

Communications and Marketing Procedure - Media, Engagement and Public Comment

Section 1 - Purpose

(1) This procedure supports the [Communications and Marketing Policy](#) by setting out processes, support and responsibilities for:

- a. corporate communication with internal and external stakeholders and community
- b. critical incident media responses
- c. news and media communications
- d. public and personal comment, including social media use, by University staff
- e. legal obligations and considerations
- f. support and advice available.

Scope

(2) This procedure has the same scope as the [Communications and Marketing Policy](#).

Section 2 - Policy

(3) See the [Communications and Marketing Policy](#).

Section 3 - Procedures

Advice and support for staff

(4) Advice and support for staff required to provide external communications under this procedure is available from the following organisational units:

- a. External Relations will support academic and other professional/general employees to engage effectively and professionally with the media on behalf of the University. Support can be requested via the [Charles Sturt Media website](#).
- b. The Communications and Government Relations provides resources, training and advice for government communications.
- c. Legal Services advice must be sought prior to making or publishing external communications if clarification of the legal limitations or potential legal consequences of any comment or critique is required.

Corporate communication

(5) Where the Vice-Chancellor designates an official spokesperson through the Communications and Marketing Schedule - Official Spokespersons [pending approval], that person may speak to the media or issue a media release in

relation to the matter they are authorised to speak on, without seeking further approval.

(6) Notwithstanding clause 5, an official spokesperson must:

- a. not use the term 'official spokesperson' as a title in media relations unless otherwise approved. A reference to an official spokesperson is only for the purposes of designating the role and describing the authorities and responsibilities in the [Communications and Marketing Policy](#) and this procedure and is not an official title or role
- b. consult with the Manager, Digital and Social Media prior to speaking to the media or issuing a media statement on matters where the Vice-Chancellor has not authorised a particular corporate position or, in urgent situations and where communication with the Vice-Chancellor is not practicable, consult with the University Secretary and/or Head, Communications and Government Relations regarding the University's position
- c. comply with the legal and quality assurance obligations as set out in this procedure.

(7) Communications and Government Relations provide operational support for corporate communication to the Vice-Chancellor and senior officers of the University by:

- a. developing, recommending and implementing external communication and media plans
- b. writing media releases, speeches and opinion pieces and assisting in the preparation of public comment
- c. organising media opportunities and interviews
- d. overseeing the preparation of corporate-level documents to ensure alignment with corporate communication and reputation goals
- e. establishing and maintaining effective relationships with key media at local, national and international levels relevant to [University Strategy](#)
- f. monitoring the outcome of University communications in relation to University goals
- g. supporting critical incident management
- h. supporting official spokespersons.

News and media communication

(8) In addition to corporate communications, the University's activities and achievements are communicated to the media, public and other stakeholders through news media communications.

(9) News and media communications are centrally coordinated and supported by External Relations, although other University employees are authorised to communicate with media in accordance with the provisions for public comment in the [Communications and Marketing Policy](#) and this procedure.

(10) External Relation's activities include:

- a. managing the [Charles Sturt News portal](#)
- b. developing and implementing media promotion plans for schools, faculties, research institutes and business enterprises, or offering advice on issues impacting on and involving their areas
- c. monitoring media outlets, and assessing and reporting on University-related material
- d. liaising with media staff at local, national and international levels and coordinating the distribution of media releases for the University
- e. assisting academic and professional/general employees, and other senior or executive leaders, in preparing comments and critiques, preparing for media interviews, or providing other training or mentoring
- f. assessing and writing media releases
- g. monitoring the performance and impact of media promotion of the University
- h. supporting critical incident management with crisis communications advice and assets.

(11) External Relations should be contacted [via their website](#) regarding:

- a. media requests for academic comment, but see also the provisions for public comment to media in this procedure
- b. internal requests for media coverage of University events and activities.

(12) The decision to develop and publish stories is at the discretion of External Relations, who will exercise professional judgment about newsworthiness, public interest and the likelihood of a story being accepted and published, or followed up, by a media outlet.

Public and personal comment

Public comment and media

(13) The [Enterprise Agreement](#), [Statement on Academic Freedom and Freedom of Speech](#) and the [Code of Conduct](#) set out the University's position and the rights and responsibilities of University employees with respect to public comment.

(14) Where academic or general/professional employees are contacted directly and requested to provide media comment, they may respond to requests where this is in accordance with their right to provide public comment related to their academic or other specialised area of appointment. However, employees should also liaise with External Relations to ensure that, if there are follow-up inquiries, the University response is coordinated and consistent.

(15) External Relations may ask academic or other employees to make themselves available to provide comments or critiques related to their academic or other specialised area of appointment. This may be in response to a request from the media or through analysis of topical issues.

(16) Communications and Government Relations may also ask academic or other employees to contribute an independent view related to their academic or other specialised area of appointment, in relation to a corporate matter or the positioning of the University.

Public comment in a personal capacity (personal comment)

(17) The University recognises the right of individuals to free speech (subject to restrictions provided by law and necessary to protect others) as set out in the [Statement on Academic Freedom and Freedom of Speech](#).

(18) Public comments made by employees in a personal capacity (personal comment), on matters related to the University, in connection with the University, or where the comments might be interpreted as being made on behalf of the University, must include a disclaimer clearly stating that they are not commenting on behalf of the University. For example: "These are my personal views and do not represent the University's policies, positions or strategies."

(19) Circumstances in which there is a connection with the University include but are not limited to where:

- a. comments or posts are made to a social media platform that is a central or official University social media account, e.g. Charles Sturt Facebook, Twitter/X or LinkedIn sites
- b. comments or posts are made to personal or non-University social media platforms accessed using University computing or communication facilities (including remote access facilities) either during normal working hours or after hours
- c. comments or posts are made on content (on social media platforms or otherwise) that is specifically about the University or any members of the University community (e.g. University ranking/rating websites) or comments about colleagues, students or supervisors
- d. a person identifies themselves as a University employee (for example, referencing the University in their

profile) or they can be directly or indirectly associated with the University

- e. comments or communications are made using University systems and resources, including but not limited to email accounts, digital signatures, or print or electronic stationery.

(20) For the avoidance of doubt, the circumstances in clauses 19 and 21 are not intended to restrict an employee's right to make personal comment, but to provide examples of situations where a clear disclaimer must be made and provide guidance on the appropriate use of social media in connection to the University. See the [Statement on Academic Freedom and Freedom of Speech](#) for restrictions that may apply to public comments.

Use of social media

(21) With regard to using official University, public or private social media platforms, University employees:

- a. must only post or comment on behalf of the University, or be perceived to post or comment on behalf of the University, where they have authority to do so and must disclose their name, position title and the fact that they are communicating the views of the University officially
- b. if commenting in a professional capacity on a subject that relates directly to their University appointment but not on behalf of the University, may give the title of their University appointment in order to establish their credentials and include a disclaimer that the views expressed are their own and not those of the University
- c. if making personal postings or comments related to the University, must include a disclaimer clearly stating that they are not commenting on behalf of the University. For example, 'These are my personal views and do not represent the University's policies, positions or strategies.'
- d. if making any personal postings or comments, must not:
 - i. include their University position title or contact details (e.g. their University telephone number or email address)
 - ii. use the University logo or any other University marks or images (including images of University buildings or facilities)
 - iii. use the University's name to promote or endorse any non-University business, product or cause, or any political party or candidate
- e. must ensure that no misleading or incorrect information or comments are deliberately published
- f. must ensure that information and comments are consistent with the University's [Code of Conduct](#), [Bullying, Discrimination and Harassment Prevention Policy](#), [Anti-Racism Policy](#) and legal obligations
- g. in relation to any central or official social media channels as described in the [Communications and Marketing Procedure - Website and Social Media Platforms](#), must stop using, accessing or asserting ownership over any social media platforms that they were authorised to use as an employee after they have ceased employment with the University (e.g. by closing, transferring or renaming the account).

(22) Employees are personally responsible and will be held accountable for any content or comments that have a connection with the University that they publish on social media platforms. This applies to content and comments published on their personal social media platforms and on the platforms of others, either in a professional or personal capacity.

(23) All employees should consider carefully the extent to which they use their personal social media platform for interactions with other employees and students. For example, it may not be appropriate for a staff member to use a social media platform to discuss a work issue or to accept students as social media 'friends' as this might be perceived as a conflict of interest.

Legal and regulatory obligations

(24) All University communications, including public comments and social media use, must be professional and in

accordance with applicable legal obligations.

(25) Employees and other University officers must ensure they comply with any legal obligations relevant to the jurisdiction in which they are communicating. In particular, they must:

- a. protect the privacy of individuals and information concerning individuals where that information has not been expressly authorised for release and is not otherwise permitted to be disclosed
- b. ensure that the copyright and moral rights of the owners of original works are not infringed and the reproduction of copyrighted materials is consistent with relevant copyright laws
- c. not make defamatory communications
- d. not make comments which are discriminatory or are unnecessarily controversial (e.g. that are unreasonably polemic or vexatious)
- e. ensure that the publication or communication of information regarding preference and enrolment figures accords with University Admission Centre and Victorian Tertiary Admissions Centre requirements.

(26) As a registered provider of higher education to domestic and overseas students in Australia, the University must identify itself on public materials as set out in the [Provider Identification Display Briefing Note](#). Approved wording for University social media can be found in this [compliance briefing note](#).

(27) Public and personal comment that is in breach of this procedure, other University policy or relevant legislation, standards or codes of practice, may result in:

- a. a direction to withdraw comments or remove material
- b. requests to social media platforms or other external parties to remove material
- c. investigation and disciplinary action in accordance with the [Code of Conduct](#)
- d. reports to the police or other appropriate authority (e.g. the Australian Communications and Media Authority) and/or
- e. legal action.

Section 4 - Guidelines

(28) [Communicating without Bias Guidelines](#).

Section 5 - Glossary

(29) This procedure uses terms defined in the [Communications and Marketing Policy](#), as well as the following:

- a. Corporate communication – relates to communications to the media, public, government or government bodies or other external stakeholders, on issues that have a general campus or University-wide impact or significance or situations that are of a particularly controversial or sensitive nature (for example, corporate comment on government higher education policy).
- b. Government communications – include communications and submissions with/to government and government agencies and are normally considered either:
 - i. corporate communication where made on behalf of the University, in particular, where these are for-publication submissions
 - ii. public and personal comment where the communication is by individual staff or groups and is consistent with the requirements set out in the [Communications and Marketing Policy](#) and this procedure.
- c. News and media communication – relates to the production of media releases, statements and copy to

strategically build beneficial relationships between the University, the media and the public, and promote the University's achievements, events and activities.

- d. Personal comment – means public comments made in a personal capacity, e.g. public comments that do not relate directly to the academic or other specialised areas of a staff member's appointment, or where they are not authorised to make the comments on behalf of the University.
- e. Public comments – as stated in the [Code of Conduct](#), includes public speaking engagements, comments on radio or television, and expressing views in letters to newspapers or in books, journals, notices or other media (including social media such as Facebook and Twitter) where it might be expected that the publication or circulation of the comment will spread to the community at large.

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