



Australian Government

**Veterans and Veterans Families
Counselling Service**

Social Media Policy

(including Acceptable Use Policy)

Last updated: 15 May 2017

Background

Social media generally allows for the creation, exchange and distribution of user-generated online content and facilitates engagement with a wide cross-section of stakeholders (e.g. clients, employees and so on).

The Veterans and Veterans Families Counselling Service (VVCS) uses social media for:

- awareness raising, engagement and consultation on policy, programs and initiatives;
- promoting news and events;
- gathering feedback;
- connecting, engaging and fostering relationships with online communities and audiences; and
- collaborating and sharing knowledge on issues relevant to the VVCS's mission.

Purpose

This Policy contains VVCS' rules in relation to social media. The purpose of this Policy is to assist in ensuring that:

- an employee's or contractor's use of social media is consistent with their obligations under the *Public Service Act 1999*, including the APS Code of Conduct and/or relevant contracts;
- public confidence in VVCS (and the Australian Public Service [APS] more generally) as an impartial and effective public service is maintained; and
- employees and contractors are aware of important considerations regarding the use of VVCS social media by VVCS clients, members of the general public and others.

Application of policy

For the purpose of this Policy, social media is defined as online technologies and resources used for publishing, discussing and sharing information, resources and opinions.

Social media can include forums, blogs, wikis, social networking websites, and any other websites that allow individual users to easily upload and share content.

Examples of social media include social networking sites (such as Facebook, Twitter and LinkedIn), content sharing sites (such as YouTube, Pinterest and Flickr), blogs, forums, discussion boards and Wiki's including Wikipedia.

This Policy applies to all VVCS' and Department of Veterans' Affairs (DVA) employees ('employees'), as well as to VVCS Outreach Program Counsellors and other contracted providers ('contractors').

The Policy applies to an employee's or contractor's use of social media, including:

- use of social media in an **official capacity**; and
- use of social media in an **unofficial capacity** (whether professional or personal use).

Employees and contractors should be aware that the requirements contained in this Policy may extend to their use of social media:

- when using their personal computing devices, as well when using VVCS'/DVA's IT systems or devices provided by VVCS/DVA; and

- in the workplace and during work hours, as well as use that may occur outside of the workplace or outside of working hours.

If an employee or contractor becomes aware of another employee or contractor who is engaging in conduct that may breach this Policy there is an expectation that they will report the conduct to VVCS.

If a VVCS employee receives or becomes aware of social media communication by another employee or contractor that is not consistent with this Policy, they should advise that person accordingly and inform their supervisor. Contractors should report to their relevant State Director or VVCS' National Manager.

The Policy also provides guidance for staff regarding the use of VVCS social media by VVCS clients, members of the general public and others. This guidance reflects the Terms of Acceptable Use that govern the use of VVCS social media.

Application of APS Code of Conduct and other VVCS/DVA Policies and contractual terms

The APS Code of Conduct, APS Values and other VVCS and DVA policies also apply to employees' use of social media, both in an official or unofficial capacity. This includes requirements that employees:

- be apolitical, impartial and professional
- behave with respect and courtesy, and without harassment
- deal appropriately with information, recognising that some information needs to remain confidential
- deliver services fairly, effectively, impartially and courteously to the Australian public
- be sensitive to the diversity of the Australian public
- treat colleagues with respect and courtesy
- take reasonable steps to avoid conflicts of interest
- make proper use of Commonwealth resources, and
- uphold the APS Values and the integrity and good reputation of the APS.

Contractors are bound by the terms of their engagement to adhere to similar requirements and are otherwise required and expected to act in accordance with this Policy.

A failure to comply with this Policy may constitute a breach of the APS Code of Conduct or breach of contract. If an employee or contractor is found to have breached the APS Code of Conduct or their contract of engagement, it may be determined appropriate to impose a sanction, which could include termination of employment/contract.

Other VVCS/DVA & Australian Public Service Commission (APSC) policies that may apply to employees or contractors when using social media include:

- DVA Security Policy
- DVA ICT Security Protocol
- Use of DVA Electronic Facilities Policy
- DVA Workplace Bullying and Harassment Prevention Employment Guideline
- APSC Circular 2012/1: Revisions to the Commission's guidance on making public comment and participating online
- APS Values and Code of Conduct in Practice—'APS employees as citizens'; and

- Public Service Regulations 1999 Clause 2.1.

Official use of social media

There may be a need or benefit in staff making use of social media as part of VVCS business for internal and external collaboration and discussion on matters of interest to VVCS.

VVCS social media content may require approval at the National Manager level (or their Delegate) prior to posting. The *VVCS Social Media Manager* will assist with this process.

Suggestions for inclusion on VVCS social media can be forwarded to vvcs.coord@dva.gov.au for consideration.

Before posting on VVCS social media, there are some important considerations that all users need to comply with, including:

- avoid committing VVCS or the government to a non-approved action or initiative;
- avoid being interpreted as speaking on behalf of the government, including DVA;
- avoid revealing information given to VVCS or the government in-confidence;
- being interpreted as having a personal political view or political advocacy or bringing VVCS or the APS into disrepute; or
- breaching the legal terms of the social media site's Terms of Use.

When a person posts content online, they should consider it as public information—even if they restrict it to a limited circle of friends, colleagues, groups, events and professional stakeholder accounts.

One of the key features of social media is 'sharing' so individual users can expect friends and colleagues to repost information they post online. This information might then be used by journalists, lobbyists and other interested parties.

Employees and contractors must not use social media in an official capacity from their personal social media account on any social media platforms without undertaking the necessary approval processes. For example, a social media account (i.e. the official VVCS Facebook, Twitter, LinkedIn, and other sites) used by an individual working for VVCS for official purposes should only be used to publish content related to their professional role and responsibilities — and not the details of their personal life and opinions.

Responsibilities of employees and contractors when using social media in an official capacity

When using social media in an official capacity on behalf of VVCS, an employee or contractor must:

1. be authorised to use social media on behalf of VVCS. This authorisation will normally be a written authorisation provided at National Manager level (or above) and will clearly set out permitted official use(s) of social media and any specific requirements or restrictions which the employee/contractor is required to observe when using social media in this capacity;
2. comply with VVCS' and DVA's communications and media policies;
3. only post content where their role requires them to do so and the National Manager or above has authorised them to do so;
4. uphold the APS Values, APS Employment Principles and APS Code of Conduct;
5. act in accordance with contractual terms where relevant;
6. behave in a way that upholds the integrity and good reputation of VVCS specifically and the APS more generally;

7. be mindful of the requirements set out in Regulation 2.1 of the Public Service Regulations 1999 concerning the disclosure of information;
8. comply with VVCS' obligations under legislation including the *Privacy Act 1988*, the *Archives Act 1983* and the *Copyright Act 1968*; and
9. not make statements that could bring VVCS or the APS into disrepute.

Unofficial Use of Social Media

There are two categories of unofficial use of social media:

- **Personal use** – where an employee or contractor engages in social media use as a private individual such as to communicate with friends and relatives, to keep up to date with particular products and trends and to follow news and current events.
- **Professional use** – where an employee or contractor engages in social media use as an experienced person in their field or subject matter expert, rather than as an employee or contractor. For example, an employee who is a qualified clinician might publish on social media in relation to an academic article.

Both categories of unofficial use are covered by this Policy.

Unofficial Personal use of social media

VVCS allows access to social media sites in accordance with the Use of DVA Electronic Facilities Policy. Personal use of the internet and social media while at work should not impact work priorities and obligations.

Expressing opinions online

The Australian Public Service Commission Circular, *Circular 2012/1: Revisions to the Commission's guidance on making public comment and participating online* assists employees and contractors to understand the issues to take into account when considering making public comment, including online.

When using social media in an unofficial capacity, whether through personal or professional use, employees and contractors should have regard to the general principles from APS Circular 2012/1, reflected in the principles and responsibilities set out below.

Making public comment in an unofficial capacity—general principles

The Code of Conduct requires APS employees to behave at all times 'in a way that upholds the APS Values and the integrity and good reputation of the APS'—section 13(11) of the *Public Service Act 1999* ('PS Act').

At all times, APS employees must be mindful of the requirements set out in Public Service Regulation 2.1 concerning the disclosure of information.

Because of their position, senior APS employees in particular should carefully consider the impact of any comments they make. Senior Executive Service ('SES') employees have a special responsibility under section 35 of the PS Act to promote the APS Values and compliance with the Code of Conduct, by personal example and other appropriate means within their own agencies.

SES employees within each agency are also part of a collective leadership group that extends across the APS. Because of the influence that SES employees carry with stakeholders, and because they are likely to be required to advise on or lead the implementation of government policies and programmes, SES employees should be particularly careful when making public

comment. The role of SES employees provides more scope for conflict, real or perceived, between a personal view and:

- the ability to fulfil current and potential duties in an apolitical, impartial and professional manner; and,
- the ability to be responsive to the Government.

It is acceptable for APS employees to take part in the political life of their communities. The APS Values stipulate that the APS is, among other things, ‘apolitical, performing its functions in an impartial and professional manner’, but this does not mean that APS employees must be apolitical in their private affairs. Rather, it means that employees should avoid behaving in a way that suggests they cannot act apolitically or impartially in their work.

Contractors are bound by the terms of their engagement to adhere to similar requirements and are otherwise required and expected to act in accordance with this Policy.

When considering making comment in an unofficial capacity, employees and contractors might wish to reflect on the following questions:

- Could the comments reasonably be expected to cause the agency’s clients and other stakeholders, including members of Parliament—whether members of the Government, the Opposition, independents, or other parties—to lose confidence in the employee’s/contractor’s ability to work in an impartial and professional manner?
- Would comment of this kind, without proper justification, be likely to lower or undermine the reputation of the individual agency or of the APS as a whole?
- Are these comments in line with how the community in general expects the public service to operate and behave?
- Are these comments lawful? For example, do they comply with anti-discrimination legislation and laws relating to defamation?

Inappropriate public comment by an employee or contractor may result in sanctions under the PS Act or relevant contract of engagement - this could include termination of employment/contract.

Responsibilities of employees and contractors when using social media in an unofficial capacity

When using social media, an employee or contractor must:

1. uphold the APS Values, APS Employment Principles and APS Code of Conduct (even when posting material anonymously, or using an ‘alias’ or pseudonym);
2. at all times behave in a way that upholds the integrity and good reputation of VVCS specifically and the APS more generally; and
3. be mindful of the requirements set out in Regulation 2.1 of the Public Service Regulations 1999 concerning the disclosure of information.

When using social media, an employee or contractor must not:

1. make comment which could be interpreted as an official statement on behalf of VVCS, the Commonwealth of Australia or the Government;
2. make comment that is, or could be perceived to be:
 - compromising the employee’s/contractor’s capacity to fulfil their duties in an unbiased manner;
 - so harsh or extreme in their criticism of the Government, Government policies, a member of parliament from another political party, or their respective policies, that

- they could raise questions about the employee's/contractor's capacity to work professionally, efficiently or impartially;
 - so strong in its criticism of the administration of VVCS that it could seriously disrupt the workplace (employees/contractors are encouraged instead to resolve concerns by informal discussion with a relevant manager/VVCS contract manager or by using internal dispute resolution mechanisms, including the scheme established under the *Public Interest Disclosure Act 2013* if appropriate);
 - a gratuitous personal attack that might reasonably be perceived to be connected with their employment/engagement;
 - unreasonable criticism of agency clients and other stakeholders; or
 - compromising public confidence in VVCS, DVA or the APS;
3. include information about another person obtained through work from which such a person could be identified, without their express written consent;
 4. post derogatory comments, obscene material, or personal attacks that may call into question the integrity and good reputation of VVCS, DVA or the APS;
 5. use social media as an avenue to engage in inappropriate activities or behaviours towards other employees/contractors or persons with whom an employee/contractor comes into contact in the course of their duties (including clients or stakeholders). Inappropriate activities, such as threatening, bullying or harassing behaviour, by employees/contractors towards other employees/contractors or stakeholders may be subject to sanctions under the PS Act and/or relevant contract, even if that conduct occurs outside the workplace;
 6. act in a way that would call into question their ability to perform their duties in an apolitical, impartial and professional manner;
 7. post photos or videos of other employees/contractors or stakeholders online without their permission (particularly if it may embarrass them); and
 8. post photos of the interior of workplace buildings or of work related documents.

Unofficial Professional use of social media

In addition to the above requirements, when using social media in an unofficial professional capacity, an employee or contractor must:

1. notify their relevant State Director of any comments that they propose to make in an 'expert' role that might reasonably reflect on their APS employment/engagement;
2. make clear, when making public comments, that they are not representing VVCS, DVA, the Commonwealth of Australia or the Government; and
3. manage situations where the relationship between their professional interests and their APS employment/engagement may create ambiguity about the capacity in which their comments are being made.

Cyber-bullying

Cyber-bullying is any behaviour, using digital technologies, that could reasonably be considered humiliating, intimidating, threatening or demeaning to a person, or group of people, and which creates a risk to health and safety. Not every adverse comment or complaint using digital technologies is unreasonable or is an instance of cyber-bullying. Clients and other members of the public have a right to express their views or make a complaint online about agencies in the same way as they can in person or in writing. The problem arises when complaints are in the form of inappropriate online behaviour directed at agency employees or contractors.

Employees and contractors should be aware that the APSC has released guidance in relation to dealing with cyber-bullying by members of the public, titled *Cyber-bullying of APS employees by members of the public*. If you have a concern that you may have been subject to cyber-bullying by a member of the public, you should make a report to your supervisor or relevant State Director immediately.

If you have a concern that another employee or contractor is engaging in cyber-bullying, the matter should be dealt with in accordance with the *Workplace Bullying and Harassment Prevention Employment Guideline*.

General considerations when using social media

Employees and contractors should be mindful of the following issues associated with the use of social media, which could lead to an individual's social media use contravening this Policy:

1. any information posted online in relation to an employee's/contractor's APS employment/engagement may be able to be located easily (for example, using a search engine);
2. before posting information, employees and contractors must determine whether it involves confidential matters or internal agency information that should not be published online—not knowing something is confidential is no excuse (examples include client lists);
3. the speed and reach of online communications means that comments posted online might become available immediately to a wide audience, and may be replicated, copied and forwarded to, or viewed by persons who the author did not intend to see or receive the comments;
4. it may be difficult, or impossible, to delete material once it is uploaded to a social media forum;
5. employees should not rely on a social media forum's security settings as a guarantee of privacy, as material posted in a relatively secure setting can still be copied and reproduced elsewhere; and
6. employees and contractors must still uphold the APS Code of Conduct, APS Employment Principles; APS Values and relevant contractual obligations even when material is posted anonymously, or using an alias or pseudonym. This means that even if they do not use their real name or identify their affiliation with VVCS, it is still possible for comments to be linked back to them or the agency.

VVCS' social media

All VVCS social media sites (i.e. Facebook, Twitter, Linked site, etc) form part of an integrated online presence for VVCS (also incorporating the VVCS website and 'news' articles). This integrated online presence provides VVCS with an effective combination of tools to connect with stakeholders online, invoke conversation and link with other mental health networks and ex-service support organisations.

An integrated VVCS online presence seeks to:

- allow the community of followers to gain support from each other through sharing of experiences and opinions, normalising mental health issues;
- enable views to be expressed, issues to be discussed and questions answered;
- allow VVCS to 'post' information on services, including upcoming group programs and eligibility changes, along with linking the online community to support at times of significant commemoration; and
- enable 'sharing' of other relevant information 'posted' by other ex-service and veteran support organisations.

Managed well, both adverse and positive comments provide an opportunity to educate and promote VVCS to the online community. Timely and well-constructed responses to criticism will

enable VVCS to improve services, build trust and further increase its profile within the veteran and ex-service community, including with families and support networks.

VVCS has developed an *Acceptable Use Policy* (Attachment A) which, together with this VVCS Social Media Policy and Facebook/Twitter/LinkedIn's own Terms, governs the terms of use of all VVCS social media.

Moderation process

VVCS' social media moderation process helps to ensure that user generated content published on the site does not breach the Acceptable Use Policy.

Monitoring and moderation will guide all interactions with communities in this medium and set out the parameters of responses.

Key aspects of the moderation process are that:

- VVCS social media will be monitored regularly both during and outside business hours;
- moderators may answer or remove posts deemed to be in breach of the Acceptable Use Policy; and
- records of interactions on VVCS social media will be monitored, maintained, used and disclosed in accordance with the VVCS Social Media Policy and applicable laws.

VVCS Social Media Acceptable Use Policy

This user policy is in addition to any user policy or terms and conditions imposed by the social media host (e.g. Facebook, Twitter, LinkedIn).

As a user of the Veterans and Veterans Family Counselling Service (VVCS) social media you may express your views, comments, ideas, insights and feedback about VVCS.

At the same time, you should show courtesy and respect to others and must not use the page to abuse others, expose others to offensive or inappropriate content, or for any unlawful purpose. Please be aware that VVCS may change this policy at any time.

When using the VVCS social media, please ensure that you:

- a) do protect your personal privacy and that of others by not including personal information of either yourself or of others in your posts to the page (for example, names, email addresses, private addresses or phone numbers);
- b) do represent your own views and not impersonate or falsely represent any other person;
- c) do not be abusive, harass or threaten others;
- d) do not make defamatory or libellous comments;
- e) do not use insulting, provocative or hateful language;
- f) do not use obscene or offensive language;
- g) do not post material to the wall that infringes the intellectual property rights of others;
- h) do not post multiple versions of the same view to the wall or make excessive postings on a particular issue;
- i) do not promote commercial interests in your posts to the page;
- j) do not include internet addresses or links to websites, or any email addresses in your post to the page;
- k) do not make unproven or unsupported accusations against individuals or organisations;
- l) do not encourage conduct that may or would constitute a criminal offence or give rise to civil liability, or that otherwise violates any local, provincial, national or international law or regulation anywhere in the world;
- m) do not incite hatred on the basis of any personal characteristic, including on the basis of race, gender, marital or domestic status, disability, sexuality or age;
- n) do not identify matters that are currently the subject of legal proceedings or would break a court's non-publication order;
- o) do not make comments that are irrelevant to the topic being discussed.

In addition to these requirements this page is governed by the social media providers' terms and conditions.

VVCS reserves the right to enforce this Acceptable Use Policy at its discretion. VVCS may remove any posted messages that it considers to be in breach of this policy. VVCS may also block or delete you as a user if it considers that you have breached this policy.

If you have any questions about this policy, please email vvcs.coord@dva.gov.au

Social Media Privacy Statement

The Veterans and Veterans Families Counselling Service (VVCS) records any information posted to the VVCS social media and uses that information for the purpose of administering its social media and considering and/or addressing any comments made.

No attempt will be made to further identify individuals except where required or authorised by law, including the Privacy Act 1988. VVCS is not responsible for the privacy practices or content of social media or any linked websites.

Disclaimer

Material on VVCS' social media has been submitted by users of the various sites. VVCS accepts no responsibility whether express or implied for the accuracy, currency and completeness of any information posted on VVCS social media or its relevance and suitability for any purpose.

VVCS does not endorse or otherwise support every view and opinion posted by a user or contributor on VVCS social media. For further information about VVCS please visit www.vvcs.gov.au or call 1800 011 046.

Moderation of posted content

While VVCS make reasonable efforts to ensure inappropriate material is identified and moderated, VVCS does not guarantee it will identify all inappropriate material or that inappropriate material will not be published.

In addition, VVCS publication of posted content does not imply any endorsement, agreement or acceptance by us of the views expressed in that content. We recommend that users exercise their own skill and care with respect to evaluating such content and that they carefully evaluate the accuracy, currency, completeness and relevance of the content for their purposes.

VVCS also does not guarantee that any posted content will be published and a user submitting content should not infer that the non-publication of that content suggests that the content is inappropriate.

As such, VVCS accepts no legal liability whatsoever arising from, or connected to: the publication of any content; the failure to moderate any content (whether due to technical error or otherwise); or the use of, or reliance on, any content by a user.

Release and indemnity

VVCS does not accept responsibility for any loss or damage, however caused (including through negligence), which you may directly or indirectly suffer in connection with your use of VVCS social media or any linked site or facility, nor do we accept any responsibility for any loss arising out of your use of, or reliance on, information accessed using VVCS social media.

To the extent permitted by law, any condition or warranty which would otherwise be implied into these Terms is hereby excluded.

When posting or otherwise communicating content using VVCS social media, you agree to indemnify us and our employees and agents against any claim by a third party arising out of any breach of these Terms by you.

These Terms do not attempt or purport to exclude liability arising under statute if, and to the extent, such liability cannot be lawfully excluded.