



Australian Government



Northern Australia Infrastructure Facility

Social Media Policy

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Document Review and Approval

Version	Author/Reviewer	Revision	Approval	Date of approval	Next review date
1.0	Chief of Staff	Original	Board	20 April 2018	April 2019
2.0	Chief of Staff	Annual review	CEO	February 2019	February 2020
3.0	Director, Corporate Affairs & Communication	Annual review	Board	March 2020	March 2021

Document Purpose

This Social Media Policy (**Policy**) outlines the responsibilities of NAIF Staff in engaging on social media in both work and personal capacities.

The Policy operates and is to be read in conjunction with the NAIF Code of Conduct as well as the Corporate Information Security Policy and Confidentiality Policy.

This Policy applies to all NAIF Staff. Separate guidance on media and social media protocols is provided to NAIF Directors.

1. Background

The internet and social media can provide innovative and exciting ways to communicate with broad and varied audiences, including stakeholders and the media. If used appropriately and effectively, it has the potential to generate significant positive exposure and publicity and reach stakeholders who would not otherwise hear or learn about NAIF.

All Staff have a responsibility to ensure the organisation can operate effectively and in a way that creates the best possible environment for fulfilling the NAIF Investment Mandate.

In order to do this, NAIF must maintain the trust and respect of the general public and key stakeholders including the Commonwealth government and the governments of the various State and Territory jurisdictions with which it operates. Public commentary, including the use of social media, is one important tool in managing these relationships. This is equally the case for private social media accounts, held by Staff, as it is for official accounts that are managed on behalf of NAIF. The speed and reach of online communication means that the material posted is available immediately to a wide audience, often with no distinction between professional and personal roles.

It is important that all Staff act in a way that does not undermine the confidence of key stakeholders in NAIF and the ability of NAIF to act impartially and deliver services professionally and without bias.

NAIF recognises that Social Media Tools are commonly used for private purposes and may also be used for work-related purposes. Staff using Social Media Tools are required to comply with this Policy and with all relevant laws, including, but not limited to, laws relating to copyright, anti-discrimination, defamation, harassment, misuse of information and criminal activities.

This Policy applies at NAIF workplaces, when Staff are working for NAIF away from the workplace and in respect of the private use of Social Media Tools. Access to and use of non-work related websites at the workplace or using NAIF's systems or equipment is covered in NAIF's Corporate Information Security Policy.

2. Definitions

APS means Australian Public Service.

CEO means the Chief Executive Officer of NAIF or his or her delegate from time to time.

Directors means a person appointed under section 15 of the *NAIF Act 2016* as a member of the NAIF Board.

Policy Owner refers to the author of this Social Media Policy as listed on the contents page.

Post refers to any shared or created content that is published online.

Public Comment includes any public statement or comment (whether to a closed group of people or available to be viewed by the public generally) through the use of Social Media Tools, and includes Posting, commenting on, liking or sharing a link.

Social Media Tools include, but are not limited to:

- Micro-blogging sites such as Twitter and Tumblr
- Social or professional networking sites such as Facebook, LinkedIn and Yammer
- Instant messaging tools such as Messenger and WhatsApp
- Video and photo sharing sites such as YouTube, Instagram and Snapchat
- Workplace intranet sites or message services such as MS Teams
- Weblogs, including corporate and personal blogs
- Forums and discussion boards, e.g. Yahoo! Groups or Google Groups
- Online encyclopaedias, e.g. Wikipedia
- Bookmarking and content curation networks such as Pinterest
- Online gaming networks such as World of Warcraft and Fortnite
- Sharing economy websites such as Gumtree
- Blogging networks such as Wordpress or newshub
- Corporate networks such as SharePoint and Skype
- Discussion forums, such as speechbubble and Whirlpool

Service Level Agreement means the service agreement between NAIF and Export Finance Australia dated 5 April 2017 (as amended or replaced from time to time).

Staff means persons employed by, or operating under an employment or similar contract with NAIF including full time or part time Staff, consultants, contractors and Export Finance Australia personnel under a Service Level Agreement.

3. Review and Approval

The Policy will be reviewed annually, or more frequently if required, by or on behalf of the Policy Owner, to ensure it remains aligned to governing legislation and best practice. The Board approves all material amendments and reviews the Policy at least every two years.

The Manager, Risk & Compliance will ensure material changes to the Policy are communicated to Staff in a timely manner.

4. Roles and Responsibilities

Accounts set up on Social Media Tools by Staff in a personal capacity are the responsibility of the relevant Staff member and the views expressed are not those of NAIF. However, NAIF expects a common sense approach to commentary with the overriding goal being to protect the reputation of NAIF and not act in a way that is likely to cause damage to NAIF's or the Commonwealth's reputation or that of a relevant State or Territory government or any other relevant stakeholders. Refer to clause 6.

Role	Responsibility
Board and Board Audit & Risk Committee (BARC)	The Board is responsible for approving this Policy in line with Section 3 of this Policy. The BARC is responsible for reviewing this Policy and endorsing it for Board approval.
CEO	The CEO is responsible for: <ul style="list-style-type: none"> overseeing this Policy and ensuring adequate and appropriate resources are allocated to implement, develop, maintain and comply with this Policy; implementing appropriate remedial, disciplinary or other action for failure to comply with this Policy; encouraging Staff to comply with this Policy and make any recommendations for continuous improvement.
Policy Owner	The Policy owner is responsible for: <ul style="list-style-type: none"> advising Staff on application of this Policy; answering any queries relating to this Policy; managing the review and approval of this Policy in line with the NAIF Policy Review Schedule.
Manager, Risk & Compliance	The Manager, Risk & Compliance is responsible for: <ul style="list-style-type: none"> arranging induction and ongoing training for Staff on this Policy including the consequences of a breach; investigating and reporting any known breaches of this Policy.
All Staff	Staff are responsible for complying with this Policy including by: <ul style="list-style-type: none"> understanding and complying with the requirements of this Policy and to seek further information if unclear; being responsible for their decisions, actions and behaviour online; advising their supervisor if they become aware of a breach; advising their supervisor if they have breached this Policy; not making statements or representations purportedly on behalf of NAIF through Social Media Tools without prior approval from the CEO.

5. Consequences of non-compliance

Breaches of this Policy may have serious consequences which could result in termination of employment or other engagement with NAIF. Incidents of non-compliance should be advised in accordance with clause 4 above or the NAIF Incident Reporting Policy.

6. Key Elements

6.1 General expected Standard

Whilst Staff are not Australian Public Service (APS) personnel (meaning they are employed under common law contract not the *Public Service Act 1999 (Cth)*), the same social media principles, consideration and need for careful judgement applies, as it does to APS employees. As such, this Policy is designed to operate in the same manner as the APS social media guide, available at <http://www.apsc.gov.au/publications-and-media/current-publications/making-public-comment>.

Staff are encouraged to read the APS guidance which includes the following directives:

- be impartial and objective;
- consider matters on their merits;
- perform to the best of their ability, with honesty and integrity;
- do not make public comment that may lead a reasonable person to conclude that they cannot provide relevant services impartially and professionally;
- treat everyone with courtesy and respect, without coercion or harassment of any kind;
- do not pursue personal interests which may conflict with NAIF's interests; and
- comply with applicable Australian laws and NAIF policies, procedures and guidelines as amended from time to time.

Subject to the terms of this Policy, NAIF recognises that Staff have a right to use Social Media Tools and respects the right for Staff to participate appropriately and respectfully in public and political debate in their private lives. However, NAIF expects a common sense approach to commentary with the overriding goal being to not act in a way that is likely to cause damage to NAIF's or the Commonwealth's reputation or that of a relevant State or Territory government or any other relevant stakeholders.

6.2 Public Comment Obligations

(a) Public Comments in support of NAIF

Staff can and are encouraged to use Social Media Tools to promote, share and like online content that has been generated by NAIF for promotional purposes. This includes for example, liking or sharing tweets on the NAIF Twitter account, sharing NAIF newsletters, media releases or job advertisements.

(b) Guide to making Public Comments and general use of Social Media Tools

Staff can generally use Social Media Tools to make Public Comment in a private or personal capacity if the Public Comment is lawful and does not:

- appear to be made on behalf of NAIF (unless with the prior consent of the CEO);
- interfere with the ability of the Staff member to carry out their work duties;
- damage the reputation of NAIF, the Commonwealth Government, the relevant State and Territory governments or any other relevant NAIF stakeholders (including proponents);
- constitute, or amount to a personal attack on or amount to bullying, harassment, defamation or discrimination of others including an employee of NAIF or a proponent, customer, supplier or contractor of NAIF;
- include language that is threatening, obscene or offensive or discourteous, disrespectful or disparaging of others or their opinions;
- negatively impact customer or stakeholder confidence in NAIF;
- appear to compromise the ability of the Staff member to act impartially, professionally and without bias in their role;
- include offensive or inappropriate images including those that reference or involve NAIF in some way including images of colleagues without their prior consent;
- bring negative media attention;
- protest against NAIF or Commonwealth, State or Territory government laws or policies or involve work related matters; or
- breach any other requirements of this Policy.

(c) Official NAIF Public Comment

A Staff member who has been nominated as a spokesperson by the CEO must comply with any directions of the CEO and/or Director Corporate Affairs and Communication in making any Public Comments on behalf of NAIF.

6.3 Confidentiality Obligations

In accordance with the NAIF Confidentiality Policy, when using Social Media Tools(including making any Public Comment) all Staff must ensure that confidentiality is maintained with regard to all aspects of the NAIF pipeline,(including specific projects and processes and whether or not a proponent has approached NAIF), other than where the proponent and NAIF have agreed to specific public references.

6.4 Time of social media use

This Policy applies to conduct occurring both during and outside working hours. The requirements of the Policy apply whether or not Staff are using NAIF's ICT systems, devices or equipment, including the use of private internet systems and/ or equipment.

6.5 Review of social media presence

Following commencement of employment with NAIF, all Staff are required to review their online presence prior to their date of employment and its potential impact on NAIF, and consider appropriate action (including deletion of comments where appropriate) in order to ensure compliance with this Policy. Staff are also encouraged, on Social Media Tools such as LinkedIn, to use standard NAIF company summaries as part of their role profile.

7. Other considerations when using Social Media Tools

Staff are encouraged to use discretion and sound judgement when using Social Media Tools and understand that content placed on the internet (e.g. blog comments or Posts) remains permanently accessible. Tracking tools can identify the contents of a website at a particular date, even if the content is later deleted. Staff are encouraged to consider the following recommendations when using Social Media Tools:

- understand that liking, sharing or commenting on a controversial or negative Post could be seen as an endorsement for the author of the Post;
- comments that are shared on social media are available immediately to a wide audience that grows fast;
- like other forms of communication, Posts could be taken out of context;
- remember that content shared online can become a digital footprint that lasts forever;
- do not rely on security settings to keep information private;
- anything shared online in any capacity can be traced and Staff should not believe that Posts provide anonymity;
- show caution due to the real, or apparent influence that they have with certain stakeholders (e.g. in relation to publicly listed companies, a negative social media Post may impact share prices).

Social Media Tools are not an appropriate communication tool to address a work grievance. NAIF provides other appropriate avenues including support services through the Human Resources function, Incident Reporting Policy, Complaint Handling Policy, and Public Interest Disclosure Policy.

8. NAIF Platforms

The Director, Corporate Affairs and Communication is responsible for maintaining the NAIF Social Media Tools. Content is focused on the activities of NAIF, including promotion of media releases, presentations given by Directors, the CEO or other Staff and significant stakeholder meetings. These platforms can also be used to engage with and respond to questions or concerns raised by a member of the public.

Website content is to be cleared and updated through the CEO and Director Corporate Affairs and Communication.

Staff must not Post on these platforms unless approved by the CEO and Director Corporate Affairs and Communication.

Website - <http://naif.gov.au/>

The NAIF website is the primary online platform for the promotion of NAIF. The website is the primary source of all material available to the public including speeches, newsletters and media releases.

LinkedIn - <https://www.linkedin.com/company/northern-australia-infrastructure-facility/>

NAIF has a linkedIn profile, which is available for NAIF Staff and Directors to connect to. NAIF Staff and Directors may list their NAIF positions on their LinkedIn profile and connect to the NAIF LinkedIn page.

Twitter - <https://twitter.com/naifaustralia?lang=en>

The NAIF twitter account may be used to promote NAIF, share NAIF related content, including media, and explain details about NAIF, its role and mandate. Retweets should be limited to comments that support NAIF, the NAIF mandate or the development of northern Australia. However, this excludes retweets that could be interpreted as commentary on political or policy matters. Tweets and retweets from conferences and presentations attended by NAIF are also allowed, provided they support NAIF's objectives.

This policy will also apply to other Social Media Tools as developed.

9. Monitoring Usage

Staff use of social media websites may be monitored by NAIF. All Staff are taken to have consented to such monitoring upon their employment / engagement with NAIF.

As with all other facilities provided in the workplace, Internet access is intended for business purposes, however, Staff may use NAIF's Internet connection for limited personal use when not in conflict with NAIF's interests. There may be circumstances where Staff access to a social media website is blocked, if accessed through a NAIF device, such as:

- if the website could interfere with or damage NAIF's computer network or systems, any program or data
- if content on the website may be considered discriminatory, bullying, threatening, harassing or offensive
- if the website or any content on the website is unlawful or in breach of any policy of NAIF.

Any blocked website should be referred to Information Technology for further review, in accordance with the requirements of the Corporate Information Security Policy.