Social Media Policy and guidance for making public comment online

Policy No:	DSSCorp-031
Purpose:	The Department of Social Services (DSS) Social Media Policy outlines protocols for using social media to undertake official departmental business, and provides guidance for employees in their personal use of social media.
Category:	**Communications**
Applicable to:	This policy applies to all DSS employees across all offices.
Relevant Authority:	Australian Public Service Commission (APSC) Public Service Act 1999 Work Health and Safety Act 2011
Related Documents:	APS Code of Conduct APS Values Making public comment on social media: A guide for employees - APSC Social Media Terms of Use ICT Acceptable Use Policy Bullying and Harassment Policy Records Management Policy Risk Management Framework Web Accessibility
Policy Statement:	DSS is committed to ensuring employees understand the Social Media Policy and expectations of them when making public comment both in their professional and personal lives. This guide complements the official publication by the APSC. In instances where there is conflict or lack of clarity, the APSC guide takes precedence.
Approved by:	People and Communications Committee
Review Date:	June 2018
Policy Owner:	Corporate Communications, Communication Services Branch
First Issued:	1 December 2014
Document Change Control:	Corporate Communications updated this document in August 2017, in consultation with Legal Branch. These updates reflect changes made by the APSC on guidance for public service employees on making public comment.

Contents

1   Introduction

The Social Media Policy outlines protocols for using social media to undertake official Department of Social Services (DSS) business, and provides guidance for employees in their personal use of social media or making public comment online.

The policy provides advice to DSS employees on how to use social media and make public comment online, both in the course of their official duties and as a private citizen. It has been developed to assist employees to use social media and feel empowered to participate in public debates, while being mindful of their obligations and responsibilities under relevant legislation, and within DSS and APS guidelines.

The Social Media Policy applies to all DSS employees, including employees on secondment to DSS, employees on leave, non-ongoing employees and contractors. Managers should ensure their employees are aware of and understand this policy.

This policy should be read in conjunction with the APSC Publication 'Making public comment on social media: A guide for APS employees' and the DSS Social Media Terms of Use.

2   Policy

The Social Media Policy applies to the use of social media, where employees have been authorised by the Department's Communication Services Branch (CSB) to use social media as a communication tool on behalf of DSS. This includes posting to an official departmental social media account (e.g. a departmental Facebook account) participating as a departmental representative on a third-party site (e.g. external blog, news comment, online forum) or utilising internal online engagement tools and platforms (e.g. STAFFnet blogs).

This policy also provides guidance to employees in their personal use of social media and making public comments online. Employees are reminded of their responsibilities under the APS Code of Conduct and APS Values, which apply at all times when using social media, both in their professional and personal capacities.

3   Official use of social media

The same high standards of conduct and behaviour generally expected of public servants also apply when participating online through social media. Online participation should reflect and uphold the values, integrity and reputation of DSS and the APS.

CSB manages and authorises the use of all official DSS social media accounts. Communication Account Managers are responsible for engaging online with stakeholders and the general public in an official capacity. In some cases, authorised employees from other business areas may be asked to assist CSB with this work, and they will be trained accordingly.

Note, the Australian Public Service Commission publishes guidance for agencies on managing the risks of cyber-bullying of APS employees by members of the public. This publication provides helpful guidance for both managers and employees interacting with the public.

3.1 Key principles for official use of social media

All employees who are authorised to use or deploy social media as an official communication tool need to be familiar with, and apply the following key principles:

Administration – an official DSS social media account must be administered by an authorised Communication Account Manager in CSB.

Approved activity – before commencing a social media initiative, it must be supported in writing by a business case, and approved by CSB.

Be accurate – make sure the information published is correct and cite sources where appropriate. Refer to an appropriate business area where necessary and ensure content has appropriate approvals.

Be impartial – avoid statements that advocate or criticise policies of government or political parties. Avoid conflicts of interest through endorsement or criticism of third-party providers, partners, products or services. Personal opinion must not be expressed.

Be respectful – be courteous and polite. Be sensitive to diversity. Avoid arguments and don't make personal attacks. Do not post obscene, defamatory, threatening, harassing, discriminatory or hateful content.

Consider – DSS employee actions on social media reflect on the department, the Minster and the APS.

Consider intellectual property – respect copyright. Always get permission to use words, images or materials from other sources. Any use of DSS departmental branding and logos must be approved by CSB.

Identity and authenticity – always use an authorised departmental identity (usually the official DSS social media account/handle) and not a personal identity when posting to, or responding from DSS social media accounts, on behalf of DSS.

Maintain confidentiality – only post publicly available information. Don't disclose or discuss official or classified information, make commitments or engage in activities on behalf of DSS or the Government, unless authorised by the appropriate business area to do so.

Make a record - keep records of social media posts made in an official capacity. Classify and store information as set out in the [Records Management Policy.](#)

Protect and respect privacy – check the account privacy settings are appropriate for the scope of engagement. Protect privacy and personal information. Don't share the private details of others. Don't disclose details of private conversations unless explicit consent from the relevant parties has been obtained.

Risk management – to ensure risk controls are effectively implemented and monitored, a Risk Management Plan must accompany the business case for a social media initiative.

Think first – review content before publishing. All DSS employees are responsible for their own actions. DSS employees should consider the impact their activities could have on them and/or DSS and should use common sense and best judgement. If unsure, first check with your manager.

If in doubt, leave it out!

Comments made from DSS social media accounts **must not**:

- endorse or make judgements about specific providers, products or services
- discuss circumstances surrounding DSS' specific relationship with, or management of, service partners or providers
- make personal judgements about how providers have implemented programme guidelines
- represent or speak on behalf of another DSS business area (i.e. don't discuss other business without the prior consent and advice of the relevant business area).

If an online discussion involves specific individual circumstances or personal details, the moderator must 'switch channel' by directing members of the public to an alternative medium (e.g. telephone, direct message, email, letter, face-to-face) as appropriate.

4 Personal use of social media and making public comment online

DSS employees have the same right to freedom of expression as other members of the community, subject to a legitimate public interest in maintaining an impartial and effective public service. Public confidence in the integrity of public administration is protected by the APS Values and Code of Conduct.

DSS respects the right of employees to participate in political, advocacy, and community activities. In doing so, however, employees must behave in a way that does not seriously call into question their capacity to act apolitically and impartially in their work. It is also important that the reputation of DSS is not placed at risk by comments that our employees make.

Employees should be aware that content published online and on social media is, or may become publicly available, even from personal social media accounts. We expect you to take reasonable steps to ensure that any social media use or public comment you make, including online, falls within the following parameters.

Employees must ensure they:

- don't use a work email address to register personal social media accounts
- don't make comments that are unlawful, obscene, defamatory, threatening, harassing, discriminatory or hateful to, or about work, colleagues, peers or the APS
- don't make comments that are, or could be perceived to be:
  - made on behalf of DSS or the Government, rather than an expression of a personal view
  - compromising their capacity to fulfil duties as an APS employee in an impartial and unbiased manner. This applies particularly where comment is made about DSS policies and programmes

- o so harsh or extreme in its criticism of the Government, a Member of Parliament from any political party, or their respective policies, that the employee is no longer able to work professionally, efficiently or impartially
    - o critical of departmental officers or figures in the department
    - o critical of DSS clients or other stakeholders
    - o a gratuitous personal attack that is connected with their employment
    - o prejudicial to the integrity or good reputation of DSS or the APS
    - o compromising public confidence in DSS or the APS
- are mindful that their behaviour is bound by the APS Values and Code of Conduct and the DSS ICT Code of Conduct at all times, even outside work hours and when material is posted anonymously or using an alias or pseudonym
- make clear that any views expressed are their own, and not those of DSS. However, this will not necessarily protect them from breaching the code. If an employee can be identified as working for DSS and they criticise the Government, a Minister or a departmental policy, it's reasonable for people to question their impartiality and ability to do their job effectively.

When considering making personal comments, employees should reflect on the following questions:

- could your comments cause DSS' clients or other stakeholders to lose confidence in your ability to work in an impartial and professional manner?
- are your comments consistent with how the community expects the public service to operate and behave?
- could your comments lower or undermine the reputation of DSS or the APS?
- are your comments lawful? For example, do they comply with anti-discrimination legislation and laws relating to defamation?
- would you be comfortable if your manager read your comments?
- what if someone takes a screenshot of your comments and then circulates these around?

4.1 Staying safe

The APSC has published some [general Do's and Don'ts](#) when making public comment and engaging online. DSS Employees should always exercise discretion and judgment when making public comment or participating online. Generally, if in doubt employees should seek advice from their supervisor or email communications@dss.gov.au before taking any action.

4.2 The Internet is forever

Content published on the internet can remain public indefinitely. Content can also be replicated and shared beyond the original intended audience who may view it out of context or use it for an unintended purpose. For example, private messages or posts can be saved, screenshot, and made public – with little potential for recourse. It is important to be aware that according to the terms and conditions of some third-party sites, the content published is the property of the site where it is posted and may be re-used in ways that were not intended.

Before posting to a social media site it is important to understand the tool/platform and that users read the terms of service and user guides and look through existing content to get an idea of the posting etiquette and any cultural and behavioural rules or protocols associated with the social media platform.

Do not rely on a social media site's default or adjustable security settings as any guarantee of privacy. Even if employees do not identify themselves online as a DSS or APS employee, they could be identified as one by other people. Posts can be traced back to individual employees and they can be identified as an employee of DSS even if they were posted anonymously or using a pseudonym.

5 Responsibilities

5.1 Access to social media at work

Access to social media sites (e.g. Facebook and Twitter) on DSS ICT resources is provided to employees on the condition that they abide by the DSS ICT Code of Conduct. Personal use is permitted, however use of DSS ICT resources for private purposes must be undertaken in accordance with the ICT Code of Conduct.

5.2 Accessibility

DSS is committed to social inclusion and provides support for people with disabilities. In 2011, Media Access Australia undertook research to determine how the accessibility issues found in each of the most popular social media tools can be overcome. Users with disabilities contributed advice on how to overcome inaccessible features. Full report: Sociability: social media for people with a disability.

Where possible, content on official DSS social media accounts should also be made available in an alternative accessible format. This alternative may be represented on DSS internet sites, however given the online interaction inherent in social media, it may also be appropriate to refer individuals to telephone or face-to-face channels.

5.3 Recordkeeping

Information that provides evidence of business activity or decision is a public record. All DSS employees have an obligation to ensure that key decisions and events are recorded in a way that captures the important features of a discussion or decision, presents a faithful and accurate account and can be easily retrieved when needed.

Social media platforms are often provided by third-party providers and are not official recordkeeping systems. In managing content in DSS social media accounts, you must keep records in accordance with the Recordkeeping Policy, ensuring appropriate records are created and captured for all the business functions, activities and transactions.

DSS employees are required to appropriately classify and store information as set out in the DSS Records Management Policy.

5.4 Privacy

Personal information about individuals cannot be provided to third-parties without their consent. The email address of your colleagues or stakeholders and other identifiable information must be treated with discretion and care. DSS employees must not upload contact details from departmental (Outlook) contacts when using, or prompted by external social networking sites.

6 Sanctions for non-compliance

As a member of the Australian Public Service your behaviour, both in and out of the workplace, must be consistent with the [APS Values](#) and the [APS Code of Conduct](#) and the [DSS ICT Acceptable Use policy.](#)

A failure to comply with this Policy may constitute a breach of the APS Code of Conduct. Examples of failure to adhere to the Code of Conduct in a social media setting include, but are not limited to:

- making derogatory or obscene posts about a manager or colleague on a social networking site
- criticising the department, its policies or individuals in a way that brings the department or the APS into disrepute
- posting derogatory comments or images about welfare recipients from a personal account
- disclosing non-publicly available information about income payments in a blog post.

A suspected breach of the Code may be investigated under the Secretary's Procedures for Determining Breaches of the Code of Conduct and for Determining Sanction (the Secretary's Procedures) to determine whether an employee has breached the Code and for determining sanction. These procedures are established under subsection 15(3) of the *Public Service Act 1999* (the Act). If an employee is found to have breached the APS Code of Conduct, the Secretary (or delegate) may determine that it is appropriate to impose sanctions. Section 15(1) of the Act provides for the following sanctions:

- termination of employment
- reduction in classification
- reassignment of duties
- reduction in salary
- deductions from salary, by way of fine
- reprimand.

7 Frequently asked questions

Please also refer to the Frequently Asked Questions published in the ['Making public comment on social media: A guide for employees – APSC document](#).

7.1 What is Social Media?

Social Media are online services and tools used for publishing, sharing and discussing information. These can include:

- social networking – e.g. Facebook, LinkedIn
- video and photo sharing – e.g. Flickr, YouTube
- blogs – e.g. corporate blogs, personal blogs or media blogs
- micro blogs – e.g. Twitter
- forums and discussion boards – e.g. Reddit, Whirlpool, Yahoo! Groups
- online encyclopaedias – e.g. Wikipedia.

7.2 Are the social media policies for DSS different to other APS agencies?

All APS employees are bound by the same principles as described in the overarching APSC guidance material. However, the way each agency implements internal policies within these confines may differ. This includes delegations for clearing official social media posts, regularity of posting, language and tone. If you operate a social media page on behalf of the Department, make sure you read this material and discuss specific implications for your work with your manager if you are unsure.

7.3 Are you saying DSS employees can't participate in public debate?

No, all Australians are eligible to participate in public debate. You need to consider the manner of your engagement, the views you put forward and how this may reflect on how a reasonable person may perceive your actions in relation to your status as a public servant and an employee of DSS.

7.4 What is Open Government?

DSS is committed to the principles of *Open Government*:

- **transparency** in process and information
- **participation** by citizens in the governing process
- **public collaboration** in finding solutions to problems and improving the well-being of the community.

Making public comment online is increasingly common for APS employees in a range of capacities, including official, professional and private use. DSS recognises the value in using social media to build more interactive relationships with customers, communities and other relevant stakeholders.

Accordingly, DSS is committed to engaging effectively with citizens in a meaningful, accountable, responsive and equitable way. When used appropriately, social media allows DSS employees to represent DSS and its diversity to the community at large.

7.5 How can social media help me to do my work?

Social media can help with:

- engaging with stakeholders using familiar and widespread technology
- developing a more active relationship with stakeholders and target audiences
- gaining a better understanding of attitudes towards DSS programs and initiatives
- increasing the speed and frequency of public engagement
- increasing trust through greater transparency
- improving the delivery of services, particularly to rural and remote communities
- facilitating innovation through collaboration with third-parties and industry experts
- organisational and individual development through the open exchange of information, perspectives and opinion
- promoting and marketing DSS activities, both within DSS and to the broader community
- gaining insight and reaching audiences in ways that traditional communication channels alone cannot
- Building and furthering professional networks.

8 More information

If you require assistance in interpreting any part of this policy, or would like to investigate the use of social media for your business area, please contact your Communication Account Manager or email communications@dss.gov.au.