

# LORETO PROVINCE OF AUSTRALIA & SOUTH EAST ASIA

## SOCIAL MEDIA POLICY



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Audience:	Internal / External

### 1. INTRODUCTION

The Loreto Province of Australia and South East Asia (Province) Social Media Policy guides all people engaged under the auspices of the Province and its ministries on professional and personal social media use.

Social media represents an online community and online applications designed to allow information to be created, shared, discussed and disseminated. Social media includes the sites, tools, channels and platforms used to publish user-generated content and promote social connections and conversations. Social media provides opportunities to build communities and to encourage dialogue through the exploration and consideration of diverse thoughts and views.

The Province embraces the use of social media to connect with each other and the broader community of partners, supporters and colleagues, as a valued means of education, community and business engagement.

This policy ensures that those who use social media, either as part of their job, in association with the Province, or in a personal capacity, have the guidelines required to meet the Province's social media use expectations.

### 2. POLICY PURPOSE

The objectives of this policy are to ensure:

- Social media is used in accordance with this policy and principles;
- The posting, publishing, and dissemination of information relating to children complies with the Province Child Safe Policy and Child Protection Program;
- Content distributed via social media is collected and disseminated truthfully and ethically, and in accordance with the Province Privacy Statement or Policy;
- The sharing of sensitive, personal or confidential information regarding Province supporters and volunteers with third parties on social media is prohibited without proper authority;
- All social media relating to the Province and its ministries, including Loreto Ministries Limited (**Loreto Ministries**) and Mary Ward International Australia Limited (**MWIA**) must accurately describe the organisation and its work, be consistent with their stated purpose, and align with the values of the Institute of the Blessed Virgin Mary, known as the Loreto Sisters; **Freedom, Justice, Sincerity, Verity** and **Felicity**. These values should underpin all professional and personal social media;

- Social media content does not defame an individual or organisation, and respects the safety and rights of individuals, groups, and organisations. Social media is not used in any way that disrespects the dignity, values, history, religion, language or culture of individuals, groups, or organisations;
- Social media content does not bring the name of the Province and its ministries, or anyone associated with them, including any other ACFID Members into disrepute, particularly with the intention of creating a reputational or other advantage to the Province and its ministries;
- The respect and privacy of the Province and its ministries' donors, employees, volunteers and wider Loreto network are maintained;
- Other organisations and partners are referenced when appropriate; and
- Employees of the Province and its ministries uphold social media expectations across all channels in accordance with the Loreto Sisters' values.

### 3. POLICY SCOPE

This policy applies to all people engaged under the auspices of the Province and its ministries, including members of the Institute of the Blessed Virgin Mary, board directors, committee members, employees, volunteers, contractors, consultants, partners and other stakeholders.

This policy does not apply to Loreto Schools and/or Associated Schools.

This policy applies to all social media and should be read in conjunction with the Province's Code of Conduct, Information and Communication Technology (ICT) Usage Policy and Privacy Statement.

### 4. DEFINITIONS

Term	Definition
Social Media	<p>Online services, tools and applications used for publishing, sharing and discussing information. They can include forums, blogs, wikis, mobile apps, social networking websites and any other application that allows individual users to upload, comment on, and share content. Social media may include, but is not limited to:</p> <ul style="list-style-type: none"> <li>○ social networking sites such as Facebook, Myspace, LinkedIn, Bebo and Yammer</li> <li>○ media sharing networks and photo sharing websites such as Flickr, YouTube, Soundcloud, Instagram, Snapchat</li> <li>○ bookmarking and content curation networks, such as Pinterest</li> <li>○ corporate networks, such as SharePoint, Zoom and Skype</li> <li>○ sharing economy websites, such as Gumtree and Uber</li> <li>○ blogs, being corporate blogs, personal blogs or comment/opinion sections hosted by media outlets such as WordPress, newshub</li> </ul>

	<ul style="list-style-type: none"> <li>○ micro blogging networks such as Twitter and Tumblr</li> <li>○ wikis and online collaborations such as Wikipedia</li> <li>○ forums, discussion boards and groups such as Google groups, Whirlpool, speechbubble, vodcasting and podcasting</li> <li>○ online multiplayer gaming platforms such as Age of Empires, World of Warcraft, Second Life and Final Fantasy XI</li> <li>○ instant messaging such as MSN and SMS</li> <li>○ geo-spatial tagging such as Foursquare</li> </ul>
Post	Any shared or created content put on Social Media. This could be a post on Facebook, a message on Skype, or content created and edited on Wikipedia
Publishing	Includes, but is not limited to, forwarding or 'sharing' images, material and posts lodged by third parties, and endorsing such material through the use of facilities such as the 'like' button on Facebook.
Employee	All those employed under the auspices of the Province and its ministries
Volunteer	A person who willingly gives their time for the common good and without financial gain, including formal volunteering that takes place within organisations in a structured way and informal volunteering that takes place outside the context of a formal organisation.

## 5. POLICY STATEMENT

The Province recognises and understands that people engaged under the auspices of the Province and its ministries use social media in their personal lives. Nothing in this policy is intended to discourage or limit an individuals personal use of social media tools. **All employees are personally responsible for any social media content published, posed, forwarded, shared or endorsed in a personal capacity.**

It is essential that all people engaged under the auspices of the Province and its ministries understand that opinions, comments or endorsements made via social media platforms are as public as if they were made to the media or in a public forum.

The intention of this policy is to establish a culture of openness, trust and integrity in respect to social media activities, and set out clear guidelines to follow for all people engaged under the auspices of the Province and its ministries who use social networking for business-related activities and personal use.

Personal and professional use of social media by all people engaged under the auspices of the Province and its ministries must not:

- bring the Province and its ministries into disrepute
- compromise the effectiveness of the Province or its ministries
- defame individuals or organisations

- imply endorsement of personal views by the Province and its ministries
- disclose, without authorisation, confidential information

Deciding whether to make a particular comment or post certain material online is a matter of careful judgement and common sense. This policy sets out factors to consider when deciding if and what to post. Employees should act with caution and take into account the underlying principles of this

## Non-Compliance

Individuals may face disciplinary action for posting inappropriate social media content, including content or comments that harass, offend, intimidate or humiliate another, as outlined in the Loreto Code of Conduct provided at the time of induction.

Individuals who publish false or misleading comments about another person in the public domain may be liable for defamation.

Any questions or concerns regarding Provincial compliance with this policy can be directed to The Province Leader:

Phone: 03 9813 4023  
 Email: [province.leader@loreto.org.au](mailto:province.leader@loreto.org.au)  
 Mail: PO Box 4082, Auburn South, Victoria 3122

Any questions or concerns regarding Loreto Ministries' or Loreto Vietnam's compliance with this policy can be directed to LM's Chief Executive Officer:

Phone: 03 9813 4023  
 Email: [ceo@loretoministries.org.au](mailto:ceo@loretoministries.org.au)  
 Mail: PO Box 4082, Auburn South, Victoria 3122

Any questions or concerns about MWIA's compliance with this policy can be directed to MWIA's Executive Officer:

Phone: 03 9813 4023  
 Email: [mwiaexecutiveofficer@loreto.org.au](mailto:mwiaexecutiveofficer@loreto.org.au)  
 Mail: PO Box 4082, Auburn South, Victoria 3122

## 6. RESPONSIBILITIES

The Province is committed to ensuring that all persons associated with the Province and its ministries, and to whom this policy applies, are aware of their obligations under this policy.

Role	Responsibility
Leadership Hub	<ul style="list-style-type: none"> <li>• Approves and supports this <i>Social Media Policy</i>.</li> </ul>
CEO (Loreto Ministries) & EO (MWIA)	<ul style="list-style-type: none"> <li>• Ensure that appropriate resources are made available to allow the <i>Social</i></li> </ul>

	<p><i>Media Policy</i> to be implemented effectively.</p> <ul style="list-style-type: none"> <li>• May from time to time, designate others to release, publish, submit, present and/or approve social media content.</li> </ul>
<p><b>Manager, Marketing and Communications (LM)</b>  <b>Manager, Project Administration, Compliance &amp; Risk (MWIA)</b></p>	<ul style="list-style-type: none"> <li>• Are accountable for taking all practical measures to legally and ethically collect and disseminate social media content.</li> <li>• Facilitate a regular review of this <i>Social Media Policy</i>.</li> </ul>
<p><b>Board and Committee Members, Contractors, Consultants, Employees, Loreto Sisters and Volunteers</b></p>	<ul style="list-style-type: none"> <li>• Are familiar with the content of this <i>Social Media Policy, Privacy Policy, and Code of Conduct</i>, and their responsibilities with respect to posting social media content professionally and personally.</li> </ul>

## 7. RELATED POLICIES & LEGISLATION

- [Privacy Act 1988 \(Cth\)](#)
- [Australian Privacy Principles](#)
- [Copyright Act 1968 \(Cth\)](#)

This policy should be read in conjunction with the Province's:

- Marketing and Communications Policy
- Discrimination, Bullying and Harassment Policy
- Privacy Statement or Policy
- [Code of Conduct](#)
- Information and Communication Technology (ICT) Usage Policy - *under development*
- [Commitment to Child Safety](#)
- [Child Safe Policy](#)
- [Brand Guidelines](#)
- Managing Conduct and Performance Policy

## 8. POLICY GOVERNANCE

Action	Detail
Policy Owner	Manager, Marketing and Communications
Approved	Leadership Hub

Action	Detail
<b>Noted</b>	Province Council, Mary Ward International Australia Limited Board, Loreto Ministries Ltd Board
<b>Approved Date</b>	20 October 2021
<b>Effective Date</b>	28 October 2021
<b>Review Date</b>	October 2023

## 9. VERSION HISTORY

Version	Date	Amendment details
1.0	25.10.2021	Published

## 10. PROCEDURE

### Using Social Media tools at work

People engaged under the auspices of the Province and its ministries use various internal social media tools such as the Microsoft suite of 365 applications and SharePoint. These channels all include features that enable users to create, share or engage with content or to participate in social networking.

These tools have their own guidelines that employees, volunteers' and contractors must follow. Whilst the Province encourages healthy debate, it is important to ensure that these networks are an open and welcoming place for all employees.

When accessing internal social media networks, employees, volunteers and contractors must use The Province's IT facilities in an acceptable manner. This should not interfere with the performance of their work.

In addition to this, when using social media at work, employees must:

- be polite and respectful of the opinions of others at all times
- be mindful that others may not share the same sense of humour
- not use the Province's IT resources to provide comments to external parties other than in the course of official duties
- not access or engage with any material that is inappropriate or unlawful. This may include posts that are fraudulent, threatening, bullying, embarrassing, of a sexual nature, obscene, racist, sexist, defamatory or profane, whether obscured by symbols or not
- not use the Province's IT resources to post explicit or sexually suggestive messages
- not infringe another person's, or the Province's intellectual property rights

### Personal use of Social Media

Employees have the right to participate in public debate. But in some cases, their responsibilities may limit their ability to participate fully in public discussions, including on social media.

The Province respects the right of employees to participate in public and political debate in their private lives. In doing so, employees must behave in a way that does not call into question their capacity to act impartially in their work.

It is also important that employees do not risk the Province or its ministries reputation with comments they make online. Employees can generally make public comment in a personal or private capacity if the comment is lawful and a reasonable person couldn't perceive it to be:

- made on behalf of the Province or its ministries
- affecting their ability to fulfil their duties in an impartial manner
- so strong in its criticism of the Province or its ministries that it could seriously disrupt the workplace
- a gratuitous personal attack that connects them to the Province or its ministries
- compromising public confidence in the Province or its ministries

When using social media, it is not acceptable at any time to:

- post comments or images that are obscene, offensive, threatening, harassing or discriminatory in relation to work, another employee, a stakeholder or the Province and its ministries
- create a social media page to protest policies that employees are responsible for implementing or promoting
- post inappropriate images that reference or involve the Province or its ministries in some way. This could be photos taken of employees engaging in misconduct that breaches the Institute's Values or Code of Conduct, or otherwise damages the Province's reputation or that of its ministries
- engage in comments that breach anti-discrimination law
- release sensitive, personal or confidential information without proper authority
- use an official work email address, or anything else that connects them to the Province or its ministries when making public comment
- use external personal social media accounts for business related internal communications, this excludes corporate networks such as SharePoint, Zoom and Skype, or project management tools such as Slack, Trello and Squidex

It is important to note that 'publishing' is not simply defined as writing or posting material - it includes, but is not limited to, forwarding or 'sharing' images, material and posts lodged by third parties, and endorsing such material through the use of facilities such as the 'like' button on Facebook.

The Province encourages employees to resolve any concerns or criticisms they have about other employees or the Province and its ministries through an informal discussion with a manager or by using internal dispute resolution mechanisms.

## What to consider when using Social Media

When using social media, employees should:

- uphold their obligations as an employee of the Province or its ministries, which includes, at all times, behaving in a way that upholds the integrity and reputation of the organisation
- behave with respect and courtesy, even when disagreeing with someone or something
- stick to the issues under discussion and avoid personal attacks
- make it clear that their views are personal and not the views of the Province or its ministries
- ensure that the information they post is informed and factually accurate, when commenting about the Province or its ministries
- understand that if they like, share or comment on a post, they could be endorsing the content or author

Before deciding to post something, employees also need to be mindful that:

- comments posted online are available immediately to a wide audience
- material posted online effectively lasts forever and may be copied without limit
- others may view material posted online out of context or use it for an unintended purpose
- they should not rely on a site's security settings to protect or keep material private
- anything they post can trace back to them and identify them as employees of the Province or its ministries – they can't rely on anonymity or a pseudonym to protect them

Senior and externally facing employees particularly, need to exercise particular care because of their leadership role, and the real, or apparent, influence they may have with stakeholders. It is more likely for a reasonable person to perceive they are commenting on behalf of the Province or its ministries, even when commenting in their personal time.

## Breaches of the Social Media Policy

The Communications section of the Province monitors the external social media and manages the Province and its ministries reputation online. Where necessary, the Communications and Marketing Manager will contact an employee's manager, to discuss inappropriate online behaviour.

The Province considers several factors when assessing whether social media activity is in breach of this policy. These include the nature of employment, seniority and the context within which the activity occurred.

Depending on the circumstances, non-compliance with this policy may constitute a breach of employment or contractual obligations, misconduct, sexual harassment, privacy, discrimination or other contravention of the law.

In circumstances where any employees or people engaged under the auspices of the Province and its ministries fail to comply with this policy, they may face disciplinary action and possibly termination in accordance with the Managing Conduct and Performance Policy.



## Legal Issues

The following is an overview of legal issues that can arise out of the use of social media, both in a professional and personal capacity. When in doubt, employees and volunteers should seek assistance from their manager.

### Privacy, confidentiality and security of information

Employees, volunteers or contractors should not publish or comment on conversations or information which is confidential, classified or deals with matters that are internal in nature.

Employees, volunteers or contractors must not publish or comment on any personal information of students, clients or employees obtained in the course of their employment. Personal information obtained in the course of employment should only be used in a manner consistent with the Privacy Act 1988 (Cth).

### Copyright

Employees, volunteers and contractors must comply with the relevant provisions of the Copyright Act 1968 (Cth) and ensure they attribute work to the original author or source of the materials wherever possible.

### Harassment and bullying

The Loreto Code of Conduct applies both in the physical workplace and in relation to the online activities of employees, volunteers and contractors. The Province expects all people engaged under the auspices of the Province and its ministries to treat their colleagues with respect and dignity. They must also ensure that their behaviour does not constitute bullying or harassment.

Workplace bullying and harassment includes any bullying or harassment undertaken in the workplace and online in a variety of ways, including through email or text messaging, internet chat rooms, instant messaging or other social media channels via private social network accounts or outside of usual working hours.

Abusive, harassing, threatening or defamatory content are in breach of the Loreto Code of Conduct and in certain circumstances, may result in disciplinary action in accordance with the Managing Conduct and Performance Policy.

A person is subjected to 'workplace harassment' if they are subjected to repeated behaviour by a person, co-worker or group of co-workers of the person that is unwelcome and unsolicited and the person considers to be offensive, intimidating, humiliating or threatening or a reasonable person would consider to be offensive, humiliating, intimidating or threatening.

Examples of behaviours that may be regarded as workplace harassment, this is not an exhaustive list – however, include leaving offensive messages on email, persistent and unjustified criticisms, often about petty, irrelevant or insignificant matters, humiliating a person through criticism and spreading gossip or false, malicious rumours about a person with an intent to cause the person harm.

Whilst working for the Province or its ministries, workers must take reasonable care that their acts or omissions do not adversely affect the health and safety of other persons (this includes workplace harassment) and co-operate with any reasonable policy or procedure of the person conducting the business or undertaking relating to health or safety at the workplace that has

been notified to workers (such as this Social Media Policy). There are civil and criminal penalties for individuals for failure to comply with this duty.

#### Defamation

All people engaged under the auspices of the Province and its ministries must not publish content which may be considered defamatory. Such content includes material which may harm or damage the reputation of another person, organisation or association. Individuals can be directly liable when posting material or commentary of a defamatory nature online.

#### Offensive or obscene material

Material which is pornographic, sexually suggestive, explicit, harassing, hateful, racist, sexist, abusive or discriminatory may constitute material which is offensive or obscene. Such material is not to be published by any person engaged under the auspices of the Province and its ministries, and such conduct may be the subject of disciplinary action and possibly termination in accordance with the Managing Conduct and Performance Policy.

#### More information

This policy is not exhaustive, and it does not anticipate every possible use of social media. Employees should contact their manager or the Communications department if they:

- aren't sure if they should engage with social media content
- are worried about their privacy or reputation due to social media posts
- find information online they think the Province, or its ministries needs to know about, including inappropriate activity on social media by other employees

Employees should always make sure they provide as much information as possible, including links or screenshots.