



# Media Policy

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## Purpose

To outline the protocols for managing East Gippsland Shire Council's media communications and relationships with media outlets, stakeholders, and community.

## Scope

Through the media, Council communicates information to residents and stakeholders about its services, programs, and activities. The media and all communication channels play a critical role in facilitating education, transparency, and public trust.

This policy applies to Councillors and Council staff, contractors and volunteers.

The policy applies to all media and communication channels where people create, publish, comment on, upload and/or share content including social media.

This policy aims to ensure:

- Information is provided to media outlets in an accurate, timely and professional manner; and
- An increase in the likelihood of balanced information being published by media outlets and through Council's media channels.

The policy also outlines requirements for compliance with confidentiality, governance, legal, privacy and regulatory parameters when using the media to conduct Council business. It seeks to:

- Inform appropriate use of Council's media tools;
- Promote effective and productive community engagement through the media;
- Minimise miscommunication or mischievous communications; and
- Help Council manage the challenges and opportunities of the media environment.

## Policy Principles

### Authorised media spokespersons

#### **Mayor**

The Mayor is the only member of Council authorised to respond to media enquiries on all matters relating to Council policy, decisions and direction. This includes state or federal matters affecting local government, and issues impacting the municipality.

The Mayor may authorise another Councillor to respond to media enquiries on a case-by-case basis.

## **Chief Executive Officer**

The Chief Executive Officer is the official spokesperson for all operational matters, including Council's administration and the overall organisation.

## **Other authorised spokespeople**

General Managers can act as authorised spokespersons on issues from their areas of responsibility, as delegated by the Chief Executive Officer.

Managers and staff are not authorised to make comment to the media unless authorised by the Chief Executive Officer.

Where staff are contacted directly by the media, staff need to refer the enquiry immediately to the Communications Unit.

Likewise, if a staff member becomes aware of an issue that has potential to escalate and harm Council's reputation, or an opportunity to be promoted, it should be brought to the attention of their Manager/General Manager immediately.

## **Comment as a private citizen**

The policy is not intended to guide how Councillors or staff interact with the media as private citizens, including as spokespeople for clubs, organisations or causes.

Councillors and staff are advised to keep this policy in mind when interacting with media as private citizens. Sometimes content can indirectly or directly connect with Council, which may breach a code of conduct.

Public comments to the media by any Councillor are to be considered in the context of Section 28 of the *Local Government Act 2020* and Sections 5.2 and 9 of the Councillor Code of Conduct. Councillors are required to make it clear that their views are their own by stating it is their personal opinion only.

Staff are required to comply with section 4.2 of the Staff Code of Conduct with regard to media communication. If a staff member is speaking on an issue as a private citizen, they must clearly indicate that the views are either personal or representing an organisation other than Council.

## **Communications support**

Council's Communications Unit works to promote Council projects, services, programs and events, amongst others. It supports the communications and marketing aims of Council and all business units.

## **Content and approvals**

### **Advertising**

All advertising related to Council must be endorsed by the relevant General Manager and authorised by the Chief Executive Officer, or an officer delegated by the Chief Executive Officer, before publication.

## **Digital**

Only authorised staff are to post digital content, including on the corporate website, Your Say engagement portal, social media and video and audio content platforms.

### **Media releases, newsletters and reports**

All media releases and newsletters for distribution by Council are approved by the Mayor and/or Chief Executive Officer. This also pertains to other information provided to the media.

### **Signage**

Council's Branding Guidelines provide the parameters on how Council's logo and other branding elements are to be used. Signage, and adherence to the branding guidelines, is the responsibility of the business unit Manager implementing the signage.

## **Local government election period**

During the local government election period, arrangements will be in place for the authorisation of media releases and media comment. This is to ensure no electoral matter, including the promotion of Councillors or election of candidates, is included in Council content during this period. See the Election Period Policy in the Governance Rules.

## **Media relations**

News media enquiries will be addressed and responded to in a timely manner.

All enquiries should be directed to the Communications Unit who will action the request and coordinate a response. Email [media@egipps.vic.gov.au](mailto:media@egipps.vic.gov.au).

Where media outlets publish inaccurate or misleading content about Council, Council will correct public inaccuracies.

If a staff member is contacted by the media directly, the officer needs to refer the enquiry to the Communications Unit.

### **After hours / emergency media response**

All after hours media enquiries or emergency communication requirements made by media outlets must be referred to the Manager Customer Experience, Communications and Libraries by contacting Council on (03) 5153 9500.

## **Social Media**

Social media provides opportunities for engaging two-way communication between Council and the community.

Council's social media accounts are intended to share Council views, news, information and advice; and raise public awareness about Council's work, challenges and services provided to communities.

If we 'follow' other organisations and individuals this does not imply endorsement of any kind.

If we repost information from another organisation or individual, we do not guarantee the accuracy or factual correctness of that information.

Where we provide a forum that allows third parties to publish content, we have a responsibility for the accuracy and fairness of that content. We will take appropriate action to manage accordingly, without notice.

### **Official use of social media**

Official use of any social media platform is when you use social media as a Council representative.

When using social media, staff, contractors and volunteers should:

- Follow Council policies and procedures;
- Conduct themselves within the parameters of the codes of conduct;
- Comply with relevant laws and regulations; and
- Act in a way that is consistent with Council's integrity, reputation and values.

When responding to social media, authorised staff should:

- Respond in a timely manner; and
- Treat general Council enquiries in the same manner as other customer requests, following Council's Customer Response Policy.

Requests for staff to be an authorised spokesperson on social media require General Manager and Chief Executive Officer approval. Requests should be emailed to: [media@eqipps.vic.gov.au](mailto:media@eqipps.vic.gov.au)

### **Responses to and moderation of public comments**

We encourage comment, open conversation and debate, but expect participants to behave in a respectful manner, as guided by Council's Mutual Respect Charter, when engaging on Council social media channels.

Council accepts that there will, on occasions, be negative comments posted. Negative comments can remain published if they don't breach the page's house rules. Refer to the Communications Procedure for the response assessment chart for social media moderators.

Council reserves the right, without notice, to delete comments that are:

- Trolling – deliberately provoking others with inflammatory and offensive remarks;
- Knowingly false or mischievous complaints or statements about individuals, companies or government;
- Abusive, misleading, obscene, threatening, off-topic, sexist, racist or spam;
- Promotional or commercial in nature;
- Unlawful or incite others to break the law;
- Information that may compromise the safety or security of the public;
- Repetitive posts copied and pasted or duplicated by single or multiple users; or
- Any other inappropriate content or comments as determined by Council.

When moderating comments, Council will use its judgement to determine if customers are asking questions or making comment and respond/not respond accordingly.

Customers who breach the above, will:

- On the first occurrence receive a warning and explanation of what house rules have not been followed;
- On the second occurrence, have their comment hidden with an explanation provided as to why, and advised that a third breach could result in a suspension from the page; and
- On the third occurrence could be suspended for 1 month, as authorised by the Chief Executive Officer.

### **Direct messaging on social media**

- Customers who direct message during business hours will receive an initial response from the Communications Unit.
- Customers who direct message after hours receive an automatic reply acknowledging the message and noting Council's account is unmonitored at that time.

### **After-hours monitoring**

Council's social media channels are actively monitored during business hours.

Outside normal business hours Council will:

- Where possible monitor, review content and provide responses deemed urgent; and
- Aim to not publish any potentially controversial content to assist with monitoring and limit after-hours exposure.

### **New social media accounts**

All requests for new Council social media accounts, pages etc. require prior approval of the Communications Unit and Executive Leadership Team, through a business case proposal.

### **Third-party social media accounts**

Council does not actively monitor third-party social media accounts. It does 'follow' or 'like' third-party media accounts that may publish content related to Council business.

Where content is deemed inaccurate and/or defamatory, Council will contact the Administrator to remove content and in exceptional circumstances and with Chief Executive Officer approval comment on the post with Council's position.

Staff are encouraged to bring content deemed inaccurate or defamatory to the attention of their Manager and the Communication Unit as a matter of urgency.

## **Inappropriate content**

Councillors, staff and the public should not post or share content on Council's accounts that could be deemed as:

- Defamatory;
- Offensive (e.g. swearing), obscene, defamatory, threatening, harassing, bullying, discriminatory, hateful, racist, sexist;
- Unrelated to the topic of the blog, board, forum or site;
- Implies you are authorised to speak on behalf of Council;
- False or misleading;
- Confidential or personal information about Council, its staff or third parties;
- Under copyright or trademark;
- Discriminatory to a person or group;
- Illegal material or materials designed to encourage law breaking;
- Potentially compromising to the safety of Council, its staff, or systems; or
- A breach of applicable laws (privacy, trade practices, financial rules and regulations, fair use).

## **Personal use of social media**

When using personal social media accounts, Councillors and staff are advised to keep this policy in mind. Personal content can be viewed by others and sometimes indirectly or directly connected with Council.

Sharing content on your personal accounts from official Council accounts is allowed.

This policy is not intended to cover personal use of social media where:

- The author publishes information in their personal capacity and not on behalf of Council
- No reference is made to Council, Councillors, staff, policies and services, suppliers or other stakeholders or Council-related issues.

Where a staff member refers to Council activities, issues, policy or Council decisions in their personal use of social media, Council will consider whether the staff member has breached the Staff Code of Conduct.

This policy should be read in conjunction with other relevant Council policies and procedures. When in doubt, seek guidance from the Communications Unit on how to comply with the following obligations.

Where the comments or profile of a staff member can identify that individual as linked to Council, the staff member should:

- Only disclose publicly available information;
- Consider if the comment is insulting or negative about Council, its staff, or services etc.
- Ensure that all content is accurate;
- Clearly state on all postings (identifying you as a Council employee) that the views are your own and are not those of Council; and
- Be polite and respectful.

Content and material should not be posted or shared that:

- Implies the person is authorised to speak on behalf of Council;
- Is confidential or personal information about Council, its staff or third parties;
- Could compromise the safety of Council, its staff, or systems; or
- May potentially bring the Council into disrepute.

## Guiding Principles

Council representatives authorised to comment or provide media content for consideration should use these principles:

### **Expertise**

Do not comment outside your area of expertise. Council must not be committed to actions or undertakings without specific prior authorisation.

### **Identity**

Be clear you are a Council employee/contractor/volunteer. Use your own identity, or an approved official account. Participation anonymously or covertly via a third party or agency is not allowed.

### **Disclosure**

Only use publicly available information. Do not share confidential information, internal discussions or decisions of Council, employees or third parties or where there is enough detail for potential identification of Councillors, Council staff or third parties.

### **Accuracy**

Be accurate, constructive, helpful and informative. Correct any errors as soon as possible. Do not publish any information that is untrue or where you have a suspicion it may be untrue. This includes misleading or deceptive information.

### **Opinion and political bias**

Personal and professional opinions must be clearly separated. Follow Council's Codes of Conduct when commenting on Council matters. Do not endorse any politician or political party.

### **Privacy**

Protect personal information obtained, whether unsolicited or by request.  
Get permission from anyone who appears in any photographs or video before publishing.

### **Language**

Language and expression must always be professional and reflective of Council's values.

### **Copyright**

You should respect copyright laws and fair use of copyrighted material and attribute work to the original author/source wherever possible.

### **Defamation**

Users must not comment, contribute, create, forward, post, upload or share content that is malicious or defamatory.

### **Reward**

Publishing content in exchange for reward of any kind is not allowed.

**Transparency**

Be open and transparent in how you engage with, or review Council personnel, services or wares.

**Discrimination**

Do not publish statements or information that may be discriminatory. Anti-discrimination laws should be kept in mind.

**State of mind**

Avoid responding to media or using social media when inebriated, irritated, upset or tired.

**Accessibility**

Government website standards pertaining to accessibility should always be met. Information made available via non-compliant platforms should be made accessible in another form where practical.

**Timeliness of response**

Timely responses to media enquiries are a high priority.

## Enforcement

Staff, contractors or volunteers breach of this policy may result in disciplinary action, including dismissal in extreme cases.

The Councillor Code of Conduct guides any perceived breach of this policy by a Councillor.

Council reserves the right to remove content, where possible, that violates this policy.

Breaches of this policy should be reported to Manager Customer Experience, Communications and Libraries via: [media@egipps.vic.gov.au](mailto:media@egipps.vic.gov.au)

## Roles and Responsibilities

These management positions are responsible for the implementation, communication and compliance monitoring of the policy:

Party / Parties	Roles and Responsibilities
Councillors	<ul style="list-style-type: none"> <li>• Seek advice from Communications Unit on using social media if required.</li> <li>• Understand and follow this policy.</li> <li>• Seek social media training if required.</li> <li>• Seek advice from the Communications Unit or CEO if unsure about applying the provisions of this policy.</li> </ul>
Staff, contractors and volunteers	<ul style="list-style-type: none"> <li>• Refer all requests for media interviews to the Communications Unit.</li> <li>• Do not provide comment to a media outlet without prior approval from the CEO, via delegation.</li> <li>• Seek authorisation from the Communications Unit on using social media and developing a social media strategy.</li> <li>• Seek approval for Council branding of social media.</li> <li>• Register social media account/tools/site with the Communications team.</li> <li>• Seek social media training and development.</li> <li>• Understand and follow this policy.</li> <li>• Maintain records of email addresses, comments, 'friends', followers and printed copies or electronic 'screen grabs' when using externally hosted sites to the extent practicable.</li> <li>• Maintain a record of the team's social media accounts including the intended administrator, URL, login, password, and provide this information to the Communications Unit.</li> <li>• Seek advice from the Communications Unit if unsure about applying the provisions of this policy.</li> <li>• Ensure contractors are provided with a copy of this policy.</li> <li>• Familiarise yourself with the End User Licence Agreements of any external social media tools being used.</li> </ul>
Business Unit Managers	<ul style="list-style-type: none"> <li>• Endorse or reject a social media strategy for any new social media accounts proposed by their teams (Step 1 in approval process).</li> <li>• Ensure staff do not create social media platforms without approval.</li> <li>• Ensure staff members do not conduct media interviews without prior approval from CEO, via delegation.</li> <li>• Ensure contractors are provided with a copy of this policy.</li> </ul>
Information Services Unit	<ul style="list-style-type: none"> <li>• Support delivery of Council's social media platforms.</li> <li>• Help staff with social media record keeping so they retain some record explaining the context or purpose of social media, and a sample of posts where it is impractical to keep large volumes of screen grabs.</li> </ul>

Party / Parties	Roles and Responsibilities
Communications Unit	<ul style="list-style-type: none"> <li>• Respond to media enquiries and identify spokespeople for interview requests for CEO approval via delegation when required.</li> <li>• Endorse or reject a social media strategy for any new accounts proposed by business units (Step 2 in approval process).</li> <li>• Provide authorisation for social media officers (e.g., staff approved to respond to comments on behalf of council)</li> <li>• Identify and implement any new social media platforms for Council.</li> <li>• Provide advice and assist with the development of communication plans.</li> <li>• Educate councillors, staff, contractors and volunteers about this policy and their responsibilities.</li> <li>• Advise appropriate precautions e.g., disclaimers.</li> <li>• Maintain a register of council's social media accounts including Business Unit social media strategies, the intended administrator, URL, login, password.</li> <li>• Assist staff to retain some record explaining the context or purpose of social media, and a sample of posts where it is impractical to retain large volumes of screen grabs.</li> <li>• Monitor and moderate Council's registered social media accounts. This refers to council-wide social media accounts and excludes accounts developed by Business Units.</li> <li>• Monitor social media for references to Council.</li> <li>• Elevate media content of reputation risk to Executive Leadership Team at the earliest convenience.</li> <li>• Seek legal advice as appropriate where an issue is likely to be contentious or may create legal risk.</li> </ul>
Executive Leadership Team	<ul style="list-style-type: none"> <li>• Review and approve content for publication.</li> <li>• Fulfil media enquiries and interviews on an as-needed basis.</li> <li>• Approve or reject a social media strategy for any new accounts proposed by Business Units (Final step in approval process).</li> </ul>

## Definitions and Abbreviations

Party / Parties	Roles and Responsibilities
Authorised spokesperson	A person with pre-approval to speak to a media outlet on behalf of council.
Social media moderator	Person with pre-approval to add content and respond on behalf of Council.
Council	East Gippsland Shire Council.
Confidential	Not public. The private information of a person or group.
EDRMS	Council's electronic records management system.
URL	The address of a webpage.
Moderation	Controlling contents on an online platform.
Monitor	Watch; keep an eye out for.

## References and Supporting Documents

### Applicable Legislation:

- *Local Government Act 2020*
- Local Government Regulation 2012

### Applicable Policy and Procedure:

- East Gippsland Shire Council Plan 2021-25
- East Gippsland Shire Council Community Vision 2040
- Policies for email, internet, digital equipment, electronic communications
- Code of Conduct (Councillor and Staff)
- Employment contracts
- Human Resource policies
- Information Services and Communications policies
- Information Privacy Policy
- Community Engagement Policy
- Customer Experience Strategy
- Customer Response Policy
- Mutual Respect Charter
- Election Period Policy (Governance Rules)
- Communications Procedure, including Response Assessment Guide
- Social Media Request Form
- East Gippsland Shire Council Branding Guidelines

## Privacy and Human Rights Consideration

All personal information collected by East Gippsland Shire Council in connection with the Media Policy will be handled in accordance with the applicable privacy legislation.

Generic principles for collecting and handling personal information by public bodies are legislated under the *Privacy and Data Protection Act 2014 (Vic)*, the *Health Records Act 2001 (Vic)* and the *Privacy Act 1988 (Cth)*.

The Media Policy has been assessed as compliant with the obligations and objectives of the Victorian *Charter of Human Rights and Responsibilities Act 2006*.

## Revision History and Review

Version Control	Approved Amended Rescinded	Date Effective	Approved By	ECM Document Reference	Summary of Changes
1	Approved	20/096/2022	Council	9659532	Migrated to new template Policy rewritten to better reflect all media