

# Human Resources Management Policy HR70 - Social Media

## **Policy Statement**

Beechworth Health Service recognises that social media is a mechanism through which communication occurs. BHS is committed to the appropriate use of social media. This policy outlines BHS's Management and expectations of all workers, regarding the use of social media including networking platforms and web-sites.

The Social Media Policy outlines protocols for using social media to undertake official Beechworth Health Service (BHS) business, and provides guidance for workers, volunteers, students and contractors in their personal use of social media or making public comment online.

The policy provides advice to BHS workers, volunteers, students and contractors on how to use social media, both in the course of their official duties, and as a private citizen. It has been developed to assist workers, volunteers, students and contractors to be mindful of obligations and responsibilities under relevant legislation, and within the Department's and Victorian Public Sector Commission (VPSC) Guidelines.

**Applicable to all workers:** (employees, including on secondment to BHS, on leave, non-ongoing employees, volunteers, students, related third parties and contractors).

Managers must ensure their workers, volunteers, students and contractors are aware of and understand this policy.

#### **Process**

Social media: BHS defines social media as the use of social networking web-sites for the posting of publicly visible material in an open and uncontrolled forum.

The same high standards of conduct and behaviour generally expected of Public Sector workers also apply when participating online through social media. Online participation must reflect and uphold the values, integrity and reputation of BHS and the Victorian Public Sector Commission (VPSC).

The Chief Executive Officer (CEO) or their delegate and the Board Chair or their delegate are the only persons authorised to comment on behalf of BHS,

#### 1. Personal use of social media and making public comments online.

BHS workers, have the same right to freedom of expression as other members of the community, subject to a legitimate public interest in maintaining an impartial and effective public health service.

The department respects the right of workers, to participate in political, advocacy, and community activities. In doing so, however, workers must behave in a way that does not seriously call into question their capacity to act apolitically and impartially in their work. It is also important that the reputation of BHS is not placed at risk by comments that our workers, make.

Workers, must be aware that content published online and on social media is, or may become publicly available, even from personal social media accounts. We expect workers to take reasonable steps to ensure that any social media use or public comment you make, including online, falls within the following parameters.

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Workers, must ensure they:

- don't use a work email address to register personal social media accounts
- don't make comments that are unlawful, obscene, defamatory, threatening, harassing, discriminatory or hateful to, or about work, colleagues, peers or BHS
- don't make comments that are, or could be perceived to be:
  - o made on behalf of BHS, rather than an expression of a personal view
  - compromising their capacity to fulfil duties as a BHS employee, volunteers, students and contractors in an impartial and unbiased manner. This applies particularly where comment is made about BHS's policies, programs and services
  - so harsh or extreme in its criticism of the government, a Member of Parliament from any political party, or their respective policies, that the employee is no longer able to work professionally, efficiently or impartially
  - critical of others working at BHS
  - critical of BHS's clients or other stakeholders
  - o a gratuitous personal attack that is connected with their employment
  - prejudicial to the integrity or good reputation of BHS
  - compromising public confidence in BHS
- are mindful that their behaviour is bound by the VPSC Code of Conduct and at all times, even outside work hours and when material is posted anonymously or using an alias or pseudonym
- make clear that any views expressed are their own, and not those of BHS. However, this will not necessarily protect them from breaching the code. If an employee can be identified as working for BHS and they criticise the organisation, a Manager or an organisational policy, it's reasonable for people to question their impartiality and ability to do their job effectively.

When considering making personal comments, workers, volunteers, students and contractors must reflect on the following questions:

- could your comments cause BHS's clients or other stakeholders to lose confidence in your ability to work in an impartial and professional manner?
- are your comments consistent with how the community expects the health service to operate and behave?
- could your comments lower or undermine the reputation of BHS?
- are your comments lawful? For example, do they comply with anti-discrimination legislation and laws relating to defamation?
- would you be comfortable if your manager read your comments?
- what if someone takes a screenshot of your comments and then circulates these around?

#### 1.1 Staying safe

The VPSC has published some <u>general Do's and Don'ts</u> when making public comment and engaging online. Workers, must always exercise discretion and judgment when making public comment or participating online. Generally, if in doubt workers must seek advice from their line manager before taking any action.

#### 1.2 The Internet is forever

Content published on the intranet can remain public indefinitely. Content can also be replicated and shared beyond the original intended audience who may view it out of context or use it for an unintended purpose. For example, private messages or posts can be saved, screenshot, and made public – with little potential for recourse. It is important to be aware

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that according to the terms and conditions of some third-party sites, the content published is the property of the site where it is posted and may be re-used in ways that were not intended.

Before posting to a social media site it is important for users to understand the tool/platform, read the terms of service and user guides, and look through existing content to get an idea of the posting etiquette and any cultural and behavioural rules or protocols associated with that social media platform.

Do not reply on a social media site's default or adjustable security setting as any guarantee of privacy. Even if workers do not identify themselves online as a BHS employee, volunteers, students or contractor, they could be identified as one by other people. Posts can be tracked back to individual workers, and they can be identified as an employee, volunteers, students and contractors of BHS even if they were posted anonymously or using a pseudonym.

## 2. Access to social media at work

#### 2.1 Responsibilities

Access to social media sites (e.g. Facebook and Twitter) on BHS's ICT resources is provided to workers on the condition that they abide by BHS's Org 55 Codes of Conduct. Personal use is permitted, however use of BHS's ICT resources for private purposes must be undertaken in accordance with the Org 55 Codes of Conduct.

Personal information about individuals cannot be provided to third-parties without their consent. The email address of your colleagues or stakeholders and other identifiable information must be treated with discretion and care. Workers, must not upload contact details from BHS (Outlook) contacts when using, or prompted by external social networking sites.

No references, images, intellectual property, documents, brands or any other such related material regarding the day-to-day operations of BHS is to be used on social networking sites, except those which have been endorsed by the CEO or delegate. In sanctioning any social media posting, a formal risk assessment will be undertaken and will involve the assessment of likelihood and consequence of reputation risk or other liability risk.

#### 2.2 Sanctions for non-compliance

As a member of the Victorian Public Sector your behaviour, both in and out of the workplace, must be consistent with BHS values and the VPSC <u>Code of Conduct</u> and BHS's Org 55 Codes of Conduct.

A failure to comply with this policy may constitute a breach of BHS's Org 55 Codes of Conduct. Examples of failure to adhere to the Code of Conduct in a social media setting include, but are not limited to:

- making derogatory or obscene posts about a manager or colleague on a social networking site.
- criticising BHS, its policies or individuals in a way that brings BHS or the VPSC into disrepute.
- posting derogatory comments or images about patients, clients or residents from a personal account.

A suspected breach of the Code will be investigated and possible disciplinary procedures will be instigated as per the relevant EBA. If the breach is deemed to have occurred the possible consequences could be:

- formal warning
- termination of employment.

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#### 3. More Information

If you require assistance in interpreting any part of this policy, or would like to investigate the use of social media for your work area, please contact your line manager.

#### **Outcome**

Workers, Contractors, Volunteers and Students on placement have an understanding of Social Media and how it pertains to them and its use within the workplace and a broad understanding of responsibilities and obligations under BHS values and Code of Conduct.

#### **Definitions**

#### Social media

Social media is the term used for internet-based tools and digital media for sharing and discussing information among people. It refers to user-generated information, opinion and other content shared and discussed over open digital networks.

Social media may include (although is not limited to):

- Social networking sites (e.g. Instagram, Facebook, LinkedIn, Myspace, Google Plus)
- Video and photo sharing websites (e.g. Flickr, YouTube)
- Blogs, including corporate blogs and personal blogs
- Micro-blogging (e.g. Twitter)
- Forums, discussion boards and groups (e.g. Google groups, Whirlpool)
- Wikis (e.g. Wikipedia)
- Vod and podcasting
- Email and instant messaging.

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

**Worker:** all employees, contractors, consultants, students and volunteers.

#### **Quality & Risk Management**

Goal	Risk	Rating (with controls as per this policy)	Required actions
All workers, contractors, student placements and volunteers understand their responsibilities and obligations in relation to social media	Damage to reputation and potential breach of privacy or confidentiality	Freq= Unlikely Conseq = Minor Rating = Low (3)	<ul><li>Manage with routine procedures</li><li>Monitor Trends</li></ul>

## **Policy Quality Improvement Action Plan**

Specify accountability and responsibility	Governance and accountability of this policy is responsibility of the Finance Resources & IT Service Committee (FRITS).	
Monitor Trends	All PDs will be reviewed regularly as above or three yearly.	
Education	<ul> <li>The Human Resource Committee will monitor the use of this policy.</li> <li>Regular posting of document to intranet and notice boards.</li> </ul>	
Quality Improvement	Quality Improvement to this policy will be informed at review by:  • Feedback (if any)	

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# **REPUTATIONS RISK IMPACT**

LOW	MODERATE	HIGH	VERY HIGH
Local complaint recognition	Local media coverage	National media coverage	International media coverage
Minimal change in stakeholder confidence	Moderate change in stakeholder confidence	Significant change in stakeholder confidence	Dramatic change in stakeholder confidence
Impact lasting less than one month	Impact lasting     between one and	Impact lasting more than three months	Impact lasting more than 12 months/irrecoverable
	three months	<ul> <li>Attracts regulators' attention/comment</li> </ul>	Public censure     by regulators

# **Document Control**

Standards	NSQHS Standard 1 – Clinical Governance		
	ACQS Standard 7 – Human Resources		
	NDIS Standard 2: Provider Governance & Operational Management		
References	Guidance for Use of Social Media in the Victorian Public Sector.		
	Code of Conduct for the Public Sector		
	Org Wide Policy 55 – Employee & Volunteer Code Of Behaviour		
Approving Committees	Finance Resources and IT Services Committee		Approval Date: 23/05/2023
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Contact Point	Chief Executive Officer		
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