



SOCIAL MEDIA MODERATION POLICY

Policy 24/2024-2028

DATE

- Ordinary Meeting of Council 28 June 2022 and 12 November 2024

POLICY NO:	24/2024-2028
LEGISLATIVE REQUIREMENTS	NIL
RESPONSIBILITY:	CUSTOMER COMMUNITY SERVICES
OBJECTIVE:	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.
REVIEW	Within the first 12 months of each term of Council or as required.

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Background

This policy outlines the administrative framework and house rules for staff moderating Council's organisational social media platforms.

The purpose of these platforms is to inform residents and share news, media statements, alerts, products, services, announcements, and decisions made by Council.

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

Objectives of the Moderation Policy:

- Establish the purpose of Council's involvement with social media, including but not limited to Facebook, X (formerly Twitter), Instagram, LinkedIn, and YouTube.
- Outline the management and use of social media by Council staff.
- Integrate social media as a tool for delivering Council's services and activities.
- Define how staff will moderate user comments regarding anti-social, off-topic, irrelevant, defamatory, offensive, spam, and other inappropriate posts.

Note that Mayoral and Councillor social media platforms are not considered Council organisational social media and are not governed by this policy or moderated by Council staff. Councillors are responsible for administering and moderating their own social media platforms, ensuring compliance with record-keeping obligations under the State Records Act 1998.

Social media serves as a vital communications platform that facilitates two-way communication. This policy aims to protect all users of Council's social media and digital platforms.

This policy encompasses all aspects of community interaction and moderation specifically for Council's organisational social media platforms, including comments on posts.

Council's social media provides numerous opportunities for the community to discuss and share its published content. Council's goal is to ensure this platform remains inclusive and safe. Maintaining an inviting space relies on encouraging intelligent discussions about Council's products, services, and decisions.

Social media platforms are intended for the business of Council and not as a general platform for the wider community. Council expects participants to help maintain this focus by notifying of potential issues and supporting each other in keeping conversations respectful and appropriate.

Moderation approach

If a contribution to social media is perceived as violating these guidelines, it may be removed or hidden to maintain the site's appropriateness for the vast majority of visitors.

Council reserves the right to take action or implement measures in response to breaches, including the potential withdrawal of an individual's posting privileges at Council's sole discretion.

Automated filters will hide posts that mention Councillors and will be reviewed during normal business hours before being made live.

Council is legally responsible for everything that appears on its platforms. All actions and decisions made by the moderators are final. Council provides this page for community use without assuming any duty of care to users and readers. Council does not offer professional advice through this page and does not warrant, guarantee, or represent the accuracy, reliability, or timeliness of the information posted by any user or community member.

Under no circumstances will Council be liable for any actions, losses, or damages of any kind related to this page at any time.

Nothing in these guidelines creates a legal obligation on Council towards those interacting with its social media platforms. Therefore, Council is not liable for errors or omissions on the page, delays, interruptions, or cessation of the page, or for any defamatory, offensive, or illegal conduct by users.

Due to the increasing volume of user content, Council cannot engage in correspondence regarding specific moderation activity; however, all correspondence will be read within a reasonable timeframe. Council will also turn comments off a post after being live for 72 hours on its Facebook platform. It may also choose to switch off comments on posts to prevent some people from spamming posts with trolling, hate speech, or negative interactions.

The General Manager will delegate the responsibility of moderating social media platforms in accordance with this policy. Requests for a formal review of hidden or deleted posts, or for bans from any social media sites, can be submitted to the Council's Public Officer in writing using the online form for social media moderation review requests available at 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: Council's 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: Council will ensure its social media platforms are kept up to date with informative content about its decisions, events, news and much more.

Accuracy The content Council uploads onto its social media platforms will be a source of truth for Council and the community, and Council will prioritise the need to correct or remove inaccuracies or off-topic posts when they occur.

Respect Council's social media platforms are safe spaces. Council will uphold and promote the behavioural standards contained in this policy and Council's *Code of Conduct* when using its social media platforms and any other social media platform.

Administrative framework for social media platforms

The General Manager will appoint a member of Council's staff to be the 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 Council's social media platforms in accordance with this policy.
- Ensure 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 Council adheres to the rules of the social media platform(s).
- Ensure 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, including:

- Authorised users are members of Council staff who are authorised by the SMC to upload content and engage on social media on 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 are accurate.
 - Correct inaccuracies in Council generated content.
 - Engage in discussions and answer questions on Council's behalf on social media platforms.
 - Keep Council's social media platforms up to date.
 - Determine whether to keep comments open or closed on posts across all channels, dependent on operational concerns such as resourcing, off-topic comments or abusive commentary.
 - Moderate Council's social media platforms in accordance with this policy.
 - Ensure 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.

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

- They are 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.

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.

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 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

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.
- 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.
- 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 only.
- Moderate comments to ensure they do not contain any personal information.
- Advise people to contact Council 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 Council, any other Council officials, contractors, related entities or any other person or organisation providing services to or on behalf of 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:

Authorised User	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.
Council Official	In the case of Council - members of staff and delegates of Council (including members of committees that are delegates of Council).
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.
SMC	Is Council's Social Media Coordinator appointed under this policy
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.