

Social Media Policy

Area – Marketing & Communications (MCM)



Document Control

Responsible Officer: Senior Manager, Marketing & Communications	Policy Number: MAR: 01.1
Contact Officer: Digital Communications Advisor	Policy Area: MAR: 01 Communications
Effective Date: June 2015	Review Date: June 2016

Introduction

Online communication and new media channels are important and provide C&K the opportunity to engage with the public. As the leading early childhood education and care provider and advocate in Queensland, C&K is able to provide information and promote its services through social media platforms and other forms of new media.

The intention of this policy is to establish a culture of openness, trust and integrity in our online activities, inform stakeholders of their responsibilities when using social media both in a professional and personal capacity and to manage associated risks with the use of new media tools.

Scope

This policy is a framework for all C&K branch services, C&K affiliates, children, parents, volunteers and any visitors to services for engaging in social media platforms. All users of social media are responsible for being aware of this policy and understanding their responsibilities around using social media in a professional and personal capacity.

This policy excludes C&K associate members.

Definitions

Social Media

Social Media is content created by people using highly accessible publishing technologies. Social media is distinct from traditional media such as newspapers, television, and film. Social media comprises relatively inexpensive and accessible tools that enable anyone (even private individuals) to publish or access information.

Social media may include (although not limited to)

- social networking sites (e.g. Facebook, Myspace, LinkedIn, Bebo, Yammer)

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- video and photo sharing websites (e.g. Flickr, Instagram, YouTube)
- blogs, including corporate blogs and personal blogs
- blogs hosted by media outlets (e.g. comments or your say feature)
- micro-blogging (e.g. Twitter)
- wikis and online collaborations (e.g. Wikipedia)
- forums, discussion boards and groups (e.g. Google groups, Whirlpool)
- vod and podcasting
- online multiplayer gaming platforms (e.g. World of Warcraft, Second life)
- instant messaging (including SMS)
- geo-spatial tagging (Foursquare)

Social media also includes all other emerging electronic/digital communication applications.

Statement of Policy

Becoming authorised to comment on behalf of C&K

Before engaging in social media as a representative of C&K, you must become authorised to comment.

You may not comment as a representative of C&K unless you are authorised to do so.

To become authorised to comment in an official capacity, you must gain approval from (at a minimum) the Senior Manager, Marketing and Communications.

The C&K Board, C&K staff, C&K central, C&K branch services, C&K affiliate services, parents, volunteers, contractors and any visitors to C&K services are encouraged to contribute to C&K's social media platforms and online communities, provided they do so in a way which promotes and enhances the business and reputation of C&K.

Rules of engagement

Once authorised to comment, you must:

- disclose you are an employee or contractor of C&K, and use only your own identity, or an approved official account or avatar

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- disclose and comment only on information classified as public domain information
- ensure that all content published is accurate and not misleading and complies with all relevant C&K policies
- ensure you are not the first to make an announcement (unless specifically given permission to do so)
- comment only on your area of expertise and authority
- ensure comments are respectful of the community in which you are interacting online
- adhere to the Terms of Use of the relevant social media platform/website, as well as copyright, privacy, defamation, contempt of court, discrimination, harassment and other applicable laws, and C&K's Privacy Policy.

If you are authorised to comment as a C&K representative, you must not:

- post or respond to material that is offensive, obscene, defamatory, threatening, harassing, bullying, discriminatory, hateful, racist, sexist, infringes copyright, constitutes a contempt of court, breaches a Court suppression order or is otherwise unlawful
- use or disclose any confidential or secure information
- make any comment or post any material that might otherwise cause damage to C&K's reputation or bring it into disrepute

Moderation of C&K-produced social media

The site owner must ensure a moderation policy is clear when inviting comments from the public on a C&K website or social media platform. A template can be provided by Marketing and Communications upon request.

All C&K website activity must be approved by the Senior Manager, Marketing and Communications.

Personal Use of Social Media

C&K recognises that you may wish to use social media in your personal life. This policy does not intend to discourage nor unduly limit your personal expression or online activities.

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You should recognise, however, the potential for damage to be caused (either directly or indirectly) to C&K in certain circumstances via your personal use of social media when you can be identified as a C&K employee. Accordingly, you should comply with this policy to ensure that the risk of such damage is minimised.

You are personally responsible for the content you publish in a personal capacity on any form of social media platform. When in doubt, you should seek guidance from the Marketing and Communications team on how to comply with the following obligations.

Where your comments or profile can identify you as C&K, you must:

- only disclose and discuss publicly available information
- ensure that all content published is accurate and not misleading and complies with all relevant C&K policies
- expressly state on all postings (identifying you are from C&K) the stated views are your own and are not those of C&K
- be polite and respectful to all people you interact with
- adhere to the Terms of Use of the relevant social media platform/website, as well as copyright, privacy, defamation, contempt of court, discrimination, harassment and other applicable laws, and C&K's Privacy Policy.

You must not:

- post material that is offensive, obscene, defamatory, threatening, harassing, bullying, discriminatory, hateful, racist, sexist, infringes copyright, constitutes a contempt of court, breaches a court suppression order or is otherwise unlawful
- imply that you are authorised to speak as a representative C&K nor give the impression that the views you express are those of C&K
- use your C&K email address or a C&K logo
- use the identity or likeness of another employee, contractor or other member of C&K
- use or disclose any confidential information obtained in your capacity as an employee/contractor of C&K
- imply you are authorised to speak on behalf of C&K, or give the impression that any views you express are those of C&K
- use your C&K email address logo that may give the impression of official support or endorsement of your personal comment

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- use or disclose any confidential information or personal information obtained in your capacity as an employee/contractor of C&K
- post material that is, or might be construed as, threatening, harassing, bullying or discriminatory towards another employee or contractor of C&K
- make any comment or post any material that might otherwise cause damage to C&K's reputation or bring it into disrepute.

Reasonable and unreasonable personal use

When accessing social media via C&K's Internet and intranet systems, you must do so in accordance with C&K's ICT Acceptable Use Policy, which requires you to use these resources 'reasonably', in a manner that does not interfere with your work, and is not inappropriate or excessively accessed.

Examples of reasonable use include (although not limited to):

- re-tweeting content from the C&K on your own Twitter account
- accessing and posting comments on the C&K network and social media platforms
- participating in working groups on the Intranet
- updating Facebook status and posting messages during a lunch break

Examples of unreasonable use include but are not limited to:

- posting any material that is fraudulent, harassing, threatening, bullying, embarrassing, sexually explicit, profane, obscene, racist, sexist, intimidating, defamatory or otherwise inappropriate or unlawful
- using C&K's Internet and computer resources to provide comments to journalists, politicians and lobby groups other than in the course of your official duties
- spending long periods of time using social media that is not related to your work during work hours.

The following is offered as general guidance to assist you in complying with the obligations set out in this policy. When in doubt, seek further guidance from the Marketing and Communications team.

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General Guidance for navigating legal issues

Privacy, confidentiality and information security

You should not publish or report on conversations or information that is deemed confidential or classified or deals with matters that are internal in nature.

Copyright

You should respect copyright laws and fair use of copyrighted material and attribute work to the original author/source wherever possible.

Harassment and bullying

C&K's Anti Bullying Policy applies to online activities as well as in the physical workplace.

Workplace bullying and harassment includes any bullying or harassing comments employees make online, even on their own private social networks or out of office hours.

Abusive, harassing, threatening or defaming postings are in breach of C&K's Anti Bullying Policy, and may result in disciplinary action being taken.

All employees are expected to treat their colleagues with respect and dignity and must ensure their behaviour does not constitute bullying and/or harassment.

Defamation

You should refrain from publishing material that may cause injury to another person, organisation, association or company's reputation, and should seek further guidance if publication of such material is thought to be necessary.

Offensive or obscene material

Material may be offensive or obscene and may infringe relevant online classification laws if it pornographic, sexually suggestive, harassing, hateful, racist, sexist, abusive or discriminatory.

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Privacy

C&K will ensure the protection of privacy and confidentiality rights by restricting the capacity to upload visual media to the official C&K social media platforms, such as images, branding and symbols, links to video and external websites to C&K Marketing and Communication in accordance with the *Privacy Act 1988*. Visual media will only be permitted if relevant and consistent with *The Privacy Policy*.

Compliance

Non-compliance with this policy or any of its associated documents may result in disciplinary action being taken, including termination of employment, refusal of service for clients, and / or the dissolving of contractual agreements with suppliers and individuals outside of C&K.

If you notice inappropriate or unlawful content online relating to C&K, or content that may otherwise have been published in breach of this policy, you should report the circumstances via email to: k.douglas@candk.asn.au.

Privacy breaches can also be reported to the C&K Legal Business Unit on 1800 177 092 or the Privacy Officer by calling 07 3352 5303.

Confidential Information includes, but is not limited to:

- Information which is personal information under the Privacy Act 1988;
- Information which is specifically designated as confidential by C&K or its parents or children;
- Information which by its nature may be reasonably understood to be confidential;
- C&K's trade secrets and intellectual property;
- Information regarding C&K's, C&K affiliate services' and parents' financial or business affairs;
- C&K's and C&K affiliate services marketing plans and marketing and sales techniques;
- C&K's and C&K affiliate services employee information; and
- C&K's and C&K affiliate services business systems and operating procedures or manuals;

except for information that is publicly and widely available, other than due to a breach of this procedure.

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Guidelines

- **Know and follow the Employee Code of Conduct**
- **Read and Understand the C&K Privacy Policy**
- **Be transparent and honest.** When discussing topics relevant to C&K, its services and products, you must use your real name, be clear who you are, and identify that you work for C&K. If you have a vested interest in something you are discussing, be the first to point it out. Protect yourself and your privacy. What you publish will be around for a long time, so consider the content carefully and also ensure you disclose personal details. Speak in the first person. Use your own voice; bring your own personality to the discussion.
- **Be thoughtful about how you present yourself in online social networks.** The lines between public and private, personal and professional are blurred in online social networks. By identifying yourself as a C&K staff member or member of the C&K community within a social network, you are now connected to colleagues, families and C&K partners. You should ensure that content associated with you is consistent with your position within the C&K community.
- **Use a disclaimer.** Whenever you publish content to any form of digital media, make it clear that what you say there is representative of personal views and opinions and not necessarily the views and opinions of C&K.
- **Executive and Senior Leadership:** This standard disclaimer does not by itself exempt Executive members or managers from a special responsibility when participating in online environments. In positions of responsibility, they must consider whether personal thoughts they publish may be misunderstood as expressing C&K's position. A manager should assume that his or her team will read what is written. Public forums are not the place to communicate policies to employees.
- **Respect copyright and fair use laws.** For C&K's protection and well as your own, it is critical that you show proper respect for the laws governing copyright and fair use of copyrighted material owned by others, including C&K's own copyrights and brands. You should never quote more than short excerpts of someone else's copyrighted work. And it is good general posting practice to link to others' work.
- **Protecting confidential and proprietary information.** Social computing blurs many of the traditional boundaries between internal and external communications. Be thoughtful

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about what you publish-particularly on external platforms. You must make sure you do not disclose or use C&K confidential or proprietary information in any online social computing platform. This may include information regarding the development of systems, processes, products, organisational change. Additionally, internal reports, policies, procedures or other internal business-related confidential communications should not be posted.

Also, only post information about a person or another company if you have the right to do so, taking into account intellectual property and privacy concerns. For example, ask permission before posting someone's picture in a social network or publishing in a blog a conversation that was meant to be private.

- **C&K's business performance and other sensitive information".** Some topics relating to C&K may be sensitive and should never be discussed, even if you're expressing your own opinion and using a disclaimer. For example, you must not comment on, or speculate about things like future business, business plans, unannounced strategies or prospects. This also relates to information you may know about C&K's competitors. If you're unsure of the sensitivity of a particular subject, seek advice from your manager or Director or Legal and Compliance before talking about it or do not initiate or involve yourself in a conversation relating to issues you are unsure about. The best rule is not to comment on rumors in any. You should merely say, "no comment" to rumours. Do not deny or affirm them, speculate about them or propagate them by participating in "what if"-type conversations.
- **Protect C&K's families, business partners and suppliers.** Families, partners or suppliers should not be cited or obviously referenced without their approval. Externally, never identify a family, partner or supplier by name without permission and never discuss confidential details of these stakeholder groups. Be sensitive to who may see your content. If a person hasn't given explicit permission for their name to be used, think carefully about the content you're going to publish on any internal social media and gain the appropriate permission.
- **Respect your audience and your online community.** Remember that C&K is a large and diverse organisation whose employees and families reflect a diverse set of customs, values and points of view. When commenting or hosting a site, do so respectfully. This includes not only the obvious (no ethnic slurs, personal insults, obscenity, etc.) but also proper consideration of privacy. If your platform is self-hosted, use your best judgment and be sure to make it clear that the views and opinions expressed are yours alone and do not represent the official views of C&K.

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- **Add value.** C&K’s brand is best represented by its people and families and everything you publish online reflects upon it. social networks and platforms should be used in a way that adds value to C&K’s overall business. If it helps you, your coworkers, our families or our partners to do their jobs and solve problems; if it helps to improve knowledge or skills; if it contributes directly or indirectly to the improvement of C&K’s overall business, processes and policies; if it builds a sense of community; or if it helps to promote C&K’s values, then it is adding value. It is best to stay within your sphere of expertise, and whenever you are presenting something as fact, make sure it is a fact.

When you see misrepresentations made about C&K on other social media platforms you may certainly use your platform—or add comments on the original discussion—to point that out. Always do so with respect, stick to the facts and identify your appropriate affiliation to C&K. Also, if you speak about a competitor, you must ensure your content is factual and that it does not disparage the competitor. In all areas of public discussion, ensure that what you are saying is factually correct. If you have any concerns, please refer to Marketing and Communications.

- **Be the first to respond to your own mistakes.** If you make an error, be up front about your mistake and correct it quickly, as this can help to restore trust. If you choose to modify content that was previously posted, such as editing a blog post, make it clear that you have done so. Please also advise Marketing and Communications so that we are able to assist should the matter be taken any further.
- **Use your best judgment.** Remember to always use good judgment and common sense in deciding what you publish. If you're about to publish something that makes you even the slightest bit uncomfortable, review the suggestions above and think about why that is. If you're still unsure, and it is related to C&K business, discuss it with your manager. Ultimately, however, you have sole responsibility for what you post to your blog or publish in any form of online social media.
- **Don't forget your day job.** You should make sure that your online activities do not interfere with performing your job responsibilities or commitments to customers.

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Links to associated documents

[C&K Marketing & Communications Guide](#)

[MAR:01 Communications Policy](#)

[CO:06 Confidentiality and Privacy Policy](#)

[C&K Code of Conduct](#)

C&K Parent Advisory Group manual

[C&K Employee handbook \(branch and central staff\)](#)

[C&K Risk Management Policy](#)

[C&K Anti Bullying Policy](#)

Revision Record

Version	Approval Date	Authorised by	Effective Date	Review Cycle	Next review date
V0.7 final	06/02/2013	Acting CEO M Comerford	06/02/2013	6 monthly	Quarter 3 2013
V0.8 final	10/04/2013	Marketing & Communications Manager N Duhig	10/04/2013	6 monthly	Quarter 3 2013
V0.9 final	23/06/2015	Senior Manager, Marketing and Communications K Douglas	June 2015	Annually	June 2016