



# **SOCIAL MEDIA MODERATION POLICY**

**Policy 24/2021-24**

## **DATE**

- Adopted Ordinary Meetings of Council 28 June 2022 and 12 September 2023

<b>POLICY NO:</b>	24/2021-24
<b>LEGISLATIVE REQUIREMENTS</b>	Nil
<b>RESPONSIBILITY:</b>	CUSTOMER COMMUNITY SERVICES
<b>OBJECTIVE:</b>	The purpose of The Hills Shire Council social media is to inform residents about its products, services and decisions. This policy outlines the ground rules by which Council staff will moderate comments on various posts.
<b>REVIEW</b>	Within the first 12 months of each term of Council or as required.

## Background

This policy outlines the administrative framework and house rules by which staff will moderate the Council's organisational social media platforms. The purpose of these platforms is to inform residents, share news, media statements and alerts about products, services, announcements, and decisions.

Social media can be broadly defined as online platforms and applications - such as social networking sites, wikis, blogs, microblogs, video and audio sharing sites, and message boards - that allow people to easily publish, share and discuss content.

The objectives of this moderation policy are to:

- Establish the purpose of Council's involvement with social media including but not limited to Facebook, Twitter, Instagram, LinkedIn and YouTube.
- Outline the management and use of social media for Council by staff.
- Provide for the inclusion of social media as a tool in the delivery of Council's services and activities.
- Define how comments from users will be moderated by staff in relation to anti-social, off-topic, irrelevant, defamatory, offensive, spam and/or other inappropriate posts.

For the purposes of this policy, Mayoral and Councillor social platforms are not Council organisational social media and are not covered by this policy or moderated by Council staff.

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 in relation to social media.

Social media represents a significant communications platform and is instrumental in allowing two-way communications. This policy is designed to protect all users of the Council's social media and digital platforms.

This policy covers all aspects of community interaction and moderation on the Council organisation social media platforms only including comments on posts.

Council social media provides a growing number of opportunities for the community who wish to discuss content we publish or debate issues. Our aim is to ensure this platform is inclusive and safe. The key to maintaining the page as an inviting space is to focus on intelligent discussion of topics about Councils products, services and decisions.

Social media platforms are for the business of Council and are not a platform for the wider community. The intention is for them to be informational, and we expect participants to help us achieve this by notifying us of potential problems and helping each other to keep conversations inviting and appropriate.

Please be mindful that social media is a public place. Don't post personal information that you would not be comfortable sharing with a stranger. We recommend that you don't post any information that may identify you or anyone else, such as your address, email address or phone number.

If you spot something problematic in community interaction areas, please report it.

In short: - If you act with maturity and consideration for other users, you should have no problems. - Don't be unpleasant. Take some responsibility for the quality of the conversations in which you're participating. Help make this an intelligent place for discussion, and it will be.

## Moderation approach

If a contribution to social media is perceived as breaching these guidelines, then it may be removed or hidden, in the interests of keeping the site appropriate for the vast majority of the people who visit.

Council reserves the right to take steps or implement measures to manage breaches, repetitive or similar posts that may have your posting privileges withdrawn at Council's sole discretion. Automated filters will hide posts that name Councillors and will be reviewed during normal business hours before going live.

Council is legally responsible for everything which appears on the platforms, all actions and decisions taken by our moderators are final. We make this page available for use by the community without assuming a duty of care to the users and readers of this page. We do not provide any professional advice through this page, and we give no warranty, guarantee or representation about the accuracy, reliability, or timeliness or otherwise of the information posted here by any user or community member.

We will not be liable under any circumstances for any action for losses or damages of any kind we do or do not take in relation to this page at any time.

Nothing in this guideline creates a legal obligation on Council towards you. Accordingly, we are not liable to you for: errors or omissions on the page, delays, interruptions of or cessation of the page and defamatory, offensive, or illegal conduct of any user of this page.

The growing quantity of user content on the page means that we can't enter into correspondence regarding specific moderation activity, although all correspondence will be read within a reasonable time frame.

The General Manager will delegate the responsibility to moderate social media platforms in accordance with this policy. Requests for a formal review of a hidden or deleted post, or banning from any social media sites can be lodged with Council's Public Officer in writing using the online form – social media moderation review request available at [www.thehills.nsw.gov.au](http://www.thehills.nsw.gov.au)

## Principles

The staff and other officials of The Hills Shire Council, are 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 Council business 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 or remove inaccuracies or off-topic posts 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.

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

The General Manager will appoint a member of council staff to be the council's social media coordinator (SMC). The SMC should be a senior and suitably qualified member of staff.

The General Manager may appoint more than one SMC and their role is to:

- approve and revoke a staff member's status as an authorised user.
- develop and/or approve the training and/or induction to be provided to authorised users.
- maintain effective oversight of authorised users.
- moderate the Council's social media platforms in accordance with this policy.
- 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).
- ensure the Council adheres to the rules of the social media platform(s).
- 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.

## **Authorised Users**

The SMC may delegate their functions to authorised users.

- Authorised users are members of council staff who are authorised by the SMC to upload content and engage on social media on the Council's behalf.
- 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.
- The SMC will appoint authorised users when required.
- 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.

The role of an authorised user is to:

- ensure, to the best of their ability, that the content they upload onto social media platforms is accurate.
- correct inaccuracies in Council generated content.
- engage in discussions and answer questions on Council's behalf on social media platforms.
- keep the Council's social media platforms up to date.
- moderate the Council's social media platforms in accordance this policy.
- ensure the Council complies with its record keeping obligations under the State Records Act 1998 in relation to social media.
- 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.
- Authorised users must not use Council's social media platforms for personal reasons.

## **Administrative Tone**

- Authorised users must use language consistent with that function and avoid expressing or appearing to express their personal views when undertaking their role.
- Authorised users may use more personal, informal language when engaging on Council's social media platforms, for example when replying to comments.

## **Authorised Users**

The SMC will revoke a staff member's status as an authorised user, if:

- is no longer employed by Council.
- the staff member makes such a request.
- the staff member has failed to comply with this policy.
- the SMC is of the reasonable opinion that the staff member is no longer suitable to be an authorised user.

## **Social Media Platforms**

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 approval of the SMC or their delegate.

Where a council social media platform is established or deleted it does not need the endorsement by the Council's governing body.

## **Councillor Social Media Platforms**

For the purposes of this policy, councillor social platforms are not council social media platforms, and this policy does not apply to councillors' social media platforms.

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.

## **Standards of Conduct on Social Media**

This policy only applies to council staffs' 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.

Council officials 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.

Council officials must not use social media to post or share comments, photos, videos, electronic recordings, or other information that:

- is defamatory, offensive, humiliating, threatening, or intimidating to other council officials or members of the public.
- contains profane language or is sexual in nature.
- constitutes harassment and/or bullying within the meaning of the Model Code of Conduct for Local Councils in NSW or is unlawfully discriminatory.
- 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.
- contains content about the Council, council officials or members of the public that is misleading or deceptive.
- divulges confidential Council information.
- breaches the privacy of other council officials or members of the public.
- 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
- could be perceived to be an official comment on behalf of the Council where they have not been authorised to make such comment.
- commits the Council to any action.
- violates an order made by a court.
- breaches copyright.
- advertises, endorses, or solicits commercial products or business.
- constitutes spam.
- is in breach of the rules of the social media platform.

Council officials must:

- attribute work to the original author, creator or source when uploading or linking to content produced by a third party.
- obtain written permission from a minor's parent or legal guardian before uploading content in which the minor can be identified.
- Council officials must exercise caution when sharing, liking, retweeting content as this can be regarded as an endorsement and/or publication of the content.
- Council officials must not incite or encourage other persons to act in a way that is contrary to the requirements of this Part.

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

Councils 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:

- 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.

- Council officials 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. Such actions must be undertaken in accordance with this Part.
- For the purposes of this Part, 'social media platform' and 'platform' means both the Council's and councillors' social media platforms.

### House Rules

Social media platforms must state or provide an accessible link to the 'House Rules' for engaging on the platform. At a minimum, the House Rules should specify:

- the principles of social media engagement referred to in this policy.
- 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.
- the process by which a person can be blocked or banned from the platform and rights of review.
- a statement relating to privacy and personal information.
- when the platform will be monitored.
- that the social media platform is not to be used for making complaints about the Council or council officials.

### House Rules that will apply to all Council Social Media Platforms

The key to maintaining the page as an inviting space is to focus on intelligent discussion of the business of Council such as products, services and decisions using the following House Rules.

- Comments on posts can only relate to the business of Council and be about the information contained in the original post.
- If you post something that contains repetitive posts copied and pasted or duplicated by single or multiple users which is unrelated to the original topic ("off-topic") then it may be removed. This also applies to queries or comments about moderation or censorship, which should not be posted as comments.
- Personal attacks (against authors or other users), naming people in a negative way, persistent trolling, spamming, smearing and mindless abuse will not be tolerated. This includes knowingly false or mischievous complaints or statements about individuals, companies, or the government.
- Any content that is defamatory or harassing of councillors, employees, volunteers, or the participants in our channels that may put Council in legal jeopardy, such as potentially libellous or defamatory postings, or material posted in potential breach of copyright will be deleted or hidden at Council discretion.
- Any content that a council moderator believes was intended to be offensive or threatening will be deleted. Please respect other people's views and beliefs and consider your impact on others when making your contribution.
- Contributions that a council moderator views as discriminatory on the basis of race, religion, sex, sexual orientation, disability, age or any other basis outlined in the NSW Anti-Discrimination Act 1977 will not be tolerated.



- Any posts that are commercial contain advertising material or external links (cybersecurity risk) to other pages are not permitted.
- Requests for a formal review of a hidden or deleted post, or banning from any social media sites can be lodged with Council's Public Officer in writing using the online form – social media moderation review request available at [www.thehills.nsw.gov.au](http://www.thehills.nsw.gov.au)
- Concerns or complaints about the administration of a council's social media platforms should be made to the council's public officer in the first instance.
- Complaints about the conduct of council officials on social media platforms may be directed to the public officer.
- Complaints about a general manager's conduct on social media platforms may be directed to the mayor.
- Unless an issue requires urgent moderation such as spam or defaming like comments, social media moderation will normally occur during business hours on Monday – Friday.

### **Privacy Considerations and Requirements**

Social media communications are in the public domain. Council officials should exercise caution about what personal information, if any, they upload onto social media.

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 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
- 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.

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**

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?

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

- is not associated with, or does not refer to, the 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
- is not related to or does not contain information acquired by virtue of their employment or role as a council official.
- 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.

## Definitions

In this Model Social Media Policy, the following terms have the following meanings:

<b>authorised user</b>	<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>
<b>council official</b>	in the case of a council - members of staff and delegates of the council (including members of committees that are delegates of the council);
<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>	is a council’s social media coordinator appointed under this policy
<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, Snapchat, LinkedIn, Yammer, YouTube, Instagram, Flickr and Wikipedia