

Social Media Policy

Purpose

The purpose of this policy is to provide a comprehensive framework for the governance, use and management of social media by Riverina Water. This policy is intended to support effective communication and engagement with the community while ensuring compliance with legislative requirements and minimising legal, reputational and operational risks.

Policy Statement

Riverina Water recognises social media as an important communication and engagement tool. Official social media platforms operated by Riverina Water are public forums and are managed in accordance with principles of transparency, accountability and procedural fairness.

This policy adopts a best-practice approach consistent with guidance issued by the Office of Local Government and contemporary NSW local government practice

Scope

This policy applies to all Riverina Water officials, including:

- Board members
- Employees
- Council committee members
- Contractors and consultants acting on behalf of Riverina Water

This policy applies to:

- all social media accounts established, maintained or moderated by or on behalf of Riverina Water
- use of social media by Riverina Water officials in an official capacity or where there is a connection to their role

Principles

Riverina Water's use of social media will be guided by the following principles:

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- **Transparency:** providing clear, accurate and timely information to the community
- **Respect:** maintaining respectful and inclusive engagement
- **Integrity:** acting lawfully, ethically and consistently with Riverina Water values
- **Accountability:** ensuring decisions and actions can be explained, documented and reviewed
- **Procedural fairness:** applying moderation decisions consistently and fairly

Policy Implementation

1. Administrative framework for Riverina Water's social media platforms

Platforms

1.1 Riverina Water maintains a presence on the following social media platforms:

- › Facebook
- › Instagram
- › LinkedIn

1.2 Riverina Water's social media platforms must specify or provide a clearly accessible link to the 'House Rules' for engaging on the platform.

Establishment and deletion of Riverina Water social media platforms

1.3 A new Riverina Water social media platform can only be established or deleted with the written approval of the Chief Executive Officer or their delegate.

1.4 Where a Riverina Water social media platform is established or deleted in accordance with clause 1.3, the Chief Executive Officer or their delegate may amend clause 1.1 of this policy without the need for endorsement by the Board.

Social Media Coordinator

1.5 The Customer and Communications Team Leader is the Social Media Coordinator of Riverina Water. The Chief Executive Officer may appoint additional Social Media Coordinators.

1.6 The Social Media Coordinator's role is to:

- › Establish or delete social media platforms in line with 1.3
- › Approve and revoke a staff member's status as an authorised user
- › Maintain oversight of authorised users
- › Ensure Riverina Water complies with this policy, related policies and legislation and the rules of each social media platform

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- › Ensure effective moderation of Riverina Water's social media platforms in line with this policy
- › Ensure authorised users are aware of their obligations under this policy and receive induction training
- › May delegate functions to other authorised users

Authorised users

1.7 Authorised users are members of Riverina Water staff who are authorised by the Social Media Coordinator to upload content and engage on social media platforms on Riverina Water's behalf.

1.8 Authorised users should have experience in using social media, and knowledge of the events, initiatives, programs or policies that are the subject of the social media content.

1.9 The role of an authorised user can include:

- › Ensure, to the best of their ability, that the content they upload onto social media platforms is accurate;
- › Correct inaccuracies in Riverina Water generated content;
- › Engage in discussions and answer questions on Riverina Water's behalf on social media platforms if necessary and appropriate resources are available;
- › Keep Riverina Water's social media platforms up to date;
- › Ensure they operate within the requirements of this policy

1.10 When engaging on social media on Riverina Water's behalf (such as, but not limited to, on a community social media page), an authorised user must identify themselves as a member of Riverina Water staff but they are not obliged to disclose their name or position.

1.11 Authorised users will use clear and accessible language consistent with that function and avoid expressing or appearing to express their personal views when undertaking their role.

1.12 Authorised users must not use Riverina Water's social media platforms for personal reasons.

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Administrative tone

1.13 Authorised users upload content and engage on social media on Riverina Water's behalf. Authorised users must use language consistent with that function and avoid expressing or appearing to express their personal views when undertaking their role.

1.14 Authorised users may use more personal, informal language when engaging on Riverina Water's social media platforms, for example when replying to comments.

Register of authorised users

The Social Media Coordinator will maintain a register of authorised users. This register is to be reviewed annually to ensure it is fit-for-purpose.

2 Administrative framework for Board Members' social media platforms

2.1 For the purposes of this policy, Board Member/Councillor social platforms are not Riverina Water social media platforms. Section 1 of this policy does not apply to Board Members' social media platforms.

2.2 Board Members are responsible for the administration and moderation of their own social media platform.

2.3 Clause 2.2 also applies to Board Members in circumstances where another person administers, moderates, or uploads content onto their social media platform.

2.4 Board Members must comply with the rules of the platform when engaging on social media.

Identifying as a councillor

2.5 Board Members/Councillors must clearly identify themselves on their social media platforms

2.6 A Board Member's social media platform must include a profile photo which is a clearly identifiable image of the Councillor.

2.7 If a Councillor becomes or ceases to be a Board Member, Chair or Deputy Chair, this must be reflected on the Councillor's social media platforms as soon as practicable.

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Other general requirements for Board Members' social media platforms

2.8 A Board Member's social media platform must include a disclaimer to the following effect:

"The views expressed and comments made on this social media platform are my own and not that of Riverina Water".

This disclaimer does not exempt Councillors from obligations under the Code of Conduct.

2.9 Despite clause 2.8, media releases or other content in line with Riverina Water's Media Policy may be published onto a Board Member's social media platform.

2.10 Board Members may publish publicly available Riverina Water information onto their social media platforms.

2.11 Board Members may use more personal, informal language when engaging on their social media platforms.

3 Standards of conduct on social media

3.1 This policy only applies to Riverina Water officials' use of social media in an official capacity or in connection with their role as a Riverina Water official. The policy does not apply to personal use of social media that is not connected with a person's role as a Riverina Water official.

3.2 Riverina Water officials must comply with Riverina Water's Code of Conduct when using social media in an official capacity or in connection with their role as a Riverina Water official.

3.3 Riverina Water officials must not use social media to post or share comments, photos, videos, electronic recordings or other information that:

- › is defamatory, offensive, humiliating, threatening or intimidating to other Riverina Water officials or members of the public
- › contains profane language or is sexual in nature
- › constitutes harassment and/or bullying within the meaning of Riverina Water's Code of Conduct, or is unlawfully discriminatory

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- › is contrary to their duties under the Work Health and Safety Act 2011 and their responsibilities under any policies or procedures adopted by Riverina Water to ensure workplace health and safety
- › contains content about Riverina Water, Riverina Water officials or members of the public that is misleading or deceptive
- › divulges confidential Riverina Water information
- › breaches the privacy of other Riverina Water officials or members of the public
- › contains allegations of suspected breaches of Riverina Water's code of conduct or information about the consideration of a matter under Riverina Water's Administrative Procedures for the Code Of Conduct
- › could be perceived to be an official comment on behalf of Riverina Water where they have not been authorised to make such comment
- › commits Riverina Water to any action
- › violates an order made by a court
- › breaches copyright
- › advertises, endorses or solicits commercial products or business
- › constitutes spam
- › is in breach of the rules of the social media platform

3.4 Riverina Water officials must:

- › attribute work to the original author, creator or source when uploading or linking to content produced by a third party
- › obtain written permission from a minor's parent or legal guardian before uploading content in which the minor can be identified.

3.5 Riverina Water officials must exercise caution when sharing, liking, retweeting content as this can be regarded as an endorsement and/or publication of the content.

3.6 Riverina Water officials must not incite or encourage other persons to act in a way that is contrary to the requirements of this Section.

3.7 Board Members must uphold and accurately represent the policies and decisions of Riverina Water's governing body but may explain why they voted on a matter in the way that they did. (see section 232(1)(f) of the Local Government Act 1993)

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4 Moderation of social media platforms

4.1 Riverina Water officials who are responsible for the moderation of Riverina Water's social media platforms may remove content and 'block' or ban a person from those platforms. Such actions must be undertaken in accordance with this Section.

4.2 For the purposes of this section, 'social media platform' and 'platform' means Riverina Water's social media platforms.

House Rules

4.3 Riverina Water's social media platforms must state or provide an accessible link to the 'House Rules' for engaging on the platform.

4.4 At a minimum, the House Rules will specify:

- › the principles of social media engagement referred to in this policy
- › the type of behaviour or content that will result in that content being removed or 'hidden', or a person being blocked or banned from the platform
- › the process by which a person can be blocked or banned from the platform and rights of review
- › a statement relating to privacy and personal information
- › that the social media platform is not to be used for making complaints about Riverina Water or Riverina Water officials. Complaints should be made through Riverina Water's Complaints Management Policy.

4.5 For the purposes of clause 4.4, third parties engaging on social media platforms must not post or share comments, photos, videos, electronic recordings or other information that:

- › is defamatory, offensive, humiliating, threatening or intimidating to Riverina Water officials or members of the public,
- › contains profane language or is sexual in nature
- › constitutes harassment and/or bullying within the meaning of Riverina Water's Conduct, or is unlawfully discriminatory
- › contains content about Riverina Water, Riverina Water officials or members of the public that is misleading or deceptive
- › breaches the privacy of Riverina Water officials or members of the public

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**Version 1.0
Last revised date N/A
Next scheduled review: February 2030**

- › contains allegations of suspected breaches of Riverina Water's code of conduct or information about the consideration of a matter under Riverina Water's Administrative Procedures for the Code Of Conduct
- › violates an order made by a court
- › breaches copyright
- › advertises, endorses or solicits commercial products or business,
- › constitutes spam
- › would be in breach of the rules of the social media platform

Removal or 'hiding' of content

4.6 Where a person uploads content onto a social media platform that, in the reasonable opinion of the moderator, is of a kind specified under clause 4.5, the moderator may remove or 'hide' that content.

4.7 Prior to removing or 'hiding' the content, the moderator must make a record of it (for example, a screenshot).

4.8 If the moderator removes or 'hides' the content under clause 4.6, they must, where practicable, notify the person who uploaded the content that it has been removed and the reason(s) for its removal and their rights of review.

4.9 A person may request a review of a decision by a moderator to remove or 'hide' content under clause 4.6. The request must be made in writing to the Chief Executive Officer and state the grounds on which the request is being made.

4.10 Where a review request is made under clause 4.9, the review is to be undertaken by the Social Media Coordinator or a member of staff nominated by the Chief Executive Officer who is suitably qualified and who was not involved in the decision to remove or 'hide' the content.

Blocking or banning

4.11 If a person uploads content that is removed or 'hidden' under clause 4.6 of this policy on multiple occasions, that person may be blocked or banned from the social media platform (or all social media platforms).

4.12 A person may only be blocked or banned from a Riverina Water social media platform with the approval of the Social Media Coordinator. This clause does not apply to blocking or banning a person from a Board Member's social media platform.

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4.13 Prior to blocking or banning a person from a social media platform, the person must, where practicable, be advised of the intention to block or ban them from the platform/all platforms and be given a chance to respond. Any submission made by the person must be considered prior to a determination being made to block or ban them.

4.14 The duration of the block or ban is to be determined by the Social Media Coordinator.

4.15 Where a determination is made to block or ban a person from a social media platform/all social media platforms, the person must, where practicable, be notified in writing of the decision and the reasons for it. The written notice must also advise the person which social media platforms they are blocked or banned from and the duration of the block or ban and inform them of their rights of review.

4.16 Despite clauses 4.11 to 4.15, where a person uploads content of a kind referred to under clause 4.5, and the moderator is reasonably satisfied that the person's further engagement on the social media platform poses a risk to health and safety or another substantive risk (such as the uploading of defamatory content), an interim block or ban from the platform/all platforms may be imposed on the person immediately.

4.17 A person who is blocked or banned from the platform/all platforms under clause 4.16 must, where practicable, be given a chance to respond to the interim block or ban being imposed. Any submission made by the person must be considered when determining whether the block or ban is to be removed or retained under clauses 4.11 to 4.15.

4.18 A person may request a review of a decision to block or ban then from a social media platform. The request must be made to the Chief Executive Officer and state the grounds on which the request is being made.

4.19 Where a review request is made under clause 4.18, the review is to be undertaken by the Chief Executive Officer, or a member of staff nominated by the Chief Executive Officer who is suitably qualified and who was not involved in the decision to block or ban the person. Where the decision to block or ban the person was made by the Chief Executive Officer, the review must be undertaken by another senior and suitably qualified member of staff who was not involved in the decision.

4.20 Where a person that is the subject of a block or ban continues to engage on a social media platform(s) using an alternative social media account, profile, avatar, etc., a

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moderator may block or ban the person from the platform(s) immediately. In these circumstances, clauses 4.11 to 4.19 do not apply.

5 Use of social media during emergencies

5.1 During emergencies, such as natural disasters or public health incidents, the Social Media Coordinator will be responsible for the management of content on the Riverina Water's social media platforms.

5.2 To ensure consistent messaging both during and after an emergency, authorised users and Riverina Water officials must not upload content onto Riverina Water's or their own social media platforms which contradicts advice issued by the lead agency (e.g. NSW SES, RFS) coordinating the emergency response, or agencies supporting recovery efforts.

6 Records management and privacy requirements

Records management

6.1 Social media content created, sent and received by Riverina Water officials on Riverina Water's social media platforms is a Riverina Water record and may constitute open access information or be subject to an information access application made under the Government Information (Public Access) Act 2009.

6.2 Riverina Water officials must follow all records management principles, procedures, and responsibilities outlined in Riverina Water's procedures and operating standards.

Privacy considerations and requirements

6.3 Social media communications are in the public domain. Riverina Water officials should exercise caution about what personal information, if any, they upload onto social media.

6.4 The Privacy and Personal Information Protection Act 1998 applies to the use of social media platforms by Riverina Water and Board Members. To mitigate potential privacy risks, Riverina Water officials will:

- › advise people not to provide personal information on social media platforms
- › inform people if any personal information they may provide on social media platforms is to be used for official purposes
- › moderate comments to ensure they do not contain any personal information

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- › advise people to contact Riverina Water or councillors through alternative channels if they have personal information they do not want to disclose in a public forum.

6.5 Riverina Water officials must ensure they comply with the Health Records and Information Privacy Act 2002 when engaging on and/or moderating social media platforms. In fulfilling their obligations, Riverina Water officials should refer to any guidance issued by the Information and Privacy Commission of NSW, such as, but not limited to, the Health Privacy Principles.

7 Private use of social media

What constitutes 'private' use?

7.1 For the purposes of this policy, a Riverina Water official's social media engagement will be considered 'private use' when the content they upload:

- › is not associated with, or does not refer to, Riverina Water, any other Riverina Water officials, contractors, related entities or any other person or organisation providing services to or on behalf of Riverina Water in their official or professional capacities, and
- › is not related to or does not contain information acquired by virtue of their employment or role as a Riverina Water official.

7.2 If a Riverina Water official chooses to identify themselves as a Riverina Water official, either directly or indirectly (such as in their user profile), then they will not be deemed to be acting in their private capacity for the purposes of this policy.

8 Concerns or complaints

8.1 Complaints about the administration of Riverina Water's social media platforms or conduct of Riverina Water officials should be made in accordance with Riverina Water's Complaints Management Policy and Code of Conduct.

8.2 Non-compliance with adopted policy may be considered a breach under the Code of Conduct. As such, any suspected or known non-compliance will be reported to the Chief Executive Officer.

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Definitions

TERM	DEFINITION
Authorised user	Members of Riverina Water staff who are authorised by the Chief Executive Officer or Social Media Coordinator to upload content and engage on Riverina Water's social media platforms on Riverina Water's behalf
Riverina Water official	Board members, members of staff and delegates of Riverina Water (including members of committees that are delegates of Riverina Water);
Minor	For the purposes of this policy, is a person under the age of 18 years
Personal information	Information or an opinion (including information or an opinion forming part of a database and whether or not recorded in a material form) about an individual whose identity is apparent or can reasonably be ascertained from the information or opinion
Social Media Coordinator	Is Riverina Water's Social Media Coordinator appointed under clause 1.5 of this policy
Social media	online platforms and applications - such as but not limited to social networking sites, wikis, blogs, microblogs, video and audio sharing sites, and message boards - that allow people to easily publish, share and discuss content. Examples of social media platforms include, but are not limited to Facebook, Twitter, Snapchat, LinkedIn, YouTube, Instagram, Flickr and Wikipedia

Policy number

Policy 1.XX

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Author: Customer and Communications Team Leader

Version 1.0

Last revised date N/A

Next scheduled review: February 2030

Responsible area

Corporate Services

Approved by

Approval date

Legislation or related strategy

Local Government Act 1993 (NSW)

Model Code of Conduct for Local Councils in
NSW (2020)

State Records Act 1998 (NSW)

Government Information (Public Access) Act 2009
(NSW) (GIPA Act)

Privacy and Personal Information Protection Act
1998 (NSW) (PPIP Act)

Health Records and Information Privacy Act 2002
(NSW) (HRIP Act)

Work Health and Safety Act 2011 (NSW)

Documents associated with
this policy

Community Engagement Strategy

Code of Conduct Policy

Privacy Policy

Social Media Usage Internal Policy

Complaints Handling Policy

Media Policy

Policy history

Policy introduced February 2026

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**Author: Customer and Communications Team
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Version 1.0

Last revised date N/A

Next scheduled review: February 2030

Policy Review

Every 4 years (2030 or before depending on new Board)

Policy details may change prior to review date due to legislative or other changes, therefore this document is uncontrolled when printed. This policy will be revised following the commencement of a new Board.

END OF POLICY STATEMENT

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**Author: Customer and Communications Team
Leader**

**Version 1.0
Last revised date N/A
Next scheduled review: February 2030**
