

Shire of Broomehill-Tambellup

COMMUNICATION AND SOCIAL MEDIA POLICY

Objective: To establish a clear, consistent and lawful framework for official communications and use of social media.

Date of adoption: *Minute No*

Date of amendment: *Minute No.*

Date of last review:

Legislative References:

Local Government Act 1995
Local Government (Model Code of Conduct) Regulations 2021
State Records Act 2000
Freedom of Information Act 1992
Defamation Act 2005
Copyright Act 1968

Internal References:

Code of Conduct for Employees, Volunteers and Contractors
 Code of Conduct for Council Members, Committee Members and Candidates
 Record Keeping Plan

PURPOSE

The purpose of this policy is to establish a clear, consistent and lawful framework for official communication and use of social media.

This policy ensures that the Shire:

- a) communicates accurately, professionally and transparently
- b) meets its legislative and governance obligations
- c) maintains public trust and confidence
- d) protects the reputation of the Shire, Council Members and employees
- e) uses communication channels effectively to inform and engage the community

POLICY SCOPE

This policy applies to:

- a) all official communications made by or on behalf of the Shire
- b) council Members in both official and personal communications relating to Shire matters
- c) employees, contractors and volunteers when acting on behalf of the Shire
- d) all communication platforms, including print, digital, media and social media

DEFINITIONS

'Social Media'

Means online platforms used to publish content and interact with users, including Facebook, Instagram, LinkedIn, and any future platforms adopted by the Shire.

'Official Communication'

Means any communication created, authorised, approved or published by the Shire, or by any person acting on behalf of the Shire in an official capacity, whether in written, electronic or verbal form.

Without limitation, this includes media releases, website content, social media posts, comments and direct messages, newsletters, public notices, correspondence and any other material disseminated to the public or specific stakeholders.

Official Communication includes:

- a) statutory and public notices
- b) information required by legislation or policy to be publicly available
- c) community consultation and engagement activities
- d) promotion of Shire services, facilities, events and initiatives
- e) emergency management and public safety information
- f) responses to enquiries, feedback, complaints and compliments

'Inappropriate Content'

Means information that:

- a) is offensive, abusive, defamatory, objectionable, inaccurate, false or misleading;
- b) is promotional, soliciting or commercial in nature, including spam;
- c) is unlawful or encourages unlawful conduct;
- d) is overtly sexual or explicit;
- e) is threatening or describing violent events or behaviours;
- f) refers to or encourages the use of illegal drugs;
- g) is harassing or hateful to an organisation or person, including the Shire, our employees, stakeholders, associates and suppliers;
- h) discloses personal information, confidential information or information that may compromise safety or security
- i) is repetitive material copied and pasted, or duplicated;
- j) is political campaigning, including content intended to influence voting at Shire elections or state or federal elections
- k) violates intellectual property rights or the legal ownership of interests of another party; and
- l) contains inappropriate content or comments at the discretion of the Shire.

LEGISLATIVE FRAMEWORK

This policy aligns with the:

- a) *Local Government Act 1995*
- b) *Local Government (Model Code of Conduct) Regulations 2021*
- c) *State Records Act 2000*
- d) *Freedom of Information Act 1992*
- e) *Defamation Act 2005*
- f) *Copyright Act 1968*

PRINCIPLES OF COMMUNICATION

All Shire communications will:

- a) be accurate, factual and timely
- b) use respectful, inclusive and plain language
- c) be consistent with Council decisions and adopted positions
- d) be appropriate to the audience and platform
- e) protect privacy and confidentiality
- f) comply with record-keeping and privacy obligations

CONTENT APPROVAL

The CEO determines the communication method, timing and approval pathway for official communications. The CEO may issue internal procedures that set practical approval steps, including for emergency communications and time-critical updates.

ESTABLISHING AND MANAGING ACCOUNTS

Only the CEO, or a delegate authorised in writing, may create, close, rename or materially change an official Shire social media account. Access must be limited to authorised staff and managed through secure credentials.

AUTHORISED SPOKESPERSONS

In accordance with the *Local Government Act 1995*:

- a) The Shire President is the principal spokesperson for the Shire
- b) The Deputy Shire President may act when authorised
- c) The CEO may speak on behalf of the Shire when authorised

No other person may represent the Shire unless authorised.

MEDIA ENQUIRIES AND PUBLIC COMMENT

All media enquiries seeking official comment must be referred to the CEO. Council members may make personal comments only where they comply with this policy and the Code of Conduct for Council Members, Committee Members and Candidates

Employees and contractors must not speak to the media on behalf of the Shire unless authorised by the CEO.

CONDUCT OF COUNCIL MEMBERS AND EMPLOYEES

Communications must not:

- a) Bring the Shire into disrepute
- b) Disclose confidential or restricted information
- c) Misrepresent Council decisions
- d) Imply Shire endorsement of personal views
- e) Undermine lawful governance or administration

OFFICIAL SOCIAL MEDIA USE

Purpose of Shire social media

The Shire uses social media to share information, service updates, community notices, emergency advice, engagement opportunities and positive stories about the district.

Platforms

At the date of adoption, the Shire maintains official accounts on

- a) Facebook
- b) Instagram
- c) LinkedIn

Other platforms may be added or removed by the CEO based on community need, resource and risk.

What social media will not be used for

- a) debating Council decisions or individual council member positions
- b) disclosing confidential information or discussing staff matters
- c) resolving complex disputes or detailed complaints where privacy is required
- d) conducting Council or committee business outside lawful meeting processes

Accessibility and respectful engagement

The Shire will aim to make social media content accessible, including by using plain language, image descriptions where practical, and captions for video where available.

Response, monitoring and moderation

The Shire will monitor social media during business hours. Response times will vary depending on workload and the nature of the enquiry. Where an issue is urgent or relates to safety, users will be directed to phone the Shire or emergency services.

Messages received through social media are treated as official correspondence when they relate to Shire business. Where practical, the Shire may redirect users to email or phone so that matters can be handled appropriately and recorded.

The Shire may hide, remove or restrict content on its social media channels where it is inappropriate content or where moderation is required to keep the space safe and useful.

Moderation decisions are made by authorised staff. Where practical, a record will be kept of removed content, including a screenshot, the reason for removal and the date and time.

The Shire may also

- a) turn off comments on specific posts where required
- b) limit posting during emergency events to ensure accurate information is shared
- c) block users who repeatedly breach the community guidelines or who pose a safety risk

The Shire does not accept responsibility for external comments made by members of the public on its social media channels.

COUNCIL MEMBER COMMUNICATIONS AND PERSONAL SOCIAL MEDIA

Council members may communicate with the community and may use personal social media accounts. When communicating on Shire matters, council members must comply with the Code of Conduct for Council Members, Committee Members and Candidates and must take care to avoid confusion about what is an official Shire position.

When posting or commenting on Shire matters, council members should:

- a) make it clear the views are personal and do not necessarily reflect the views of Council or the Shire
- b) only publish material that is factually correct and can be supported
- c) avoid disclosing confidential information, including information from closed meetings or confidential briefings
- d) avoid directing staff through social media and avoid operational instructions
- e) avoid commentary that could be seen as undermining a Council decision or the Shire administration
- f) take extra care during election periods and avoid content that could be considered political campaigning on Shire channels

Council members must not use the Shire logo, official branding, or imply authorisation as a spokesperson unless authorised by the Shire President or the CEO in accordance with this Policy.

EMPLOYEE AND CONTRACTOR PERSONAL USE

Employees, volunteers and contractors may use social media in a personal capacity.

They must not:

- a) disclose confidential information or personal information obtained through their work
- b) comment publicly in a way that could compromise the impartial performance of their duties
- c) misrepresent their role or imply they speak on behalf of the Shire unless authorised
- d) engage in conduct that brings the Shire into disrepute

Employees, volunteers and contractors must follow the Shire's Code of Conduct for Employees, Volunteers and Contractors

RECORDKEEPING

Official communications and social media content created or received in relation to Shire business are records and must be managed under the *State Records Act 2000* and the Shire's Record Keeping Plan.

Freedom of Information (FOI) requests are managed under the *Freedom of Information Act 1992*. Any FOI request received via social media must be referred to the CEO as soon as practical.

Personal information must be handled carefully. If a user posts personal information on a Shire channel, the Shire may hide or remove it to protect privacy and safety.

COMPLAINTS, LEGAL RISK AND ESCALATION

If a post or comment raises legal risk, including defamation, threats or disclosure of confidential information, the matter must be escalated to the CEO promptly. The CEO may seek legal advice where required.

Where content indicates imminent risk to a person or property, the Shire may refer the matter to emergency services or the relevant agency.

TRAINING AND SUPPORT

The Shire will provide practical guidance to staff with social media responsibilities. Council members may be offered briefings on social media expectations as part of their induction or ongoing development.

BREACHES

A breach of this policy may be managed under the relevant Code of Conduct, employment processes, or other governance processes, depending on who is involved and the nature of the breach.

REVIEW

This policy will be reviewed at least every three years, or earlier if legislation changes or operational practice needs to change.