

INTERNAL ONLY
ISLHD POLICY
COVER SHEET



Health
Illawarra Shoalhaven
Local Health District

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FUNCTIONAL GROUP OR HUB	Media & Corporate Communications
NSQHS STANDARD	Standard 1 – Clinical Governance Standard 2 – Partnering with consumers
SUMMARY	This Policy provides guidelines for the correct use of Social Media to raise awareness and inform the community about ISLHD's facilities, services and initiatives. It also outlines how staff must conduct themselves when using Social Media both in a professional and personal capacity.

COMPLIANCE WITH THIS DOCUMENT IS MANDATORY

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1. POLICY STATEMENT

Definition

Social Media in this policy is defined as any digital platform, tool, or app (desktop or mobile environment) designed to share online content and/or comment with groups of people.

It includes, but is not limited to Facebook, Twitter, YouTube, Instagram, Snapchat, Flickr, Pinterest, Messenger, LinkedIn and WhatsApp and also applies to blogging platforms and news media websites.

The intent of this policy is to provide guidance to employees for the appropriate and responsible use of social media, and to outline expected behaviour when using social media in both a professional and personal capacity. This includes making comments about NSW Health, ISLHD, colleagues, staff, patients or services on social media (during both work and personal time) where the status of the person making the comments as an ISLHD staff member is indicated, implied or can be reasonably ascertained.

This policy also outlines how the Illawarra Shoalhaven Local Health District (ISLHD) will manage its social media presence and includes advice for staff looking to use social media to promote their department/service.

All staff are required to maintain ethical and professional standards of behaviour as defined in the [NSW Health Code of Conduct \[PD2015_035\]](#) when using social media in both personal and professional contexts.

Compliance with this policy is mandatory. Staff guidelines have been developed for use in conjunction with this policy and for ease of reference.

Breaches of policy may result in disciplinary action including counselling, formal warning or termination of employment, in accordance with [NSW Health Managing Misconduct \[PD2018_031\]](#).

If a manager is concerned that policy has been breached, they should contact their [Workforce Support team](#) for advice and support.

2. AIMS

The policy sets out guidelines for ISLHD staff on:

- Conduct of all ISLHD employees and volunteers when using social media both in a professional and personal capacity.
- How social media is being used by the organisation
- The purpose of social media as a communication tool of ISLHD
- Obligations of users

3. TARGET AUDIENCE

In this policy, use of the term 'staff' includes:

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- Individuals who are employed in Illawarra Shoalhaven Local Health District (ISLHD) whether on a permanent, casual, temporary or voluntary basis;
- Contractors (including visiting medical officers, practitioners, agency staff and volunteers) working in ISLHD; and students, researchers or persons undertaking or delivering training or education in ISLHD

4. RESPONSIBILITIES

A) All staff have a responsibility to

- Act in accordance with this policy and any other relevant policy, procedures and legislation when using social media. This includes the [NSW Health Code of Conduct \[PD2015_035\]](#), [NSW Public Health Communication Procedures \[PD2017_012\]](#), [NSW Health Electronic Information Security Policy \[PD2013_33\]](#), [NSW Government Social Media Policy and Guidelines](#), and the [NSW Health Communication – Use & Management of Misuse of NSW Health Communication Systems \[PD2009_076\]](#) policy.
- Ensure patient privacy is maintained in accordance with the [NSW Health Privacy Manual for Health Information](#) and other regulatory requirements.
- Report any instances of the posting of inappropriate material, photos, comment or intellectual property in accordance with the Code of Conduct, which requires staff to report any breach of the Code to their line manager or a more senior member of staff. When reporting serious breaches, staff are reminded they are covered by whistle-blower laws <https://www.legislation.nsw.gov.au/view/html/inforce/current/act-1994-092>.
- Ensure that personal use and access of social media sites occurs outside of work hours on personal devices only unless on an authorised break.
- Be aware that only authorised ISLHD spokespeople are permitted to make comments on social media on behalf of the organisation, as part of the employee's role with ISLHD.
- Ensure that when they access and use social media sites (in either a professional or personal capacity) staff act in a manner that is consistent with public sector values, legal requirements, related policies and Codes of Conduct. Staff conduct online should not adversely reflect on ISLHD or NSW Health, patients, your colleagues or yourself as a public sector employee.
- Use ISLHD computers, devices and network connections appropriately and in line with relevant policies.
- Be aware of guidelines and processes relating to the use of social media for promoting ISLHD services and facilities.
- Be aware of guidelines governing professional involvement of staff on social media channels external to NSW Health.

B) All managers must

- Ensure that staff working within their area of management are aware of and understand this policy, social media guidelines and other social media resources.
- Investigate any alleged breach of the Social Media Policy and/or Code of Conduct regarding their use or connection with social media.
- Respond appropriately to actions arising from complaints, feedback or concerns raised about their area of management.

C) The Media and Communications team and any other teams with approved responsibility for a social media channel must:

- Have in place detailed processes for reviewing, managing and responding to enquiries and comments made via social media, including a specific complaints management and escalation process
- Ensure content on social media has been appropriately approved by subject matter experts within the District
- Ensure content adheres to the guidelines outlined in this policy
- Maintain an on-call roster for social media monitoring

How this policy relates to the Code of Conduct

All employees, contractors, volunteers, students, researchers and persons undertaking or delivering training or education in NSW Health must abide by the Code of Conduct and the core values and principles that it promotes.

The NSW Health Code of Conduct defines standards of ethical and professional conduct that are required of everyone working in NSW Health in any capacity, the outcomes we are committed to, and the behaviours which are unacceptable and will not be tolerated.

This includes the inappropriate use of social media as outlined in this policy.

The Code of Conduct includes the following mandatory requirements including when using social media.

Relevant Code of Conduct sections:

4.1 Promote a positive work environment

4.1.1 Treat patients and members of the public with courtesy and respect and with due sensitivity to the needs of people with different backgrounds and cultures.

4.1.2 Treat all other members of staff (irrespective of whether they are at the same level of seniority, or more senior or junior) in a way that promotes harmonious and productive working relationships, and a collaborative teamwork approach.

4.1.3 Not bully or harass other staff, patients or members of the public, or discriminate against them on the basis of their sex, race, ethnic or ethno-religious background, marital status, pregnancy, disability, age, homosexuality, transgender or carers' responsibilities.

4.1.4 Not encourage or support other staff in harassing or bullying, or in acting in a way that is contrary to harmonious working relationships between staff members.

4.1.5 Where appropriate, attempt to settle any complaints, disagreements or grievances involving other staff themselves in the first instance; or pursue such matters

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through their manager or a more senior member of staff in a way which is proportionate to the issues raised, utilises applicable NSW Health policies, and recognises that in any process to resolve such matters other staff also have perspectives and rights.

4.2 Demonstrate honesty and integrity

4.2.1 *Avoid situations which may give rise to pecuniary or other conflicts of interest, and should any conflicts or possible perceptions of such conflicts arise declare them immediately to their manager - for further information, refer to the current NSW Health policy on conflicts of interest and gifts and benefits.*

4.2.3 *Ensure that their actions and decisions are not influenced by self interest or considerations of personal gain or other improper motives*

4.3 Acting professionally and ethically

4.3.1 *At all times act in a way which is consistent with NSW Health's duties of care to its patients and clients, and its obligations to provide a safe and supportive environment on its premises for patients and their family members.*

4.3.8 *Comply with all applicable NSW Health policies and procedures, and those of the NSW Health agency where they work.*

4.3.11 *Observe all laws, professional codes of conduct and ethics relation to their profession.*

4.3.13 *Avoid conduct that could bring NSW Health or any of its staff, patients or clients into disrepute, including when using social media*

4.3.14 *Act in a way which protects and promotes the interests of NSW Health and the particular NSW Health agency where they work.*

4.3.15 *Only provide official comment on matters related to NSW Health if authorised to do so.*

4.5 Maintain the security of confidential and/or sensitive official information

4.5.1 *Keep confidential all personal information and records, including not discussing or providing information on social media that could identify patients or divulge patient information*

4.5.4 *Not disclose, use or take advantage of information obtained in the course of official duties*

5. PERSONAL USE OF SOCIAL MEDIA BY ISLHD STAFF

- Personal use is only permitted during legitimate work breaks, such as lunch breaks and via personal device only. Staff are not permitted to use ISLHD communication devices, including computers, to access personal social media for personal purposes.
- Permissible personal use of social media is in line with NSW Health policies including the [NSW Public Health Communication Procedures \[PD2017_012\]](#), [NSW Health Electronic Information Security Policy \[PD2020_046\]](#) and [Communication – Use & Management of Misuse of NSW Health Communication Systems \[PD2009_076\]](#).
- Accessing official District social media channels including YouTube and Facebook at work as part of your work duties, is not considered personal use. However, all responsibilities outlined in this policy must be adhered to.
- Any employee is able to establish their own personal social media accounts in their own time, however, staff should always be mindful that anything posted on social media may be seen by anyone with access to the internet, regardless of privacy settings. Any comments, posts, images, videos etc made in a personal capacity may still contravene policies mandatory to employment with NSW Health, which may result in disciplinary action, including under the Code of Conduct.
- Comments, posts, images, videos etc that could be interpreted to discriminate against, harass or vilify colleagues, staff, patients/clients or the public on the grounds of sex, pregnancy, marital status, age, race, nationality, cultural, religious or ethnic background, disability, HIV/AIDS status, sexuality will be investigated and if proven staff may face disciplinary action, including termination of employment.
- Comments/posts made in a personal capacity should not imply, mislead or indicate in any way that they are made as a representative of ISLHD. Photos, videos or other inappropriate material that may contravene any NSW Health policy or bring NSW Health or ISLHD into disrepute should not be posted; this includes inappropriate images or videos of staff in uniform.
- Staff should not offer opinions or comments on behalf of ISLHD or its facilities via their personal social media accounts.
- As a member of the general public, you have the right to share your views and opinions. However, you can't self-identify as an ISLHD employee and use your position to validate your opinion, especially when using knowledge gained as an employee of ISLHD.
- Employees must not make any statements or comments on behalf of ISLHD in social media about any incident, policy or procedure without prior authorisation from the Chief Executive or ISLHD Media & Corporate Communications Unit. This includes commenting on the District's own social media accounts.
- Making comments or remarks about patients that have been treated in an ISLHD facility or service is likely to contravene patient confidentiality and also breach the Code of Conduct, other NSW Health standards and relevant legislation.
- Employees must not make any statements or comments on social media that discloses, uses or takes advantage of information obtained in the course of their employment.
- Uploading photos, images or videos of patients onto personal social media accounts is strictly prohibited.

- Uploading photos, images or videos of NSW Health staff without their knowledge or consent is prohibited.
- Both the Australian and New Zealand Medical Association and the Royal College of Nursing Australia recommend that even in a personal capacity staff should not accept friend requests from former or existing patients as this can breach professional boundaries.
- Staff should think carefully before sharing any information on social media, including tweeting, re-sharing a post, sharing a photo on Instagram, or checking into a location on Facebook. Do not say or show anything you would not want printed on the front page of a newspaper, or for an employer to see.
- Employees must not use their employment with ISLHD or information obtained in the course of their employment for the purposes of self-interest and personal gain i.e. to obtain “likes”, “shares” and/or “follows”.
- Remember, everything on the internet is searchable and may be seen by unintended audiences and members of the public, regardless of your privacy settings. What you write and share is your responsibility.

6. OFFICIAL USE

Official ISLHD Social Media Channels

- All official ISLHD Social Media Channels are approved by the ISLHD Chief Executive and Board and meet the requirements set out in this guideline.
- Access to official channels for the purpose of posting or moderating content will only be provided to approved business units and staff members.
- ISLHD acknowledges that social media has become a preferred source of information and communication for many demographics within the community. A social media presence allows the organisation to communicate directly with key groups, with less reliance on traditional methods including paid advertising and mainstream media.
- ISLHD social media channels are developed to maximise communication with consumers of our health services/programs, their families, carers, the general community and those looking to work within the District. The content of ISLHD social media channels is intended for public use. Any content intended for staff only should be shared via appropriate internal channels rather than via social media.
- ISLHD encourages planned and approved official use of social media to enhance open and honest communication, collaboration, promotion, information and recruitment.
- The organisation will ensure maximum efficiency in developing social media tools that target both, specific groups or a wide community approach, in delivering key messages.
- Social media will be used by the District as a standard communication tool, in line with the organisation’s framework for communicating and engaging with the community and health consumers.
- Social media tools will be integrated with the District’s website, where possible.
- Communications plans or activities which incorporate the use of official ISLHD social media channels should be approved by a manager, and the Media & Corporate Communications Unit.

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Social media channels for individual services / departments

- To ensure maximum reach and to reduce reputational risk, priority will be given to the development of District-wide channels for communication rather than individual site/service sites.
- To avoid a proliferation of channels, and to maintain clarity for ISLHD consumers, websites and social media channels for individual services, departments, projects or sites within ISLHD are generally not supported, however the following section outlines the requirements / process for establishment.
- The merit of individual site/service social media accounts may be considered if applicant can demonstrate:
 - ✓ Existing social media channels are not suited for the proposed activity
 - ✓ The activity will deliver a clear patient/consumer benefit
 - ✓ The activity has an identifiable community and/or audience
 - ✓ The activity is allocated a dedicated resource with a specific social media skill set
 - ✓ The activity can generate enough high value content over a long lifespan.
- Should the above be demonstrated, the following process is required:
 1. **Development of a detailed Business Case** that clearly outlines:
 - ✓ The intended audience/s and purpose of the channel
 - ✓ Justify the platform chosen
 - ✓ Consideration given to using a page, group or profile
 - ✓ Reasons why this is standalone channel should be supported
 - ✓ Benefits to the LHD and patient/consumer outcomes
 - ✓ Identified ongoing allocated resources to develop, manage and moderate content in line with this policy
 - ✓ Social Media Plan that outlines approval processes for sourcing and publishing content, development of key messages and strategies for managing contentious issues and responding to emerging issues including outside of business hours.
 - ✓ Risk management considerations and mitigation plan
 2. **Approval by the relevant Executive Director** and the Manager Media and Corporate Communications.
- Staff who want to upload content to social media sites that are not supported by ISLHD (e.g. TikTok) must seek approval by following the process outlined above.

7. OTHER PROFESSIONAL USE OF SOCIAL MEDIA

- Staff who are approached by organisations outside of ISLHD to appear in, or develop, material for use on social media (or other forms of media) are not permitted to undertake this activity without written approval from their Manager and the Manager of Media and Corporate Communications.
- Staff who are approached to produce a blog or microblog (or similar), for a third party, must not engage in the activity without written approval from their manager and/or Executive Director as determined by the manager and must be disclosed to the Corporate Communications unit.

- Staff who are approached to produce a blog or microblog (or similar), for a third party, could constitute a conflict of interest and/or secondary employment, and must be disclosed to their manager in addition to approval outline above. Conflict of Interest and/or secondary employment declarations must be submitted and approved.
- Personal use of LinkedIn or other professional platforms for the purpose of sharing work experience, career highlights and professional networking is permitted provided all relevant policies outlined above are adhered to. As always, sharing confidential information, patient details and/or photos is strictly prohibited, and appropriate consent should be obtained before sharing images that show your colleagues or workplace.

8. DEFINITIONS

Inappropriate Material

For the purpose of this policy, inappropriate material includes, but is not limited to, any material that:

- could damage NSW Health or ISLHD reputations or good standing in the community;
- is misleading or deceptive or likely to mislead or deceive;
- may lead to criminal or civil liability;
- could reasonably be found to be offensive, threatening, intimidating, abusive or defamatory;
- could potentially result in victimisation, harassment or bullying;
- could be interpreted to discriminate against, harass or vilify colleagues, patients/clients or the public on the grounds of sex, pregnancy, marital status, age, race, nationality, cultural, religious or ethnic background, disability, HIV/AIDS, sexuality;
- is retained and secured by the organisation, in accordance with Section 5 of the *Health Records and Information Privacy Act 2002* or the *Health Services Act 1997*. Examples of this may include private health information, records, photos or images, employee or patient personal details;
- may commercially disadvantage ISLHD.

Comments, Conversation, Posts, Posting

For the purpose of this policy, the terms comments, conversation, posts and posting, include but are not limited to any form of communication made via social media.

9. AUDIT

Random audit of social media platforms is conducted regularly to ensure adherence to this policy.

10. REFERENCES

- [NSW Health Code of Conduct](#) - [PD2015_035]
- [NSW Public Health Communication Procedures](#) - [PD2017_012]
- [NSW Health Electronic Information Security Policy](#) - [PD2020_46]

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- [NSW Health Privacy Manual for Health Information](#)
- [NSW Health Communication – Use & Management of Misuse of NSW Health Communication Systems](#) - [PD2009_076]
- [NSW Health Complaint Management Policy](#) - [PD2020_013]
- [NSW Government Social Media Policy and Guidelines](#)
- Social Media and the Medical Profession, Australian Medical Association
<https://ama.com.au/article/social-media-and-medical-profession>
- Terms of Use for NSWNMA Social Media Channels
<https://www.nswnma.asn.au/privacy/social-media-terms-of-use/>

11. REVISION & APPROVAL HISTORY

Date	Revision	Author and Approval / Date
2014	0	Author: Manager Media & Corporate Communications Approved by Illawarra Shoalhaven Local Health District Board Approval / Date: September 2014
2020	1	Author: Director Stakeholder & Strategic Relations Approval/Date: Corporate Policy Recommendation committee/ April 2021 Approval/Date: Executive Director Strategic Improvement Programs/ April 2021

APPENDICES**Appendix A - Content guidelines for official social media channels**

- As with personal use of social media, common sense and sound judgment are essential. Use discretion, act politely and treat people in a way that you would expect to be treated in accordance with our CORE Values.
- Content should be relevant to the audience, succinct, written in plain English and include a call to action.
- Any photos or images shared on social media must have consent from those pictured, and must not infringe on copyright.
- The same standards of professional practice and conduct associated with all communication activities apply. ISLHD must not be seen to be endorsing products, businesses, organisations, causes or opinions through social media.
- Do not disclose confidential information. Under the Health Privacy Principles established by the *Health Records and Information Privacy Act 2002*, it is the responsibility of all staff to ensure that the privacy of client/patient information is protected.
- Abide by the [NSW Health Code of Conduct \[PD2015_035\]](#), the law and respect copyright. Do not post any material that is prejudicial, defamatory, libellous, discriminatory, harassing, obscene, threatening, discloses other people's personal information or infringes intellectual property, copyright or a trademark.
- If a mistake is made, such as providing incorrect information, be upfront and correct it as quickly as possible. ISLHD Media and Communications can provide extra assistance when required - the on-call media officer is available 24/7 on 0422 003 764.
- Where possible, links to the ISLHD website should be communicated via social media to steer traffic to the website.

Appendix B - Responding to contentious social media activity

- All ISLHD social media channels will include a moderation policy that outlines the purpose of the channel, the guidelines we use when blocking or deleting comments that do not adhere to the policy and provide information on the official channels that should be used contacting emergency services or seeking health information, making complaints or providing feedback to the LHD.
- If an employee is contacted by the media about posts on their social media sites that relate to ISLHD, they must contact their manager and the Media & Corporate Communications Unit before responding and the usual Media Protocols would apply.
- If an employee becomes aware of a social media site or posting that can impact on the reputation of ISLHD, they must advise their manager or the Media & Corporate Communication unit.
- Social media is now regarded as a complaint/compliment mechanism. Questions, complaints, concerns or negative feedback should be promptly assessed and referred to appropriate sites/services/departments for action, if required.

- Offensive, inappropriate, inaccurate, threatening or defamatory comments will be removed and repeated offenders will be blocked.
- Managing negative or vexatious comments will be determined on an individual basis and action taken within the parameters of the online environment. It should be noted that social media involves a third party host (i.e. Twitter and Facebook) where comment control and escalation may be limited.