

1. Policy Intent

- 1.1 The Digital Communications and Social Media Policy (this policy) establishes the standard of behaviour expected of employees and Councillors when using digital communication and social media platforms. It applies in both work and personal capacities.

2. Scope

- 2.1 This policy is applicable to all TRC employees (permanent, temporary, full-time, part-time, casual and volunteer), Councillors, students, work experience placements, contractors, consultants, advisory committee members, and anyone working in any other capacity for TRC.
- 2.2 This policy applies to situations where employees and Councillors use digital communications and social media to communicate to customers and the community on TRC's behalf, and where they are commenting and posting on matters that relate to TRC, whether in a professional or personal capacity.
- 2.3 TRC's [Media Policy](#) continues to apply and takes precedence over this policy for media requests, including those received via social media.
- 2.4 TRC digital communication and social media platforms include the corporate website, Facebook, Messenger/Chats, Instagram, LinkedIn, YouTube, Snapchat, Google My Business and TripAdvisor. TRC is registered on TikTok but this platform isn't currently being used as a communication channel. Ongoing use of TripAdvisor is being investigated.

3. Background & Supporting Information

- 3.1 Digital communications and social media refers to online technology that allows an exchange of dialogue between organisations, communities and individuals. It may include, but is not limited to:
- social networking websites and applications (e.g. Facebook, LinkedIn and Instagram)
 - video and photo sharing websites and applications (e.g. YouTube, Snapchat and TikTok)
 - blogs (e.g. comments on news articles)
 - Wikipedia and online collaborations
 - forums, discussion boards and groups
 - podcasting
 - instant messaging (e.g. Messenger and Chats)
 - geospatial tagging
 - location and review websites and applications (e.g. Google My Business and TripAdvisor).
- 3.2 The ever-changing and inherently public nature of online communication presents a range of challenges and opportunities for TRC in safeguarding its reputation and the security and safety of employees.

- 3.3 Digital communication and social media platforms are important communication and engagement tools for interaction with customers, residents, stakeholders and online communities. They present the opportunity to enhance TRC’s customer relations capabilities, and to listen to and engage in meaningful conversations with the community.
- 3.4 It is recognised that employees and Councillors will use digital communication and social media platforms outside work time in a private capacity. Employees and Councillors must take care to avoid negative impacts on TRC by acting in TRC’s best interests. There is no expectation of privacy when it comes to content and information stored, posted and shared on digital communication and social media channels. Even information that is intended to be kept private may unintentionally enter the public domain.
- 3.5 TRC actively manages digital communication and social media platforms for communicating and engaging with community and stakeholders. As per the [Employee Code of Conduct](#), the Communications Team and authorised staff will respond to comments and messages ensuring information provided to the public properly represents TRC policies, activities and services.

4. Legislation

- 4.1 The Criminal Code (Sharing of Abhorrent Violent Material) Bill 2019 has been implemented to suppress harmful content.
- 4.2 The *Information Privacy Act 2009* contains rules or ‘privacy principles’ that govern how Queensland Government agencies collect, store, use and disclose personal information.
- 4.3 The *Public Records Act 2002* ensures public records are made, managed, kept and, if appropriate, preserved in a useable form for the benefit of present and future generations; and public access to records under this Act is consistent with the principles of the *Right to Information Act 2009* and *Information Privacy Act 2009*. Posts and comments on social media and digital platforms are public records (refer section 4.4).
- 4.4 Posts on social media containing election material must comply with *the Local Government Electoral Act 2011* if posted during an election period, regardless of whether they are posted on a personal or official social media platform.
- 4.5 The Voller Decision confirms that owners and administrators of public Facebook pages, and other social media pages, can be held liable for defamatory comments made by a third-party user, irrespective of intention or knowledge.

5. Policy Statement

5.1 Councillor Use of Digital Communications and Social Media

5.1.1 Obligations

- a. If using digital communication and social media platforms, whether personally or in their TRC role, Councillors must adhere to relevant legislation and the [Code of Conduct for Councillors](#) in Queensland, including only using official Councillor accounts when conducting TRC business.
- b. If using these platforms Councillors will:
- use digital communication and social media platforms according to the terms and conditions of use and statements of rights and responsibilities (or similar)

- allow authorised TRC staff to respond to comments on TRC’s digital communication and social media platforms
- use legitimate identities (not false or fake personas)
- not refer to TRC customers, colleagues, suppliers or contractors without their prior approval
- ensure they do not damage TRC’s credibility, integrity, customer confidence, corporate values, brand or trademarks
- not express comments on matters that may cause, or be in relation to, a conflict of interest
- not expose TRC to a judgment for damages against it, as a result of negligence or breach of any law or policy including financial disclosure, occupational health and safety, employment and other applicable laws
- ensure posts, messages and comments are:
 - commercially impartial, including avoiding promotion of community groups and not-for-profits who are in competition with commercial entities
 - free from obscene, defamatory, discriminatory, racially and/or sexually harassing/explicit content
 - free from material that contains or depicts nudity, violence or offensive subject matter
 - free from any form of criminal activity, bigotry, hatred, bullying or physical or emotional harm to any group or individual.

5.1.2 Use

- a. Councillors are responsible for their own digital communication and social media platforms and TRC staff should not have access to or manage these platforms.
- b. Councillors should maintain a clear distinction between personal and TRC/Councillor-related platforms. Councillors should not identify themselves as a Councillor on their personal platforms and should consider increased privacy settings for these accounts.
- c. The Office of the Independent Assessor’s [Queensland Councillor Social Media Community Guideline](#) contains the moderation rules for a Councillor to post or link to on their social media sites. It aims to strike a balance between ensuring Councillors’ use of social media is appropriate and open to positive, negative, and neutral electorate feedback, while also supporting Councillors to protect themselves against unacceptable online behaviour.

5.2 Employee Use of Digital Communications and Social Media

5.2.1 Obligations

- a. When using digital communication and social media platforms, whether personally or in their TRC role, staff must adhere to relevant legislation and the [Employee Code of Conduct](#), including not representing or replying on behalf of TRC, or as an employee.
- b. In addition to Employee Code of Conduct obligations, when using these platforms **in any capacity** staff will:
 - use the platforms according to the terms and conditions of use and statements of rights and responsibilities (or similar)
 - not pretend to be an impartial individual to either promote, defend or attack TRC,

- employees and Councillors
- not refer to TRC customers, colleagues, suppliers or contractors without their prior approval
 - ensure they do not damage TRC’s credibility, integrity, customer confidence, corporate values, brand or trademarks
 - not express comments on matters that may cause, or be in relation to, a conflict of interest
 - not expose TRC to a judgment for damages against it, as a result of negligence or breach of any law or policy including financial disclosure, occupational health and safety, employment and other applicable laws
 - ensure posts, messages and comments are:
 - free from obscene, defamatory, discriminatory, racially and/or sexually harassing/explicit content
 - free from material that contains or depicts nudity, violence or offensive subject matter
 - free from any form of criminal activity, bigotry, hatred, bullying or physical or emotional harm to any group or individual.
- c. When using **TRC-managed** digital communication and social media platforms authorised staff will:
 - use legitimate identities (not false or fake personas)
 - adhere to the [Corporate Style Guide](#)
 - only speak on behalf of TRC, if authorised to do so
 - ensure posts, messages and comments are commercially impartial, including avoiding promotion of community groups and not-for-profits who are in competition with commercial entities.

5.2.2 Use

- a. TRC’s digital communication and social media platforms are managed by authorised employees, primarily during business hours. The Coordinator Communication and Engagement, Strategic Communications Advisor (SCA), and Digital Communications Officer (DCO) are authorised administrators of TRC’s digital communication and social media accounts. The SCA and DCO have administrator access to all accounts and access information is maintained by the Systems and Information Team. A selection of staff have access to the corporate website that is related to their role requirements.
- b. Additional positions have authority to create, post and edit content, respond to comments and messages, and remove content that contravenes our page rules on specific TRC social media platforms:

Communication tool	Authorised staff
Facebook Atherton Tablelands Information Centres	Supervisor Visitor Centres, Information Centre Officer, Supervisor Malanda Visitor Centre and Heritage Officer.
Corporate website (online engagement)	Community Engagement Advisor
Facebook Malanda Falls Caravan Park	Park management
Instagram Malanda Falls Caravan Park	Park management
Facebook Lakeside Motor Inn & Caravan Park	Park management
Instagram Lakeside Motor Inn & Caravan Park	Park management

- c. The purpose of all social media and digital platforms must be clear and align with objectives in the [Corporate Plan and Communication and Engagement Strategy](#). A business case for the creation of new digital communication and social media platforms must be approved by the SCA. This includes creating accounts for, or that could be perceived to represent, TRC facilities or assets.
- d. Joining or linking TRC social media platforms to other social media groups, sites and accounts must adhere to obligations of use, and must only be to corporate and professional organisations.

5.3 Breach

Failure to comply with this policy may result in disciplinary action in accordance with Local Government regulations. Suspected breaches will be investigated and dealt with individually, and relevant circumstances will be considered. Depending on the severity of the breach, formal disciplinary proceedings may apply, up to and including termination of employment. Complaints regarding Councillors' use of social media will be referred to the Office of the Independent Assessor in accordance with the Complaints Policy.

5.4 Record Keeping

- 5.4.1 The CEO is ultimately responsible for maintaining and managing TRC's official records under the *Public Records Act 2002*. Under the act, 'any form of recorded information, created or received by, or created on behalf of a Queensland public authority in the transaction of government business' is considered a record. This includes unique content related to service delivery and public consultation exercises, providing formal advice or guidance, responding to queries, and content that triggers internal processes.
- 5.4.2 It is the Councillors' responsibility to ensure public records created in their role are provided to TRC for capture and management in official systems.

6. Responsibility

Council is responsible for the adoption, amendment and repeal of the policy and the Chief Executive Officer is responsible for the development and amendment of associated procedures and guidelines relevant to the policy.

7. Review

It is the responsibility of the Coordinator Communication and Engagement to monitor the adequacy of this policy and recommend appropriate changes. This policy will be formally reviewed every three years or as required by Council.

This policy is to remain in force until otherwise amended or repealed by resolution of Council.

This policy repeals the former Tablelands Regional Council Policy titled 'Social Media Policy' adopted 25 June 2020.