



Communications Policy

1. PURPOSE

Council recognises that traditional and digital media (including social media and Council's website) provide opportunities for the City of Tea Tree Gully to proactively communicate and engage with its community and stakeholders in a professional, timely and positive manner.

This policy formalises Council's position on the creation and dissemination of official content by Elected Members and employees, and applies to all traditional and digital spaces where people may comment, contribute, create, forward, post, upload and share official content on, as individuals or on behalf of the City of Tea Tree Gully.

The policy is not intended to curtail (nor be construed as curtailing) an individual's right to free speech or the publication of information in their personal capacity.

As it is not possible to expressly refer to or list all traditional and digital media, the absence of any reference does not limit the application of this policy.

2. POLICY

Council requires a professional approach when liaising with the media and the community, whether it is through traditional mechanisms or online. Council owned and non-Council owned mediums will be used in a coordinated manner for strategic external communications, with the aim to:

- a. inform, communicate and initiate community involvement and discussion
- b. extend the reach of our communications and direct the community to Council information
- c. provide a convenient, accessible and flexible form of service delivery, and
- d. build and enhance relationships with the community and stakeholders.

When representing Council in traditional or digital media, employees must:

- a. act with honesty, integrity and transparency
- b. use Council information and resources appropriately
- c. not put forward their own personal commentary or opinions, and

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- d. not present themselves as official representatives without appropriate authorisation and training.

Use of traditional and digital media must not intentionally:

- a. damage Council's reputation
- b. disclose sensitive or confidential Council information
- c. use Council's intellectual property or copyrighted materials or otherwise reproduce material in a manner that gives rise to breach of copyright, and
- d. communicate offensive or defamatory information or commentary – particularly about Council, employees or Elected Members.

Most Council decisions, except those deemed confidential, are public documents and public property which are accessible on our [website](http://www.cttg.sa.gov.au) (www.cttg.sa.gov.au).

Confidential employee matters and matters discussed at an 'in camera' Council session (subject to the resolution of the 'in camera' Council session) cannot be conveyed externally in any form.

2.1 Administration

All traditional and digital media are administered by the Customer & Communications Department. This ensures the City of Tea Tree Gully is able to monitor and respond to issues and provide a consistent and professional message and image.

2.2 Traditional media

As delegated by the CEO, the Communications Team is responsible for handling all media enquiries (including photograph and filming requests) and providing prompt and professional response in partnership with the authorised media representative(s). This extends to seeking proactive media coverage, a key element in our communications approach.

Where the size or complexity of a topic requires it (e.g. the budget and annual business planning, strategic planning and rates processes), relevant employees will provide Elected Members with information and/or corporate key messages to assist with media and/or community contact.

2.2.1 Media enquiry

When a media enquiry is received, it is to be directed to the Communications Team or CEO who will determine the appropriate method and level of response. Responses may be in the form of a news release, email, written or verbal statement.

Elected Members are also encouraged to contact the Communications Team or CEO about any media enquiries they receive. In most cases, notification will be to the Media Advisor.

Employees must also advise the Communications Team where an event or issue is likely to generate significant public and/or media interest. This ensures Council is prepared to respond to public and media enquiries.

2.4 Proactive communications

Where a proactive news story is generated by the Communications Team, the appropriate representative will work with the relevant people to ensure information is correct and appropriately approved.

Council's CEO may invite Elected Members to make comment on news stories with particular consideration to;

- a. ward specific major projects, developments, services and events; or
- b. an initiative that a Councillor has initiated in the chamber or had significant input into.

Elected Members must provide this comment within the timeframe specified by the CEO (or their nominated delegate). Comments are to be limited to Council's involvement in the project, development, service and event.

Elected Members are encouraged to identify and share proactive news opportunities with the Communications Team or CEO before releasing any information.

For Council employees, all identified news opportunities must be approved by the Communications Team before any information is released.

The Communications Team, in consultation with the relevant General Manager will determine whether to proceed with the opportunity, and if so, how best to engage the media. The decision will be based on:

- a. Alignment with Council's Strategic Plan
- b. Timeliness
- c. Newsworthiness
- d. Audience reach and relevance
- e. Media appeal
- f. Competing priorities

Any media release being issued as an official communication, using Council resources, requires the approval of the CEO prior to being issued. The appropriate corporate leader of the area under discussion must also provide prior approval. During this process, Council's spokespersons and the corporate leader can request changes to content and representation.

Copies of every media release issued must be sent to the Elected Members and the Executive Leadership Team.

2.5 Social media

Only authorised and trained employees may provide information via Council owned and non-Council owned Social Media platforms. Authorisation and training is administered by the Customer and Communications Department.

Social media is administered in accordance with Council's Social Media procedures and guidelines, including Council's Social Media User Guide. The Customer & Communications Department is responsible for its procedures and guidelines and for the maintenance and review of them.

Teams that operate Social Media Accounts are responsible for their accounts and must use the approved publishing and monitoring system to administer their account. To develop a new social media account, a business case must be submitted and endorsed by the relevant manager and approved by the Manager Customer & Communications.

Accounts that do not meet the needs of the community or cannot be adequately administered will be closed on instruction from the CEO.

All accounts operate under a uniform terms and conditions framework, which must be utilised by all platforms. Terms and conditions will be inclusive of information relating to monitoring hours and appropriate communications.

Where unauthorised employees engage with and/or comment on Council decisions, information or news, whether it is within a Council owned or non-Council owned social media platform, the employee must clearly identify that it is his/her own personal view. If the Council decision, information or news relates directly to the employees role and/or work, the employee is encouraged not to comment if their personal opinion is contrary to Council's position.

2.5.1 Moderation

The City of Tea Tree Gully retains the right to remove content that does not adhere to the guidelines identified in this policy or other associated policies.

Posts containing the following will not be responded to, and will likely be removed from the relevant page:

- a. Racist, sexist or sexual discrimination
- b. Harassment or bullying
- c. Incitement to unlawful conduct

- d. Profanity; utilised as abuse
- e. Personal, confidential, or copyrighted material
- f. Potential defamatory material
- g. Threatening or abusive behaviour
- h. Spam, junk or advertising
- i. Political or election-related lobbying.

2.6 Corporate publications

The City of Tea Tree Gully produces a variety of contemporary print and electronic publications to inform residents of relevant Council decisions, projects, services and events. Particulars for each communication method are –

2.6.1 Corporate newsletter (currently Gully Grapevine)

Council's corporate newsletter is distributed to residents on a quarterly basis and is to include:

- A message from Council's Principal Spokesperson up to a maximum of 160 words.
- Photographs (see Council Photographs Policy) of each Elected Member and their contact details.
- Councillors may provide a column:
 - Maximum of 160 words per ward to be agreed between the ward councillors
- A nominated officer of Council is to advise Elected Members of any requirements and to proof/edit each contribution.
- The CEO reserves the right to edit Elected Member content, in consultation with the individual Elected Member, to ensure compliance with Council policy and position.
- A community noticeboard for community, sporting and school groups to promote their events and activities. Inclusion is subject to timing, budgetary constraints and space availability, and Council reserves the right to refuse to promote any activity it considers inappropriate. Requests for inclusion in Council produced materials must be submitted in writing by either:
 - Online: www.cttg.sa.gov.au/publicity
 - Regular mail – City of Tea Tree Gully, PO Box 571, Modbury SA 5092
 - In person – at the Civic Centre, 571 Montague Road, Modbury SA 5092

Operational matters, including content, production, promotion and the sale of advertising are the responsibility of the relevant officer of Council.

2.6.2 Rates notice insert

Operational matters, content, production, frequency and promotion are the responsibility of the relevant officer of Council.

2.6.3 Electronic Newsletters

Operational matters, content, production, frequency and promotion are the responsibility of the relevant officer of Council.

2.6.4 Paid advertising

Operational matters, content, production, frequency and promotion are the responsibility of the relevant officer of Council.

2.8 Authorisation

2.8.1 Spokespersons

The spokespersons for the City of Tea Tree Gully are Council's nominated principal spokesperson and the CEO.

- The Principal Spokesperson is responsible for communicating political, policy matters and decisions of Council.
- The CEO is responsible for responding to all overarching organisational and operational matters and decisions.

Authority may be delegated and another person nominated to act in place of or represent him/her. This applies to traditional media, social media and corporate publications.

The Principal Spokesperson of Council is the Mayor. In the absence of the Mayor, the Acting principal spokesperson should be nominated in the following order:

- a. Deputy Mayor, and
- b. Any other Elected Member at the discretion of the Mayor or CEO.

The principal spokesperson is responsible for communicating information that is consistent with the views and decisions of Council. Where the principal spokesperson's views are counter to the views and decisions of Council, the principal spokesperson must identify that it is his/her personal view.

The CEO will be Council's Principal Spokesperson for all matters from the final declaration of a periodic election.

2.8.2 Elected Members

Elected Members may respond to media enquiries concerning public debate in the Council Chambers. However, they must abide by the behavioural requirements for Council Members. If an Elected Member communicates a personal opinion or makes a public comment, he/she must make it clear that it is his/her own personal view, which does not necessarily reflect the position of Council.

When any social media conversations are about a debate held in the Council Chamber or about comments made by Elected Members in their personal capacity, authorised employees will avoid involvement and, instead, encourage participants to contact the relevant Elected Members.

2.8.3 Media representative

The departmental manager is the default media representative for a specific area. Following a media enquiry, the Communications Team will liaise directly with the relevant media representatives or employee to generate an appropriate response.

It is the responsibility of the media representative or staff member to ensure the accuracy of their information and to obtain all relevant departmental approvals prior to responding to the Communications Team. Responses to media enquiries must be made within two working days.

If the media representative is not available to respond to an urgent media enquiry, the Communications Team can decide who is the next most appropriate and available person to approach.

While media representatives have been authorised to represent Council, they must not comment on areas outside of their expertise.

All media representatives will undergo training or guidance relevant to the expertise required.

2.8.4 Authorised employees

Employees must be authorised and trained to post on social media and to publish content on Council's website (www.cttg.sa.gov.au) on behalf of Council. Authorisation and training is administered by the Customer and Communications Department. The operational management of social media is governed by the User Guide for Corporate Social Media Administrators.

2.8.5 Caretaker period

Employees and Elected Members cannot engage in Media activity that contravenes the caretaker period requirements during periodic council elections. These requirements are set out in the Council's Caretaker Policy.

2.9 Records management

Records management will comply with the requirements pursuant to the *State Records Act 1997* and Council's Records Management Policy.

2.10 Monitoring and reporting

Traditional media and social media activity is monitored on an ongoing basis by the Customer & Communications Department as well as by authorised employees. Relevant information is forwarded in a timely manner to the Mayor, Elected Members, CEO, appropriate directors and other relevant staff.

Our corporate media monitoring system provides a variety of reports that can be customised based on the end user need and interest.

2.11 Third party endorsements

From time to time, Council may be approached for testimonials and endorsements of third-party businesses, products and services. Employees must seek approval before committing to and/or providing a third party testimonial and endorsement.

Approval must be obtained from the Manager, Customer and Communication, Directors or another nominated employee under delegation from the CEO.

3. DEFINITIONS

For the purposes of this policy the following definitions apply:

Authorised employee

A content creator who has been approved and trained to post on Social Media on behalf of Council.

CEO

Refers to the Chief Executive Officer (including their delegate) of the City of Tea Tree Gully.

Employee(s)

A person that works for Council and includes employees, contractors, volunteers, work experience placements, students or any other person who has access to Council's electronic systems and services either in a permanent or temporary role.

Media

Media channel employees, such as reporters and editors.

Media Advisor(s)

An employee identified by the CEO, who is responsible for liaising with and distributing media material through different channels.

Media channels

The distribution stream(s) for different media material. These can be mainstream channels (e.g. newspapers and website) or social media (e.g. Facebook and Twitter).

Media material

A piece of proactive information such as a media statement, news release or a video statement.

Media representative(s)

An employee identified by the CEO to represent the organisation due to their expertise in a specific area.

Digital media

Group term for a range of online communication platforms that enable interaction, content sharing, and collaboration. These platforms include but are not limited to:

- a. Council's website
- b. Social networking sites (e.g. Facebook, Google+ and LinkedIn)
- c. Microblogging sites (e.g. Twitter)
- d. Blogs
- e. Podcasts and video podcasts
- f. Photo sharing sites (e.g. Flickr, Instagram and Pinterest)
- g. Forums and discussion boards
- h. Sites that facilitate public content
- i. Wikis

Social media account

The profile an organisation or individual adopts on a platform. There are two types of accounts that are used:

- a. *Social media corporate account* - A centrally managed social media account used to communicate cross-organisational matters

Social media targeted account

A de-centrally managed social media account used to communicate select information to a targeted audience

4. LEGISLATIVE FRAMEWORK

There is no legislative requirement for Council to have a policy relating to this area.

Local Government Act 1999

Section 58 under the Act specifies that the Mayor is Council's principal spokesperson, unless otherwise resolved by the Council.

Section 62(3) of the Act establishes that Elected Members are not to make improper use of information acquired by virtue of their office as members of the Council.

Section 63 of the Act states that the Code of Conduct must be observed by all Council Members.

4.1 Other references

Council's document including:

- a. Advertising Guidelines
- b. Caretaker Policy
- c. Elected Member Behavioural Management Policy
- d. Elected Member Support and Training Policy
- e. Community Engagement Framework
- f. Council's Community Engagement (Public Consultation) Policy determines the nature and extent of community engagement required for this matter
- g. Employee Conduct Policy
- h. Fair Treatment Policy and Procedure
- i. Information and Communications Technology Appropriate Use Principles
- j. Promote your community event or group section on Council's website
- k. Records Management Policy

External document including:

- a. Code of Conduct for Council Members
- b. Criminal Law Consolidation Act 1935
- c. Defamation Act 2005
- d. Fair Trading Act 1997
- e. Fair Work Act 1999
- f. Freedom of Information Act 1991
- g. Local Government (Elections) Act 1999
- h. Equal Opportunity Act 1984
- i. Australian Human Rights Commission Act 1986 (Cth)
- j. Spam Act 2003 (Cth)
- k. Privacy Act 1988 (Cth)
- l. State Records Act 1997
- m. Civil Liability Act 1936

This policy is based on a model policy developed by the Local Government Association.

5. STRATEGIC PLAN/POLICY

5.1 Strategic Plan

The following strategic objectives in Council’s Strategic Plan 2025 are the most relevant to this report:

Objective	Comments
Community	
<i>People feel a sense of belonging, inclusion and connection with the City and the community</i>	Proactively engaging with the community through traditional and social media helps build and enhance Council’s relationship with the community and other key stakeholders. It also assists in creating a positive perception of Council and our City.
<i>Our services are accessible to all and respond to changing community needs</i>	Proactively engaging with the community through traditional media and social media allows council to amplify its message and deliver important information to thousands of people.
<i>People can have a say in decisions that affect them and the key decisions of the Council</i>	Proactively engaging the community through traditional and social media allows Council to inform, communicate and initiate community involvement and discussion.
Leadership	
<i>Customer service provides a positive experience for people and is based on honesty and transparency</i>	All traditional media and social media interactions are based on honesty, integrity and transparency.
<i>Delivery of services is sustainable and adaptable</i>	Proactively engaging with the community through traditional media and social media provides a convenient, accessible and flexible form of service delivery.

5.2 Organisation Plan

Our Strategic Plan is supported by an Organisation Plan which focuses on five key themes of organisational excellence. One of these themes is “Governance” which deals with how Council defines roles, powers and responsibilities within the organisation with the aim of modelling best practice in local government.

Delegations helps streamline Council’s operations and leads to a much faster decision making process than would otherwise be the case and making more efficient use of Elected Member and staff time.

The other theme which applies directly to this policy is “Customer and Community Relations”, which deals with overall community satisfaction and the provision of information that is relevant, current and meaningful through accessible communication channels.

6. POLICY IMPLEMENTATION

This policy will be implemented by the Chief Executive Officer or relevant portfolio director and managed in accordance with Council’s scheme of delegations.

Record number	D23/15959
Responsible Manager	Manager Customer & Communication
Other key internal stakeholders	General Manager Corporate Services
Last reviewed	28 February 2023
Adoption reference	Council
Resolution number	83
Previous review dates	(merges Council's Corporate Publications Policy & Media Policy) 22/6/21, 19/01/21, 23/06/2020, 09/05/17, 08/10/13, 13/12/11
Legal requirement	Nil
Due date next review	2027