



# Councillor Social Media Policy

<b>Policy outcome</b>	To support Councillors to use social media to strengthen community engagement, while complying with the Model Councillor Code of Conduct and managing legal and reputational risk.
<b>Responsible area</b>	Communications and Governance
<b>Version</b>	1.0
<b>Date approved/adopted</b>	20 May 2026
<b>Planned review date</b>	20 May 2030

## Document Governance

<b>Policy outcome</b>	To support Councillors to use social media to strengthen community engagement, while complying with the Model Councillor Code of Conduct and managing legal and reputational risk.
<b>Responsible division</b>	Communications and Engagement
<b>Responsible department</b>	Communications and Governance
<b>Policy owner</b>	Manager, Communications and Governance
<b>Final approver</b>	Council
<b>Version</b>	1.0
<b>Date approved / adopted</b>	20 May 2026
<b>Planned review date</b>	20 May 2030 (4 years)
<b>Type of review</b>	New
<b>Supersedes</b>	N/A — new policy

## Document History

<b>Version</b>	<b>Date</b>	<b>Review type</b>	<b>Changes made</b>	<b>Approved by</b>
1.0	20/05/2026	New	Initial release	Council

## Compliance Attestations

### Gender Equality

Under the *Gender Equality Act 2020* (Vic), Council has a positive duty to advance gender equality in our organisation and community.

- A Gender Impact Assessment has been completed for this policy.
- A Gender Impact Assessment is not required for this policy. [State reason]

### Child Safe

The City of Port Phillip is a Child Safe Organisation committed to preventing, detecting, responding to and reporting any Child Safety concerns.

- Consideration has been given to the Child Safe Standards in the development of this policy.

## Table of Contents

Document Governance.....	2
Table of Contents .....	4
1. Purpose.....	5
2. Scope .....	5
3. Policy Context and Strategic Alignment .....	5
3.1. Council Plan Alignment .....	5
3.2. Policy Background .....	5
4. Policy Statement.....	6
4.1. Expectations and standards .....	6
4.2. Behaviour.....	6
4.3. Freedom of expression .....	6
Reasonable apprehension of bias .....	8
4.4. City of Port Phillip first approach .....	8
4.5. Council resources and support.....	8
4.6. Customer requests.....	9
4.7. Moderation of community content .....	9
4.8. Record keeping.....	9
4.9. Clarification statements.....	10
(a) Profile clarification — required for all Councillor social media accounts.....	10
(b) Personal-views statement — required where Councillor comments on Council matters .....	10
(c) Moderation statement — required where community content is enabled .....	10
(d) Authorisation statement — required where electoral material is published .....	10
5. Roles and Responsibilities.....	10
6. Review .....	11
7. Related Legislation .....	11
8. Associated Instruments .....	11
9. Definitions.....	12
10. Attachments .....	12

# 1. Purpose

To outline the benefits and risks of social media use by Councillors and to provide clear guidance to support its appropriate use, including specific provisions to assist Councillors in complying with the Model Councillor Code of Conduct.

# 2. Scope

This policy applies to all Councillors of the City of Port Phillip in relation to their use of social media in performing their role as a Councillor in accordance with section 28 of the *Local Government Act 2020* (Vic) (the Act).

Acknowledging that the distinction between official and personal roles can be unclear, this policy provides guidance on the appropriate use of personal accounts where they intersect with a Councillor's public role.

The provisions applicable to Councillor social media also apply to a social media presence operated by another person who, with the Councillor's authorisation, administers, moderates or uploads content on the Councillor's behalf.

# 3. Policy Context and Strategic Alignment

## 3.1. Council Plan Alignment

This policy supports the *Plan for Port Phillip 2025–35*, particularly Strategic Direction 6: A Trusted and High-Performing Organisation. By setting clear expectations for Councillor conduct in the digital environment, the policy supports public trust in local government and the integrity of Council decision-making.

## 3.2. Policy Background

Social media is a powerful tool for maintaining connections between Councillors and members of the public. The use of social media can foster open communication between Councillors and the municipal community.

Used well, social media can be used by Councillors to:

- strengthen community engagement
- promote transparency
- foster trust
- provide a trusted voice in the social media environment
- distinguish the role of the individual Councillor from that of Council
- provide another avenue to contact the Councillor directly, and
- enable Councillors to hear from members of the community that may otherwise be difficult to reach.

Councillor social media use also presents risks, including:

- exposure to trolling, cyberbullying and other abusive behaviour
- the creation of a platform for the dissemination of misinformation
- the creation of an expectation about the 24/7 availability of a Councillor
- a significant administrative workload associated with managing a platform
- the risk of inadvertently disclosing confidential information, and

- exposure to legal liability.

In March 2026, Councillors agreed to progress the Victorian Local Governance Association (VLGA) model Councillor Social Media Policy. This policy is based on the VLGA model (December 2024), with adaptations reflecting the City of Port Phillip operating context — including a 'City of Port Phillip first' approach to Council-related communications.

## 4. Policy Statement

### 4.1. Expectations and standards

Councillors are under no obligation to maintain a social media presence.

Councillors who choose to maintain a social media presence do so of their own volition and have a right to express an independent view consistent with the *Charter of Human Rights and Responsibilities Act 2006* (Vic), and are required to adhere to the Model Councillor Code of Conduct.

Councillors who choose to maintain a social media presence are responsible for:

- compliance with this policy
- administration of the social media platform
- moderation of community content, and
- compliance with the terms of service of the social media platform in use.

### 4.2. Behaviour

The Model Councillor Code of Conduct requires that Councillors act with integrity, exercise reasonable care and diligence, and take reasonable steps to avoid any action that may diminish the public's trust and confidence in the integrity of local government.

For Councillors who maintain a social media presence, this means:

- not posting content which could be perceived to be an official comment on behalf of Council (noting that Councillors are free to link to or re-post social media content published by Council, including with their own perspective or commentary, in line with the City of Port Phillip first approach in section 4.4)
- not creating a social media presence purporting to represent Council or a Council-aided entity, such as an advisory committee, reference group, steering committee or similar
- not posting anonymously, or by using a fake or intentionally misleading identity
- not engaging in trolling, harassment, personal attacks or similar behaviour
- not intentionally publishing misinformation, falsehoods or misleading material
- not engaging in doxing
- not engaging in cyberbullying, and
- not publishing defamatory material.

### 4.3. Freedom of expression

Councillors have the human right to freedom of expression, including the freedom to seek, receive and impart information and ideas of all kinds, subject to any lawful and reasonably necessary restrictions.

Councillors may express independent views on social media provided it is clear that these are personal views and do not represent Council. This includes, but is not limited to:

- expressing a personal view that differs from that of Council
- stating a desire for change to a Council policy or position

- expressing an opinion on a matter that is to come before Council (without expressing a pre-determined decision)
- encouraging members of the public to participate in the decision-making process
- expressing disappointment or dissatisfaction, or stating that they do not support a Council position or decision
- explaining why they voted on a matter the way they did in a meeting that was open to the public, or
- otherwise engaging in robust public debate.

Councillors must not post content that, if posted, would be contrary to the Model Councillor Code of Conduct in that it:

- could reasonably be perceived to be an official comment on behalf of Council where the Councillor has not been authorised by the Mayor to make such a comment
- is demeaning, abusive, obscene, threatening or of a sexual nature
- intentionally causes or perpetuates stigma, stereotyping, prejudice or aggression against a person or class of persons
- constitutes discrimination or vilification
- undermines Council in applying its community engagement policy to develop respectful relationships and partnerships with Traditional Owners, Aboriginal community-controlled organisations and the Aboriginal community
- undermines Council in fulfilling its obligation under the Act or any other Act (including the *Gender Equality Act 2020* (Vic)) to achieve and promote gender equality
- is not in line with Council's policies and procedures as a child safe organisation, and obligations under the *Child Wellbeing and Safety Act 2005* (Vic) to the extent they apply to Councillors
- adversely affects the health and safety of other persons
- would bring discredit upon Council
- would deliberately mislead Council or the public about any matter related to the performance of the Councillor's public duties
- makes Council information publicly available where public availability of the information would be contrary to the public interest
- expressly or impliedly requests preferential treatment for themselves or a related person or entity, or
- is otherwise contrary to the Model Councillor Code of Conduct.

Councillors must not post content where publication would be contrary to law, including but not limited to:

- the *Local Government Act 2020* (Vic), insofar as it relates to misuse of position, including the disclosure of confidential information
- the *Privacy and Data Protection Act 2014* (Vic), insofar as it relates to the disclosure of personal information
- the *Health Records Act 2001* (Vic), insofar as it relates to the disclosure of health information
- the *Defamation Act 2005* (Vic), in a manner that constitutes defamation
- the *Copyright Act 1968* (Cth), in a manner that constitutes infringement of copyright
- the *Summary Offences Act 1966* (Vic), in a manner that is obscene or indecent or uses threatening language and behaviour
- the *Crimes Act 1958* (Vic), in a manner that constitutes stalking, and
- the *Criminal Code Act 1995* (Cth), in relation to the use of a carriage service to menace or harass.
-

### ***Reasonable apprehension of bias***

Councillors must not post content that creates a reasonable apprehension of bias in relation to matters that are subject to, or potentially subject to, Council decisions. Councillors are encouraged to seek advice from the CEO or relevant General Manager where there is doubt about whether a proposed post may give rise to such apprehension.

## **4.4. City of Port Phillip first approach**

City of Port Phillip social media channels exist to provide clear, accurate and timely information to residents, businesses and visitors about Council services, activities and events.

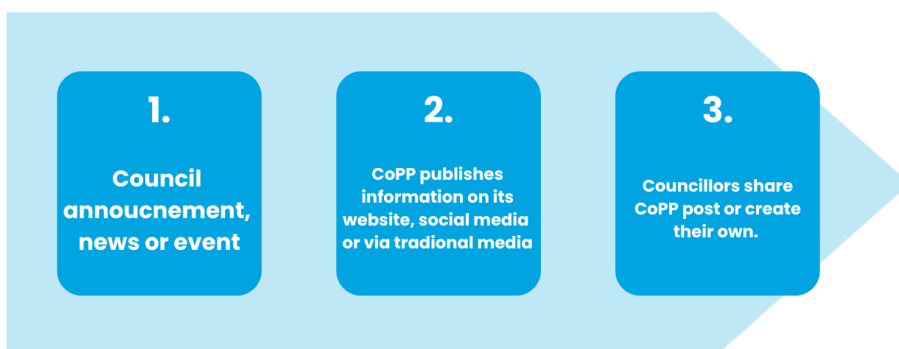
Councillors are strongly encouraged to follow a Council-first approach when using social media. This means that any Council-related information be published through official City of Port Phillip communication channels before it is shared or posted by Councillors or any other party. Official channels include the Council website, media releases and Council-managed social media accounts.

Once content has been published through an official Council channel, it may then be shared or reposted by Councillors. Councillors are strongly encouraged to share or re-post Council social media content to help amplify Council's official messages and ensure consistent, accurate communication.

If a Councillor wishes to independently post commentary or content relating to Council matters, they must not use Council-owned imagery or branding without prior approval, where this could be perceived as representing Council.

When posting personal images from Council events or activities, Councillors must ensure that consent has been provided by all individuals featured, including Council staff, members of the public and relevant stakeholders.

Councillors must not feature, promote or identify Council staff on social media without prior approval from the staff member and Manager, Communications and Governance.



## **4.5. Council resources and support**

Councillors who choose to maintain a social media presence will be provided with:

- technical support for Council-provided hardware
- training in social media obligations as part of mandatory Councillor induction and ongoing professional development programs

- generic collateral (such as graphics, images and suggested copy) that promotes Council programs, on request, and
- access to Council's employee assistance program - a voluntary and confidential service designed to assist Councillors with personal concerns that affect their wellbeing or performance as a Councillor.

Councillors will not be provided with:

- ad hoc technical support for the use of social media platforms
- social media monitoring or reporting services, or
- legal advice regarding social media content.

Councillors must not use Council resources, including Council facilities, computer equipment, smartphones and internet connections, for social media activity:

- to gain or attempt to gain, directly or indirectly, an advantage for themselves or for any other person
- to cause, or attempt to cause, detriment to Council or another person
- in a way that is intended to, or is likely to, affect the result of an election under the *Local Government Act 2020 (Vic)*
- in a way that is intended to, or is likely to, affect the result of an election for a state or federal parliament, or
- in the furtherance of private business or commercial activity.

#### **4.6. Customer requests**

Councillors may receive service requests, complaints, feedback or other correspondence intended for Council (customer requests) from members of the public via social media channels.

The receipt and handling of customer requests is an operational function of Council. Councillors in receipt of customer requests:

- may pass on customer requests to Council's centralised customer request handling process
- may provide the customer with details of Council's official communication channels
- may refer a customer to Council's website which sets out the official communication channels, or
- may determine to take no action.

Councillors must not solicit customer requests or otherwise encourage members of the public to bypass Council's official communication channels.

#### **4.7. Moderation of community content**

Councillor social media pages are not official communication channels of Council and are privately hosted by individual Councillors.

- Councillors have an absolute right to moderate community content on their social media platforms, including comments, reactions and other contributions.
- Councillors must remove community content that, if published by the Councillor, would be contrary to the Model Councillor Code of Conduct.
- Councillors have an absolute right to block or ban persons from their social media platform at their sole discretion.

#### **4.8. Record keeping**

Councillors are not employed by a public office and are therefore not public officers as defined by the *Public Records Act 1973 (Vic)*.

- Documents made or received by Councillors are not public records (regardless of content) unless they are subsequently received by an employee of Council.
- Councillors are not required to maintain records of social media content for record-keeping purposes.

#### 4.9. Clarification statements

Councillors should display the following clarification statements on their social media platform (in the 'about me', 'biography', 'impressum' or similar place). The statements required will depend on the content hosted by the Councillor; multiple or all statements may be required.

**(a) Profile clarification — required for all Councillor social media accounts**

*“This page is hosted by me in my capacity as an individual. This is not an official page of the City of Port Phillip and should not be used for making service or maintenance requests or otherwise contacting Council. Council can be contacted at <https://www.portphillip.vic.gov.au/contact-us/>.”*

**(b) Personal-views statement — required where Councillor comments on Council matters**

*“The views expressed on this social media platform are my own and not those of Council.”*

**(c) Moderation statement — required where community content is enabled**

*“As the host of this page, I endeavour to maintain a safe, positive space for the discussion of Council issues, and I reserve the right to hide or delete content and to block or ban users.”*

**(d) Authorisation statement — required where electoral material is published**

Councillors who use their social media presence to publish electoral material must include an authorisation statement in accordance with the *Local Government Act 2020 (Vic)*. This obligation applies at all times, not just during a formal election period. Councillors may not use a Council address for this purpose. For example:

*“Authorised by J Citizen, 123 Main Street, SUBURB VIC 9999.”*

## 5. Roles and Responsibilities

Role	Responsibility
Council	Adopt and review the policy. Uphold the standards of conduct it sets out.
Mayor	Authorise official comments by Councillors made on behalf of Council, in accordance with section 4.3 of this policy.
Councillors	Comply with this policy. Manage their own social media presence in line with this policy and the Model Councillor Code of Conduct. Display required clarification statements on any account used in their role as a Councillor.
Chief Executive Officer	Ensure organisational support for Councillors in accordance with this policy. Approve minor administrative updates between scheduled reviews.

Role	Responsibility
Manager, Communications and Governance	Provide operational support and approve use of Council imagery or branding. Coordinate Councillor induction and ongoing training on social media obligations.
Communications Governance team	Maintain the policy on the Governance Instrument Register. Coordinate scheduled reviews. Support compliance reporting to Council.

## 6. Review

This policy will be reviewed every four years, or earlier if triggered by changes to legislation (in particular the *Local Government Act 2020* (Vic), the Model Councillor Code of Conduct, or the VLGA model policy), changes to organisational structure, or community expectations. Minor administrative updates may be made with the approval of the CEO.

## 7. Related Legislation

- *Charter of Human Rights and Responsibilities Act 2006* (Vic)
- *Child Wellbeing and Safety Act 2005* (Vic)
- *Copyright Act 1968* (Cth)
- *Crimes Act 1958* (Vic)
- *Criminal Code Act 1995* (Cth)
- *Defamation Act 2005* (Vic)
- *Equal Opportunity Act 2010* (Vic)
- *Freedom of Information Act 1982* (Vic)
- *Gender Equality Act 2020* (Vic)
- *Health Records Act 2001* (Vic)
- *Local Government Act 2020* (Vic)
- *Local Government (Governance and Integrity) Regulations 2020* (Vic)
- *Privacy and Data Protection Act 2014* (Vic)
- *Public Records Act 1973* (Vic)
- *Summary Offences Act 1966* (Vic)

## 8. Associated Instruments

- Model Councillor Code of Conduct
- City of Port Phillip Councillor Code of Conduct
- Privacy and Data Protection Policy
- Reconciliation Action Plan
- Records Management Policy
- Acceptable Use Policy (Council ICT)

## 9. Definitions

Term	Definition
Confidential information	Has the same meaning as section 3 of the Local Government Act 2020 (Vic).
Customer request	A service request, complaint, item of feedback or other correspondence from a member of the public that is intended for Council, however received.
Health information	Has the same meaning as section 3 of the Health Records Act 2001 (Vic).
Model Councillor Code of Conduct	Has the same meaning as section 3 of the Local Government Act 2020 (Vic).
Personal information	Has the same meaning as section 3 of the Privacy and Data Protection Act 2014 (Vic).
Social media	Online interactive technologies through which individuals, communities and organisations can share, co-create, discuss or modify user-generated content or pre-made content posted online. Social media includes but is not limited to: social networking websites (e.g. Facebook, LinkedIn, Threads); video and photo sharing websites (e.g. Instagram, Snapchat, TikTok, YouTube, Vimeo, Flickr); blogs (including corporate, personal and media-hosted blogs); micro-blogging (e.g. Mastodon, Truth Social, X); wikis and online community forums; discussion boards and groups; vodcasts and podcasts; group messaging technologies (e.g. WhatsApp, SMS); streaming platforms (e.g. Twitch); geospatial tagging (e.g. Foursquare, Facebook check-in); and any other tool or emerging technology that allows individuals to publish or communicate in a digital environment (excluding website content).

## 10. Attachments

N/A