



PRINTED COPIES ARE NOT CONTROLLED

Social Media Policy C6.4G

Our practice social media policy is as follows. It is also on our website.

Policy

This policy provides guidance for employee use of social media. Social media has many forms. This policy must be broadly applied to all forms of social media; these include but are not restricted to Facebook, Twitter, LinkedIn, Share, Blogging, Messenger, message boards, chatrooms, electronic newsletters, online forums, social networking sites, and wikis.

Mannum Medical Associates acknowledges that the use of social media and social networking tools can considerably benefit the achievement of this clinic's objectives as they allow timely, easy and cost-effective communication, consultation and influencing of a broad audience. Mannum Medical Associates also recognises staff's right to exchange views and other content on social media platforms as private individuals.

Social media communications can reach a broad audience and content can be replicated, repeated and further distributed by users with access regardless of any privacy settings. Therefore all communications and activities on social media websites are considered to be in the public domain and may have significant negative consequences for Mannum Medical Associates and for the initiator.

For this reason, guidance and direction about responsible and safe use of social media are therefore required for Mannum Medical Associates employees. This Policy intends to:

- alert staff to possible risks and liabilities of inappropriate use of public communications.
- assist staff to make appropriate decisions when sharing or posting content on social media sites.
- provide staff with advice about their responsibilities and obligations to this clinic when using social media or networking tools as private individuals.
- provide guidance and direction to staff on managing the risks associated with using social media.

Due to the fast-moving nature of information technology including the development of new social media platforms it is important that this policy be reviewed at regular intervals.

Guidelines

- Employees need to be aware that their actions may have an impact on their individual image as well as the practice's image. The information that employees post or publish may be public information for a long time. Employees must use their best judgement in posting material that is neither inappropriate nor harmful to the practice, its employees or patients.
- Our practice may observe the content and information made available by employees through social media.
- Examples of prohibited social media conduct include posting commentary, content or images that are defamatory, pornographic, proprietary, harassing, or libellous.
- Employees are not to publish, post or release any information that is considered confidential or not public.
- Employees must get appropriate permission before referring or posting images of current or former employees, contractors or patients.
- Employees must be clear that their online posts are personal and purely their own. The practice should not be held liable for any repercussions the employee's content may generate.
- Employees must show respect for others' and others' opinions in all posts.

Overall employees must observe the principles of integrity, professionalism, privacy and impartiality when posting online.

There may be disciplinary implications for employees not complying with the practice's social media policy and guidelines.

The RACGP's Guide for the use of social media in general practice is available at www.racgp.org.au/your-practice/ehealth/social-media

Application

This policy applies to all staff regarding their use of social media networks and sites – even if it is used outside work and even if Mannum Medical Associates equipment is not used – in situations where:

- their comments or profile can identify them as working in Mannum Medical Associates (e.g. where their employer or the location of their employment can be established from their comments); *or*
- they refer to issues relating to Mannum Medical Centre *or*
- they communicate information on the internet that they obtained in the course of their work with Mannum Medical Associates *or*
- they interact with or comment on others working at Mannum Medical Associates

Policy context requiring compliance

Code of Ethics

When using social media, Mannum Medical Associates employees should bear in mind that the *Code of Ethics* requires them to:

conduct themselves at all times in a manner that will **not bring** them, the agency in which they work, the public sector or Government of the day into **disrepute** and to act with respect, integrity and accountability. These requirements apply to employee conduct and actions that could be published to a broad public audience such as comments or other content placed on the internet. In the context of social media, employees have an obligation to ensure that their communications do not undermine public trust in the integrity of the public sector by tarnishing its reputation or the reputations of its agencies or of its employees.

use their **employer's equipment** efficiently and only for appropriate purposes as authorised;

maintain **confidentiality of information** acquired during the course of their employment and not use or disclose information that is not generally available to the public without expressed authorisation. Confidentiality obligations also include not using or publishing without authorisation any personal information of others obtained in the course of their employment. Examples include any information that identifies patients, consumers or colleagues, such as their names, addresses; images, likes, opinions or workplace. Similarly staff must not disclose potentially sensitive information gained during the course of their work about any person, for example their political opinions; affiliations with political, professional or other associations; religious or philosophical beliefs; race or ethnicity; sexual preferences; criminal history or health and genetic information.

Legal principles

Legal principles have implications for staff posting content on social media and for Mannum Medical Associates, such as relating to intellectual property; personal information and privacy; Work Health and Safety (WHS); discrimination and equal opportunity.

In particular it should be noted:

Staff must respect copyright laws and fair use of copyrighted material. Mannum Medical Associates retains **intellectual property** rights on matter developed during the course of a person's work or employment in this clinic.

Staff have obligations under **Work Health and Safety** and **discrimination** legislation not to cause injury or harm, discriminate against, harass, intimidate or bully any other employee, client or contractor of SA Health. These obligations also relate to comments posted online on private social networks or made out of work hours where any such comments have a connection to their work in this clinic. Besides the personal consequences for the communicator, SA Health could be held vicariously liable.

Social media content that may injure the reputation of another person, organisation, association or company may be **defamatory** and may have legal implications for the communicator and for Mannum Medical Associates;

Information in the public domain that refers to pending court proceedings should not include material that may prejudice or be part of evidence in those proceedings. Before commenting on past or pending proceedings, staff should be mindful of legal principles including **contempt of court** and court suppression orders.

Risks of non-compliance

Substantial breach of the standards of the Code of Ethics or legal principles may result in disciplinary action which may include termination of employment. Dismissal may result where:

the conduct of an employee seriously and significantly damages the interests of Mannum Medical Associates;

the actions compromises the psychological or physical safety of other staff, patients, clients or contractors of Mannum Medical Associates;

the conduct causes serious damage to the employment relationship;

the conduct is incompatible with the employee's duties as an employee.

To assist staff to use social media lawfully, responsibly and in a manner consistent with their obligations as public sector employees, acceptable standards for social media use are discussed in more detail the next section.

Standards for use of social media

The Policy does not intend to discourage nor unduly limit staff's use of social media for personal expression or personal purposes. However, when using social media as private individuals, staff need to be aware of risks to themselves and to the Mannum Medical Associates if social media are used inappropriately. To minimise such risks and to assist staff to make appropriate decisions when using social media for personal purposes, this policy requires staff to:

Refrain from accessing social media or social networks for personal purposes **during work time**.

Be mindful that activities or content posted on the internet should be regarded as **in the public domain** and permanent in nature.

Not post content that may bring themselves, Mannum Medical Associates, its agencies or its staff into **disrepute** or could be considered slanderous; otherwise improper or inconsistent with their obligations as staff of this clinic. This includes not posting or participating in interactions that would be construed by a reasonable person as being offensive, defamatory, threatening, harassing, bullying, discriminatory, hateful, racist, sexist or obscene.

Act and communicate at all times with **integrity, respect, accountability** and in such a manner as to uphold the public trust and treat the public and other public sector staff with respect and courtesy.

Not post content that may compromise the physical or psychological **safety** of colleagues; and of Mannum Medical Associates' clients, patients or contractors.

Ensure that the **privacy** of personal information of others including colleagues and patients is conserved.

Not disclose **information** acquired in the course of their work in Mannum Medical Associates without authorisation (where such information is not already generally available to the public).

Refrain from posting content or making comments on social media sites on behalf of Mannum Medical Associates unless they have been explicitly authorised to do so as part of their role.

Ensure that their contributions and communications are regarded as those of a private individual and **not** as a **representative** of their agency. This includes not using a departmental email address, logo or insignia that may give the impression of official endorsement of personal comments.

Ensure that their communications are not unlawful, for example do not infringe **copyright**, constitute **contempt of court**; or breach a suppression order.

Comply with their obligations and responsibilities under the Code of Ethics legislation, the Mannum Medical Associates **policies**, and the social media **guidelines of their respective professional bodies** regarding use of social media and digital communication.