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| Social media policy |

Table of Contents

[Purpose 3](#_Toc175586391)

[Application 3](#_Toc175586392)

[Types of social media 3](#_Toc175586393)

[Use of social media by Commission employees and contractors 4](#_Toc175586394)

[General conditions 4](#_Toc175586395)

[Using social media for personal use 4](#_Toc175586396)

[Using Commission social media for official purposes 5](#_Toc175586397)

[When posting on social media the VDWC will: 5](#_Toc175586398)

[Responding to negative comments on social media 5](#_Toc175586399)

[Access and approvals 6](#_Toc175586400)

[Information security, privacy and risk mitigation 6](#_Toc175586401)

[Accountability 7](#_Toc175586402)

[References/related documents 7](#_Toc175586403)

[Policies and guidelines 7](#_Toc175586404)

[Compliance 7](#_Toc175586405)

[Policy review and currency 7](#_Toc175586406)

[Version history 7](#_Toc175586407)

[Appendix 1: Commission social media accounts 8](#_Toc175586408)

# Purpose

The Victorian Disability Worker Commission (the Commission), its employees and contractors use social media platforms and online communities (social media) to interact with each other, stakeholders, the community and to promote the Commission’s work in the public domain.

This policy has been developed to govern the creation and use of social media content by employees and contractors of the Commission.

Employees must comply with their responsibilities under the *Code of Conduct for Victorian Public Sector Employees 2015* (VPS Code of Conduct)in connection with their professional and personal use of social media. This includes, but is not limited to, obligations relating to confidentiality, public record-keeping, privacy, bullying and inappropriate behaviour, workplace safety, conflict of interest, upholding the Commission’s values, and the appropriate use of government resources.

This policy aims to:

* create a governance framework around social media use by staff
* set out the Commission’s rules and procedures for social media use by staff
* help staff use social media confidently and responsibly within the government context
* ensure employees and contractors are aware of their obligations as public servants or contractors to government when using social media.

This policy should be read in conjunction with the Victorian Public Sector Commission’s (VPSC's) [Guidance for use of social media in the Victorian Public Sector](https://vpsc.vic.gov.au/html-resources/guidance-for-the-use-of-social-media-in-the-victorian-public-sector/) <https://vpsc.vic.gov.au/html-resources/guidance-for-the-use-of-social-media-in-the-victorian-public-sector/>

# Application

This policy applies to all workplace participants. For this policy, this includes employees, contractors, consultants and any individuals or groups undertaking activity for or on behalf of the Commission.[[1]](#footnote-2)

## Types of social media

Social media includes but is not limited to:

* social networking sites (e.g. Facebook, LinkedIn, Yammer, WeChat, Weibo, Snapchat)
* video and photo sharing websites (e.g. Instagram, Flickr, YouTube, Pinterest, TikTok)
* blogs, both personal and corporate
* micro-blogging (for example X)
* forums, discussion boards and groups (for example Google groups, Whirlpool)
* wikis (for example Wikipedia)
* podcasts
* email and instant messaging (for example WhatsApp)
* social and digital advertising campaigns.

Social media content encompasses various material and actions and includes, but is not limited to: text (for example posts, articles and comments) including emoticons (e.g. a combination of symbols such as :-)), ideographs (for example emojis) and other social media activities which can be interpreted as endorsement or criticism (for example ‘likes’ or ‘thumbs down’ and re-shares/posts).

# Use of social media by Commission employees and contractors

## General conditions

The following requirements apply to the use of social media by workplace participants for any purpose:

* All Commission employees and contractors must comply with this policy and must use social media in accordance with this policy and all other relevant Commission policies and laws. This extends to both the use of social media channels for professional communications purposes, and personal use of social media outside of professional working hours where references to the Commission and its activities are made.
* Employees must promote an environment that encourages respect and all communications should be fair, objective and courteous (VPS Code of Conduct, clause 6.1 (Fair and objective treatment)).
* Employees should act consistently with the Commission and VPS values.
* Users should not post content likely to adversely affect an employee’s standing as a public official or bring themselves, the Commission or the Victorian public sector into disrepute (VPS Code of Conduct, clause 3.9 (Public trust)).
* Employees must remain apolitical and not include statements promoting or criticising the policies of a political party (VPS Code of Conduct, clause 2.2 (Remaining apolitical)).
* Employees and contractors should not depict or identify Commission employees by name or position or publish their image on social media without their express, prior, written permission.
* Managers should ensure that the employees and contractors for whom they are responsible are aware of and understand this policy and other relevant policies, such as the departments’ policies referenced in this policy.

Non-compliance with this policy or the policies referred to therein may constitute a breach of employment or contractual obligations, including a contravention of the VPS Code of Conduct. If an employee fails to comply with this policy, they may face disciplinary action and, in serious cases, termination of employment.

## Using social media for personal use

Employees and contractors must comply with the Commission’s values and the values set out in theVPS Code of Conduct in their interactions with others including colleagues, partner organisations, clients, stakeholders and the public.

Employees’ obligations continue when using social media for personal use. If an employee or contractor uses personal social media accounts (including anonymised accounts) they must:

* avoid giving endorsements where it would lead to an actual or perceived conflict of interest with their duties as a public servant or a contractor to the Commission or breach their employment obligations. The Commission’s Conflict of interest policy should be consulted if in doubt.
* ensure that content to or from personal social media accounts does not purport to be and limit potential interpretation as an official statement on behalf of the Commission.
* use personal social media in their own time or at times acceptable to the employee’s line manager. Refer to the Acceptable Use of Technology policy for further details.
* not use a Commission (e.g. [name@vdwc.vic.gov.au](mailto:name@vdwc.vic.gov.au)) email address to register for social media accounts. Use of work emails may breach the Commission’s information security see the Acceptable Use of Technology policy.
* not conduct official business. Professional networking (i.e. LinkedIn) is an exception to this requirement in certain instances where approved content from VDWC account can be shared/reposted/liked by an individual’s LinkedIn account.
* Use of a pseudonym (e.g. anonymously and/or using a non-verified social media account) may not prevent a finding that they have breached the VPS Code of Conduct.

These obligations extend to the use of an individual’s personal social media accounts due to the unique nature of public sector employment: expressing personal views via social media can reflect on us as individuals as well as the Commission, government, and the Victorian public service as a whole.

If a workplace participant feels that they have a conflict of values where their personal values conflict with their work they should:

* refer to the Commission [conflict of interest policy](https://dhhsvicgovau.sharepoint.com/:w:/r/sites/VDWC/_layouts/15/Doc.aspx?sourcedoc=%7B0D869AA2-CA38-4DDA-B570-632F56E72BCC%7D&file=VDWC%20-%20Conflict%20of%20interest%20policy.DOCX&action=default&mobileredirect=true)
* seek advice from your manager or the Commission’s Manager Corporate Services

This can assist in making a decision that preserves both your integrity and that of the Commission and the Victorian public service.

## Using Commission social media for official purposes

The Commission operates multiple social media accounts (set out in Appendix 1). These are the official channels through which the Commission communicates about strategic priorities and engages with stakeholders and the community.

The Digital Media and Communications Officer is trained to use the social media accounts and is authorised to post on VDWC social media channels. In the absence of the Digital Media and Communications Officer, the Senior Engagement and Communications Officer and the Community Education Officer are authorised to post on social media. All posts are approved by the Manager Communications and Engagement.

### When posting on social media the VDWC will:

* be accurate, concise and informative when explaining Commission policies and programs on social media, and be receptive to public views or comments
* not depict or identify any person including stakeholders, including people with disability, their families or carer, or others on social media without their express, prior written permission, or the express, prior written permission of their guardian (if applicable). Where the Commission uses a photo of an individual or image from an event, a release form must be completed to ensure permission from individuals is always provided
* not infringe the intellectual property rights or moral rights of third parties. This means that they must not post trademarks, copyright or any intellectual property of third parties (that is, material not created by or owned by the Commission). Permission must be obtained before any third-party content is posted on any social media account (whether department operated or otherwise). This includes images (including photographs and drawings), graphics (including diagrams), sounds, music, video or other media. Should you require any advice about whether a post would infringe the intellectual property rights or moral rights of a third party, please contact the Commission’s legal team before posting
* be respectful of other opinions, cultures and beliefs when posting material on social media or interacting with other social media users
* ensure that information posted is factually correct and cite sources as appropriate
* for material of a technical or specialised nature, obtain appropriate approval from a Commission subject matter expert, manager or the Director before posting to ensure information is accurate
* if they identify an error in material published on a Commission-operated social media account, act to promptly correct the content. Please contact the Manager Communications and Engagement for advice about the correction or removal of content.

#### Posting of job ads on social media

At the request of the hiring manager, the Digital Media and Communications Officer can promote a VDWC job on social media.

VDWC employees can use the VDWC job posting to repost and/or like to expand the reach of the job ad to their networks.

### Responding to negative comments on social media

The Commission sets standards about engagement on its social media accounts. These expectations are published on our website.

The Commission has a process for dealing/responding to negative comments on social media that do not meet these expectations. The Commission uses commentary as an opportunity to inform and explain our role and functions. The Commission will respond to commentary that is negative and unfairly impacts on the reputation of the Commission and its staff, or is misleading, harmful or breaches our expectations, in accordance with the VDWC Community Standards and Rules of Use which state:

**VDWC Community standards and rules of use**

Our social media channels are a place for you to participate in positive and constructive conversations.

Comments are moderated and those that do not meet VDWC community standards and rules of use will be removed. By posting a comment, the public agree to abide by these VDWC community standards and rules of use which are published on our social media platforms in the “About” page and are as follows:

* Be polite and treat others with respect.
* Do not post comments that include inappropriate language, are abusive to others, or appear to deliberately provoke arguments. Such comments will be removed.
* Stay on topic.
* Do not dominate the conversation. We reserve the right to remove comments from people who seek to dominate the discussion.
* Do not use our channels to advertise. Content that endorses commercial products/services or solicits donations will be removed.
* Do not post comments which are defamatory, discriminatory, incite violence, infringe copyright or are otherwise unlawful.
* Stick to the facts. Content that is factually wrong or misleading may be moderated.

### Access and approvals

The Manager Communications and Engagement manages and authorises the use of all Commission-operated social media accounts and the Digital Media and Communications Officer is trained to use the authorised accounts.

Staff seeking to establish a new social media account for the Commission must obtain permission from the Manager Communications and Engagement in writing.

Any proposals to use free or paid third-party social platforms or applications outside of the major social networks should be referred to the Manager ICT Operations and Development.

## Information security, privacy and risk mitigation

Identifying and managing risk helps minimise negative consequences in the pursuit of the Commission’s objectives.

If an employee or contractor becomes aware of any communication or online content that poses (or may pose) a reputational risk to the Commission, they should consult the Manager Communications and Engagement or the legal team. Further guidance can be found in the Commission’s risk management process.

Employees and contractors must not use social media to distribute material where its dissemination limiting marker (DLM) is OFFICIAL, OFFICIAL – Sensitive, PROTECTED, CABINET-IN-CONFIDENCE. Distribution and information exchange is limited to documents designated UNOFFICIAL or with no DLM.

In the event of inadvertent posting of security classified information, or of a person’s personal or health information the employee/contractor must immediately contact the Manager Communications and Engagement and the legal team.

# Accountability

The Manager of Communications and Engagement is accountable for the delivery of effective and standards-compliant social media content across the Commission. The Manager Communications and Engagement can provide guidance on how to comply with this policy.

# References/related documents

### Policies and guidelines

* Commission values and behaviours
* [Privacy policy](https://dhhsvicgovau.sharepoint.com/:w:/r/sites/VDWC/Document%20Centre/VDWC%20Policies/Privacy%20policy/VDWC%20-%20Privacy%20policy%20-%20final%20-%20April%202022.docx?d=wc1409383410342e1bce6a7c1804519fa&csf=1&web=1&e=eDuIsL)
* Privacy incident procedure
* Conflict of Interest policy
* Board media policy
* VDWC Acceptable Use of Technology policy
* Victorian Public Sector Commission’s (VPSC's) [Guidance for use of social media in the Victorian Public Sector](https://vpsc.vic.gov.au/html-resources/guidance-for-the-use-of-social-media-in-the-victorian-public-sector/) <https://vpsc.vic.gov.au/html-resources/guidance-for-the-use-of-social-media-in-the-victorian-public-sector/>
* [Code of Conduct for Victorian Public Sector Employees 2015](https://vpsc.vic.gov.au/resources/code-of-conduct-for-employees/) <https://vpsc.vic.gov.au/resources/code-of-conduct-for-employees/>

## Compliance

* *Public Administration Act 2004 (Vic)*
* *Privacy and Data Protection Act 2014* (Vic)
* *Health Records Act 2001* (Vic)
* *Equal Opportunity Act 2010* (Vic)
* *Racial and Religious Tolerance Act 2001* (Vic)

# Policy review and currency

This policy will be reviewed annually from the last approved date, or when there is a significant change in the policy.

## Version history

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| Release notice | | | | |
| Version | Date of effect | Amendment details | Amended by | |
| 1.0 | 26/11/2020 | Initial release |  | |
| 2.0 | 08/08/2024 | Revised | Manager Communications and Engagement | |
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| Policy owner: | Manager Communications and Engagement | | | |
| Approved by: | Commissioner | | Approved on: | 02/09/2024 |
| Next Review Due: | 11/2025 | |  |  |

# Appendix 1: Commission social media accounts

| Brand | Account |
| --- | --- |
| Victorian Disability Worker Commission | [Victorian Disability Worker Commission Instagram](https://www.instagram.com/vicdwcommission/)  <https://www.instagram.com/vicdwcommission/>  [Victorian Disability Worker Commission Facebook](https://www.facebook.com/VDWCommission)  <<https://www.facebook.com/VDWCommission>>  [Victorian Disability Worker Commission Twitter](https://twitter.com/vdwcommission)  <<https://twitter.com/vdwcommission>>  [Victorian Disability Worker Commission LinkedIn](https://www.linkedin.com/company/vdwcommission)  <https://www.linkedin.com/company/vdwcommission>  [Victorian Disability Worker Commission YouTube](https://www.youtube.com/channel/UCHej89-upE0DDW4bonnx8zA) <<https://www.youtube.com/channel/UCHej89-upE0DDW4bonnx8zA>> |

1. Contractors and consultants are only bound by the Code of Conduct for Victorian public sector employees if explicitly required by their contract for services [↑](#footnote-ref-2)