

SOCIAL MEDIA

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Consultation This policy is based on the Office of Local Government’s Model Social Media Policy.

Document Revision History	
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Notes	

POLICY

PURPOSE

This Social Media policy is based on the Model Social Media policy published by the Office of Local Government (OLG). The model policy has been developed following two rounds of consultation with the local government sector and represents a 'best practice' approach. The Model Social Media policy provides councils with a robust framework for the administration and management of their social media platforms. It also sets standards of conduct for all council officials and Councillors who use social media in their official capacity. It has been developed to be fit-for-purpose in a digital age where innovation and emerging trends are the norm.

The Model Social Media policy recognises that councils use social media differently depending on factors such as a council's size and resources, the demographics of a local government area and council's willingness to engage with their community in this way.

This policy aims to provide a framework by which Council and Councillors can realise the benefits of social media whilst mitigating the associated risks.

BACKGROUND AND RELATED LEGISLATION

Dubbo Regional Council is committed to the four Principles of social media engagement which should underpin every aspect of a council's social media activity and all councils, council officials and Councillors should commit to upholding them:

- Openness;
- Relevance;
- Accuracy; and
- Respect

List of relevant legislation and policy that is related to this policy:

- *Copyright Act 1968*
- *Trade Marks Act 1995*
- *Intellectual Property Laws Amendment Act 2015*
- *Privacy and Personal Information Protection Act 1998*
- *State Records Act 1998*
- *Government Information (Public Access) Act 2009*
- *Local Government Act 1993*
- *Work Health and Safety Act 2011*
- *Dubbo Regional Council Code of Conduct Policy*
- *Dubbo Regional Council Media Policy, and*
- *Dubbo Regional Council Corporate Image and Communications Policy*

SCOPE

The Social Policy is structured as follows:

Part 1	Set out the principles of social media engagement for councils	Part 6	Prescribes how councils social media platforms should be used during emergencies
Part 2	Contains two administrative models that councils can adopt in relation to the management of their social media platforms	Part 7	Contains information about records management and privacy requirements relating to social media
Part 3	Details the administrative framework for social media platforms for Councillors	Part 8	Relates to personal use of social media by council officials and Councillors
Part 4	Prescribes the standards of conduct expected of council officials when engaging on social media in an official capacity or in connection with their role as a council official	Part 9	Provides information about where concerns or complaints can be directed in relation to social media conduct or social media use by Council, council officials or Councillors
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 10	Definitions

POLICY

Part 1 – Principles

1.1 Dubbo Regional Council is committed to upholding and promoting the following principles of social media engagement:

- Openness** Our social media platforms are places where anyone can share and discuss issues that are relevant to our Council and the community we represent and serve.
- Relevance** We will ensure our social media platforms are kept up to date with informative content about our Council and community.
- Accuracy** The content we upload onto our social media platforms and any other social media platform will be a source of truth for our Council and community and we will prioritise the need to correct inaccuracies when they occur.
- Respect** Our social media platforms are safe spaces. We will uphold and promote the behavioural standards contained in this policy and our Council's code of conduct when using our social media platforms and any other social media platform.

Part 2 – Administrative Framework for Council’s Social Media Platforms

Platforms

2.1 Council will maintain a presence on the following social media platforms, and may for time to time add or remove/deactivate accounts as determined by the Chief Executive Officer:

Platform	Account	Account
Facebook	Dubbo Regional Council Aquatic Leisure Centres DREAM Festival Dubbo City Dubbo City Animal Shelter/Wellington Pound Dubbo Regional Events Dubbo Region Ignite Dubbo Regional Airport Dubbo Regional Theatre & Convention Centre	Dubbo Visitor Information Centre Keswick Estate Macquarie Regional Library Old Dubbo Gaol The Yard Visit Dubbo + Great Western Plains Wellington Caves Wellington NSW Western Plains Cultural Centre
Instagram	Dubbo Regional Council DREAM Festival Dubbo City Regional Events Dubbo Regional Airport Dubbo Regional Theatre & Convention Centre	Macquarie Regional Library Old Dubbo Gaol The Yard Visit Dubbo + Great Western Plains Wellington Caves Wellington NSW Western Plains Cultural Centre
Twitter	Dubbo Regional Council Dubbo City Dubbo Regional Airport Dubbo Regional Theatre and Convention Centre	Macquarie Regional Library Old Dubbo Gaol Visit Dubbo + Great Western Plains
YouTube	Dubbo Regional Council Dubbo Region Dubbo Region Skills Macquarie Regional Library	Old Dubbo Gaol Visit Dubbo + Great Western Plains Western Plains Cultural Centre
LinkedIn	Dubbo Regional Council	
TikTok	Dubbo Regional Council Old Dubbo Gaol	Western Plains Cultural Centre

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

Establishment and Deletion of Council Social Media Platforms

2.3 A new council social media platform, or a social media platform proposed by a council related entity (for example, a council committee), can only be established or deleted with the written approval of the Chief Executive Officer or their delegate.

2.4 Where a council social media platform is established or deleted in accordance with clause 2.3, the Chief Executive Officer or their delegate may amend clause 2.1 of this policy without the need for endorsement by the Council’s governing body.

The Role of the Chief Executive Officer

- 2.5 The role of the Chief Executive Officer is to:
- a) approve and revoke a staff member's status as an authorised user;
 - 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) ensure the Council adheres to the rules of the social media platform(s); and
 - f) coordinate with the Council's Corporate Image and Communication branch 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 Chief Executive Officer is an authorised user for the purposes of this policy.

Authorised Users

- 2.12 Authorised users are members of council staff who are authorised by the Chief Executive Officer to upload content and engage on social media on the Council's behalf.
- 2.13 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.
- 2.14 The Chief Executive Officer will appoint authorised users when required.
- 2.15 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.
- 2.16 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 the Council's social media platforms up to date;
 - e) moderate the Council's social media platforms in accordance with Part 5 of this policy; and
 - 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)
- 2.17 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.
- 2.18 Authorised users must not use Council's social media platforms for personal reasons.

Administrative Tone

- 2.19 Authorised users upload content and engage on social media on the Council's behalf. Authorised users must use language consistent with that function and avoid expressing or appearing to express their personal views when undertaking their role.
- 2.20 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

- 2.21 The Chief Executive 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 Person

- 2.22 The Chief Executive 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 three months;
 - c) the staff member has failed to comply with this policy; or
 - d) the Chief Executive Officer is of the reasonable opinion that the staff member is no longer suitable to be an authorised user.

Part 3 – Administrative Framework for Social Media Platforms for Councillors

- 3.1 For the purposes of this policy, Councillor social media platforms are not council-corporate social media platforms. Part 2 of this policy does not apply to social media platforms for Councillors.
- 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 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 Councillors must comply with the rules of the platform when engaging on social media.

Induction and Training

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

Identifying as a Councillor

- 3.6 If a Councillor choose to have a dedicated Councillor page, the Councillor must identify themselves on their social media platforms in the following format:
Councillor "First Name and Last Name".
- 3.7 A Councillor's social media platform must include a profile photo which is a clearly identifiable image of the councillor.
- 3.8 If a Councillor becomes or ceases to be the mayor, deputy mayor, or the holder of another position (for example, chairperson of a committee), this must be clearly stated on the Councillor's social media platforms and updated within one month of a change in circumstances.

Other General Requirements for Social Media Platforms for Councillors

- 3.9 Councillor specific social media platforms must specify or provide a clearly accessible link to the 'House Rules' for engaging on the platform.
- 3.10 A Councillor's social media platform must include a disclaimer to the following effect:
"The views expressed and comments made on this social media platform are my own and not that of the Council".
- 3.11 Despite clause 3.10, Mayoral or Councillor media releases and other content that has been authorised according to the Council's media and communications protocols may be uploaded onto a Councillor's social media platform.
- 3.12 Councillors may upload publicly available Council information onto their Councillor or personal social media platforms.
- 3.13 Councillors may use more personal, informal language when engaging on their social media platforms.

Councillor Queries Relating to Social Media Platforms

- 3.14 Questions from Councillors relating to their obligations under this policy, technical queries relating to the operation of their social media platforms, or managing records on social media may be directed to the Chief Executive Officer in the first instance, in accordance with Council's Councillor requests protocols.

Other Social Media Platforms Administered by Councillors

- 3.15 A Councillor must advise the Chief Executive Officer 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:
- a) Immediately after becoming a councillor, or
 - b) Immediately after becoming the administrator.

Part 4 – Standards of Conduct on Social Media

- 4.1 This policy only applies to use of social media by council officials' and Councillors in an official capacity or in connection with their role as a council official or Councillor. The policy does not apply to personal use of social media that is not connected with a person's role as a council official or Councillor.
- 4.2 Council officials and Councillors must comply with the Council's code of conduct when using social media in an official capacity or in connection with their role as a council official or Councillor.
- 4.3 Council officials or Councillors 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, Councillors or members of the public;
 - b) contains profane language or is sexual in nature;
 - c) constitutes harassment and/or bullying within the meaning of the 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, council officials, Councillors or members of the public that is misleading or deceptive;
 - f) divulges confidential Council information;
 - g) breaches the privacy of other council officials, 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) advertises, endorses or solicits commercial products or business;
 - n) constitutes spam;or
 - o) is in breach of the rules of the social media platform.
- 4.4 Council officials and Councillors must:
- a) attribute work to the original author, creator or source when uploading or linking to content produced by a third party; and
 - b) obtain written permission from a minor's parent or legal guardian before uploading content in which the minor can be identified. It is the responsibility of the social media account owner to which to the content is uploaded to, that must obtain the written permission.
- 4.5 Council officials and Councillors must exercise caution when sharing, liking, retweeting content as this can be regarded as an endorsement and/or publication of the content.
- 4.6 Council officials and Councillors must not incite or encourage other persons to act in a way that is contrary to the requirements of this Part.

4.7 Councillors must uphold and support and accurately represent the policies and decisions of the Council's governing body. (see section 232(1)(f) of the Local Government Act 1993).

Part 5 – Moderation of Social Media Platforms

Note: Councils, council officials 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 Council officials who are responsible for the moderation of Council-corporate social media platforms or Councillors' social media platforms may remove content and 'block' or ban a person from those platforms. Such actions must be undertaken in accordance with this Part.

5.2 For the purposes of this Part, 'social media platform' and 'platform' means both the Council and Councillor social media platforms.

House Rules

5.3 Social media platforms must state or provide an accessible link to the 'House Rules' for engaging on the platform.

- 5.4 At a minimum, the House Rules should specify:
- a) the principles of social media engagement referred to in clause 1.1 of this policy;
 - b) the type of behaviour or content that will result in that content being removed or 'hidden', or a person being blocked or banned from the platform;
 - c) the process by which a person can be blocked or banned from the platform and rights of review;
 - d) a statement relating to privacy and personal information (see clause 7.4 of this policy);
 - e) when the platform will be monitored (for example weekdays 9am – 5pm, during the Council's business hours); and
 - f) that the social media platform is not to be used for making complaints about the Council or council officials or Councillors.

Note: The House Rules should include information about, or a link to, Council's complaints handling policy.

5.5 For the purposes of clause 5.4(b), third parties engaging on social media platforms must not post or share comments, photos, videos, electronic recordings or other information that:

- a) is defamatory, offensive, humiliating, threatening or intimidating to council officials or members of the public;
- b) contains profane language or is sexual in nature;
- c) constitutes harassment and/or bullying within the meaning of the Model Code of Conduct for Local Councils in NSW, or is unlawfully discriminatory;
- d) contains content about the Council, council officials, Councillors or members of the public that is misleading or deceptive;

- e) breaches the privacy of council officials, 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; or
- k) would be in breach of the rules of the social media platform.

Removal or 'Hiding' of Content

- 5.6 Where a person uploads content onto a social media platform that, in the reasonable opinion of the moderator, is of a kind specified under clause 5.5, the moderator may remove or 'hide' that content.
- 5.7 Prior to removing or 'hiding' the content, the moderator must make a record of it (for example, a screenshot).
- 5.8 If the moderator removes or 'hides' the content under clause 5.6, they must, where practicable, notify the person who uploaded the content that it has been removed and the reason(s) for its removal and their rights of review.
- 5.9 A person may request a review of a decision by a moderator to remove or 'hide' content under clause 5.6. The request must be made in writing to the Chief Executive Officer and state the grounds on which the request is being made.
- 5.10 Where a review request is made under clause 5.9, the review is to be undertaken by the Chief Executive Officer or delegate who is suitably qualified and who was not involved in the decision to remove or 'hide' the content.

Blocking or Banning

- 5.11 If a person uploads content that is removed or 'hidden' under clause 5.6 of this policy on, that person may be blocked or banned from the social media platform.
- 5.12 A person may only be blocked or banned from a council-corporate social media platform with the approval of the Chief Executive Officer. This clause does not apply to blocking or banning a person from a Councillor's social media platform.
- 5.13 Prior to blocking or banning a person from a social media platform, the person must, where practicable, be advised of the intention to block or ban them from 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.
- 5.14 The duration of the block or ban is to be determined by the Chief Executive Officer, or in the case of a Councillor's social media platform, the Councillor.

- 5.15 Where a determination is made to block or ban a person from a social media platform platforms, the person must, where practicable, be notified in writing of the decision and the reasons for it. The written notice must also advise the person which social media platforms they are blocked or banned from and the duration of the block or ban and inform them of their rights of review.
- 5.16 Despite clauses 5.11 to 5.15, where a person uploads content of a kind referred to under clause 5.5, and the moderator is reasonably satisfied that the person's further engagement on the social media platform poses a risk to health and safety or another substantive risk (such as the uploading of defamatory content), an interim block or ban from the platform may be imposed on the person immediately for a period no longer than 12 months, subject to review.
- 5.17 A person who is blocked or banned from the platform under clause 5.16 must, where practicable, be given a chance to respond to the interim block or ban being imposed. Any submission made by the person must be considered when determining whether the interim block or ban is to be removed or retained under clauses 5.11 to 5.15.
- 5.18 A person may request a review of a decision to block or ban then from a social media platform. The request must be made in writing to the Chief Executive Officer and state the grounds on which the request is being made.
- 5.19 Where a review request is made under clause 5.18, the review is to be undertaken by the Chief Executive Officer or delegate who is suitably qualified and who was not involved in the decision to block or ban the person. Where the decision to block or ban the person was made by the Chief Executive Officer, the review must be undertaken by a another senior and suitably qualified member of staff who was not involved in the decision. Council may at any time engage an external consultant to undertake the review.
- 5.20 Where a person that is the subject of a block or ban continues to engage on a social media platform(s) using an alternative social media account, profile, avatar, etc., a moderator may block or ban the person from the platform(s) immediately. In these circumstances, clauses 5.11 to 5.19 do not apply.

Part 6 – Use of Social Media During Emergencies

- 6.1 During emergencies, such as natural disasters or public health incidents, the Strategic Partnerships and Investment (Communications Services) branch will be responsible for the management of content on the Council's social media platforms.
- 6.2 To ensure consistent messaging both during and after an emergency, authorised users and council officials must not upload content onto the Council's or their own social media platforms which contradicts advice issued by the agency coordinating the emergency response, or agencies supporting recovery efforts.
- 6.3 Training on social media use during emergencies should be included in training and/or induction provided to authorised users and Councillors.

Part 7 – Records Management and Privacy Requirements

Records Management

- 7.1 Social media content created, sent and received by council officials (including Councillors) whilst acting in their official capacity is a council record and may constitute open access information or be subject to an information access application made under the Government Information (Public Access) Act 2009. These records must be managed in accordance with the requirements of the State Records Act 1998 and the Council's approved records management policies and practices.
- 7.2 You must not destroy, alter, or remove social media content unless 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 Chief Executive Officer to manage/transfer records of social media content created during their term of office and comply with the requirements of the State Records Act 1998.
- 7.4 In fulfilling their obligations under clauses 7.1 to 7.3, council officials and Councillors should refer to any guidance issued by the State Archives and Records Authority of NSW relating to retention requirements for Council's and Councillors' social media content¹.

Privacy Considerations and Requirements

- 7.5 Social media communications are in the public domain. Council officials 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. To mitigate potential privacy risks, council officials and Councillors will:
- advise people not to provide personal information on social media platforms;
 - inform people if any personal information they may provide on social media platforms is to be used for official purposes;
 - moderate comments to ensure they do not contain any personal information; and
 - advise people to contact the Council or Councillors through alternative channels if they have personal information they do not want to disclose in a public forum.
- 7.7 Council officials 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 their obligations, council officials and Councillors should refer to any guidance issued by the Information and Privacy Commission of NSW, such as, but not limited to, the Health Privacy Principles.

Part 8 – Private Use of Social Media

Note: *Activities on social media websites are public activities. Even though privacy settings are available, content can still be shared and accessed beyond the intended recipients.*

¹ See State Archives and Records Authority of NSW 'Government Record Keeping/Advice and Resources/Local Government' and 'Social media recordkeeping for councillors'.

The terms and conditions of most social media sites state that all content becomes the property of the site on which it is posted².

What Constitutes ‘Private’ Use?

- 8.1 For the purposes of this policy, a council official’s or Councillor’s social media engagement will be considered ‘private use’ when the content they upload:
- a) is not associated with, or does not refer to, the Council, any other council officials or Councillors, 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 or Councillor.
- 8.2 If a council official or Councillor chooses to identify themselves as a council official or Councillor then they acknowledge the risk that they may not be deemed to be acting in their private capacity for the purposes of this policy.

Use of Social Media During Work Hours

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

Part 9 – Concerns or Complaints

- 9.1 Concerns or complaints about the administration of a council’s social media platforms should be made to the council’s Chief Executive Officer in the first instance.
- 9.2 Complaints about the conduct of council officials (including Councillors) on social media platforms may be directed to the Chief Executive Officer.
- 9.3 Complaints about the Chief Executive Officer’s conduct on social media platforms may be directed to the Mayor.

Part 10 – Definitions

To assist in interpretation, the following definitions apply:

Term	Definition
Authorised user	Members of council staff who are authorised by the Chief Executive Officer to upload content and engage on the Council’s social media platforms on the Council’s behalf.
Councillor	An elected member of the governing body of Council.
Council official	Members of staff and delegates of the council (including members of committees that are delegates of the council).
Council-corporate social media account	Social media accounts as listed in Part 2.1, a Councillors social media account is not a Council-corporate social media account.
External consultant	A suitability qualified person who is not a Council official.

² Social Media: Guidance for Agencies and Staff (Government of South Australia) – page 9

Minor	For the purposes of clause 4.4(b) of this policy, is a person under the age of 18 years
Personal information	Information or an opinion (including information or an opinion forming part of a database and whether or not recorded in a material form) about an individual whose identity is apparent or can reasonably be ascertained from the information or opinion.
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.

RESPONSIBILITIES

The Chief Executive Officer and relevant delegate are responsible for enforcing and enacting this policy.