

POLICY



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NFSA SOCIAL MEDIA POLICY

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1. INTRODUCTION

Social media is part of the professional and personal lives of many APS employees. This policy provides guidelines for the use of social media for NFSA staff.

Social media is defined in the Report of the Government 2.0 Taskforce as:

online technologies and practices that people use to share opinions, insights, experiences, and perspectives¹

and can take many different forms, including internet forums, weblogs, social blogs, wikis, podcasts, pictures, video, rating and bookmarking. Technologies include, but not limited to: blogs, picture-sharing, email, instant messaging, music-sharing, and crowd sourcing².

Social media offers powerful communication tools for the NFSA to extend its reach and influence. These may be delivered through technologies controlled by the NFSA and by external providers of social media platforms. Popular platforms include Facebook, Twitter, YouTube and Instagram.

The NFSA encourages the use of social media to establish two-way communication with stakeholders, clients and audiences, to present a human face to our work, to engage new and existing audiences in our public programs and to develop and share knowledge about the collection.

All NFSA employees need to adhere to the APS Values and Code of Conduct and use good judgement in determining: what material appears online; in what context and how much of their time and effort is spent participating in social media activities.

1.1 APPLICATION

This NFSA Social Media Policy applies to:

- NFSA employees and contractors (NFSA staff) using social media
- NFSA staff with responsibility for the management of NFSA social media engagement.

1.2 UPDATES AND FURTHER GUIDANCE

Senior Manager Communications has carriage of this policy and it will be revised and updated as the NFSA extends its social media practice.

Manager Social Media and the Communications team will provide specific guidance to handle the risks and opportunities of social media as they arise.

Senior Manager Human Resources will provide for training and additional information to inform and remind NFSA employees of the APS Values and Code of Conduct.

¹ W3C eGovernment Wiki Glossary (draft)
<http://www.w3.org/2007/eGov/IG/wiki/Glossary#S>

² Engage: Getting on with Government 2.0, 29 December 2009, Report of the Government 2.0 Taskforce, Appendix F: Glossary, <http://www.finance.gov.au/publications/gov20taskforcereport/appendixf.htm>

1.3 RELATED DOCUMENTS

- APS Circular 2012/1: Revisions to the Commission's guidance on making public comment and participating online and uses³
- APS Values, Employment Principles and Code of Conduct
- HR Policy – Procedures for determining breaches of the APS Code of Conduct and for determining sanction.
- Public Service Act, 1999⁴
- NFSA Acceptable Computer Use Policy
- NFSA Marketing and Communication Strategy
- NFSA Media Protocol

This policy has also drawn on work done in the social media area by the ABC⁵, the National Library of Australia⁶ and the Powerhouse Museum⁷.

1.4 NON-COMPLIANCE

Communications, in conjunction with Senior Management and Human Resources will investigate any potential breach of this policy, and determine how to best manage said breach.

2. USE OF SOCIAL MEDIA BY NFSA STAFF

2.1 APS VALUES AND CODE OF CONDUCT FOR USING SOCIAL MEDIA PLATFORMS

As APS employees, NFSA staff in identifying themselves in any form of social media and discussing any aspect of their work at the NFSA or work undertaken by the NFSA past and present must act in accordance with the APS Values, Employment Principles and Code of Conduct. Whilst it is the responsibility of all NFSA Managers to raise awareness and keep staff informed of current protocols and values, it is equally the responsibility of all NFSA Staff to keep themselves informed of the practices that are expected of them. The Australian Public Service Commission provides following advice on [Your rights and responsibilities as an APS employee](#) on its website.

2.2 MAKING COMMENT IN AN OFFICIAL CAPACITY AND RELATED TO YOUR ROLE AT THE NFSA

³ <http://www.apsc.gov.au/publications-and-media/current-circulars-and-advice/2012/circular-20121>

⁴ Public Service Act, 1999, Section 10 and Section 13: <http://www.apsc.gov.au/aps-employment-policy-and-advice/aps-values-and-code-of-conduct>

⁵ <http://about.abc.net.au/reports-publications/use-of-social-media-policy/>

⁶ <http://www.nla.gov.au/policy-and-planning/social-media>

⁷ http://www.powerhousemuseum.com/pdf/about/policies/Internet_Intranet_policy.pdf

There are a number of NFSA positions that may require the use of social media on a regular basis as part of their core duties. There will also be occasion where NFSA staff will engage in social media as part of their professional roles. In all instances, NFSA staff use of social media must be consistent with the APS Values and Code of Conduct when representing the NFSA in an official capacity.

2.3 MAKING COMMENT IN AN UNOFFICIAL CAPACITY BUT RELATED TO YOUR ROLE AT THE NFSA

Some NFSA staff may use a personal blog or Twitter account to discuss their NFSA work in ways that benefit the NFSA, and contribute to their sphere of knowledge and expertise. The NFSA is supportive of this as long as the above guidance (see: 2.1) for APS employees is strictly adhered to.

Staff should be aware that any information they post online relating to their employment (such as naming their employer or describing their role) is able to be located easily and quickly by a search engine, even if using an alias.

NFSA staff that already have a personal blog or website that does indicate they work at the NFSA should discuss potential conflicts of interest with their Senior Manager.

NFSA staff who want to start a personal blog or social media account such as Twitter, and wish to say that they work for the NFSA should discuss potential conflicts of interest with their Manager.

If it is clear that the author works for the NFSA, it should include a simple and visible disclaimer such as *'these are my personal views and not those of the NFSA'*.

Staff must not use NFSA's name or branding in a personal social media account in a way that implies that the organisation endorses said account.

Personal blogs, websites or Twitter accounts should not reveal confidential information about the NFSA. This includes aspects of unpublished NFSA policy or details of internal NFSA discussions. If uncertain about what might be confidential, staff members should consult their Senior Manager.

If an NFSA staff member is offered – for payment or non-payment - to produce or contribute to a website, blog or social media platform for a third party this could constitute a conflict of interest and must be discussed with their Senior Manager.

If an NFSA staff member is contacted by the press about posts on their blog or social media account that relate to the NFSA, staff must refer the matter to their Senior Manager. The Senior Manager should then follow the NFSA Media Protocol and contact Communications in the first instance.

NFSA staff members contributing to a professional sphere are able to update or contribute to social media from an NFSA computer at work when it is a requirement of their NFSA role, under the NFSA's Acceptable Computer Usage Policy. If uncertain about what constitutes a reasonable time and usage, staff members should discuss it with their Senior Manager.

2.4 MAKING COMMENT IN AN UNOFFICIAL CAPACITY AND UNRELATED TO NFSA

- **Professional.** Some employees are subject matter experts in fields that may relate to their APS employment—or which may be wholly separate from it—and might make comment – unofficially - in that capacity.
- **Private.** APS employees may generally make public comment in a private capacity, so long as they make it clear they are expressing their own views.

In either case, NFSA staff use of social media needs to be consistent with the APS Values, Employment Principles and Code of Conduct.

The Australian Public Service Commission has issued the following [guidelines](#):

When APS employees are making public comment in an unofficial capacity, it is not appropriate for them to make comment that is, or could be perceived to be:

- *being made on behalf of their agency or the Government, rather than an expression of a personal view*
- *compromising the APS employee's capacity to fulfil their duties in an unbiased manner. This applies particularly where comment is made about policies and programmes of the employee's agency*
- *so harsh or extreme in its criticism of the Government, a member of parliament from another political party, or their respective policies, that it raises questions about the APS employee's capacity to work professionally, efficiently or impartially. Such comment does not have to relate to the employee's area of work*
- *so strong in its criticism of an agency's administration that it could seriously disrupt the workplace. APS employees are encouraged instead to resolve concerns by informal discussion with a manager or by using internal dispute resolution mechanisms, including the APS whistleblowing scheme if appropriate*
- *a gratuitous personal attack that might reasonably be perceived to be connected with their employment*
- *unreasonable criticism of an agency's clients and other stakeholders*
- *compromising public confidence in the agency or the APS.*

2.5 POSTING ON SOCIAL MEDIA ANONYMOUSLY

APS employees must still uphold the APS Values, Employment Principles and Code of Conduct even when material is posted anonymously, or using an alias or pseudonym, and be mindful that even if they do not identify themselves online as an APS employee or an NFSA staff member, they could nonetheless be recognised as such.

The APS Values, Employment Principles and Code of Conduct requires NFSA staff to behave at all times in a way that upholds the integrity and good reputation of the APS⁸.

⁸ s 13(11), Public Service Act 1999

In using an alias, staff must adhere to general principles of behaving with respect and courtesy, without harassment, and not be extreme in political views or make unreasonable criticism of stakeholders.

NFSA staff must use their own name and clearly identify themselves as an NFSA employee when posting on NFSA sites and other NFSA social media channels.

3. CONTRIBUTING TO NFSA WEBSITES

NFSA websites (nfsa.gov.au and aso.gov.au) offer registered users the ability to contribute content for public viewing in the form of comments, reviews and group discussions.

To become a registered user, individuals must read and agree to website terms and conditions of use. Users are also advised of the Privacy Statement on NFSA websites⁹.

The terms and conditions¹⁰ apply equally to NFSA staff and external users, with the exception that NFSA staff who register are expected to register their full name as their user name for making contributions as NFSA staff.

3.1 PROVIDING FEEDBACK

Any feedback regarding NFSA activity on social media should be directed to the Manager Social Media, and not published as a public comment/response to the respective post.

4. NFSA MANAGEMENT OF SOCIAL MEDIA

4.1 NFSA WEBSITES INCORPORATING USER GENERATED COMMENTS (UGC)

NFSA will clearly distinguish user generated content (comments, reviews, etc.) from other content produced, commissioned or acquired by the NFSA.

The NFSA staff responsible for the management of NFSA social media will moderate UGC in the following ways, subject to the regulation of NFSA staff use and consistent with the relevant terms and conditions of use.

Moderation

NFSA may employ one of three methods of moderation:

(a) pre-moderation - UGC is not published until a moderator has reviewed it and determined it is suitable for publication;

(b) post-moderation - UGC is published on the site, ICT is alerted, and a moderator determines whether it is suitable to remain on the site in its published form;

(c) reactive moderation - the moderator reacts to alerts from users about particular UGC. The moderator does not view every user contribution.

⁹ <http://nfsa.gov.au/about/privacy/>

¹⁰ <http://nfsa.gov.au/about/terms/>

Links posted by users.

Communications will check user-submitted links to ensure they are editorially justified and suitable for the likely audience, which may include children. Particular care must be exercised when linking to sites with contentious content or that may give the appearance of inappropriately favouring a particular service provider or business.

When assessing a user-submitted link, consideration should be given to:

- (a) how long the link is likely to remain available;
- (b) any need to regularly monitor the quality of the material on the pages being linked to;
- (c) any legal risks;
- (d) how to remove the link quickly if necessary.

4.2 NFSA ACCOUNTS WITH THIRD PARTY SOCIAL MEDIA PLATFORMS

The NFSA uses external social networking and other third party sites to interact with audiences, clients and stakeholders. New social media platforms emerge every day, and it is difficult to predict which one will be the next 'big thing'. The NFSA should not invest resources in joining all platforms, but it must be open to new opportunities to share the collection and the NFSA's work.

Proposals for new NFSA social media accounts must be submitted to Communications to be evaluated for suitability, audience fit, and sustainability. The following criteria should be considered:

- Benefits to the NFSA, specific to the new platform. Is it offering new functionality?
- Analysis of terms and conditions and potential copyright issues.
- Participation of other cultural institutions, and possibility of an official partnership.
- User profile – who is using it and how?
- Reach and coverage of the new platform.
- Identification of content relevant to the new platform and resources required to establish/maintain a meaningful presence.
- Trial period 3-4 months, followed by an assessment before committing to a fuller presence.

All third party social media accounts and websites must be registered with Communications– this includes relevant log in and password information..

It should be clear to users of the third party site that they are interacting with an account that is officially maintained by the NFSA. NFSA branding should be used, as directed by Communications.

5 FREQUENTLY ASKED QUESTIONS

Q: I already have a personal Twitter account and use it mainly for social purposes but do sometimes Tweet about work related things. Is this okay? Do I have to tell my Manager?

A: If you identify yourself as an NFSA employee, either through your Tweets or in your bio, you should add a statement to your bio that the opinions expressed are your own and not those of your employer. Any contribution you are making within your role at the NFSA needs to be in accordance with this policy. If in doubt, consult your Senior Manager, or the Manager, Social Media.

Q: I want to comment on NFSA websites but don't want to do it under my own name. Is that okay?

A: No. You need to register and log in using your real name. Regardless of whether you are commenting privately or on behalf of the NFSA, your contributions should be consistent with APS values.

Q: Can I contribute to a website under my real name but not explicitly identify myself as an NFSA employee?

A: Yes. If your contribution is not related to or being made in the capacity of your NFSA role you do not need to identify yourself as an NFSA employee but you need to be aware that you may still be associated with your NFSA role and should behave according to APS Values and Code of Conduct.

Q: I've noticed that the NFSA has posted something on social media that is factually incorrect, has a typo, etc. Can I leave a comment so that someone in Communications can fix it?

A: No, do not leave internal feedback on Facebook, Twitter, etc. We welcome your comments; please send them to the Manager, Social Media, or communications@nfsa.gov.au.

Q: Can I express my opinions about the Australian Government and/or any news and current affairs on my own social media accounts?

A: Yes, you can, but you must adhere to the guidelines issued by the Australian Public Service Commission (see 2.4 or consult the document [Circular 2012/1: Revisions to the Commission's guidance on making public comment and participating online \(social media\)](#)).