# Social Media Protocol

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## Introduction

SBS uses social media as it allows SBS and communities to explore, learn and connect in ways that promote SBS's purpose.

This Protocol provides further detail to assist everyone covered by the SBS Code of Conduct to understand their responsibilities when using social media. The Code of Conduct applies to you whenever you are working for or on behalf of SBS, and whenever you could reasonably be identified by a member of public as being a representative of SBS (employees and workers). Responsibility for maintaining SBS standards rests with the individual.

The Protocol is part of the policy framework and guidance which underpins the Code of Conduct. A breach of the Code of Conduct may result in disciplinary action, including termination of your employment or engagement (see 'Enforcing the Protocol').

Social media is a dynamic and evolving space. If you have any concerns about your engagement on social media platforms under this Protocol please talk to your manager.

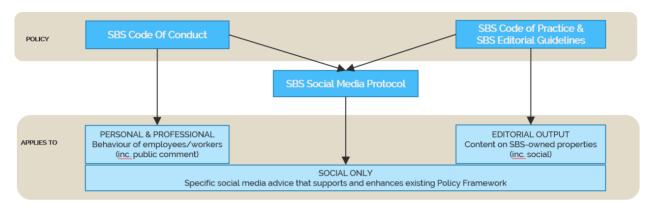
# **Policy Framework**

The Code of Conduct applies to personal and professional conduct, including public comment in any forum, which includes social media. The Code of Conduct is the primary policy for public comment on accounts, websites, fora and platforms not owned by SBS.

The <u>SBS Code of Practice</u> and the <u>SBS Editorial Guidelines</u> apply to editorial output on SBS platforms, including official SBS-branded accounts on social media.



This Social Media Protocol combines advice from the above two sources, with extra details and advice specific to social media platforms, best practice, and SBS ways of working. It states that the Code of Conduct applies to complaints about comments made by SBS employees and workers on non-SBS social media accounts.



## Scope

Social media is broadly defined to cover online and mobile platforms that allow users to create and share content, and includes, but is not limited to, platforms like Facebook, Twitter, Instagram, YouTube, LinkedIn, TikTok and more. Material can include text, audio, visuals (photographs, videos, illustrations), and engagement.

The term 'post' in this policy refers to any shared or created material posted on social media or any engagement with another post e.g. a comment, like, hashtag, or share.

# Professional vs private use

SBS employees and workers may use social media in both their work and personal lives.

SBS does not generally expect employees and workers to post on their personal social media accounts for work purposes.

Personal social media accounts of SBS workers are not owned or directly controlled by SBS. As such, SBS cannot be responsible for what happens on these accounts. Following the Code of Conduct is the best way for SBS workers to avoid any issues.

When you are posting on a personal social media account, the SBS audience may not be able to distinguish when you are posting in an official capacity on behalf of SBS or when social media use is personal.

The nature of social media means that private posts are essentially made in the public domain. Anonymity is not guaranteed and control over your post is limited. Therefore, the risks of your personal post reflecting on you or SBS are heightened.

SBS, as a public broadcaster, must be, and must be seen to be, independent of political, commercial and other influences. Maintaining SBS's independence and integrity is the responsibility of all SBS employees and workers covered by the Code of Conduct.

It is important to ensure that SBS's reputation and integrity is not compromised. You should consider how your posts will be perceived by the community, taking into account the standards which apply to your work.



## Responsibility and accountability

The strictest standards apply to SBS employees and workers who have a high public profile and greater capacity for editorial control. This includes news, current affairs and sport journalists and presenters, radio broadcasters, online editorial staff, managers with editorial responsibilities and Division Directors.

Even if you don't have a public profile, by identifying that you are associated with SBS stricter standards will apply.

Even if your profile does not identify that you work for SBS, using an SBS email or IP address (by using the SBS network) may associate you with SBS.

• If you use a pseudonym in your personal capacity, take care; anonymity is not guaranteed, especially if you post controversial material. The Code of Conduct applies when you are clearly identifiable as a representative of SBS.

### Disclaimers on personal accounts

If your association with SBS is likely to be obvious, even though you are operating a personal account, you should post a simple and visible disclaimer (e.g. "The views presented here are my personal views and not the views of SBS.") in an accessible position (e.g. your Twitter bio, or Facebook 'About' section). However, a disclaimer will not necessarily protect you from controversy or disciplinary action under the Code of Conduct if you post material on a personal account that has the potential to bring SBS into disrepute (see 'Enforcing the Protocol' below).

## Legal responsibility

SBS is not legally responsible for material that you post on your personal social media accounts. SBS employees and workers are legally responsible for what they post on their own personal social media profiles. You should think carefully about your personal liability for what you choose to post.

# Key standards

Key standards SBS employees and workers should follow when using social media (whether for personal or work use):

- Be authentic, truthful and transparent subject to your responsibilities under the Code of Conduct.
- Treat everyone with honesty, respect, fairness, courtesy and sensitivity.
- Always communicate in line with SBS's values.
- When communicating in either a professional or personal manner do not act in ways likely to bring yourself or SBS into disrepute. Follow the Code of Conduct.
  - Don't post material that could give the public reason to doubt SBS's or your professional independence, impartiality and integrity, particularly if you are a journalist, broadcaster or have an editorial role at SBS. This could include publishing news material or commentary on a topical issue.
  - Don't post anything on a social media service that you wouldn't want to be broadcast on air or published in a newspaper. Remember that private posts can be screen-capped and circulated to a broader audience.
  - Liking or sharing without comment can be perceived as the equivalent to endorsement. If you do
    wish to share someone else's post, it is important that you provide appropriate context, so your
    post is not perceived as endorsement of the original message. Adding your own words is



important in providing balance, distance, and context for the original. Treat it as you would a headline for a news report. If you want to save a tweet for later, use the Bookmark feature as it's private.

- Don't endorse any commercial product or service or any other interests that could give rise to a conflict of interest.
- o Don't disclose confidential or personal information obtained through SBS.
- Don't criticise other employees or workers.
- Be very cautious about criticising other media outlets should you find such criticism a valuable contribution to public debate, be respectful and professional.
- o Keep internal work discussions internal.
- o If you are posting material about SBS you should be transparent about who you are.
- Don't post material or comment on behalf of SBS without appropriate authorisation.
  - In your personal capacity: don't post material that could be interpreted as an official statement on behalf of SBS; and don't use the SBS logo or other branding associated with SBS without appropriate authorisation. Do not offer advice or information that could be interpreted as customer service, programming or audience assistance from your personal handle as it may be confusing for the audience and imply that you are speaking on behalf of SBS on this or other occasions. This information should come from an official SBS handle.
  - Links to content owned by SBS should be circulated first by an official SBS profile. Do not break stories on your personal profile.
  - Only those with appropriate authorisation from the Managing Director or their delegate can make public comment about SBS matters such as programming, editorial, employment and management policies and practices.
  - You can post publicly available information about SBS, such as information in media releases, annual reports and on the SBS website, including behind the scenes information that is either already available on the SBS's digital platforms or which has been approved for such use (see 'SBS Corporate Use' below).
  - o If you are unsure about what you can and can't say, refer up to your manager.
- The safest way to post about SBS on your personal social media accounts is to share a post published by SBS.
- Be professional in your posting and interactions with the public and apply appropriate levels of skill, care, diligence and conscientiousness.
- Do not reveal personal details of another person (doxxing).
- Consider people's privacy. Don't post photos of other people (colleagues, sources, attendees at community events) without first seeking their consent.
- Consider reviewing and removing historical posts on your personal social media accounts that may no longer be relevant or appropriate given the passage of time and changing context.
- Be aware of your legal responsibilities including copyright (see below).
- Don't vilify or discriminate.
- Don't bully, intimidate, harass, humiliate, or threaten anyone.
- Don't be abusive, offensive, insulting, hateful, or violent.



- Don't be vulgar, sexually explicit, obscene or deliberately provocative.
- Don't attack anyone personally.
- Employees and workers may promote SBS content through their personal accounts. It's best for SBS to publish content first, and for personal accounts to share content published by SBS accounts. However, if you would like to cross-promote your personal account on SBS's social media channels, consult your manager and the SBS account's relevant editorial manager regarding conflict of interest considerations.

## SBS corporate use

- SBS-owned social media accounts are subject to the <u>SBS Code of Practice</u> and the <u>SBS Editorial</u> <u>Guidelines</u>.
- All proposed SBS social media accounts must be approved by the relevant Division Director and the Head of Social Media. No social media profile should be launched without first securing this permission and meeting the relevant criteria.
- All engagement with representatives of third party/social media platforms must be in consultation with the relevant SBS representative as the 'relationship manager' for these stakeholders if in doubt, talk to the Head of Social Media.
- All SBS social profiles must include a link to the <u>SBS Website Network Terms and Conditions</u>, which set out SBS's terms of use for user-generated contributions to third party social media sites where SBS has a branded presence. They must also include a link to SBS's complaints processes.
- Each SBS social profile must have a manager who will be required to oversee its moderation.
- The Head of Social Media must have access to all SBS social profiles, either through admin access or being provided with current passwords and logins.
  - SBS branded sites must be managed in accordance with the <u>SBS Website Network Terms and Conditions</u> and the <u>SBS User Generated Content Guidelines</u>.
  - SBS site moderators may communicate using a pseudonym as long as the pseudonym is the name of the site (e.g. SBS Food) or otherwise makes clear the association with the SBS property (e.g. Cycling Central Editor).

#### Copyright:

- Check that you have cleared or have permission to use the rights for any material you are going to post including SBS sourced material (such as promos for commissioned or acquired content) and third party material.
- If you want to use third party material not owned by SBS you need permission from the rights owner. Consult with SBS Legal if you are unsure of the copyright status of third party material.
- Original content posted to social media platforms is protected by copyright. You should never assume that copyright owners of material online have waived their rights simply by publishing it online.
- For tips on how to manage copyright risks refer to Social Media: Copyright How to Guide available on the SBS Legal Intranet site.
- Be aware of the specific rules of each social platform, and do not breach them.
- If you plan to engage with children and young people: make sure the platform is suitable and has the right age requirements; don't use unsuitable content, and make sure that you have strategies in place to ensure their safe use of the platform.



- Where appropriate and relevant, cross-promote SBS accounts on other SBS channels.
- If you are considering using social media to market or promote activity or content, contact the Head of Social Media who will direct you to the right team to respond to your query.

SBS has moderation and best practice training available. This can be tailored to the different content and program teams. Consult with the Head of Social Media for options and contact SBS Legal directly for legal training.

## Legal considerations

While the legal principles applying to social media may be the same as those which apply to television and radio broadcasts, there may be a greater legal risk due to the pervasive nature of social media and the volume of material that must be managed. In some circumstances the courts may order ISPs and social media hosts to disclose the identity of the individual behind an anonymous profile.

Be mindful of content that could give rise to a legal risk including:

- Copyright (see above) and plagiarism.
- Defamation or injurious falsehood material that lowers the reputation of a person, an organisation or a company (more information is available on the SBS Legal Intranet).
- Contempt of court material about court cases or which reveal information that is subject to a suppression order (more information is available on the SBS Legal Intranet).
- Reporting restrictions such as revealing a protected person's identity including children/juveniles involved in court proceedings (acquitted or convicted); people who have been adopted; people under guardianship orders; victims of sexual assault; people charged with sexual assault; people involved in Family Court matters (more information is available on the SBS Legal Intranet).
- Private or confidential information including pictures, personal information, and commercially sensitive information.
- Discrimination and vilification posts which make negative or offensive comments about a person's race, colour, nationality, ethnicity, religion, gender or sexuality or other protected attributes.
- Sharing of abhorrent violent material recorded or streamed by the perpetrator(s) or their accomplices.
- Reporting information which: has been classified as secret or top secret; damages the security or defence of Australia or interferes with the prevention, detection, investigation, prosecution or punishment of a criminal offence; or prejudices the health or safety of the Australian public.

# Dealing with negative comments about SBS or misuse of the SBS brand

SBS employees and workers should never remove criticism of SBS on third party sites, unless it is abusive, offensive, threatening, hateful or violent. If you have any concerns, please upwardly refer or discuss the matter with the Head of Social Media.

If you become aware that someone is using the SBS brand inappropriately you should refer it to the Head of Corporate Communications and Head of Social Media (if it is on social media) for appropriate action. Legal may be able to help to address misuse of SBS copyrighted content or branding in some cases.

Derogatory, offensive or inaccurate comments (such as errors on wikis) should be referred to your manager who will decide the best course of action, which may include referral to the Head of Social Media or the Head of Corporate Communications.



## Dealing with harassment and other dangers

- If in the course of your work you feel unsafe on social media, it's important that you talk to your manager or the SBS Health and Safety Team (People & Culture).
- If a person is posting inappropriate content (under the <u>SBS Website Network Terms and Conditions</u>) on an SBS social media property SBS will take action as appropriate to the channel and content. Generally, SBS will:
  - Hide or delete the inappropriate content
  - o If the person continues posting inappropriate content the SBS moderator can block them from contributing to our social profiles.
- It is best not to respond to harassment or offensive comments directed at you on an SBS-owned social media account:
  - o Talk to your manager, SBS People & Culture and SBS Legal to determine the best course of
  - o If you are being harassed, bullied or discriminated against by another SBS employee or worker, follow the procedures set out in the SBS Appropriate Workplace Behaviour Policy. SBS does not tolerate such behaviour.
  - o Report the issue to the social media platform. If they don't resolve it, share the support reference details with the Head of Social Media to see if the social platform can address the behaviour.
- SBS may monitor official fan sites and take appropriate action where necessary, but must respect the autonomy of those sites.
- Identity theft can be a problem:
  - o Explore the privacy options and choose the options that are best for you.
  - o Don't post information that you want to keep private.
  - o If you find out that someone has appropriated your SBS identity, report it to the platform and refer up to your manager to determine the best course of action.

# **Complaints**

#### SBS properties

Complaints about material on SBS properties and accounts will be forwarded on to the Head of Social Media and relevant editorial manager or Content Director to consider under this Protocol.

#### Personal properties

Complaints about material on personal properties and accounts are not the responsibility of SBS unless they come under the Code of Conduct. SBS employees or workers should raise these matters with their relevant manager or their SBS People & Culture business partner.

# **Enforcing the Protocol**

Breaches of the Code of Conduct may result in disciplinary action, including termination of your employment or termination of your engagement.



This includes situations where:

- Your actions could damage the reputation and integrity of SBS, including in relation to our obligations of impartiality and objectivity.
- Your actions adversely affect other employees and workers at SBS.
- Your actions are considered to be inappropriate for a professional work environment.
- Your actions in your private life affect your capacity to perform your duties in an effective manner.

#### Feedback

Social media is very dynamic and this Protocol is reviewed regularly. If you think this Protocol needs updating or changing send your feedback to the Codes & Guidelines team and the Head of Social Media.

#### **Additional Resources**

- SBS Code of Conduct
- SBS Website Network Terms and Conditions
- SBS User Generated Content Guidelines
- SBS Privacy Policy
- SBS Code of Practice
- SBS Editorial Guidelines
- Office of the e-Safety Commissioner

#### Contact

All enquiries from the public should be directed to the Audience Relations Team who will refer them to the appropriate Division.

SBS Audience Relations Team Tel: 1800 500 727 (toll free) Contact via email here

This policy is effective from 01/09/2011, as updated: 16/09/2019; 23/04/2020; 25/08/2021.