

| Policy | Social Media | |
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| Purpose | 1.1 | <p>This Social Media Policy outlines protocols for using social media in an official capacity for the Victorian Legal Services Board and Commissioner (VLSB+C), and provides guidance for employees in their personal use of social media.</p> <p>The policy aims to inform VLSB+C employees how to use social media effectively and appropriately, within VLSB+C and the Victorian Public Sector (VPS) guidelines. It has been developed to assist employees to use social media so they feel empowered to participate, while being mindful of their responsibilities.</p> |
| Introduction | 2.1 | <p>As the regulator of the Legal Profession in Victoria, the VLSB+C is required to communicate with the legal profession and consumers of legal services in a timely and effective manner. This policy applies to the official use of social media, where employees have been authorised by the Board CEO and Commissioner to use social media as a communication tool.</p> <p>This policy also provides guidance to employees in their personal use of social media. Employees are reminded of their responsibilities under the VPS Code of Conduct and VPS Values, which apply when using social media, either professionally or personally.</p> |
| Application | 3.1 | <p>This policy applies to the Victorian Legal Services Commissioner and VLSB+C staff, including all contractors, consultants and employees on secondment. Members of the Victorian Legal Services Board are not covered under this policy, however, are also not authorised to use social media in their official Board capacity.</p> |
| Legislative Framework | 4.1 | <p>The <i>Legal Profession Uniform Law Application Act 2014 (Vic)</i>, and its subordinate schedule, the <i>Legal Profession Uniform Law (Victoria)</i>, limits what information the VLSB+C can disclose to the public. This includes information communicated via social media.</p> <p>This policy complies with the Guidance for the use of social media in the Victorian public sector, produced by the Public Sector Standards Commissioner.</p> |
| Key definitions | 5.1 | <p>Social media is a collective term for all media used for social interaction and sharing content or information. Social media may include but is not limited to:</p> <ul style="list-style-type: none"> • Social networking websites (e.g. Facebook, LinkedIn, Myspace); • Video and photo sharing websites (e.g. Instagram, YouTube); • Blogs, including corporate blogs and personal blogs; • Micro-blogging (e.g. Twitter); • Online forums, discussion boards and groups (e.g. Google groups, Whirlpool); • Wikis (e.g. Wikipedia); • Vodcasting and podcasting; and • Email and instant messaging. <p>Social media also includes all other emerging electronic/digital communication applications.</p> <p>5.2 Follow means to subscribe to access or receive an individual’s posts, updates or messages.</p> <p>5.3 Post means to write, publish or disseminate comments, statements or material through social media.</p> |

Comment means when an individual replies to a social media post and is a form of engagement. It can also refer to our right to reply to a comment according to written protocols. Comments can offer praise, ask a question, express disagreement, and otherwise contribute to online conversation about social content. Comments may include text, hashtags, @mentions, and emoji's. Comments show posts are engaging and may boost a posts position in social media newsfeeds based on a social network's algorithm.

Official use of social media

6.1

Authorised users

Only the following authorised staff may use social media on behalf of VLSB+C:

- the CEO and Commissioner;
- the Director, Policy and Outreach (or their delegate);
- the Manager, People & Culture (or their delegate);
- the Manager, Strategic Communications and Engagement (or their delegate);and
- an appointed staff member, in their absence.

6.2

Purpose of use

The VLSB+C will use social media platforms primarily to support the legal profession and consumers to understand their rights and obligations, and how to access our services. We recognise social media allows for peer-to-peer communication, ongoing feedback loops with audiences and the development of social advocates.

Official comments published on our social media pages must be by authorised persons listed in this policy and must be published in accordance with our Social Media Moderation Guide, terms of use, and where appropriate, use standard response statements.

VLSB+C social media pages are not intended as a place to report legal complaints or discuss the details of investigations, or disclose personal information. This, along with other inappropriate use of our social media pages, directly contravenes our terms of use.

We reserve the right to remove inappropriate material or comments that don't comply with our guidelines or contravene the law.

Equally, they may use it for the monitoring of issues of importance discussed on social media.

The Manager, Strategic Communications and Engagement or their delegate is authorised to make posts on the Board and Commissioner's social media accounts on issues including (but not limited to) the Grants program events, presentations, practising certificate renewals, media releases, news bulletins issued, , and announcements.

The Manager, People & Culture or their delegate is authorised to post and share content on professional websites, such as LinkedIn, or any other websites used to attract talents or related to employment at VLSB+C.

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Principles

Content posted on the Board and Commissioner’s social media accounts will comply with the VPS Code of Conduct, all relevant VLSB+C policies, the Terms of Use of the applicable social media platform, and will be respectful and sensitive to the platform or community in which they are posted.

Content posted on the Board and Commissioner’s social media accounts will not disclose information that:

- is confidential, or:
- contain material that
 - is offensive, defamatory, harassing, discriminatory;
 - infringes copyright;
 - comprises a contempt of court; or
 - is otherwise unlawful.

Equally, authorised users will generally not respond to posts from the public that contravene our terms of use according to the Moderation Guide.

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| Hours of operation | 7.1 | VLSB+C social media pages are monitored between 9.00am and 5.00pm AEST Monday to Friday, excluding public holidays. Comments outside these hours will receive a response within the normal hours of monitoring. |
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| Responding to and moderating comments | 8.1 | <p>VLSB+C expects users of its social media channels will respect the intent and themes of its posts, and the posts of others and will not post unlawful, misleading or inflammatory comments that could be considered trolling.</p> <p>VLSB+C reserves the right to remove any comment that falls into the above categories, and to block any users who severely or consistently violate these terms of use.</p> <p>We encourage people to notify us of any circumstances where a comment on our Social Media pages is unlawful, misleading or offensive, or otherwise breaches our terms of use by immediately contacting a member of the Strategic Communications and Engagement team at news@lsbc.vic.gov.au.</p> |
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| Personal use of social media | 9.1 | <p>Responsibilities</p> <p>VLSB+C staff should be aware that content published on social media is, or may become publicly available, even from personal social media accounts. Staff must ensure they:</p> <ul style="list-style-type: none"> • are mindful that their behaviour is bound by the VPS Values and Code of Conduct – even outside work hours and when material is posted anonymously or using an alias or pseudonym; • make it clear that any views expressed are their own, and not those of VLSB+C, if their employment with the VLSB+C is evident in the person’s profile; • don’t use a work email address to register personal social media accounts; • don’t divulge private or professional information acquired at work; |
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- don't make comments that are obscene, defamatory, threatening, harassing, discriminatory, hateful or otherwise deemed to be inappropriate to, or about work, colleagues, peers or the VPS; or
- don't post comments or images that are, or could be perceived to be:
 - made on behalf of VLSB+C or the VPS;
 - so harsh or extreme in criticism that they raise questions about their capacity to work professionally or impartially as a VPS employee (such comments would not have to relate directly to their area of work);
 - compromising their capacity to fulfil duties as a VLSB+C employee in an impartial and unbiased manner;
 - so strong in criticism of VLSB+C that it could seriously disrupt the workplace. (Employees are encouraged to resolve concerns in discussion with a manager or via internal dispute resolution mechanisms);
 - unreasonable criticism of VLSB+C stakeholders; or
 - compromising public confidence in VLSB+C or the VPS.

9.2 The Internet is forever

What is published on the internet can remain public for a long time. Content can also be replicated and shared beyond the original intended audience and sent to recipients who were never expected to see it, or who may view it out of context.

Staff should be aware that according to the terms and conditions of some third-party sites, the content they create is the property of the site where it is posted and so it may be re-used in ways which they had not intended. Before posting to a social media site, staff should understand the tool/platform they are using.

Staff should not rely on a social media site's security settings as a guarantee of privacy. Even if staff do not identify themselves online as a VLSB+C or VPS employee, they could nonetheless be recognised as such.

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| Reasonable use of social media | 10.1 | Access to social media sites on VLSB+C devices is provided to employees so long as they abide by the IT Policy and Conditions of Use and the VPS Code of Conduct. The same applies to the use of VLSB+C IT resources for private purposes. |
| | 10.2 | Staff accessing social media during normal business hours via a personal internet connection (eg. mobile phone), are required to use these resources in a manner that does not interfere with their work and is not inappropriate or excessive. Examples of unreasonable use include excessive use of social media for private use, during work hours, and accessing material that is offensive, unlawful, harassing, or otherwise inappropriate during business hours or while still at the office. |

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| Bullying and harassment | 11.1 | VLSB+C is committed to achieving a workplace free of bullying and harassment. For more information, refer to the Equal Employment Opportunity Policy and Sexual Harassment Policy. We encourage staff to resolve any concerns or criticisms they have about staff members, the organisation or the VPS, through an informal discussion with a manager or by using an internal dispute resolution mechanism. |
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| Breaches | 12.1 | Identifying inappropriate use |
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If you become aware of inappropriate or unlawful content online relating to the VLSB+C or a staff member, employees are encouraged to report it to the Manager, Strategic Communications and Engagement (or team member), your manager or the People & Culture team.

12.2 **Non-compliance (members of the public)**

The Manager, Strategic Communications and Engagement and delegates (Social Media Administrator and team members) will identify any inappropriate use of social media and take action according with the steps outlined in the VLSB+C Social Media Moderation Guide and terms of use.

Non-compliance (employees)

Non-compliance with this policy may constitute a breach of employments or contractual obligations, misconduct, sexual harassment, discrimination, or some other contravention of the law.

If employees post or share inappropriate material on social media, they may be requested to remove it.

Those who fail to comply with this policy may face disciplinary action and, in serious cases, termination of their employment or engagement.