

POLICY

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22 NOLAN STREET MARYBOROUGH VIC 3465



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1. Purpose

This Online Communications Policy aims to provide timely, quality information to our community.

The Central Goldfields Shire Council website and social media platforms provide us with an opportunity to complement our existing traditional based communication channels and to improve our ability to communicate Council news, information and services to a broader audience.

2. Scope

This policy applies to all Councillors, employees, contractors, sub-contractors, consultants and volunteers who engage online through websites and/or social media on behalf of, and for the purpose of conducting Council business.

This policy outlines the requirements for compliance with confidentiality, governance, legal, privacy and regulatory parameters.

It aims to:

- Address appropriate use of Council's web content management system and social media tools
- promote effective and productive online community engagement through websites and social media
- minimise miscommunication or mischievous communications
- help Council manage the inherent challenges of speed and immediacy.

The policy applies to those digital spaces where people may comment, contribute, create, forward, post, upload and share content, including:

- Apps
- blogs
- bulletin boards
- citizen journalism and news sites
- forums and discussion boards
- instant messaging facilities
- microblogging sites (eg Twitter)
- online encyclopaedias (eg Wikipedia)
- podcasts
- social networking sites (eg Facebook, Myspace, Bebo, Friendster, Linkedln)
- video and photo sharing sites (eg Flickr, YouTube)
- video podcasts
- wikis
- any other websites that allow individuals to use simple publishing tools or new technologies emerging from the digital environment.



As it is not possible to expressly refer to or list the specific sites or kinds of social media sites or outlets, the absence of a reference to a particular site or kind of social media activity does not limit the application of this policy.

This policy is intended to cover the use personal use of social media even where:

- the author publishes information in their personal capacity and not on behalf of, or in association with Central Goldfields Shire Council; and
- no reference is made to Central Goldfields Shire Council, its councillors, staff, policies and services, suppliers or other stakeholders or Council-related issues.

Notwithstanding, any personal use of social media during work hours should be kept to a minimum and not impede or interfere with work.

This policy should be read in conjunction with other relevant policies and procedures of Central Goldfields Shire Council.

3. Policy

Staff, contractors and volunteers of Council are expected to demonstrate standards of conduct and behaviour that are consistent with relevant legislation, regulations and policies. A list of relevant legislation which may be used as a guide is included in section 8 of this document.

Council's online presence aims to:

- enable people to conduct their Council business online 24/7
- provide customer service
- distribute positive news, events and information of interest to residents
- engage in two way conversation where possible
- · establish greater engagement with the community
- establish trust in Central Goldfields Shire Council
- humanise and bring personality to the Central Goldfields Shire Council brand

4. Website

In order to create a better website for everyone, Council's website should adhere to the following requirements:

4.1.1. Authorisation

Authorised Users only are permitted to contribute to Council's website on behalf of Council. Authorisation is granted through the Communications Officer in coordination with the relevant service unit Manager. Training in the web content management system by the provider or the Communications Officer is mandatory.

4.1.2. Accessibility

The Web Accessibility National Transition Strategy sets a course for improved web services, paving the way for a more accessible and usable web environment that will more fully engage with, and allow participation from, all people within our society.

It states that Web Content Accessibility Guidelines (WCAG) 2.0 is applicable to all online government information and services. Conformance is required on all government websites owned and/or operated by government under any domain. This includes external (public-facing or private) and internal (closed community) sites.



The WCAG 2.0 guidelines have been developed with a goal of proving a single shared standard for web content accessibility that meets the needs of individuals, organisations, and governments internationally.

Central Goldfields Shire Council must meet the legislative requirements under the:

- Victorian Equal Opportunity Act 2010
- Human Rights and Equal Opportunity Commission Act 1986
- Disability Discrimination Act 1992.

4.1.3. Accuracy

The website must be updated as often as needed, with a minimum of every three months to ensure the information is timely and correct.

4.1.4. Responsiveness

The website must be accessible through desktop, mobile phone and tablet. The layout should automatically adjust based on the user's screen size. This is now an expected feature in websites.

4.1.5. Usability

User 'needs' should be the guiding principle for government websites. Users come to the site to accomplish tasks and to fulfil needs. It is Council's responsibility to make sure they can complete the top tasks easily and efficiently. The website should be simple and approachable and focussed on Council's core services and users 'top tasks'.

The information presented should be necessary, useful, and understandable and presented in a clear, concise and accessible manner. The pages should contain simple, clear language using active voice and avoiding jargon.

4.1.6. Content included

The Communications Officer retains the right to amend, delete, add content on an as-needs basis.

Information included on the site should;

- Inform and provide access to Council's programs and services, or provide relevant links to information from other stakeholders and/or
- Engage the community and/or
- Allow stakeholders to conduct Council business.

The website is not a reference for information that does not pertain to Council business.

5. Sub sites

Central Goldfields Shire Council only has three main websites – Central Goldfields Shire Council, Visit Maryborough and Go Goldfields. If service units have specific needs in website functionality or branding that can't be met by Council's main website they can create a sub site.

5.1. Authorisation

Service units need to provide a business case and get authorisation from the Communications Officer to create a sub site. Unless there is a demonstrable reason why the Council brand should not take precedence, all sub sites will be so branded.

To protect the reputation and image of Council, authorisation will depend on:

- Specify aim and target group and functionality needs
- Quality assurance
- Resources to start and maintain the sub site



Policy Name: Online Communications Policy

Policy Number: 1.30

- Hosting facilities
- Branding
- Temporary or permanent sub site
- Risk management strategy

6. Social media

Currently there are five Facebook pages – Central Goldfields Shire Council, Go Goldfields, Visit Maryborough, Maryborough Regional Library and Central Goldfields Rehoming. There is one twitter account - Central Goldfields Shire Council. There is also a Central Goldfields Shire Council Linked In account.

6.1 **Authorisation**

If service units want to create a social media presence for a certain program, target group or issue, they need to develop a business case and risk management strategy and get authorisation from the Communications Officer.

Authorisation will depend on the following:

- Specify the aim and target group of the social media tool
- Social media tool needs to provide two-way communication
- Specifying how the social media tool will be branded and linked back to Council and how it will be linked to other Council communication materials
- Specifications on quality insurance regarding content production and timing, monitoring, effectiveness measurement, response strategy, accessibility, usability, content permission, copyright, content optimisation and promotion
- Specifications on resourcing (budget and staff)
- Risk management strategy
- Data management and record keeping
- Social media tool look/brand will need be professionally designed and approved by Communications

Only Authorised Users are permitted to use social media for professional reasons or on behalf of Council.

A social media presence always needs to be linked to a profile and for this a mock profile to which more than one staff member has access. The Communications Officer must have access to all pages.

Authorised User status can be revoked without prior notice by Communications, service unit manager or Executive and is revoked immediately after leaving the organisation or termination of employment.

Staff must have participated in social media training.

When using social media Councillors, staff and contractors are required to:

- adhere to Central Goldfields Shire Council codes of conduct, policies and procedures
- behave with caution, courtesy, honesty and respect
- comply with relevant laws and regulations
- reinforce the integrity, reputation and values of Central Goldfields Shire Council
- Disclaimer: Rules of engagement and disclaimers should always be included in the 6.2 profile section of the social media tool or be available in a clearly obvious and discoverable way.
- Authorisation: You must obtain authorisation from the Communications Officer before 6.3 using social media, including, but not limited to, uploading content and acting as a



spokesperson on behalf of Council. The Communications Officer can authorise the continual use of a social media tool.

- **6.4 Expertise:** Do not comment outside your area of expertise. Do not commit Council to actions or undertakings.
- **Disclosure:** Only discuss publicly available information. Do not disclose confidential information, internal discussions or decisions of Council, employees or third parties. This includes publishing confidential, personal or private information where there is sufficient detail for potential identification of councillors, Council staff or third parties.
- **Accuracy:** Be accurate, constructive, helpful and informative. Correct any errors as soon as practicable. Do not publish information or make statements which you know to be false or may reasonably be taken to be misleading or deceptive.
- **6.7 Identity:** Be clear about professional identity or any vested interests. Do not use fictitious names or identities that deliberately intend to deceive, mislead or lie. Do not participate anonymously or covertly via a third party or agency.
- **Opinion:** Clearly separate personal opinions from professional ones and be mindful of Council's Code of Conduct when discussing or commenting on Council matters. Do not express personal opinions using Council # tags or other identifications. Only where this is not possible, consider using a formal disclaimer to separate official Council positions from your personal opinions.
- **6.9 Privacy:** Be sensitive to the privacy of others. Do not publish personal information (which can include a person's name or image or information or an opinion that makes the identity of a person apparent or reasonably capable of being ascertained) without the consent of the person to whom the information relates. If, having consented to the publication, the person subsequently asks you to remove or correct that publication, you must do so as soon as practicable.
- **6.10 Intellectual property:** Seek permission from the creator or copyright owner, to use or reproduce copyright material including applications, audio tracks (speeches, songs) footage (video), graphics (graphs, charts and logos), images, artwork, photographs, publications or music. Also seek permission before publishing or uploading material in which the intellectual property rights, such as trademarks, are owned by a third party (for example, company logos).
- 6.11 End User Licence Agreements: Be aware of any End User Licence Agreements (EULA) that exist on any social media sites or outlets that you use and seek authorisation before accepting any EULA. An EULA is a set of terms and conditions provided by the owner of the social media outlet that you must accept and are generally unable to negotiate. The terms and conditions can provide the social media outlet owner the right to change the terms of use of the site, exclude any liability of the owner of the site and in some instances grant the owner rights to use material uploaded by users without the user's consent.
- **6.12 Defamation:** Do not comment, contribute, create, forward, post, upload or share content that is malicious or defamatory. This includes statements which may negatively impact the reputation of another.
- **6.13** Reward: Do not publish content in exchange for reward of any kind.
- **6.14 Transparency:** Do not seek to buy or recompense favourable social media commentary. Encourage online publishers to be open and transparent in how they engage with, or review Council personnel, services or wares.
- **6.15** Political bias: Do not endorse any political affinity or allegiance.
- **6.16 Respect:** Always be courteous, patient and respectful of others' opinions, including detractors.



6.17 Discrimination: Be mindful of anti-discrimination laws and do not publish statements or information which may be discriminatory.

- **6.18 Language:** Be mindful of language and expression. Use language which is clear and simple. Avoid slang and jargon. Plan your writing first and always proofread content.
- **6.19** State of mind: Do not use social media when inebriated, irritated, upset or tired.
- **6.20** Be safe: Protect your personal privacy and guard identity theft.
- **6.21 Media:** Do not issue statements or make announcements through social media channels unless authorised. Do not respond directly if approached by media for comment through social media. Refer the enquiry to the Communications Officer as per Council's Media Policy.
- **6.22 Modification and moderation:** Ensure that any social media sites created or contributed to can be readily edited, improved or removed and appropriately moderated. Ensure appropriate moderation guidelines and processes are in place.
- **6.23** Access: Be mindful of the requisite government web standards for accessibility. Information made available via non-compliant platforms should be made accessible in another form where practical.
- **6.24** Be responsive: Specify the type of comments and feedback that will receive a response and clearly communicate a target response time. Make it easy for audiences to reach Council via other methods by publishing Council's phone number, generic email, Facebook and Twitter accounts.
- **Record keeping:** All content published or communicated by or on behalf of Council using social media must be recorded (including the author's name, date, time and media site location) and kept on record in accordance with Council's Record Management Policy.
- 6.26 Enforcement: Council actively monitors social media for relevant content that impacts on the City, its operations and reputation. Council will be able to find and act upon content communicated or published by staff if deemed necessary. This policy will be published and promoted to staff of Council. Breaching this policy may result in disciplinary action, performance management and review. Serious breaches may result in suspension or termination of employment or association. Council reserves the right to remove, where possible, social media content that violates this policy or any other Council policy.
- **6.27 Content not permitted:** The following content is not permitted under any circumstances:
 - Offensive or inappropriate language or material (such as pornography, depictions of extreme violence, racial or other vilification or hatred)
 - Content which is false or misleading
 - Confidential information about Council or third parties
 - Copyright or Trade mark protected materials
 - Discriminatory material in relation to a person or group based on age, breastfeeding, employment activity, gender identity, impairment (also known as 'disability'), industrial activity, lawful sexual activity, marital status, parental status or status as a carer, physical features, political belief or activity, pregnancy, race, religious belief or activity, sex, sexual orientation or personal association (weather as a relative or otherwise) with a person who is identified by reference to any of the listed attributes
 - Illegal material or materials designed to encourage law breaking
 - Materials that could compromise Council, employee or system safety



- Materials which would breach applicable laws (defamation, privacy, trade practices, financial rules and regulations, fair use, trademarks)
- Material that would offend contemporary standards of taste and decency
- Material which would bring the Council into disrepute
- Personal details or references to Councillors, Council staff or third parties, which may breach privacy laws
- Spam, meaning the distribution of unsolicited bulk electronic messages
- Statements which may be considered to be bullying or harassment
- Content not relating to the subject matter of that blog, board, forum or site.

7. Responsibility/Accountability

7.1 Councillors

- Seek advice from the Communications Officer on using social media
- Seek approval for Council branding of social media
- Register social media accounts with the Communications Officer
- Understand the comply with the provisions of this policy
- Seek training and development for using social media

7.2 Executive

Promotion of adherence of this policy to Management team and staff

7.3 Staff and contractors

- Seek approval from relevant manager for business case for social media or sub-site
- Seek training for using social media or sub-site content management system
- Understand and comply with the provisions of this policy
- Maintain records of URLs logins, passwords and content management training
- Ensure contractors are provided with a copy of this policy

7.4 Business Unit Manager

- Ensure staff obtain authorisation from the Communications Officer on their planned use of social media or creation of a sub site.
- Ensure contractors and staff are aware of this policy and comply with its requirements
- Offer training to staff where needed

7.5 IT Department

- Facilitate secure access to support delivery of Council business via social media
- Provide technical support and solutions to assist regularly back –up and archiving internally hosted social media sites as practicable

7.6 Communications Unit

- Protect the reputation and image of Council
- Authorise use of social media tools or creation of sub sites for conducting Council business
- Identify (in cooperation with Managers), authorise and train uses to maintain Council's website
- Provide advice on development and use of social media tools and sub sites
- Educate Councillors, staff and contractors about this policy and their responsibilities when using social media
- Monitor social media accounts/tools/ and sub sites
- Seek legal advice as appropriate where an issue is likely to be contention or may create legal risk to Council

Policy Name: Online Communications Policy

Policy Number: 1.30

8. Relevant legislation

Victorian legislation

- Crimes Act 1958 (Vic)
- Defamation Act 2005 (Vic)
- Equal Opportunity Act 2010 (Vic)
- Fair Trading Act 1999 (Vic)
- Freedom of Information Act 1982 (Vic)
- Information Privacy Act 2000 (Vic)
- Local Government Act 1989 (Vic)
- Public Records Act 1973 (Vic)
- Racial and Religious Tolerance Act 2001 (Vic)
- Spam Act 2003 (Vic)
- Wrongs Act 1958 (Vic)

Commonwealth legislation

- Australian Human Rights Commission Act 1986 (Cth)
- Copyright Act 1968 (Cth)
- Fair Work Act 2009 (Cth)
- Privacy Act 1988 (Cth)
- Trade Marks Act 1995 (Cth)