



SOCIAL MEDIA Policy

SUMMARY

Summary description of Policy	Social Media Policy
Policy Status	<input type="checkbox"/> New Policy <input checked="" type="checkbox"/> Revision of Existing Policy (previously version 1.0)
Policy applies to	<input checked="" type="checkbox"/> National Gallery wide <input type="checkbox"/> Specific (eg. Portfolio)
Approval Authority	Senior Management Group
Policy Steward	Senior Digital Marketing Officer
Contract area	Marketing
Date of policy review	February 2023
Related Policies, Procedures, Guidelines and Local Protocols	<i>National Gallery Act 1975</i> <i>Public Governance, Performance and Accountability Act 2013</i> National Gallery Policy on Policy Development National Gallery Conditions of Entry National Gallery Risk Management Policy Privacy Policy Information and Data Management Policy Cyber Security Strategy Code of Conduct National Gallery's Ethics Framework Professional and Personal Conduct Child Safe Framework Copyright Procedure Aboriginal and Torres Strait Islander Cultural Rights and Engagement Policy National Gallery Brand and First Nations Style Guides National Gallery Communications Policy Crisis Communications Plan Information Systems Security Policy & Guidelines Registration back-of-house photography guidelines Conservation guidelines for filming and photography

APPROVALS

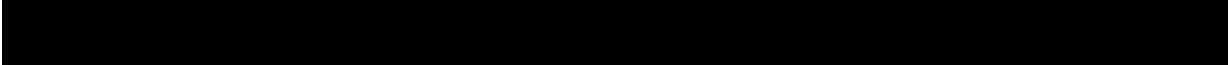
			
Assistant Director	Susie Barr	Yes, Endorsed	17 March 2023
Director	Nick Mitzevich	Yes, Endorsed	27 March 2023
Council	Ryan Stokes	Yes, Approved	14 Apr 2023

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Social media consists of tools such as websites and applications that allow users to create and share content and to participate in social networking.

The National Gallery embraces the use of social media and utilises a range of platforms to further its marketing and communication efforts and reach a broad and diverse audience across Australia and globally. Through a dynamic and innovative approach, and through art and the voice of artists, the National Gallery aims to nurture thought, discussion and inspiration.

The National Gallery acknowledges that all employees can communicate online in many ways, including through social media, professional networking sites, blogs, online news sites and personal websites. This policy stipulates that all National Gallery staff must use good judgment in assessing what material appears online, and in what context.

Social media and instant messages used as part of agency business are official Government records. The National Gallery recognises the ongoing changing landscape of social media and makes effort to record and report on the impact, success and challenges of working in this dynamic space.

1. PURPOSE

This policy supports staff in their online use, providing guidance and clarity on how to conduct themselves on social media and informs them of their responsibilities. It encourages employees to find a voice in social media, while protecting the interests of the National Gallery. The Policy outlines key areas of care and governance when National Gallery staff are working in the social media space.

2. SCOPE

This policy applies to all National Gallery staff including contractors using, or engaged to participate in, social media activity professionally for official National Gallery communications and personal social media use. Use is further outlined in 4. Policy Statement.

3. ROLES, RESPONSIBILITIES AND AUTHORITIES

Head of Marketing	<ul style="list-style-type: none">• Sets Social Media strategic direction• Reviews Social Media Policy
Assistant Director, Marketing, Communications and Visitor Experience	<ul style="list-style-type: none">• Reviews and endorses Social Media Policy and Strategy• Promotes compliance
Senior Digital Marketing Officer	<ul style="list-style-type: none">• Reviews Social Media Policy• Contributes to Social Media Strategy• Develops Social Media Guidelines and content
Head of Governance and Strategic Planning	<ul style="list-style-type: none">• Reviews Social Media Policy providing legal and governance advice and direction

Chief Information Officer	<ul style="list-style-type: none"> Reviews Social Media Policy providing IT and Cyber Security advice and direction, and records management guidance.
Senior Management Group	<ul style="list-style-type: none"> Endorse Social Media Policy Promote compliance
Council	<ul style="list-style-type: none"> Approve Policy

4. POLICY STATEMENT

4.1. OFFICIAL USE

Official use refers to communication broadcast from the National Gallery's social media accounts or when a staff member uses their personal account in a professional capacity (see Professional use). Eg. Live stream from Facebook, engaging in #AskaCurator via a Gallery account, or @nickmitzevich on Instagram.

Employees conducting official communication through social media:

- Must have approval from the relevant Department Head to use social media in an official capacity.
- Must read, understand, and comply with the National Gallery's IT Network Internet and Email Code of Conduct and this Social Media Policy.
- Must not comment on the activities of another National Gallery Department apart from providing factual information that is on the public record, unless they have authority to do so.
- Must avoid any statement that might bring the National Gallery into disrepute.
- Must not commit the National Gallery to any action or initiative without appropriate authority.
- Must not disclose official information unless authorised to do so or unless it is already in the public domain.
- Should be aware of, and must adhere to, laws covering libel, defamation, privacy and the protection of intellectual property.
- Must ensure all activities are in line with National Gallery policies. These include:
 - behaving with respect and courtesy, and without harassment
 - dealing appropriately with information, recognising that some information needs to remain confidential
 - delivering services fairly, effectively, impartially, and courteously to the Australian public
 - being sensitive to the diversity of the Australian public
 - taking reasonable steps to avoid conflicts of interest

- making proper use of Commonwealth resources
- upholding the Gallery's values and the integrity and good reputation of the National Gallery
- not acting in a way that would call into question an employee's ability to be apolitical, impartial and professional in the performance of their duties.
- Must be apolitical, impartial and professional, and avoid any statements that might be interpreted as advocating government policies or criticising the policies of political parties or groups.
- Must protect personal information entrusted to the National Gallery from distribution into the public domain.
- Must abide by any copyright notices and intellectual property legislation attached to content they wish to use. Employees should cite or otherwise acknowledge content sources when they are known. The Rights and Permissions department can be contacted for advice.
- Must refer to the National Gallery's Head of Communications for guidance in the event of an emergency or business continuity event.

4.2. PROFESSIONAL USE

Professional use is when an employee is commenting personally on social media but as an experienced person in their particular field. In this capacity, staff are not representing the National Gallery or the Government. For example, a curator working at the National Gallery might want to leave an opinion on social media regarding an art movement.

Employees participating in social media in a professional capacity:

- Must declare their purpose and their position as a representative of the National Gallery, using an official staff account. Depending on how close the relationship is to the topic being discussed the employee may wish to provide a graduated level of identification. Eg. Nick Mitzevich, National Gallery Director.
- Must provide a disclaimer making it explicit that their views do not represent those of the National Gallery. Eg. Views are my own.
- Must ensure all activities are in line with National Gallery policies.
- Should not comment in depth on the activities of another department of the National Gallery or other Federal Government departments apart from providing factual information that is on the public record, unless employees have authority to do so.
- Must not disclose official information unless authorised to do so or unless it is already in the public domain.
- Must protect personal information entrusted to the National Gallery from distribution into the public domain.

4.3. PERSONAL USE

Personal use is when a staff member is commenting on social media with a profile that is not identified as an official Gallery staff account. While the staff are not employed under the Public Service Act 1999 it is expected that National Gallery employees must read, understand, and comply with the Australian Public Service Code of Conduct, the National Gallery's Code of Conduct and the National Gallery's IT Network Internet and Email Code of Conduct. Employees participating in private social media activity must uphold the National Gallery's Values and Code of Conduct even when material is posted anonymously or using an 'alias' or pseudonym. Even if they do not identify themselves online as an employee of the National Gallery, they may be recognised as such as social media websites are public forums. Staff must remain abreast of changes in privacy and other conditions of use on the social media channels they use.

4.4. INAPPROPRIATE USE

Inappropriate use of social media includes, but is not limited to:

- protest policies the National Gallery implements
- release sensitive, personal or confidential agency information
- conducting private business on National Gallery platforms
- using the National Gallery's name, brand, logotype without consent
- using discriminatory, defamatory, abusive or otherwise objectionable language in content
- accessing, downloading or transmitting any kind of sexually explicit material, violent images including graphic images of blood or gore (without medical purpose)
- accessing, downloading or transmitting information on the use and construction of weapons, explosives and other tools of violence or terrorism
- accessing, downloading or transmitting any material deemed to be illegal under ACT or Australian Commonwealth law
- accessing, downloading or transmitting hate speech and overt racism; material extolling the inherent or moral superiority or inferiority of a particular race, ethnic group, or sexual orientation; racial epithets; or religious bigotry
- compromising the privacy of any person
- using services for personal political purposes
- using services for industrial campaigns (apart from messages sent by officials of unions and professional associations for informational or consultative purposes)
- attempting to gain unauthorised access to the computing resources of other organisations
- disruption of the integrity of the National Gallery's data or information services.

Staff who participate in online communication deemed not to be in the best interest of the National Gallery will be subject to investigation and possible disciplinary action under the National Gallery's Code of Conduct.

The National Gallery will remove, or request the staff member to remove, any material where there is a breach of the National Gallery's Values and Code of Conduct or a breach of the controls detailed in this Policy e.g. a staff member infringes copyright or posts inappropriate content.

5. LIABILITIES

Social media is an ever changing space – the National Gallery keeps an open Risk Assessment outlining the platforms, liabilities, actions and status.

Potential risks that may arise in employees using social media include:

- breach of the National Gallery's Values and Code of Conduct
- plagiarism or breach copyright/Intellectual property rights when using or repurposing material
- excessive time used browsing social media applications while on work time
- inappropriate use of social media
- bring the National Gallery brand and reputation into disrepute
- misrepresent a personal political view as that of the National Gallery
- making promises or statements regarding the National Gallery's service charter which are not true
- the National Gallery may be found liable for the publication of comments by third parties on National Gallery social media channels if that content is defamatory or misleading. Moderation matrix with actions is outlined in 6.7 Moderation, Feedback and Mediation.
- disclosing personal information relating to National Gallery staff or users, or official information which is classified or commercial-in-confidence.

6. GUIDANCE FOR STAFF

6.1. PRIVACY

National Gallery staff must familiarise themselves with the *Privacy Act 1988*, to support the National Gallery in protecting the information related to our staff, members, artists and its audience.

6.2. COPYRIGHT, RIGHTS AND PERMISSIONS

National Gallery staff must protect and promote the copyright and intellectual property of artists, curators and other arts professionals working within the Australian art context in line with the *Copyright Act 1968*.

Captioning guidelines: As a minimum, works of art posted on social media should contain the artists' name, title of the work, creation date and credit line as stipulated in the Gallery's records, with written approval for online use. Eg. Work: Sol LeWitt 'Wall drawing no.380 a-d' 1982 © Sol Lewitt (1928)

Staff must work closely with the Rights and Permissions Department to ensure all social media and digital content has the appropriate level of written permissions recorded in National Gallery records and reporting requirements for external copyright bodies can be met.

6.3. CONTEMPT OF COURT

National Gallery staff must not comment on court proceedings of any kind when publishing content online that may prejudice those proceedings. Staff should ask if there are any applicable court suppression orders prior to commenting on any court proceedings, whether past or pending.

6.4. DEFAMATION AND MISLEADING CONTENT

National Gallery staff must familiarise themselves with chapter 9 (defamation) of the *Civil Law (Wrongs) Act 2002 (ACT)*. Further section 18 of the *Australian Consumer Law at Schedule 2 of the Competition and Consumer Act 2010*, prohibits misleading or deceptive conduct done in the course of trade or commerce.

Employees must not publish any information that they know or suspect is untrue, misleading or information which may cause reputational injury to another person, organisation, association or that could bring the National Gallery brand into disrepute.

If in doubt, staff should seek guidance from the Governance team.

The key legal risk is that the National Gallery's social media platforms may invite publication of comments by third parties and that the National Gallery could be found liable in any legal proceedings for publication of any defamatory or misleading third-party content.

As a result, the National Gallery must assess the risk and put in place measures and actions to mitigate any identified risks.

The National Gallery's moderation practices (see 6.7 Moderation, Feedback and Mediation) provide guidance to social media administrators with consideration also given to the terms of use for each platform. Arrangements must be in place to proactively moderate National Gallery-owned accounts on weekdays, and weekends if required, with an agreed protocol should escalation be required.

Depending on the nature of the content, moderation actions include:

- hiding comments
- muting comments or users
- deleting comments
- blocking the user, or
- reporting the user or content to social media companies (if required).

6.5. CHILD SAFETY AND PERMISSIONS

In line with *the Children and Young People Act 2008 (ACT)* and the Commonwealth Child Safe Framework, children must have signed permission from their guardian or school to be captured on film or in a photograph. Social media content, as a general rule, should not identify children by name unless given express permission by a parent or legal guardian and is absolutely necessary.

Written and verbal permissions should be sought when filming or photographing anyone for social media. In the case of children, a signed (by the child's guardian) media permission form should be obtained, held and archived by the National Gallery. In line with the National Gallery's Conditions of Entry, filming and photography may take place during public programs and events – in this case, every effort should be made to obtain consent from participants.

6.6. REGISTRATION, CONSERVATION AND EXHIBITIONS

Gallery staff should follow Registration back-of-house photography guidelines and the Conservation guidelines for filming and photography whenever photographing the national collection or behind the

scenes at the National Gallery. Images must be approved by the Head of Registration and Head of Conservation before being posted on social media.

6.7. MODERATION, FEEDBACK AND MEDIATION

For all social media moderation, feedback and potential mediation or escalation, Gallery staff must consult with the Senior Digital Marketing Officer. The Gallery uses the methodology – IDENTIFY – SITUATION – ACTION to guide its approach to moderation.

MODERATION MATRIX

MODERATION MATRIX				
SITUATION	Top fans and happy user generated content. Content may not require a response – but remember engagement builds community and grows the National Gallery’s audience.	Users seeking customer service, advice and information.	Unhappy users and people publishing negative comments and content about the Gallery an artist or a work of art. Users are allowed to have opinions about works of art. However, when comments turn personal, it is time to intervene	Users who post abusive, inflammatory, untrue content, or hate speech.
ACTION	Acknowledge and thank user/s. Start a conversation. Share/repost content.	Answer all direct questions promptly. Liaise with visitor experience, or appropriate portfolio for correct response. Fix facts and provide more information. Direct people online. Post holding statements where necessary. Consider taking the conversation to email or private message when the topic is complex.	In some instances, it is better to let the post stand, minimise the reach. Complaints and negative feedback should be responded to as soon as possible. Openly acknowledge the concern and offer solution. Consider taking the conversation to email or private message.	Monitor the conversation online. Delete defamatory content. Report scams and fraud. Draw user’s attention to community guidelines of kindness and respect. Block and report users who are non-compliant. Seek the advice of the Communications department.

6.8. ACCESS AND INCLUSION

National Gallery staff should familiarise themselves with the *Disability Discrimination Act 1992*, to assist the Gallery in being inclusive of all audience needs. Where possible online and on social media platforms, Gallery staff should abide by the *Web Content Accessibility Guidelines 2.0*, and make use of accessibility software on platforms, including:

- providing written image descriptions
- providing subtitles or closed captions on video content wherever possible.

6.9. COMPETITIONS

National Gallery staff must take care when engaging in competitions hosted on social media platforms, email marketing services, surveys and other digital platforms and familiarise themselves with *The Competition and Consumer Act 2010*. As a general rule, a permit is required for any competition involving a lottery, however, if the competition is a game of skill, no permit is required. Detailed Terms and Conditions must be available on the Gallery's website. These Terms and Conditions must be prepared in consultation with the Gallery's Governance team, ensuring there is a one week turnaround for legal feedback.

7. CRISIS COMMUNICATIONS

In the event of an emergency or event impacting business continuity, National Gallery staff must not publish any content online or on social media without the direct permission of the Business Continuity Command Team Leader, National Gallery Director, Assistant Director Marketing, Communications and Visitor Experience or the Head of Communications. Only those with official permissions to speak on behalf of the Gallery should do so. Any official communications will be cleared by the Gallery Director and provided to social media administrators for publishing.

8. INFLUENCERS, CONTENT CREATORS AND COLLABORATORS

The Commonwealth government generally does not support the use of social media influencers. In 2018, the Federal Government determined that paid social media influencers are not to be used in any advertising and outreach campaigns of the Australian Government as they do not deliver value for money and could undermine the effectiveness of relevant campaigns; and if social media influencers were to be used the agency involved would need to demonstrate the benefit of using the influencer and their suitability through a thorough assessment and vetting process.

The National Gallery works to share diverse voices and perspectives across its digital channels and actively engages social media influencers, content creators and collaborators for Tier one marketing campaigns.

In circumstances where the National Gallery wants to engage content creators or influencers, Marketing must do comprehensive due diligence on potential influencers to:

- inform the assessment of an influencer's suitability, content relevance, legitimacy, authenticity, audience quality and reach
- check their prior content to ensure the influencer hasn't communicated any conflicting messages in the past and that they align with the Gallery's Vision and values
- ensure the Gallery is not brought into disrepute through association.

Where relevant, staff should refer to the Gallery's Ethics Framework to assist in decision making and assessment.

It is also recommended that any contract entered into delivers a clear return on investment. When engaging an external content collaborator, complete a Simple Contract, clearly outlining the scope of work undertaken by the third party.

9. SECURITY AND CYBER SAFETY

9.1 SECURITY

National Gallery-owned social media accounts must be set to the highest available security settings. Only identified Gallery staff should have access to official National Gallery-owned accounts. The following security procedures and practice must be followed:

- Enable two-factor authentication where possible.
- Regularly change passwords for all platforms and accounts, including after staff changes.
- Store all password information in secure filing, including any backup codes that apply.
- Work closely with the Chief Information Officer and Cyber Security Manager to remain up to date with all online security updates.
- Maintain contact with the Office for the Arts, and Meta, TikTok, and Twitter Australia Government policy contacts to remain abreast of platform changes, legislation and updates.

The Chief Information Officer will also provide advice to ensure that the Social Media Policy is in line with the National Gallery Cyber Security Strategy and related information security policies.

9.2 CYBER SAFETY

Social media and messaging platforms present risk of fraud, scams and identity impersonation or theft, and risks to personal privacy, cyber security and intellectual property rights of the National Gallery.

A Social Media risk assessment is maintained by the Senior Digital Marketing Officer to monitor risks associated with the National Gallery's social media presence and the controls in place to mitigate them. This is reviewed annually and/or as needed in response to the continuously evolving social media environment and technology advances.

The National Gallery's Fraud Control Plan contains some Digital Fraudulent Scam General Principles to assist in the identification and management of potential scams and to provide guidance on a scalable, appropriate and proportionate response to address the potential digital scam.

Should any cyber crimes occur:

- Immediately notify the National Gallery's Cyber Security Manager, Chief Information Officer, Head of Governance and Strategic Planning, and Head of Marketing and Assistant Director Marketing, Communications and Visitor Experience
- Document the situation, tasks and actions taken, and the result. It may be necessary to provide a written brief to the National Gallery Director and/or Senior Management or external investigators (such as the Australian Federal Police)
- Utilise the reporting tools or function within the social media platform to report the incident to the social media company and contact the platform's Government liaison.

Please refer to the National Gallery's Fraud Control plan for further information.

10. RECORD KEEPING AND REPORTING

Social media and instant messages used as part of the National Gallery's business are official Government records.

Third party social media and messaging platforms are often:

- vulnerable to content deletion, change, and undesirable re-use
- unable to create or capture enough metadata for information management purposes
- not able to manage disposal
- limited in their ability to import, export or generate reports.

The National Gallery recognises the ongoing changing landscape of social media and makes effort to record and report on the impact, success and challenges of working in this dynamic space. This takes the form of engagement metrics, content analysis and incident documentation. User profiles such as social media handles are recorded only for the purpose of administering competitions and documenting incidents.

The National Gallery is required to capture and manage any social media content on official social media accounts in accordance with our Information and Data Management Policy.

11. REVISION HISTORY

V.2	01 2023	Keren Nicholson Senior Digital Marketing Officer	Revised and updated existing 2020 Social Media Policy
V.3	03 2023	Susie Barr Assistant Director, Marketing, Communications and Visitor Experience	Review and edits
V.4	03 2023	Siobhan Ingall Head of Governance & Strategic Planning Tom Georgilas Chief Information Officer	Review and edits

12. DEFINITIONS

WHAT IS SOCIAL MEDIA?

Social media consists of tools such as websites and applications that allow users to create and share content and to participate in social networking.

Social media tools are defined in this policy as all online media which allow user participation and interaction including (but not limited to):

Post	The term 'post' in this policy refers to any shared or created content put on social media. This could be a post on Facebook, Instagram, Twitter, a message in Skype or content created and edited in Wikipedia.
Social networking sites	E.g. Facebook, WeChat, TikTok
Video and photo sharing sites	E.g. Instagram, YouTube, Flickr
Mirco-blogging and activity stream sites	E.g. Twitter and Yammer
Blogs and blogging platforms	E.g. Medium, WordPress and Tumblr
Forums, discussion boards and instant messaging	E.g. WhatsApp, TripAdvisor
Online encyclopaedias	E.g. Wikipedia
Other	Any other online platform that allows individual users or companies to use simple publishing tools, e.g. wikis.

