

SESLHD POLICY COVER SHEET



Health
South Eastern Sydney
Local Health District

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EXECUTIVE SPONSOR	Manager Media and Communications
AUTHOR	Manager Media and Communications Marketing and Communications Officer
POSITION RESPONSIBLE FOR THE DOCUMENT	Manager Media and Communications SESLHD-Communications@health.nsw.gov.au
FUNCTIONAL GROUP(S)	Communications
KEY TERMS	Social media, internet, intranet
SUMMARY	This Policy provides a Framework for the correct use of social media to promote and inform the community about SESLHD facilities and related services. It also also outlines how staff must conduct themselves when using social media.

COMPLIANCE WITH THIS DOCUMENT IS MANDATORY
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1. POLICY STATEMENT

The intent of this policy is to provide guidance to all SESLHD employees on the responsible use of social media in the context of their employment with NSW Health. The policy is underpinned by NSW Health's Core Values and the strategic direction of South Eastern Sydney Local Health District (SESLHD).

This policy also outlines how the Local Health District will utilise a range of social media tools to engage with the public.

Employees engaging in social media must adhere to this policy in conjunction with NSW Health's Code of Conduct and other relevant NSW Health and SESLHD policies and legislation. This is to ensure patient confidentiality, ensure zero tolerance of bullying and harassment in the workplace, ensure SESLHD's reputation is upheld in the community and to ensure professional integrity.

Social media must not interfere with an employee's effective and efficient performance of their work responsibilities.

Possible breaches of the policy will be investigated and if proven may result in disciplinary action being taken in accordance with [NSW Health PD2018_031 Managing Misconduct](#).

2. AIMS

The policy sets out guidelines for employees of SESLHD on how social media will be used by the organisation, the obligations of users and the purpose of social media for SESLHD's communication with internal and external stakeholders.

3. BACKGROUND

Social media is a communication tool which is used by individuals as an extension of other traditional means of communication. For organisations, social media can complement existing traditional methods of promoting services and communicating with key stakeholders, including the public. Social media was outlined in the NSW Government's 2021 Plan as a necessary tool, which all government agencies should utilise.

The growing use of social media and networking sites is providing opportunities for individuals to communicate and share information. Social media is also a powerful engagement tool for organisations to communicate with staff, external stakeholders and the community. Social media includes blogs, podcasts, video and audio sharing sites, online groups and social networking sites such as *Facebook, Twitter, YouTube, LinkedIn, Instagram, TikTok, WeChat; dating applications and sites, and WhatsApp*. The comments an individual makes either professionally or personally can potentially remain online permanently. This policy has been produced to help employees minimise the risks of using social media.

SESLHD will use social media for the following purposes:

- To engage with members of the community and community groups.
- To facilitate a communication channel for the public to access information about our services.
- To facilitate a communication channel for health promotion.
- To promote SESLHD events.
- To facilitate communication regarding public health announcements such as new programs, outbreaks.
- To provide interesting and useful information for the community.
- To engage distinct demographics, communities and audiences.
- To encourage feedback from the public.
- To enable information sharing for clinicians.

4. TARGET AUDIENCE

This policy applies to all employees of SESLHD, contractors (including Visiting Medical Officers, honorary appointments and agency staff) and all members of the public engaged in a voluntary capacity, including work experience placements.

5. RESPONSIBILITIES

A) Staff have a responsibility to:

- Act in accordance with this policy, [NSW Government Social Media Policy](#), and any other relevant procedures and legislation when using social media.
- Report any instances of the posting of inappropriate material, comment or intellectual property in accordance with the NSW Code of Conduct which requires staff to report any breach of the Code to their line manager or a more senior staff member.
- Carry out their duties responsibly, effectively and efficiently.
- Ensure they only access and use social media sites outside working hours in a private capacity, unless for the purpose of carrying out their duties.
- Use SESLHD computers and network connections appropriately and in line with relevant policies.

B) Managers are to:

- Ensure that staff working within their area of management understand this policy.
- Investigate any alleged breach of the Code of Conduct by their staff.

C) Online Communications Committee are to:

- Approve [requests to establish social media sites](#).

6. PRIVATE USE OF SOCIAL MEDIA BY STAFF

Using social media for personal purposes while at work is **not** permitted. However, staff who have personal accounts should be reminded that anything they do post on their personal accounts can potentially be seen by anyone with access to social media.

Staff should not post personal comments that identify or discuss their place of work. It is important that individuals know who their online friends and contacts are when using social media sites and, most importantly, understand privacy settings.

Both the Australian and New Zealand Medical Associations and the Royal College of Nursing Australia recommend that even in a personal capacity, staff do not accept friend requests from former or existing patients as this can breach professional boundaries.

Making comments or remarks about patients that have been treated in the health service may contravene patient confidentiality. Making comments or remarks about patients that have been treated in the health service may also breach the Code of Conduct.

Comments or posts made privately should not purport to be made as a representative of SESLHD, nor should inappropriate material be loaded which may contravene any NSW Health Policy or bring NSW Health or SESLHD into disrepute. If a staff member has a personal social media account, they must not offer opinions or comments on behalf of SESLHD or its facilities, to do so would breach the Code of Conduct.

All staff should be aware that personal comments on their own social media pages, or in public or private groups, which could be considered inappropriate material by any member of the community can easily be duplicated and reposted without the staff member's knowledge. This can result in the staff member facing a backlash from online trolls. If the staff member has listed their place of work in their biography, complaints may come through to the SESHD and there could be consequences for the staff member in line with the Code of Conduct.

Staff would not normally be expected to access and use social media sites during working hours in a private capacity, unless for the purpose of carrying out their duties.

Using live Instagram broadcasts, "Facebook Live", "Periscope" or other live broadcasting services within any hospital setting is prohibited, unless prior approval has been sought through the Media and Communications Manager.

7. SESLHD SOCIAL MEDIA SITES

Public sites

SESLHD social media sites are developed for engagement with the public. The District currently has accounts with Facebook, Twitter, LinkedIn and YouTube.

No hospitals or units/wards/services/facilities within a hospital can apply to create a public social media site. All information relating to these areas can be sent to [media and communications](#) to post on the official SESLHD pages (subject to approval).

Only staff members who have been granted approval from their Tier 2 Director and the Media and Communications Manager may upload material or post material on an

approved SESLHD social media account. Approval to establish a social media account must be granted via Tier 2 Director and the Media and Communications Manager. No hospitals or units/wards/ services/facilities within a hospital can apply to create a public social media site.

Approver: Tier 2 Director and Media and Communications Manager.

- Ensure the Authorised Delegate understands their responsibilities in relation to behaving appropriately while on-line.

Authorised Delegate: Appointed by the Tier 2 Director, Media and Communications Manager to respond and post material on behalf of SESLHD and its facilities.

- Is responsible for posting material frequently to social media.
- Should maintain the social media account by monitoring the page regularly and responding to posts.

Appropriate access to social media will be enabled by ICT for Authorised Delegates.

Posting information on public sites

- A [Social Media Monthly Content Plan](#) must be completed on a monthly basis and sent to the Directorate’s manager, Tier 2 Director and Media and Communications Manager for approval. A copy of the Content Plan must also be trimmed. The Content Plan illustrates the type of information which will be displayed on the social media page.
- Information should be relevant to the facility and its services and be suitable for the public domain.
- Information should use appropriate language.
- Information must not breach patient privacy.
- Content should be posted to the social media page at least twice a week.
- Any photos to the page must have consent from all parties.
- [House Rules](#) should be posted on the Home Page of the Facebook page to provide users a guide on appropriate behaviour.
- A message should also be placed on the Home Page advising users that if they are experiencing an emergency to phone 000.
- New material will stimulate discussion and maintain interest in the site.

Examples of material suitable to be posted include:

- press releases
- photos
- health and wellbeing (health promotion) messages
- public health alerts
- health event information.

Closed Groups

Units/Wards/services/facilities can create closed/private Facebook pages for the purpose of sharing information, such as roster changes or other work-related discussions with staff. These closed groups are still required to be given approval from

the Tier 2 Director and Manager Media and Communications before proceeding.

All closed/private groups must have at least two administrators and all staff in the group are required to follow the social media guidelines set out in this policy.

8, RECORD KEEPING

The content of social media pages will be captured and archived on a regular basis in accordance with State Records Guideline – Records Management and Web 2.0.

9. 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 SESLHD reputations or good standing in the community.
Is misleading or deceptive or is likely to mislead or deceive.
- May lead to criminal or civil liability; or 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 or ethnic background, religious background, disability, HIV/AIDS status, sexuality.
- Is retained and secured by the organisation, in accordance with Section 5 of the *Health Records and Information Privacy Act 2002 (NSW)* or the *Health Services Act 1997 (NSW)*. Examples of this may include private health information, records, photos or images, tax file numbers, employee personal details.

Social Media

For the purpose of this policy, social media includes, but is not limited to:

- Social networking sites e.g. Facebook, Instagram, Yammer, LinkedIn; Dating applications/sites including but not limited to, Tinder and Grindr.
- Video and photo sharing websites e.g. Instagram, YouTube; Vimeo; TikTok, Flickr.
- Micro blogging sites e.g. Twitter, Snapchat, WeChat, WhatsApp.
- Web blogs, including corporate blogs, personal blogs or blogs hosted by traditional media publications.
- Forums and discussion boards e.g Whirpool, Yahoo!, Reddit, Facebook groups or Google Groups.
- Podcasting hosted through third-party platforms such as Soundcloud.
- Any other websites that allow individual users or companies to use simple publishing tools.

Comments, Conversation, Posts or Postings

For the purpose of this policy, comments, conversations, posts, blogs or postings, include but are not limited to any form of communication made via social media.

Engaging with Members of the Public on Social Media

Only the Authorised Delegate is permitted to respond to public posts on behalf of SESLHD.

- Comments made by a member of the public which contain personal information or are a complaint, should be handled in line with the standard complaint handling process.
- If a complaint is made on social media by a user, the Authorised Delegate should provide appropriate contact details with this message:
 - SESLHD welcomes feedback. So that we can investigate and respond to your concerns appropriately please email SESLHD-Mail@health.nsw.gov.au.
- If the complaint is of a serious nature, not just a negative comment, the Authorised Delegate should notify their Tier 2 Director and the Media and Communications Team.
- Direct engagement with patients regarding their personal medical records **must not occur**. If a patient tries to discuss their personal history, they should be directed to contact the appropriate health facility or doctor or alternatively email the generic email address SESLHD-Mail@health.nsw.gov.au
- SESLHD has a zero tolerance of bullying and harassment, at all times, in all forms, including social network sites.

Removal of Content from Social Media

- Material posted by a member of the public, including comments, which breaches the House Rules should be removed.
- If material has to be removed, a message should be sent to the person explaining the message was removed as it breached [House Rules](#).
- Material should not be removed just because it is negative.
- Material may be removed at any time by the Manager Media and Communications if the material is deemed inappropriate to be in the public domain.

Frequency of Monitoring of Social Media

Monitoring should occur twice a day by the Authorised Delegate.

Advertising on a Facebook or other Social Media page

Advertising a SESLHD service on a social media page is only permitted following approval by the Tier 2 Director. [A Request to Advertise Form](#) must be completed and submitted to SESLHD-communications@health.nsw.gov.au.

10. REFERENCES

- [NSW Government Social Media Policy](#)
- [NSW Ministry of Health Policy Directive PD2015_049 - Health Code of Conduct](#)
- [NSW Ministry of Health Policy Directive PD2018_031 - Managing Misconduct](#)
- [NSW Ministry of Health Privacy Manual for Health Information](#)
- [SESLHDPR/290 - Promoting a positive and respectful workplace – Preventing and managing workplace bullying and harassment](#)
- [SESLHD Request to Establish a Social Media Website](#)

11. VERSION AND APPROVAL HISTORY

Date	Version	Version and approval notes
April 2013	0	Kate Sikora Manager Media and Communications
August 2013	1	Scarlette Acevedo, District Policy Officer
April 2015	2	Kate Sikora Manager Media and Communications
August 2017	3	Allyson Moore Marketing and Communications Officer
February 2020	4	Allyson Moore Marketing and Communications Officer
February 2020	4	Minor updates to section 6 and 7; and hyperlinks in section 10 Processed by Executive Services prior to publishing.
June 2024	4.1	Minor review by Nicola Buric, Marketing and Communications Officer: Amalgamated with SESLHDBR/023 -Social Media – SESLHD Use of. Approved by Executive Sponsor.

Appendix 1**House Rules for SESLHD Facebook Pages**

This Facebook page is open to all. Users are free to post their thoughts or feedback and exchange with one another. To make sure this site is a safe place for all users, and for legal reasons, there are terms of use and some house rules users are asked to be followed.

We expect that users will not post content that falls into the following categories and reserve the right to remove postings that are:

- offensive, divisive, aggressive, abusive, defamatory or intolerant
- fraudulent, deceptive, misleading or unlawful
- trolling, deliberately derailing discussions or posting multiple versions of the same view to the forum
- unrelated or off-topic
- violates the intellectual property right of another individual or entity
- spamming in nature
- commercial solicitation or solicitation of donations
- uses obscene or offensive language.

The views, opinions, and information expressed in user-generated comments remain with the authors and do not necessarily reflect those of South Eastern Sydney Local Health District or its staff.

While user generated comments are not edited, to ensure a positive experience for visitors of this site and the broader community, the District may report or remove at its discretion any content or comments containing spam, profanity, or otherwise objectionable or prohibited material.

We encourage you to have open and honest discussions whilst being respectful of your fellow community members.

SESLHD does not give specific medical advice to individuals through Facebook. If you are concerned with your symptoms you should seek medical advice through your GP, or if you think it is an emergency, go to your local hospital.

You can also call Health Direct Australia on 1800 022 222, where a registered nurse will assess your symptoms and advise on what you should do.