# Whole of Victorian Government Social Media Operational Policy

Prepared by Department of Premier and Cabinet (2025)

## Why is this policy important?

Social media platforms provide significant opportunities for Victorian Government departments, agencies and entities to engage with the public.

Departments, agencies and entities can build audiences and generate engagement by opening up a two-way conversation with the public. This interaction plays an important role in delivering communications about the policies and operations of government, but there are risks, including staff welfare, being sued for defamation and inadvertently misrepresenting the policies of the government. This is particularly important in the context of the recent case of *Fairfax Media Publications Pty Ltd v Voller* where the High Court determined that an entity that operates social media accounts can be considered the publisher of third-party comments[[1]](#footnote-2) and could be liable in defamation for such comments.

This policy aims to mitigate the risk of defamation and provide protective measures to support the safety and wellbeing of Victorian Public Sector staff utilising social media in their work.

Victorian Government departments, agencies and entities must follow this policy and use the Social Media Operational Guidelines for best practice examples and supporting information on this policy.

## Scope

The Social Media Moderation Policy ('the policy') is relevant to all Victorian Government departments, agencies and entities operating official social media accounts or undertaking paid social media advertising.

Separate from this policy, Victorian Government departments, agencies and entities should determine whether they require their own specific policy if they expect an increased likelihood of defamatory comments occurring in response to their social media posts. A tailored policy may subsequently be developed, which considers the objectives, resources, and nature of the specific department, agency or entity’s social media posts.

Departments, agencies and entities should refer to relevant Retention and Disposal Authorities issued by the Public Records Office Victoria (PROV) to determine retention and disposal actions their social media records. Please see PROV’s website for advice on [managing social media records](https://prov.vic.gov.au/recordkeeping-government/a-z-topics/social-media-records).

This policy does not cover the use of social media for personal or workplace communications (such as Microsoft Teams), or department or agency-specific social media policies. For guidance on the personal use of social media, refer to the [Code of Conduct for Victorian Public Sector Employees](https://vpsc.vic.gov.au/resources/code-of-conduct-for-employees/) (VPS Code of Conduct).

The policy does not cover the full operation of official government social media accounts. All channels managed by a department or agency are the responsibility of the accountable officer for that entity.

For more information read your department’s, agency's or entity’s social media documents and visit the [Use social media – digital guide](https://www.vic.gov.au/use-social-media), [Social media branding – digital guide](https://www.vic.gov.au/social-media-branding-digital-guide) and [Victorian Government communication requirements](https://www.vic.gov.au/victorian-government-communication-requirements#requirements-under-legislation).

Importantly, all social media posts by Victorian Government departments, agencies and entities are the responsibility of the accountable officer for that entity, and are considered ‘public sector communications’ and must comply with the requirements of:

* the [*Public Administration Act 2004*](https://www.vic.gov.au/victorian-government-communication-requirements#public-administration-act-2004) (Vic) and
* the [*Public Administration (Public Sector Communication) Regulations* *2018*](https://www.vic.gov.au/victorian-government-communication-requirements#public-sector-communications-regulations).

These requirements are designed to ensure that public sector communications (including social media posts) are in the public interest and are apolitical.

## Requirements

While there isn’t a universal approach to managing and moderating accounts, at a minimum, official social media account owners **must** identify posts that are likely to attract defamatory comments as well as any mitigating and moderation actions required.

To help in this process, all official social media accounts **must** have:

* a **social media strategy** including a risk mitigation strategy, a plan for regular audits of the account to identify opportunities, issues and risks, appropriate authorisation and approval processes, and a process for record-keeping.
* **community guidelines** for users that sets out what is and is not permitted on the social media channel.
* **a moderation guide** to identify content that requires a response and the type of response required.
* a process for handling complaints and a publicly available **complaints handling policy,** with a process for individuals to make a complaint about any alleged defamatory comment made against them and to seek its removal.
* consideration of **moderation staffing levels** with plans for sufficient staffing levels to handle peak demand.
* **support for staff** and proactive measures to ensure mental wellbeing.

Staff must be aware of any Victorian Government or Department/Agency guidelines that restrict use of certain social media platforms or tools, such as TikTok or Artificial Intelligence tools.

## Policy checklist

Use this checklist to determine what actions your team needs to take to address the requirements of the policy.

[ ]  Have you read the [Use social media guide](https://www.vic.gov.au/use-social-media)?

[ ]  Have you read the [Social media branding – digital guide](https://www.vic.gov.au/social-media-branding-digital-guide)?

[ ]  Are you aware of the requirements of the [Public Administration Act and the Public Administration (Public Sector Communication) Regulations](https://www.vic.gov.au/victorian-government-communication-requirements#requirements-under-legislation)?

[ ]  Have you read your organisation’s specific social media guidance?

[ ]  Do your accounts have a social media strategy?

[ ]  Does your team have a risks or issues management guide?

[ ]  Does your team conduct an annual audit of your account?

[ ]  Does your team have a record keeping procedure?

[ ]  Do your accounts have community guidelines publicly available on your account?

[ ]  Do your accounts have a moderation guide available for moderators to reference?

[ ]  Do your accounts have a publicly available complaint handling policy?

[ ]  Does your team have contingencies for moderation staffing levels?

[ ]  Has your team done enough due diligence to ensure they are aware of any policy or guidelines that prohibit certain social media platforms or tools

1. See F*airfax Media Publications Pty Ltd v Voller; Nationwide News Pty Limited v Voller; Australian News Channel Pty Ltd v Voller* [2021] HCA 27. [↑](#footnote-ref-2)