applies to Council officials' use of social media in an official capacity or in connection with their role as a Council official. The Policy does not apply to personal use of social media that is not connected with a person's role as a Council official.
- 8.18 Council officials must comply with Council's Code of Conduct when using social media in an official capacity or in connection with their role as a Council official.
- 8.19 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 Council's Code of Conduct or is unlawfully discriminatory.
  - d) Is contrary to their duties under the Work Health and Safety Act 2011 and their responsibilities under any policies or procedures adopted by Council to ensure workplace health and safety.
  - e) Contains content about Council, Council officials or members of the public that is misleading or deceptive.
  - f) Divulges confidential Council information.
  - g) Breaches the privacy of other council officials or members of the public.
  - h) Contains allegations of suspected breaches of the Council's Code of Conduct or information about the consideration of a matter under Council's Procedures for the Administration of the Code of Conduct.
  - i) Could be perceived to be an official comment on behalf of Council where they have not been authorised to make such comment.
  - j) Commits Council to any action.
  - k) Violates an order made by a court.
  - l) Breaches copyright.
  - m) Advertises, endorses or solicits commercial products or business.
  - n) Constitutes spam.
  - o) Is in breach of the rules of the social media platform.
- 8.20 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.
- 8.21 Council officials must exercise caution when sharing, liking, retweeting content as this can be regarded as an endorsement and/or publication of the content.



- 8.22 Council officials must not incite or encourage other persons to act in a way that is contrary to the requirements of this Part.
- 8.23 Councillors must uphold and accurately represent the policies and decisions of Council's governing body but may explain why they voted on a matter in the way that they did (see Section 232(1)(f) of the Local Government Act 1993).

### **Moderation of social media platforms**

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

- a) is uploaded by a third party; and/or
  - b) appears on their social media platform because they have 'liked', 'shared', or 'retweeted' the content, or similar.
- 8.24 Council officials who are responsible for the moderation of Council's social media platforms may remove content and 'block' or ban a person from those platforms. Such actions must be undertaken in accordance with this Part.
- 8.25 At the discretion of the Council officials who are responsible for the moderation of Council's social media platforms, Facebook posts or other social media can be set to prevent comments by the public. These could be, but not limited to, posts that are deemed likely to draw offensive responses, or illicit bullying towards members of staff, Council officials, elected officials or the broader community.

### **House Rules**

- 8.26 Social media platforms must state or provide an accessible link to the 'House Rules' for engaging on the platform.
- 8.27 At a minimum, the House Rules should specify:
- a) The principles of engagement referred to in Clause 2.0 of this Policy.
  - b) The type of behaviour or content that will result in that content being removed or 'hidden', or a person being blocked or banned from the platform.
  - c) The process by which a person can be blocked or banned from the platform and rights of review.
  - d) A statement relating to privacy and personal information.
  - e) When the platform will be monitored (for example weekdays 8:30am to 5pm, during Council's business hours).
  - f) That the social media platform is not to be used for making complaints about Council or Council officials.
- 8.28 For the purposes of Clause 8.27(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 Council's Code of Conduct or is unlawfully discriminatory.



- d) Contains content about Council, Council officials, staff or members of the public that is misleading or deceptive.
- e) Breaches the privacy of Council officials or members of the public.
- f) Contains allegations of suspected breaches of Council's Code of Conduct or information about the consideration of a matter under Council's Procedures for the Administration of the Code of Conduct.
- 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**

- 8.29 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 8.28, the moderator may remove or 'hide' that content.
- 8.30 Prior to removing or 'hiding' the content, the moderator must make a record of it (for example, a screenshot).

#### **Blocking or banning**

- 8.31 If a person uploads content that is removed or 'hidden' under Clause 8.29 of this Policy, that person may also be blocked or banned from the social media platform/all social media platforms. This Clause does not apply to blocking or banning a person from a Councillor's social media platforms.
- 8.32 A person may request a review of a decision to block or ban them 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.
- 8.33 Where a review request is made under Clause 8.32, the review is to be undertaken by the General Manager.
- 8.34 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.

#### **Privacy considerations and requirements**

- 8.35 Social media communications are in the public domain. Council officials should exercise caution about what personal information, if any, they upload onto social media.
- 8.36 The Privacy and Personal Information Protection Act 1998 applies to the use of social media platforms by Council and Councillors. To mitigate potential privacy risks, Council officials will:
- a) Advise people not to provide personal information on social media platforms.
  - b) Inform people if any personal information they may provide on social media platforms is to be used for official purposes.
  - c) Moderate comments to ensure they do not contain any personal information.



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

8.37 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.

### **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 posted.

### **What constitutes 'private' use?**

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

- a) Is not associated with, or does not refer to Council, any other Council officials, contractors, related entities or any other person or organisation providing services to or on behalf of 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.

8.39 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**

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

8.41 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.

### **Concerns or complaints**

8.42 Concerns or complaints about the administration of a Council's social media platforms should be made to the Council's General Manager or Corporate Communications and Events Manager in the first instance.

8.43 Complaints about the conduct of Council officials (including Councillors) on social media platforms may be directed to the General Manager or Corporate Communications and Events Manager.

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

### **Administrative framework for Councillors' social media platforms**

8.45 For the purposes of this Policy, Councillor social media platforms are not Council social media platforms.

8.46 Councillors are responsible for the administration and moderation of their own social media platforms and ensuring they comply with the record keeping obligations under the State Records Act 1998 and Council's Records Management Policy in relation to social media.



8.47 Clause 8.46 also applies to Councillors in circumstances where another person administers, moderates, or uploads content onto their social media platform.

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

### **Councillor induction and training**

8.49 Councillors who engage, or intend to engage, on social media must be offered induction training on social media use. Induction training can be undertaken either as part of the Councillors' induction program or as part of their ongoing professional development.

### **Identifying as a Councillor**

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

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

8.52 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 a Councillor's social media platforms and updated within (Council to specify timeframe) of a change in circumstances.

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

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

8.54 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 Council".

8.55 Despite Clause 8.54, Mayoral or Councillor 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.

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

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

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

8.58 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 or Corporate Communications and Events Manager in the first instance, in accordance with Council's Councillor requests protocols.

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

8.59 A Councillor must advise the General Manager or Corporate Communications and Events Manager of any social media platforms they 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) One month of becoming a Councillor, or
- b) One month of becoming the administrator of a social media platform.



## **9. USE OF MEDIA, SOCIAL OR DIGITAL MEDIA DURING EMERGENCIES**

- 9.1 During emergencies, such as natural disasters or public health incidents, the Corporate Communications and Events Manager will be responsible for coordinating media releases and statements on behalf of the Council.
- 9.2 Councillors, Council staff and other Council officials must not provide comment or information to the media that is inconsistent with official advice issued by the Council and any other agency coordinating the emergency response.

Training on media engagement during emergencies will be provided to relevant staff and offered to other Council officials and Councillors.

## **10. MEDIA ENGAGEMENT IN THE LEAD UP TO ELECTIONS**

- 10.1 This Policy does not prevent the Mayor or Councillors who are candidates at a Council or any other election from providing comment to the media in their capacity as candidates at the election.
- 10.2 Any media comment provided by the Mayor or Councillors who have nominated and been declared as candidates at a Council or another election must not be provided in an advertisement, newspaper column, or a radio or television broadcast paid for by Council or produced by Council or with Council resource.

## **11. RECORDS MANAGEMENT REQUIREMENTS**

- 11.1 Media content created and received by Council officials (including Councillors) acting in their official capacity is a Council record and may be subject to information access applications made under the Government Information (Public Access) Act 2009. These records must also be managed in accordance with the requirements of the State Records Act 1998 and Council's approved records management policies and practices.
- 11.2 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 Council's approved records management policies and practices.
- 11.3 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 Coordinator and comply with the requirements of the State Records Act 1998.
- 11.4 When/if a Councillor's term of office concludes, the Councillor must contact the Council's Records Coordinator or General Manager or Corporate Communications and Events 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.
- 11.5 In fulfilling their obligations, 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 content.

## **12. BRANDING AND USE OF COUNCIL LOGO**

Council's Branding Style Guide provides guidance on the logos, colours and fonts which form Council's visual identity, comprising Council's corporate brand. It is important that these elements are applied correctly and consistently to ensure that Council related material is readily available. The Guide provides directions on how to use Council's visual identity.



The logo is the most important part of Council's visual identity. The Council logo may only be used in Council's official media releases, digital media posts, advertising, promotion and letterheads. The Council logo may not be used by staff, Councillors, volunteers, contractors or other related entities for promotion, media or otherwise unless written permission is granted by the General Manager or the Corporate Communications and Events Manager.

Requests to use the official Council logo must be in writing to the Corporate Communications and Events Branch. If permission is granted, a high resolution image will be provided for the specified use only.

### 13. BREACHES OF MEDIA POLICY

If there is a breach of the Media Policy, the individuals, group, Councillor or Council Officer breaching the Policy will be contacted and requested to take action that will rectify the breach, which may include removing a logo/letterhead, removing a social media comment or post or reissuing a more appropriate media statement.

### 14. PRIVACY AND ACCESS OF INFORMATION

Council must comply with legislation and requirements, including the NSW Privacy and Personal Information Protection Act 1998 (PIPPA Act), which regulates how personal information is collected, used, stored, secured and disclosed.

The PIPPA Act stipulates that any information about an individual, whose identity could be reasonably ascertained from the information is 'personal information'. Personal information can only be disclosed to the media if:

- a) The person has consented.
- b) The disclosure to the media is directly related to the purpose for which the information was collected, and Council has no reason to believe that the individual concerned would object to the disclosure.
- c) The individual concerned is reasonably likely to have been aware, or has been made aware in accordance with section 10 of the PIPPA Act that information of that kind is usually disclosed to the media.

Council must comply with the Government Information (Public Access) Act 2009 which regulates the rights of members of the public and organisations (including media organisations) to access Council information.

Some Council information is Open Access and Council must publish it on Council's website or make it available for inspection. Council also identifies other information which may be frequently requested or of special interest and is therefore proactively released (including to the media as a media release).

Information, particularly from the media in the form of a media enquiry, which is not Open Access or proactively released can be obtained through informal or formal access requests under the Government Information (Public Access) Act 2009.

### 15. DEFINITIONS

**Council official** In the case of a Council – Councillors, members of staff and delegates of the Council (including members of committees that are delegates of the Council), volunteers, contractors and service providers.

**Media organisation** A media organisation is a person or entity, which works in an organised fashion, to at all times produce and publish accurate, balanced and fair news information for the benefit of the entire community. This can include, but is not limited to, newspapers, magazines, internet publishers, radio, and television broadcasters.



Where reasonably practicable, media organisations are required to be members of the Australian Press Council. Council understands this may not be possible for smaller organisations, and they may be excused from this requirement.

**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.

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

**Authorised user** Members of Council staff who are authorised by the General Manager or Corporate Communications and Events Manager to upload content and engage on Council's social media platforms on Council's behalf.

**Minor** For the purposes of this Policy, a person under the age of 18 years.

## 16. RELATED DOCUMENTS

### Legislation

- Local Government Act NSW 1993
- Government Information (Public Access) Act 2009
- Privacy and Personal Information Protection Act 1998

### Policies and Codes

- Council's Code of Conduct
- Council's Branding Style Guide
- NSW Government Model Media Policy
- NSW Government Model Social Media Policy

### Operational Management Standards and Procedures

- Social Media Operational Standard - Council Officers
- Procedures for the Administration if Council's Code of Conduct