

STANDARD OPERATIONAL POLICY AND PROCEDURES



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| TOPIC | Social Media – SOPP 7.06 | | |
| RESPONSIBILITY | Chief Executive | | |
| AUTHORISATION | Chief Executive | | |
| SIGNED | | DATE | 30/5/2023 |
| VERSION | 1.4 | LAST REVIEWED | May 2023 |
| EFFECTIVE | March 2014 | NEXT REVIEW | May 2026 |

1. PURPOSE

This policy provides guidance to all employees of East Grampians Health Service (EGHS) about engaging in social media. All employees are responsible for being aware of the policy and understanding their responsibilities around using social media in their professional and personal capacity.

Online communication and media tools are important communication channels that provide EGHS with the opportunity of engaging with their staff and community. These tools can be used to inform the community about EGHS, to provide information about programs and to create new channels to open up a two-way conversation and consultation.

The intention of this policy is to establish a culture of openness, trust and integrity in activities.

2. POLICY OBJECTIVES

The objective of this policy is to set the parameters for the use of social media, including

- Employees' professional responsibilities
- Employees' responsibilities in a personal capacity
- To manage risk

It is essential that employees understand that comments published via social media platforms are treated the same way as public statements and should be made by an authorised spokesperson in the same way that comments are made in any public forum or to the media.

The objectives of this policy are compatible with the **Code of Conduct for Victorian Public Sector Employees May 2015**, incorporating the **Public Sector Standards Commissioner Guidelines for the use of Social Media in the Victorian Public Sector**, and the **Charter of Human Rights and Responsibilities Act 2006**.

3. DEFINITIONS

Social media is the term used for internet-based tools for sharing and discussing information among people. It refers to user-generated information, opinion and other content shared over open digital networks. Social media may include (although is not limited to):



Integrity



Excellence



Community Focus



Working Together



Learning Culture

- Social networking sites (e.g. Facebook, Twitter, LinkedIn, Instagram, Snapchat, TikTok, Pinterest and Reddit)
- Video and photo sharing websites (e.g. Flickr, YouTube, Vimeo)
- Blogs, including corporate blogs and personal blogs
- Blogs hosted by media outlets (e.g. ‘comments’ or ‘your say’ feature on theage.com.au)
- Wikis and online collaborations (e.g. Wikipedia)
- Forums, discussion boards and groups (e.g. Google groups, Whirlpool)
- Vod and podcasting
- Online multiplayer gaming platforms (e.g. Fortnite, GTA Online, League of Legends, Call of Duty, Apex Legends)
- Email and instant messaging (including SMS, Messenger)
- Geo-spatial tagging (Foursquare).

Social media also includes all other emerging electronic/digital communication applications.

Employees include permanent staff and executives, contractors, temporary staff, volunteers and students on placements.

4. PROTOCOLS

4.1 General responsibilities as an employee

Employees should be aware of and understand their responsibilities under the Code of Conduct for Victorian Public Sector Employees. The following sections of the Code of Conduct are particularly relevant to this policy:

- Section 2.2 Remaining apolitical
- Section 3.2 Using powers at work
- Section 3.4 Official Information
- Section 3.5 Public comment
- Section 3.9 Public trust
- Section 5.3 Work resources
- Section 5.4 Open to scrutiny
- Section 6.1 Fair and objective treatment
- Section 6.2 Privacy and confidentiality
- Section 6.3 Maintaining confidentiality
- Section 6.4 Equity and diversity.

4.2 Compliance

Depending on the circumstances, non-compliance with this policy may constitute a breach of contract of employment or other contractual obligations, misconduct (under EGHS's relevant discipline policy), sexual harassment, discrimination, or some other contravention of EGHS policies and the law.

Failure to comply with the policy may result in disciplinary action and, in more serious cases, may result in termination of employment.

4.3 Identifying inappropriate use

Where an employee becomes aware of inappropriate or unlawful online content that relates to EGHS, or content that may otherwise have been published in breach of this policy, the situation and circumstances should be reported immediately to either the Director or if a serious matter directly to the Chief Executive.

Privacy breaches can also be reported through the EGHS Compliments and Complaints Process. Refer to [Management of Compliments and Concerns – SOPP 16.01](#) and [Employee Complaints and Grievances – SOPP 35.12](#)

4.4 Professional use of social media

The Chief Executive shall nominate the Community Liaison Officer to co-ordinate EGHS social media management.

The Community Liaison Officer will oversee expansion of social media and help to develop social media strategies to promote EGHS core business, events and engage communities and members.

Staff may, from time to time and where appropriate, post on behalf of East Grampians Health Service using the organisation's online social media profile. This is to be done only after training and authorisation has been provided by the Community Liaison Officer.

The Community Liaison Officer has ultimate responsibility for:

- Ensuring appropriate and timely action is taken to correct or remove inappropriate posts (including defamatory and/or illegal content) and in minimising the risk of a repeat incident.
- Ensuring that appropriate and timely action is taken in repairing relations with any persons or organisations offended by an inappropriate post.
- Moderating and monitoring public response to social media, such as tweets and Facebook replies, to ensure that trolling and spamming does not occur, to remove offensive or inappropriate replies, or caution offensive posters, and to reply to any further requests for information generated by the post topic.

It is important to maintain the balance between encouraging discussion and information sharing, and maintaining a professional and appropriate online presence.

EGHS will follow all directives from government on social media, such as permitted platforms.

4.4.1 Moderating social media

The reputation of EGHS is first and foremost and this involves maintaining a safe and friendly environment for its members.

From time to time social media forums may be hijacked by trolls or spammers, or attract people who attack other posters or the organisation aggressively. In order to maintain a pleasant environment for everybody, these posts need to be moderated.

Freedom of speech is to be encouraged, but if posts contain one or more of the following, it is time to act:

- Excessive or inappropriate use of swearing

- Defamatory, slanderous or aggressive attacks on EGHS, other individuals, organisations, projects or public figures
- Comments that are in any way racist, sexist or discriminatory
- Breach of copyrighted material not within reasonable use, in the public domain, or available under Creative Commons license
- Breach of data protection or privacy laws
- Repetitive advertisements
- Topics which fall outside the realms of interest to members and stakeholders, and which do not appear to be within the context of a legitimate discussion or enquiry.

If a post appears only once:

- Remove the post as soon as possible
- If possible/appropriate, contact the poster privately to explain why you have removed the post and highlighting EGHS's posting guidelines.

If a poster continues to post inappropriate content, or if the post can be considered spam:

- Remove the post as soon as possible
- Ban or block the poster to prevent them from posting again.

Banning and blocking should be used as a last resort only in consultation with the Chief Executive and only when it is clear that the poster intends to continue to contribute inappropriate content. However, if that is the case, action must be taken swiftly to maintain the welfare of other social media users.

The decision to block, ban and remove posts ultimately lies with the Community Liaison Officer, but may, at their discretion, be delegated to responsible staff.

4.5 Personal use of social media

This policy does not discourage nor unduly limit employees using social media for personal expression or other online activities in their personal life.

Employees should be aware of and understand the potential risks and damage to EGHS that can occur, either directly or indirectly from their personal use of social media and should comply with this policy to ensure that the risk is minimised.

Employees are personally responsible for content published in their personal capacity on any form of social media platform.

To avoid breaching this policy employees must:

- Only disclose and discuss publicly available information
- Ensure that all content published is accurate and not misleading and complies with all relevant EGHS policies
- Expressly state that stated views are personal and are not representative of EGHS
- Behave politely and respectfully

- Adhere to the terms of use for using the social media platform or website, and adhere to legislation including copyright, privacy, defamation, contempt of court, discrimination, harassment and any other EGHS policies and applicable laws.

Employees must not:

- Post material that is offensive, obscene, defamatory, threatening, harassing, bullying, discriminatory, hateful, racist, sexist, infringes copyright, constitutes a contempt of court, breaches a Court suppression order, or is otherwise unlawful
- Imply that they are authorized to speak as a representative of EGHS, nor give the impression that the views expressed are those of EGHS
- Use the identity or likeness of any patient or resident or another employee, volunteer, contractor or other member of EGHS
- Use pictures of themselves or others in EGHS uniform or wearing EGHS identification, other than those pictures sanctioned by the organisation
- Use their EGHS email address or any EGHS logos or insignia that may give the impression of official support or endorsement of their personal comment
- Use or disclose any confidential information or personal information about patients, residents, consumers, staff or volunteers obtained in their capacity as an employee or contractor of the EGHS
- Post material that is, or might be construed as, threatening, harassing, bullying or discriminatory towards another employee, volunteer or contractor of EGHS
- Comment or post any material that might otherwise cause damage to EGHS' reputation or bring it into disrepute.

4.5.1 Reasonable and unreasonable personal use

When accessing social media via the EGHS internet and intranet systems, employees must do so in accordance with the [Computer Use, Internet Access and Email – SOPP 27.01](#), which requires employees to use these resources 'reasonably', in a manner that does not interfere with work, and is not inappropriate or excessively accessed.

4.6 Harassment and bullying

- The EGHS [Serious Misconduct - Harassment – Sexual Harassment – Bullying – SOPP 35.18](#) applies both online and in the physical workplace.
- Workplace bullying and harassment includes any bullying or harassing comments employees make on-line, even on their own private social networks or out of office hours.
- Abusive, harassing, threatening or defaming postings are in breach of EGHS policies and may result in disciplinary action being taken.
- All employees are expected to treat their colleagues with respect and dignity and must ensure their behaviour does not constitute bullying and/or harassment.

4.7 Defamation

Employees are to refrain from publishing material that may cause injury to another person, organisation, association or company's reputation, and should seek further legal guidance if publication of such material is thought to be necessary.

5. RELATED DOCUMENTS

[Code of Conduct for Victorian Public Sector Employees](#)

[Serious Misconduct - Harassment – Sexual Harassment – Bullying – SOPP 35.18](#)

[Computer Use, Internet Access and Email – SOPP 27.01](#)

[Management of Compliments and Concerns – SOPP 16.01](#)

[Employee Complaints and Grievances – SOPP 35.12](#)

[Improving Performance Guide](#)

7. REFERENCES

Australian Commission on Safety and Quality in Health Care. National Safety and Quality Health Service Standards guide for hospitals. 2nd ed – version 2. Sydney: ACSQHC; 2021 – Standard 1

Australian Government Aged Care Quality and Safety Commission. Aged Care Quality Standards. Canberra: ACQSC; 2018 – Standard 8

Health Records Act 2001

STUDENT DECLARATION - SOCIAL MEDIA

I agree to adhere to this Policy

Name: _____

Signature: _____

Date: _____