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Social Media Policy

Last approved March, 2022

Responsible Branch - People Branch

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	Media Policy

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1. PM&C policy commitment

Social media is part of everyday life, in both personal and professional contexts. It is a condition of employment that PM&C employees use social media appropriately; in a manner that upholds the reputation of PM&C, broader public service and is compliant with the APS Code of Conduct and Values.

This policy is not intended to cover every possible use of social media. This policy provides guidance to PM&C employees on the use of social media, and outlines their responsibilities when using social media for unofficial purposes. The policy should be read in conjunction with the Australian Public Service Commission's <u>Social Media Guidance</u>.

2. Overarching authority

In accordance with Section 13, *Public Service Act 1999* (Cth) (PS Act), all APS employees must behave in a manner consistent with the APS Values and Code of Conduct.

3. Who is covered by this policy

This policy applies to all PM&C employees, both non-SES and SES.

Individuals engaged as contractors via labour-hire firms and secondees into PM&C, while not formally covered by this policy, are expected to act in a manner consistent with the APS Code of Conduct, and conduct standards set out in their contract.

Guidance contained in this policy extends to an employee's use of social media <u>at all times</u>, including personal and anonymous use.

PM&C employees who are required to use social media as part of their role, should refer to the <u>Social Media Governance</u> Policy.

4. Contact and Support

Employees are encouraged to speak with their manager, or manager once removed, for advice in the first instance.

Queries about unofficial social media use (i.e. personal, private use) can be submitted to <u>HR Help</u> through Service Portal or calling (02) 6271 6000 (option 2). Queries may be escalated by HR Help to the Professional Standards Team.

Queries about official social media use (i.e. operating PM&C social media accounts) can be submitted to the Social Media Team in Communications Branch by emailing SocialMedia@pmc.gov.au.

The Australian Public Service Commission <u>Ethics Advisory Service</u> is available to all APS employees, who wish to discuss and seek advice on ethical issues that occur in the workplace and make sound decisions around these issues. The APSC Ethics Advisory Service can be contacted on 02 6202 3737 or <u>ethics@apsc.gov.au</u>.

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5. Definitions

Term	Definition Social media includes websites and applications that enable users to create and share content or to participate in social networking.		
Social Media			
Platforms	Platforms include but are not limited to: Social networking sites such as Facebook, Twitter, Instagram, Snapchat, or Reddit; Professional networking sites like LinkedIn; Video sharing sites and apps like YouTube and TikTok; Blogs, online forums and communities; PM&C internal engagement platforms, such as Your Say; Comments section on news articles; and		
	In some cases, private tools like email.		
Social Media Use	 Posting content (both critical or praising); Uploading pictures (include themed 'frames' or captions); Participating in petitions and fundraisers on social media platforms; Commenting on posts, blogs, Instagram photos or YouTube videos; Sharing memes; 'Liking' content; 'Following' or 'Friending' accounts; 'Tagging' accounts or people; and Sending direct or private messages on social networking platforms. 		
Unofficial use	Where an employee engages in social media use as a private individual such as to communicate with friends, relatives and contacts, to keep up-to-date with particular products and trends, and to follow news and current events.		
Official use	Employees who have been authorised to operate a social media account on behalf of PM&C on an official channe		

6. Expectations and Responsibilities

6.1 All employees

- 6.1.1 Observe the requirements set out in Regulation 2.1 of the Public Service Regulations 1999. Regulation 2.1 requires APS employee to not disclose information obtained in connection with their employment that could be prejudicial to the effective working of government, was or is to be communicated in confidence within government, or was received in confidence by the government from someone outside government.
- 6.1.2 Take personal responsibility for social media use, assess the risk of their online behaviours undermining trust in the APS, discuss any concerns with their manager and make considered decisions when using social media.
- 6.1.3 Comply with <u>Australian Public Service Commission (APSC) Social Media: Guidance for Australian Public Service Employees and Agencies</u> and internal PM&C policies when using social media in an unofficial capacity.
- 6.1.4 Raise concerns respectfully and directly with colleagues if there are concerns about their behaviour on social media.

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- 6.1.5 Report serious and/or ongoing inappropriate social media use by PM&C employees that may be in breach of this policy to People Branch.
- 6.1.6 When necessary, seek guidance and support from People Branch about unofficial social media use.

6.2 Managers

- 6.2.1 Take reasonable steps to share information with employees to inform their understanding of the current internal operating environment.
- 6.2.2 Encourage employees to seek guidance about potentially high risk social media activity before deciding what to do.
- 6.2.3 Refer repeated and/or more serious concerns about inappropriate use of social media to People Branch.
- 6.2.4 Ensure employees are aware of this policy and relevant <u>Australian Public Service Commission (APSC) Social</u>
 Media: Guidance for Australian Public Service Employees and Agencies.

6.3 People Branch

- 6.3.1 Review and maintain this policy to inform managers and employees about their responsibilities related to the use of social media in an unofficial capacity.
- 6.3.2 Provide advice, and best practice approaches to employees in relation to unofficial social media use.
- 6.3.3 Manage reports of inappropriate social media use; and where relevant, take appropriate action in accordance with PM&C's Procedures for determining breaches of the APS Code of Conduct and the imposition of sanctions.

7. Key Policy Principles

Balancing personal rights and professional obligations

All APS employees are entitled to private lives, personal views, and political opinions. PM&C respects the rights of employees to participate in political, advocacy, and community activities. In doing so, however, employees must behave in a way that does not call into question their capacity to act apolitically and impartially in their work. Public confidence in the integrity of public administration is protected by the APS Values and Code of Conduct.

Employees need to use their judgement when assessing the risks that their online behaviour may pose to public confidence in PM&C and the APS, so as to strike a reasonable balance between their rights as individuals and their obligations as public servants.

Assessing the risks, and taking personal responsibility for social media use

The use of social media by government officials can pose a risk to public trust in the APS if it is inappropriate.

The risk of employees' behaviour reflecting poorly on PM&C, the APS and/or the Government of the day is relative to the seniority of the individual posting information, the connection between the topic and the individual's work, and the activity undertaken online and/or content published (i.e. tone and language).

These risks apply even when content is published anonymously or under an alias or pseudonym.

All employees must take personal responsibility for their online social media use, and make considered decisions about the risks of that behaviour reflecting poorly on PM&C and the APS.

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Maintaining awareness of perceived and/or actual positional power and knowledge

Employment at PM&C conveys a close connection to the Government of the day, and to the decision making processes of government.

Regardless of an employee's role in the department, reasonable members of the public may perceive that an employees' views reflect a:

- deep understanding of government business;
- connection to individual Government Ministers, including the Prime Minister; and/or
- level of power and/or decision making control over government policy and/or programs.

This perception of perceived and/or actual knowledge and power is outside the control of individual employees. Nonetheless, individual employees must be aware of how their use of social media could be considered by reasonable members of the public within this context.

Seeking guidance and/or support if in doubt

Employees should seek guidance and/or support from their manager or People Branch if unsure about their unofficial social media use and/or how to apply this policy.

8. Unofficial Social Media Use

8.1 How personal behaviour can affect confidence in the APS

PM&C has a central role in government administration, including advising the Prime Minister and Cabinet members across a wide range of policy areas. Members of the community need to have confidence that PM&C employees are serving the public interest, whilst members of Parliament expect the government of the day to be served impartially. As such PM&C employees have a greater responsibility to ensure their social media use is appropriate at all times.

Conduct on social media and comments on some topics by PM&C employees might be given greater weight—and cause greater concern—than similar comments made by members of the public or employees of other Departments, as they may be perceived to have privileged access to knowledge and influence within government. This becomes more likely the closer the topic is to an individual's area of work, the more senior role the individual's position is within PM&C, or the more public the individual's profile.

This does not mean employees cannot engage online on political or social issues—or that engaging on other issues is always risk-free. However, when considering whether to comment on such issues, individuals need to be mindful that the closer the topic is to their work, the Department, or the Prime Minister, the greater the risk it can pose to public confidence in PM&C or the APS.

8.2 APS behavioural requirements

All PM&C employees must be aware that professional obligations under the APS Code of Conduct extend into our private lives, and are balanced with our rights as citizens. In our personal lives we are required to act at all times in a way that upholds the:

- APS Values and APS Employment Principles; and
- integrity and good reputation of PM&C and the APS (s 13(11)(a) and (b) of the PS Act).

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Online behaviour committed anonymously, under a pseudonym, or subject to a disclaimer can still be inappropriate and may be in breach of the APS Code of Conduct.

Employee's online behaviours impact on community confidence in employees' ability to perform their duties impartially. Employees should consider their interactions online as akin to interactions in the workplace, and maintain respect and civility at all times.

8.3 Identifying as a PM&C and/or APS employee

Employees should exercise caution in identifying as a PM&C employee on social media. You must not advertise your security clearance level online as a requirement of the Australian Government Protective Security Policy Framework (PSPF).

Posting material online which indicates a level of exposure to particular business functions, capabilities or other work-related information can be a potential security vulnerability for the Department and its employees. Posting this type of content could potentially impact an employee's suitability to access Australian Government information and resources. This could result in being unable to obtain or maintain a Commonwealth security clearance.

When interacting on professional networking platforms such as LinkedIn, where declaration of employment is the norm, employees should exercise particular caution. Approaches from unknown individuals purporting to want to learn about an employee and/or their colleagues, the Department, Australian Government policy, business and processes should be reported to the <u>Department's Cyber Security team</u>.

8.4 Privacy

Employees are urged not to rely on a platforms' security settings to assure their privacy. Even material posted in a relatively secure setting may be copied and reproduced elsewhere, including on platforms that purport to have automatic destruction or deletion of content after opening or a set time limit.

Employees should also be mindful that content published on social media may become publicly available, even from personal social media accounts.

Employees are responsible for safeguarding access to their social media accounts by using strong passwords, platform privacy settings and multi-factor authentication where available. For further information on this topic, please contact the Department's Cyber Security team.

9. Inappropriate social media use

9.1 What is inappropriate social media use?

Behaviour on social media is inappropriate when:

- it breaches the <u>APS Code of Conduct</u>;
- it breaches PM&C policies; and/or
- a reasonable member of the community would conclude on the basis of the post or interaction that:
 - the employee cannot behave impartially, professionally, or with integrity in the APS; and/or
 - PM&C or the broader APS cannot be trusted to implement the policies of an elected government.

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9.2 Examples and considerations

Some behaviours may appear to pose an inherently lower risk because they do not take place in a public forum—e.g. private emails, group chats, or direct or private messages on networking sites. While on their face comments made through these channels may present a low risk to public confidence, private correspondence does not always stay private. Employees need to exercise judgement when engaging in private correspondence, and consider the likelihood and consequences of it being shared more broadly than they anticipated.

The table below provides some examples and considerations relevant to determining how appropriate our online social media use may be.

Risk to public trust/confidence in the APS/PM&C	Example
Low	Starting or sharing an online fundraiser for bushfire relief if it obtains funds through lawful means such as by selling merchandise. The risk may increase, for example, if the merchandise features slogans that criticise a Minister personally.
	Engaging in respectful social debate on relatively uncontroversial issues such as the rights of cyclists to ride on road.
	Posting photos of friends, family and/or colleagues (with consent) in a social setting.
Moderate to high	Criticising or praising PM&C, the Government, Opposition, or other persons such as a specific Minister or Member of Parliament. This needs to be considered in the context of the risk factors, noting that extreme pro-Government posts raise the same concerns as those that are extremely anti-Government: both can call into question an employee's capacity to be impartial, and damage public confidence.
	Liking content of organisations that are stakeholders or service providers of PM&C. The risk may increase if the organisation receives grants from PM&C.
	Signing a petition that is extremely critical or supportive of government policy, PM&C, or the Government. This type of behaviour may have a different risk profile than starting or sharing a petition, and will need to be assessed having regard to all the risk factors.
	Posting photos of colleagues without their explicit consent, and/or posting photos of colleagues that might reasonably damage their reputation, or the reputation of the Department.
High	Posting unlawful material (including content inconsistent with the confidentiality provisions in regulation 2.1 of the PS Regs or with the <i>Privacy Act 1988</i> (Cth)).
	Online behaviour that is illegal or falls far outside the norms of acceptable social behaviour, e.g. hate speech, threats or encouragement of violence or harassment, personal attacks or derogatory comments about individuals or groups within the community.
	Establishing an online community that is overly supportive or critical of PM&C or the employee's policy area, or which encourages or endorses harassment or defamation of individuals including Ministers, colleagues, members of particular communities or public figures.
	Airing significant workplace grievances on social media.
	Using social media platforms to bully or harass PM&C employees or members of the public.
	Joining an online community whose purpose is to share unlawful material or advocate violence.
	Undertaking social media behaviour that is, or could be perceived to be made on behalf of the Department, or the Government.

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Risk to public trust/confidence in the APS/PM&C	Example
	Participating in social media activities that are harsh or extremely critical of: a government, a Member of Parliament, a political party and/or their policies, which might lead a reasonable person to conclude that the employee is no longer able to conduct their duties professionally, efficiently or impartially.
	Social debate on contentious issues such as the merits of greyhound racing or live animal export, the legalisation of cannabis, or the date of Australia Day. The risk is higher the more extreme the expression – using slurs, abusive language, engaging in harassment, or threatening violence has a high risk of undermining confidence in the APS regardless of context.

9.3 Reporting inappropriate social media use

In the first instance, employees and managers are encouraged to raise concerns directly with colleagues if they have reason to believe that their use of social media may be inappropriate. This allows the employee to take immediate action to clarify the issue and/or rectify their behavior without unnecessary escalation.

Should the behaviour be repeated and/or more serious concerns emerge about inappropriate use of social media, a report should be made to People Branch immediately.

Employees who have been subject to cyber-bullying should make a report to their manager, or People Branch immediately.

Approaches from unknown individuals purporting to want to learn about an employee and/or their colleagues, the Department, Australian Government policy, business and processes should be reported to the <u>Department's Cyber Security team</u>.

9.4 Consequences

The Department will manage reports of inappropriate social media use in contravention of this policy by assessing the genuine risk to the reputation of PM&C, the APS or the government while balancing the employees' right to be politically engaged.

Any action taken will be proportionate to the risk the behaviour poses. For less serious matters, actions may include (but are not limited to):

- being asked to remove the social media content;
- informal counselling;
- training; and/or
- a written warning.

For serious matters, action may be taken in accordance with the Department's <u>Procedures for Determining Suspected</u>
<u>Breaches of the APS Code of Conduct and the Imposition of Sanctions.</u>

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10. Useful Resources

The Australian Public Service Commission (APSC) provides APS employees and agencies with clear guidance about appropriate unofficial social media use. Employees should familiarise themselves with <u>Australian Public Service Commission</u> (APSC) Social Media: Guidance for Australian Public Service Employees and Agencies, and:

- <u>Factsheet: Personal Behaviour on Social</u>
 <u>Media</u>
- Social Media: Tips for Employees

- Frequently Asked Questions
- Case Studies

A short check list for social media use to assist employees to comply with this policy is at Appendix A.

Other relevant resources:

- Public Service Act 1999 (Cth)
- Public Service Regulations 1999 (Cth)
- ICT Security Policy
- PM&C Online Channel Guidance
- Appropriate Workplace Behaviour Policy
- ICT and Internet Usage Policy
- APS Values and Code of Conduct in Practice (APSC)
- Procedures for Determining Suspected Breaches of the APS Code of Conduct and the Imposition of Sanctions
- Conflict of Interest Policy

11. Seeking a review of decision

PM&C acknowledges the right of employees to raise concerns and make complaints professionally and in good faith, and to have them received and considered fairly.

Employees are encouraged to raise concerns about decisions relating to their employment with their manager in the first instance, or with another senior manager. Where concerns cannot be resolved locally, employees can seek assistance from People Branch in the first instance.

A non-SES employee may seek a formal review of APS actions under section 33 of the Public Service Act 1999. See the <u>Review of Action Procedures</u> for further information.

What happens if this policy is not followed

If an employee behaves in contravention of this Policy, formal action may be taken in accordance with <u>PM&C's Procedures</u> for Determining Suspected Breaches of the APS Code of Conduct and the Imposition of Sanctions.

13. Appendix

Appendix A – Checklist for Unofficial Social Media Use

Appendix B – Case Studies

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14. Document control

Date published	Approved by	Brief description of change
People Branch	Paul Wood February 2021	Revised to align with updated APSC Guidance. Separation from Official Social Media Use Policy.

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15. Appendix A - Checklist for Unofficial Social Media Use

In some circumstances, it may be unclear whether a certain post or online behaviour may be inconsistent with this policy. In this case, it is recommended that you err on the side of caution and not publish or engage with the material, and seek advice from your manager or People Branch.

Do	Do not
Consider the tone and appropriateness of all posts and online interactions prior to publishing material.	Associate your PM&C email address with your personal social media accounts.
Consider how closely related your work is to the content of the interaction or post.	Interact in a way that is unlawful, obscene, defamatory, threatening or discriminating.
Consider how, in the context of your seniority, or public profile, your interaction or post may be perceived.	Interact with others online in a way that would compromise your ability to fulfil your duties as an APS employee in an impartial or unbiased manner – including making harsh or extreme comments about PM&C or Ministers.
Discuss any published works related to your area of expertise with your manager before uploading online.	Share your password or login details with anyone.
Consider that online behaviour, even outside of work, can be regulated by the APS Values.	Release sensitive, personal or confidential information without proper authority.
Ensure posts or interactions made anonymously, under a pseudonym or subject to a caveat are consistent with the APS Values.	Specify you hold a Commonwealth security clearance.
Set privacy settings appropriately.	
Seek advice from your manager or People Branch if you are unsure about your behaviour on social media.	

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16. Appendix B - Case studies

Scenario 1 – Harry, Corporate Division

Harry is an APS 4 advisor in Corporate Division. Harry's friend, Donald, posts a meme on Facebook that shows a Minister with photoshopped devil horns at a press conference. Harry's friend Lucy then comments on the post and says 'An absolute devil, he should be shot!' Harry 'likes' Lucy's comment.

Lucy's comment on Harry's post is far outside of the social norms, and Harry's act in 'liking' the comment may be seen to endorse Lucy's extreme view. This act brings into question Harry's ability to serve the government impartially and is higher risk. Harry needs to be mindful of the unique role that PM&C plays in supporting the Prime Minister and the government of the day, and how his actions could be perceived.

In the first instance, Harry should avoid engaging with Donald's meme, and not 'like' Lucy's comment. However, if Harry engages and later identifies that his actions could undermine the Department or his ability to perform his role impartially, best practice would be for Harry to 'unlike' Lucy's comment.

Scenario 2 – Sally, National Bushfire Recovery Agency

Sally is an EL2 in the National Bushfire Recovery Agency. Sally posts a link on her personal Twitter account to a press release from the Example Political Party announcing their revised bushfire recovery plan. The article includes an image of Sally with Minister Purple. Sally captions the post 'To all my friends and family affected by the recent bushfires, please educate yourself on the announcement by Minister Purple and let me know if you have any questions in the comments below.'

As a senior staff member within the Agency, and being pictured with Minister Purple, Sally would be a strong influence within the community who would expect that she has insider knowledge about the relevant plan and policies. The expression in Sally's caption is socially acceptable and stimulates conversation. However, depending on the nature of comments made by her followers, the Twitter post is moderately risky. Sally should take care in moderating any extreme views, or responding to any questions so as to not represent the response is on behalf of the government, Department or APS.

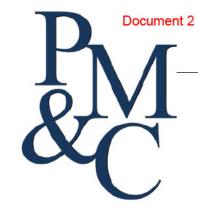
Later that night, Sally reposts an article from the Example News about the Government's scrapped tax cuts to claw money back for the budget. Sally enjoys a glass of wine and is reading the comments on her Twitter post about the bushfire recovery plan. A comment on the bushfire recovery plan post states the plan fails to support small business owners. Frustrated by the comment Sally responds "You don't know the struggles we went through to get here – behind the scenes the sacrifices made for small business owners like you impacted every other Australian financially. They should be grateful!"

The expression in Sally's response is not vulgar, however it is still high risk. This is because Sally has a public profile and it would be reasonable for members of the public to assume she has access to information that is not publically circulated such as budget trade-offs. While Sally did not state what the 'financial impact' was, members of the public may infer it was the tax cuts as posted by Sally later that night. Also, Sally's language of 'we' blurs the line of serving the government impartially as it implies she sees herself as part of the government as opposed to impartially advising or implementing the governments' policy.

As a whole, Sally's online behaviour is high risk and may impact her ability to serve the government of the day and reduce the public's confidence in the APS. Her actions may also be considered serious enough to warrant investigation under the APS Code of Conduct.

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Social Media Governance Policy

Version control

Date	Version	Comments
November 2022	1.1	Updated by s 22(1)(a)(ii) - Changes made: Style and branding changes, Sprinklr is PM&C's scheduling and management platform, End of shared services arrangements reflected in document
March 2021	1.0	74

Overview

The policy sets rules for account managers across PM&C and clearance policies for content that is developed and shared via our social media channels.

It ensures our engagement is consistent with our corporate communications objectives, meets our brand principles and complies with whole of government policies.

The Communications Branch is responsible for channel strategy, account management, clearance requirements and governance arrangements.

Note:

- For the policy on expected behaviours of use as an employee under the Public Service Act read
 the PM&C Social Media Staff Use Policy and the Australian Public Service Commission –
 Social media: Guidance for Australian Public Service Employees and Agencies. These policies
 apply to all PM&C employees, including authorised spokespeople.
- The PM&C Employee Social Media Policy is managed by the HR team.
- Please contact the Communications Branch if you would like more information about 'authorised spokesperson' accounts.

Contact

Email: socialmedia@pmc.gov.au

Other resources are available on the Communications intranet page.

Strategic Objectives & Approach

The Department uses social media to share information, engage with stakeholders and to promote the outcomes of policy and programs.

This policy supports our <u>Digital Communications Strategy</u>, which aims to improve online engagement, increase transparency, public understanding and community involvement in line with best practice.

Our strategic objectives are to:

1. Create an integrated PM&C digital ecosystem

Research indicates our audience are interested in more than one policy area. Consolidation of accounts will remove the fragmentation of audiences by topic. It also provides the opportunity to tell deeper stories across policy siloes.

We will progressively consolidate content from across the remit of PM&C onto PM&C's social media channels.

2. Build trust with external audiences.

Content must be current, accurate, and meet a defined user need. It must be written or designed for the digital environment and in the PM&C tone of voice.

We put our audience first when it comes to content development and channel selection and we tailor our communications to meet the needs of our audience.

3. Support PM&C purposes and meet the business needs of PM&C areas/staff All communications should link to the PM&C core priorities and purposes.

All content should be planned in agreement with the Communications Branch and prepared with an 'audience first' approach. The Communications Branch will work with you to get this

If you would like to discuss content for the PM&C or Australia.gov social media channels please contact the Digital Communications Team at socialmedia@pmc.gov.au.

Account Management

right.

The Communications Branch manages the following social media accounts:

- PM&C: Facebook, Twitter, LinkedIn, YouTube, SoundCloud
- Australian Government (AusGov): Facebook, Twitter, LinkedIn, Instagram, YouTube
- National Indigenous Australians Agency: LinkedIn (Ends 9 December 2022)

- Indigenous.gov: Facebook, Twitter, Instagram, YouTube (Ends 9 December 2022)
- Office for Women: Twitter

In addition the Communications Branch provides advice and governance support to channels managed by PM&C including:

- Behavioural Economics Team (BETA)
- G20 Australia
- The NDIS Review
- APS Reform

In line with the Department's work to consolidate channels, new social media accounts and platforms will only be established in exceptional circumstances in consultation with the Communications Branch and relevant SES.

Additional accounts may be managed by line areas following consultation with the Communications Branch and agreed with the relevant Deputy Secretary. Business and content planning, governance and evaluation methods will all need to be established and regularly reviewed.

Requests for new social media accounts will need to complete:

- Request for a new social media account
- Governance for proposed social media accounts

If a new social account has been transferred into the Department with machinery of government changes – please contact the Digital Communications Team at socialmedia@pmc.gov.au to discuss arrangements for its ongoing use and resourcing. Advice on Decommissioning social media accounts is outlined below.

PM&C community managers:

In addition to adhering to the Australian Public Service Commission <u>Social media: Guidance for Australian Public Service Employees and Agencies</u>, when using social media in an official capacity a PM&C employee must:

- 1. be authorised to use social media
- 2. comply with PM&C's Social Media Governance Policy and moderation guidance
- 3. only post approved content where their role requires them to do so. All content must be approved at SES Band 1, or above

- 4. behave in a way that upholds the integrity and good reputation of PM&C specifically and the APS more generally
- 5. be mindful of the requirements set out in <u>Regulation 2.1 of the Public Service Regulations 1999</u> concerning the disclosure of information
- 6. comply with PM&C's obligations under legislation including the Privacy Act 1988, the Archives Act 1983 and the Copyright Act 1968
- 7. not make statements that could bring PM&C or the APS into disrepute
- 8. participate in training and governance sessions arranged by the Communications Branch.

Clearance

Social media is a live and active environment, it is important content is cleared in a timely manner to ensure the information is current and relevant when it is shared and that all questions are responded to in a reasonable timeframe.

In line with best practice, all social media content must be in Sprinklr, our content management system, by 4pm the day prior to its scheduled publication. Any content not in Sprinklr by this time will not be published.

There are some exceptions:

- Prime Minister and ministerial media releases and transcripts
- Departmental statements
- Urgent or unforeseen announcements
- Timely retweets / shared posts.

Attachment A outlines clearance requirements for all PM&C social media channels.

Moderation

All social media accounts need to be regularly monitored to maintain a good relationship with community, respond to any questions, manage issues and prevent crises.

The PM&C social media moderation guidelines are publicly available on our website.

A response to correct misinformation is the best way to prevent a minor issue escalating into a crisis. In this instance, we recommend a cleared response is published within <u>two business hours</u> of the question being received by a Communications branch staff member.

Best practice is that queries not deemed to be offensive or a nuisance are responded to, even if only an acknowledgement of their question is published. There may be occasions where responding to

posts is not appropriate, however this should be the exception. Responses to comments should be drafted, cleared, and posted within two business hours. The expedient posting of replies will be prioritised to maintain engaged followers and deliver high quality service.

In response to nuisance complaints, the Communications Branch will determine the appropriate action to be taken on a case by case basis in line with our moderation guidelines. This may include hiding, muting, blocking or reporting users, constructively replying to comments or correcting misinformation.

A file note needs to be maintained of any social media account that has been blocked and the reason why.

Our public communications receive ongoing attention from the media. Sometimes we are the target of malicious activity by people seeking to bring disrepute to government. The Communications Branch maintains relationships with social media providers and can expedite issues resolution when required.

Handling sensitive material:

If sensitive material is forwarded to a social media account via a comment, reply, direct message or email please action appropriately.

The PM&C IT Security area are able to assist with assessing the validity of sensitive content, for example if it is already in the public domain and if it should be escalated.



Reporting

Contact the Australian Federal Police (AFP) directly if the material includes:

- Child exploitation (minors in compromising positions)
- acts of credible violence (terrorist threats, images depicting graphic harm)
- threats of suicide or self-harm (evidence based specific details mentioned, visual indicators this may occur).

AFP National Operations State Service Centre (NOSSC) contact information:

- Contact via phone first 02 5127 001
- Email information to www.NOSSC-Client-Liaison@afp.gov.au (during business hours)
- Outside of business hours email: www.nossc@afp.gov.au or call 02 5126 0000.

When you are forwarding content via email:

- take a screen shot or right click and save
- include a message in the email subject message Warning Disturbing Image

The AFP NOSSC unit are located in Barton, Canberra. If required, they can be contacted to organise a hand over of sensitive materials.

Record keeping:

Keep a record of incidents by theme. This will enable you to reporting for resourcing and monitor changes in metrics.

Evaluation

All PM&C accounts are monitored and reported on to the Executive on a monthly basis.

Account managers are required to conduct their own analytics and reporting. Templates are supplied by the Communications Branch and support provided by Sprinklr.

Data should be analysed and evaluated against objectives stated in the communications strategy for each priority area/account.

Data can be supplied to line areas via detailed written request; however, a minimum of five business days' notice is required to prepare the required material.

Security

Account passwords can be shared on a need to know basis only. Passwords must be changed quarterly and be consistent with the Department's <u>ICT Security Policy</u>.

To assist issues resolution or urgent requests, up-to-date account details including registered email addresses, current user list and passwords must be provided to the Digital Communications team following each password update.

Activate two-factor authentication for social media accounts and associated administration user profiles.

Archiving

Social media content authored by the Department is considered a Departmental record and must be archived.

Decommissioned channels will be archived in accordance with the *Archives Act 1983*. Further information is available from the National Archives Act *Guidelines for managing social media*.

Decommissioning

The Communications Branch will work with line areas to ensure their social media presence remains current and compelling. Any social media channels that have become redundant, or have been identified by the Communications Branch as being inactive or to have limited participation will be decommissioned or repurposed.

All decommissioning is undertaken by the Communications Branch following a discussion with the relevant line area and agreement to a closing strategy. The Communications Branch will:

- assess and mitigate any risks associated with the change
- retain the account name for a period of time to prevent others from assuming the profile's identity
- ensure stakeholders and the affected online community are informed of any changes and have the opportunity to continue their engagement with the topic elsewhere.

Decommissioned channels will be archived in accordance with the *Archives Act 1983*. Further information is available in *Guidelines for managing social media*.

Content published on government social media accounts is on the public record. Wherever possible the accounts should be un-published or made private rather than deleting the accounts.

The implications for un-publishing vs deleting an account are outlined by channel below.

Decommissioning accounts needs to occur in advance

Ensure there is email documentation of the agreement to close the accounts. This should be saved in the account profile folder of the Social Media.

Advise the Communications Branch AS that the social media accounts will be closed down.

As soon as there is confirmation to close accounts:

- 1. update account profile to advise the account will be no longer be active, for example:
 - On XX XXXX 20XX, our work was completed. This account is no longer active.

- This account is no longer active. We are tweeting from @XXXXX follow our hashtag #XXXXX
- 2. Publish and a pin a post that advises the account will be closing down on a particular date.
- 3. For LinkedIn contact employees linked to the account to advise the page is going to be rendered not active.

On the date the accounts are closed

- 1. Publish and pin a post to advise the account is no longer active.
- 2. Download archival records of published content. Save in the appropriate Share Hub folder.
- 3. Update account administration records for each Platform to identify who has access or associated email addresses (e.g. Twitter).
- 4. Update lists of active social media accounts.
- 5. Remove account access and related user profiles from social media publishing platforms.

Twitter

- Ensure PM&C Community Mangers have details of the email address (and access codes if known) used to establish the account and the connected email address and mobile authentication number are updated and documented.
- **Private**: Set the Twitter account to private, this will hide the feed from everyone, except those that follow the page. Followers cannot retweet previous posts from the account and no new content will appear on the feed.
- **De-activate:** A Twitter account can be de-activated for 12 months. Content and followers will still be there if account is re-activated.
- **Delete**: All your content and followers will no longer be deleted. You will need to reclaim the Twitter handle so another user does not claim it.

Facebook

- Ensure PM&C Community Managers have admin access to the accounts and that no adaccounts linked to the page.
- **Un-publish:** The content on the Facebook page and followers will remain; the content will not be visible to anyone (except page admins) unless the page is republished.

• **Delete page:** The page, content and followers will be deleted. Note it can take up to 14 days for the page to be removed.

LinkedIn

- Ensure PM&C Community Managers have administration access to the accounts.
- Not active: the LinkedIn page and content remains public. Users can still follow the account, and staff can indicate they work at the organisation. A pinned-post will indicate the page is not active.
- **Delete:** a LinkedIn account will mean all the content has been deleted. A page cannot be deactivated if there are more than 100 employees.
- Affiliated page: a page can become an affiliated page of the main public page ensuring the content is still available. An affiliated page will always remain linked to the parent page. Affiliated pages need to be requested by the main page admins.

Instagram

- Ensure PM&C Community Mangers have details of the email address / connected mobile authentication number are updated and documented.
- **Private:** Set the account to private. This means the account posts will still be able to be seen by account followers. Comments can still me left on the posts.
- **Temporarily disable:** An Instagram account can be temporarily disabled which means the profile, posts and comments will all be hidden unless you reactive it.
- **Delete:** Your Instagram profile, posts and comments will be permanently removed. You cannot use the same username or claim the username.

Attachment A: Clearance Requirement

ACTION	CLEARANCE LEVELS		
In addition to the clearances required below, to ensure quality standards are met (scheduling, tone of voice, high quality images/video, brand application), all content is cleared at Director-level in the Communications Branch prior to publishing.			
Tweet, post or reply (including multimedia & graphic designed content) – about PM&C	AS, Communications		
Tweet, post or reply (including multimedia & graphic designed content) – policy	AS, Policy Area An AS can delegate to an EL2 if required.		
Tweet or post (including audio-visual content) – Secretary	Chief of Staff to the Secretary		
Live content at events, including video, audio and images.	Requires pre-approved delegation by event host AS. General consent required from speaker/participants prior to the event.		
Retweet or share	Director, Communications Branch Community managers can retweet, share or like content from a pre-approved list of stakeholders.		
Events			
General content, including infographics.	Assistant Secretary, event host/co-host, or pre- approved delegation.		
Live tweeting, broadcasting and audio	Live content: pre-approved delegation Assistant Secretary.		
Video, audio and photos	General consent required from guest speaker, participants.		

Guests of Government

General content

No social media post should threaten the security of the travelling delegation – posts are not to be published ahead of visit. Upcoming meeting/engagement times and locations must not be released.

Protocols & International Visits Division (PIV), Assistant Secretary.

Additionally, content must be fact-checked by relevant policy area.

If no media is present at an event, tweets can be made once the VIP has moved onto the next event.

Live tweeting, broadcasting, audio, video and photographs

Pre-delegated authority

If an event is 'open' media event (where media outlets are broadcasting live or streaming live to studios), live tweeting is permitted.

OTHER REQUIREMENTS

Prime Minister

Use of an image depicting the Prime Minister must be approved by the PMO/PiV prior to use.

The Prime Minister may only be quoted from public transcripts.

No images of the Prime Minister are to be altered unless there is a directive from the PMO or there is a requirement from PIV. If editing is undertaken, when approval is sought from both departmental senior executive and the PMO, a detailed explanation of what has been edited is to be included.

PMO approvals are managed by the Communications Branch contact – <u>Digital Communications</u> <u>Team</u>.

Other Ministers

Use of an image depicting a Minister may need to be approved prior to use. The Communications Branch will be advised on a case by case basis.

Secretary

Images and videos that include the Secretary must be cleared by the Chief of Staff prior to use.

Information on the Voice Referendum for employees

This information has been developed to provide employees with guidance on:

- supporting their own wellbeing leading up to the referendum, as well as supporting their colleagues
- engaging with the referendum while maintaining the integrity and impartiality of the APS
- safely reporting incidences of racism, discrimination and inappropriate behaviour
- engaging publicly with the referendum either in a personal or official capacity
- participating in activities relating to the referendum.

If you are seeking guidance as a manager, please refer to <u>Information on the Voice referendum for managers</u>.

We understand the lead up to the referendum may be difficult for some of our employees who find commentary and public debate distressing. Heightened exposure to racism and discrimination may put particular strain on the strength and resilience of our First Nations employees, their families and communities.

Ensuring our workplaces are psychologically and culturally safe is important and the responsibility of us all. The department is committed to a safe workplace that is free from racism, discrimination and inappropriate behaviour.

It is likely our employees will have a personal view on the issues being discussed, and that they may be asked about those views and the views of PM&C either at work or outside of the workplace. This page will provide you with the information to navigate those conversations.

Engaging with the referendum in an official capacity The role of the Australian Public Service in the referendum

The government is committed to implementing the <u>Uluru Statement from the Heart</u> in full. This includes holding a referendum in 2023 to recognise Aboriginal and Torres Strait Islander peoples in the Constitution, through an <u>Aboriginal and Torres Strait Islander Voice</u>.

The role of the public service in the referendum is the same as in other government policy – to serve the government of the day and help it deliver on its commitments.

To support the government's policy agenda, the role of the public service in the referendum involves:

- 1. Preparing for and delivering the referendum.
- 2. Providing a trusted source of factual information to the Australian public.
- 3. Supporting government processes (such as legislation and budget processes) and members of government (for instance, through briefing and supporting meetings).

The lead up to and during the referendum will be a unique period in Australian history, presenting some complexities for public servants to navigate in their day-to-day work. This is particularly true for PM&C employees who are working directly on the referendum.

PM&C's role in preparing for and delivering the referendum

PM&C is working with a range of APS agencies to prepare for and deliver the referendum, including the National Indigenous Australians Agency (NIAA), Attorney-General's Department (AGD), Department of Finance and the Australian Electoral Commission (AEC).

As part of our role in assisting the elected government, PM&C will continue to support government processes and members of government, including through drafting briefs, speeches and responding to correspondence from the public.

Talking points when engaging in an official capacity

Some PM&C employees have an important role to play in explaining the government's policy on the referendum to stakeholders. Our approach to engaging with stakeholders must support public confidence in the capacity of the APS to remain impartial.

Employees should explain the government's policy on the referendum using factual and neutral language to explain the referendum, rather than advocating for a certain position.

Below are some key points you can use when discussing the referendum with stakeholders or members of the public.

When describing the government's policy position:

- The Australian Government is committed to implementing the Uluru Statement from the Heart in full.
- The government will hold a referendum to recognise Aboriginal and Torres Strait Islander peoples in the Constitution, through an Aboriginal and Torres Strait Islander Voice, in 2023.
- You can go to the <u>Voice website</u> for the most up to date information.

If you are asked about the 'Yes' and 'No' campaigns:

- The government will not fund a 'Yes' or 'No' campaign, but will develop a neutral, facts-based civics education program.
- You can go to the <u>Voice website</u> for the most up to date information.

If you are asked about voter enrolment:

- It is compulsory by law for all eligible Australian citizens aged 18 and older to enrol and vote in referendums. This will work in the same way as a federal election.
- If you are already enrolled, you do not need to enrol again to vote in the referendum.
- For more information or to check your enrolment status, visit the <u>Australian Electoral Commission</u>.

If you are asked to provide a personal opinion:

• The public service's role in the referendum is to provide a trusted source of factual information and to remain impartial. I'm sorry, but it is not appropriate that I share my own views when I'm working.

Inappropriate comments in an official capacity include:

- Presenting arguments for or against the Voice.
- Attempting to persuade stakeholders to vote 'Yes' or 'No' in the referendum.

Engaging with the referendum in a personal capacity

The Australian Public Service Commission (APSC) has developed guidance for employees who wish to engage publicly with the referendum in a personal capacity. This may include situations such as:

- attending a community event
- making comments on social media
- volunteering time or donating money to a campaign
- discussing the referendum with family and friends.

Employees are encouraged to follow the guidance available on the APSC website.

Supporting your wellbeing

PM&C recognises that engaging with the referendum – whether in a personal or official capacity – can be a challenging responsibility to navigate. As public commentary about the referendum intensifies, you may come across views or opinions that you find uncomfortable or distressing. In the first instance, please speak with your manager. The Wellbeing team can provide additional confidential support to anyone who does not want to disclose concerns to their manager, or who may require support such as reasonable adjustments to be put in place.

You can access a range of support services such as the <u>Employee Assistance Program</u> (EAP) (1300 360 364) for you and your immediate family. First Nations employees can access free and confidential counselling and support through a dedicated Aboriginal and Torres Strait Islander Support line (1800 816 152).

For immediate and urgent 24/7 support, contact:

- 13YARN (13 92 76) (First Nations employees)
- Lifeline (13 11 14).

PM&C's <u>Mara Network</u> fosters opportunities for Aboriginal and Torres Strait Islander employees to support each other, as well as share information and lived experiences..

A range of additional <u>mental health and wellbeing</u> support options are available to assist you in the lead up and during the referendum.

Supporting your colleagues

It's likely we will all have different reactions and experiences in relation to the issues being raised about the Voice and we need to be considerate of our colleagues. For example, staff with lived experience relevant to the referendum may have a different experience of the debate, and it is important not to make assumptions about experience or willingness to engage.

Before engaging with colleagues about the Voice and referendum:

- Take active steps to inform yourself. The <u>Aboriginal and Torres Strait Islander Voice</u> website has the most up-to-date information and resources.
- Practice judgement and be mindful of who may hear your conversation and the impact the conversation may have.
- Respect the rights of others not to engage in conversation about referendum.
- Behave respectfully and with courtesy at all times, and raise inappropriate behaviour with a trusted manager or the People Branch.

The Cultural Protocols Guide eBook provides information and guidance on working respectfully and effectively with Aboriginal and Torres Strait Islander peoples and communities and is a useful resource for employees around behaviour, communication and cultural protocols.

Training courses have been scheduled on the Corporate Training Calendar to support employees, including:

- Pindara Cultural Training
- Managing Mental Health

Talking points when engaging with colleagues

Here are tips and key messages you can use to help engage with colleagues about the referendum.

If you're comfortable responding to questions

- There will be a referendum proposing to recognise Aboriginal and Torres Strait Islander people in the Constitution through establishing an Aboriginal and Torres Strait Islander Voice. The referendum will happen in late 2023.
- It's important you are fully informed and conduct your own research.
- The <u>Aboriginal and Torres Strait Islander Voice</u> website has up-to-date information about the Voice. You can subscribe to receive the latest information.
- Other relevant sources of information include:
 - o <u>Australian Electoral Commission website</u>
 - o Parliamentary Education Office website

If you don't want to answer questions or engage in conversation

- Thank you for asking for my opinion, but I'd prefer not to discuss this. I recommend you check the following resources to help with your understanding:
 - o The <u>Aboriginal and Torres Strait Islander Voice website</u> has up to date information about the referendum. You can subscribe to the monthly newsletter.
 - o Other relevant sources of information include:
 - Australian Electoral Commission website
 - Parliamentary Education Office website

Fulfilling cultural obligations for First Nations employees

Some First Nations employees may have cultural obligations leading up to and during the referendum. With delegate approval, First Nations employees required to return to their community to conduct or participate in business such as Lore Business relating to the referendum can:

- access up to three days of Cultural and Ceremonial Leave with pay
- access up to two months of leave without pay
- negotiate flexible working arrangements during that period.

For further information on leave provisions, refer to the PM&C Leave Policy and Flexible Work Policy.

Reporting inappropriate behaviour experienced at work

PM&C is committed to promoting and maintaining a culture of courtesy and respect in the workplace. It is important staff are mindful of discussions and comments about the Voice and referendum.

All employees, contractors and consultants should be able to work in a safe, positive and supportive

environment that is free from inappropriate workplace behaviour. This behaviour includes, but is not limited to, discrimination, racism, harassment, bullying and interpersonal conflict.

More information is available in PM&C's <u>Appropriate Workplace Behaviour Policy</u>, including a <u>conversation guide</u> for addressing inappropriate behaviour and options for <u>reporting complaints</u>. Complaints may be managed confidentially and sensitively.

Reporting inappropriate behaviour experienced outside of work

eSafety Commissioner

The eSafety Commissioner has resources to help you if you experience online abuse or cyberbullying. Visit the <u>eSafety website</u> for information, resources, or to report <u>serious online abuse</u>.

Threatening behaviour

If you experience threatening behaviours outside of work, you should contact your local police or dial 000 in an emergency.

If you come across misinformation online outside of work, you are under no obligation to report or correct it. While it may be difficult to step back in these situations, in most cases, it is best to not engage with misinformation. This is because arguing with someone online makes it more likely that a larger number of people will see the original post.

If the misinformation is being spread by someone who is close to you, you might direct them to the <u>Voice website</u> or the <u>Australian Electoral Commission</u>. Both have factual and up-to-date information about referendums and the Voice proposal.

Sidebar links

Website links

- Aboriginal and Torres Strait Islander Voice
- Australian Electoral Commission
- Australian Public Service Commission (APSC)
- APSC Ethics Advisory Service
- The Statement Uluru Statement from the Heart

Document links

- APS Code of Conduct
- APSC Values and Code of Conduct in Practice-Section 6 Employees as Citizens
- APSC Engagement in the Voice Referendum in a personal capacity
- APSC's Case Study on APS Employee use of Social Media
- <u>Joint Letter to Secretaries and Agency Heads on the Referendum</u>
- PM&C Appropriate Workplace Behaviour Policy
- PM&C Conflict of Interest Policy

- PM&C Procedures for Determining Breaches of the APS Code of Conduct and the Imposition of Sanctions
- PM&C Social Media Policy
- Public Service Act 1999
- Social media: APS Guidance for Australian Public Service Employees and Agencies