

## **Summary of main points**

This Regulation outlines:

- definitions of online social media, online social networking services and corporate electronic communication
- obligations and responsibilities when using social media and/or online social networking services in the course of employment and in a private capacity
- obligations and responsibilities when using corporate electronic communication tools, such as email, instant messaging and online platforms
- examples of inappropriate or unacceptable use of social media, social networking and official email, instant messaging and online platforms
- potential consequences of inappropriate or unacceptable use
- privacy considerations.

### **This Regulation applies to all Dogs ACT Members which includes:**

All employees and those persons holding ANY membership subscription of Dogs ACT, including Associate members residing outside the ACT.

## **19.1 Introduction**

Members who participate in social media and social networking, either in the course of their employment or privately, must ensure their behaviour does not conflict with their responsibilities as a Member of DOGS ACT. This applies equally to the use of Members email, instant messaging and online platforms. These responsibilities include behaving in a way that is consistent with the DOGS ACT values and the integrity and good reputation of the Members and DOGS ACT.

From an integrity risk perspective, online social media activities can also expose Members to targeting by organised crime groups. Organised crime groups may target Members in order to gain knowledge or access information or systems for the purposes of circumventing personal firewalls and safety protection. Information posted on social media sites may be used by criminals to gather information on Members, their families, friends and associates in an attempt to identify those who may be susceptible to corruption and groomed for this and other purposes. Other groups, including lobby groups, may also have an interest in identifying and targeting Members through social media.

Members should not rely on site security settings for a guarantee of privacy as material posted on social media sites can easily and quickly be copied and reproduced elsewhere. The terms and conditions of many social media sites include provisions that any postings (including comments, photos and videos) become the property of the site and allow any material posted to be reused or reproduced on other sites. Members should assume that their identity and the information they post will be revealed more widely. Inappropriate use of social media, social networking services or official email, instant messaging or online platforms can compromise Members (and potentially their family and friends) as well as jeopardise their career. It can also compromise the reputation of DOGS ACT.

## **19.2 Scope**

This Regulation covers the use of social media, social networking services, and Members email, instant messaging and online platforms as defined below.

### **19.3 Definitions**

**Social media** - online social media can take many forms, including (but not limited to) online social networking services, chat rooms, social blogs, wikis, podcasts, internet forums, gaming and dating sites. Social media includes any website or application that allows users to post dialogue, pictures and/or video (e.g. YouTube) and includes technologies such as picture-sharing. Although not normally defined as social media, the provisions in the policy also apply to the use of personal email and personal instant messaging

**Social networking service** - an online social networking service can be any website or platform that builds online communities of people who share interests and/or activities, and/or enables users to create and/or maintain social relations over the internet.

Facebook, LinkedIn, RSVP, YouTube, Twitter, Snapchat, Instagram, email, Plaxo, Flickr, Friends Reunited, Flixster, Last.fm, Xanga, Meetup, Bolt, MEETin and Tumblr are just some examples of online social networking services, however, there are many others.

**Office electronic communication** - official email, instant messaging (e.g. Lync) and online platforms originating from the DOGS ACT office environment which carry an official unique source identifier. Unique source identifiers include logos for Dogs ACT, ACT Canine Association and/or any other related to DOGS ACT present and past (such as Canberra Kennel Association).

In certain limited circumstances, Members may be authorised by either the Business Manager, Councillors or Executive to post material using DOGS ACT electronic communications. These to be confirmed in writing from the Business Manager or member of the Executive only.

Members are permitted to like, follow and comment on official social networking posts in a personal capacity ONLY.

#### **Using social media for private purposes**

Dogs ACT members are obliged at all times (including when using social media in a private capacity) to behave in a way that is consistent with the DOGS ACT values, and the integrity and good reputation of DOGS ACT, including treating others with courtesy and respect at all times. This applies whether the employee is making comment under their own name or a pseudonym.

Privately DOGS ACT members may express opinions and take part in the political life of their communities.

If you make public comment in a private capacity, you must not make a comment that is or could be perceived to be:

- Being made on behalf of the Members of DOGS ACT, rather than an expression of a personal view.
- So harsh or extreme in its criticism that it impugns the character, person, life or work of other DOGS ACT members.
- So strong in its criticism of DOGS ACT administration that it could seriously disrupt the workplace. Members are encouraged to discuss their issues and any perceived problem with the Executive and Council of DOGS ACT.
- A gratuitous personal attack that might reasonably be perceived to be maligning another person's character.
- Unreasonable criticism of another DOGS ACT Member.
- Compromising public confidence in the Members or the office of DOGS ACT.

- So disrespectful about other Members that the comments constitute bullying or harassment.

When using social media or social networking services in a private capacity, members must not make any negative comments or postings (including images) about the office of DOGS ACT, its Executive or Councillors.

When considering whether to make a comment Members should also reflect on the following questions:

- Would a comment of this kind, without proper justification, be likely to lower or undermine the reputation of the Members or DOGS ACT as a whole?
- Are the comments in line with how the Australian community in general expects the Members and DOGS ACT to operate and behave?
- Are these comments lawful? For example, do they comply with anti-discrimination legislation and laws relating to defamation? Could they involve a breach of secrecy obligations (such as sections of the *Criminal Code Act 1995*, or sections 70 or 79 of the *Crimes Act 1914*)?

#### Privacy considerations

There are serious privacy risks associated with using online social media and/or online social networking services. These sites have varying levels of security and all are vulnerable to security breaches.

Before posting or sharing personal information about yourself or others, remember that giving out information online makes it easier for people to gather information for their own purposes.

If you are using smartphones or tablets to take pictures and access social networking sites, you could be inadvertently posting the exact geographic location of your home or daily travel patterns. This technology is known as geotagging. Many phones, tablets and digital cameras are set up to geotag by default.

For further information on the potential risks in using social media and how to protect your privacy, visit the Office of the Australian Information Commissioner ([www.oaic.gov.au](http://www.oaic.gov.au)), the Australian Communications and Media Authority ([www.acma.gov.au](http://www.acma.gov.au)) or [www.staysmartonline.com.au](http://www.staysmartonline.com.au). These websites have information about how to minimise the risks of online activity.

#### **19.4 Acceptable use of DOGS ACT office electronic communication tools**

Official email systems are provided for business purposes and must be used appropriately. This includes ensuring that information contained in, or attached to emails, is shared on a need to know basis, and is appropriately classified, stored and retained.

When receiving official email, instant messaging on online platforms or any other communication from DOGS ACT Office staff, Members must adhere to the principles set out in the DOGS ACT Code of Conduct and act in a responsible and respectful manner, consistent with the DOGS ACT values. You are not to send on, forward, save and/or use any of the DOGS ACT logo/images or other communication and purport to be a Member of DOGS ACT or an employee of DOGS ACT. This information is considered to be the property of DOGS ACT and its Members and will be retained and managed in accordance with relevant legislation and policies. Usage and content of these systems is also monitored to ensure it is used in accordance with relevant legislation and policies.

Any misuse of a communication from the DOGS ACT Office would constitute a breach of this Regulation and relevant action will be taken.

## 19.5 Inappropriate or unacceptable use of social media or social networking sites

### Examples of inappropriate or unacceptable use

The following (non-exhaustive) list provides examples of use that is considered inappropriate or unacceptable:

- Unauthorised discussion of any personal information of Members, DOGS ACT and its day to day work. This could be considered misuse of official information and may result in criminal proceedings as well as action under the DOGS ACT Code of Conduct.
- Unauthorised discussion of any legal matter in which a Member is materially involved.
- Unauthorised comment or sharing of information relating to the infrastructure, hardware, software, security etc. of Member systems.
- Making personal comments or expressing opinions that could be misconstrued as official comments.
- Using official email to send personal messages to public figures or organisations on matters relevant to Members or the Australian Government.
- Personal attacks on Members, clients, individuals or Office staff. This includes belittling or making fun of any of these, or engaging in any type of behaviour that could be considered bullying or harassment either directly or indirectly.
- Posting or sharing unauthorised photos or video-clips of Dogs ACT activities, or of yourself or people who can be identified as Dogs ACT members.
- Posting or sharing any material subject to copyright (e.g. logos, crests, and insignia, without express permission).
- Using official DOGS ACT images/logos/insignia for personal gain (e.g. running or supporting a personal business).
- Text messages will also be included in this Regulation.

Using another Dogs ACT member login credentials, or accessing their unlocked computer, to access, delete distribute or convey information.

## 19.6 What happens if this Regulation is not followed?

Dogs ACT members are reminded that Rules and Regulations have the effect of being directions by the Executive and Council of Dogs ACT and Members must therefore comply with the requirements of these Rules and Regulations. A failure, neglect or refusal to adhere to this Regulation may give rise to a breach of the Code of Conduct, an offence under the *Criminal Code Act 1995*, and may result in disciplinary or other appropriate action being taken commensurate with the circumstances and the seriousness of the occurrence.

## 19.7 Actions to be taken by DOGS ACT should any Member breach this Regulation.

- Once a complaint has been received by DOGS ACT, the Office will put the item on the agenda of the next Council meeting.
- Dogs ACT Council will appoint a sub-committee to investigate the complaint.
- The sub-committee will recommend action to be taken at the next Council meeting. Council will take a majority action decision based on all matters presented to it.
- Council will direct the Office to send correspondence to both the complainant and the offending person/Member advising them of the outcome. If the alleged offending person is a Member of another State/territory canine control their canine control will be advised of action taken.

- Any breaches of this policy may be a disciplinary issue for Members. This might include but is not limited to a formal warning, education and training on the acceptable use of social media and suspension from DOGS ACT.
- DOGS ACT will liaise directly with the Australian Federal Police if there are criminal charges to be laid.
- DOGS ACT will not enter into any civil action where it applies in these matters.

## **19.8 Legislation and other references**

- *Privacy Act 1988*
- *Freedom of Information Act 1982*
- *Crimes Act 1914*
- *Public Interest Disclosure Act 2013*