



Health Professional Councils Authority

## SOCIAL MEDIA POLICY

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**Version:** V2

**Summary:** Provides a framework and standards for the use of social media in personal and professional capacities to safeguard the privacy, reputation and rights of Councils, the HPCA, HPCA employees, hearing members, health practitioners, and health consumers more broadly.

**Applies to:** HPCA employees, Council members, and hearing members

**Author:** Corporate Governance

**Related legislation, policies, awards and agreements:** The Defamation Act 2005  
Privacy and Personal Information Protection Act 1998  
[NSW Health Privacy Internal Review Guidelines](#)  
Anti- Discrimination Act 1977  
Criminal Code Act 1995  
[NSW Health Code of Conduct](#)  
[NSW Health Public Communication Procedures](#)  
[Communications - Use & Management of Misuse of NSW Health Communications](#)

**Review date:** 2021

**Approved by:** HPCA Executive

**Approval date:** 10 September 2020

## PURPOSE

This policy outlines how employees and members should conduct themselves when using social media in order to safeguard the privacy, reputation and rights of Councils, the HPCA, HPCA employees, hearing members, health practitioners, and health consumers. This policy provides a framework for the implementation and management of any social media channels. The policy outlines the mandatory requirements for the professional use of social media. The policy applies to internal and external use of social media.

Social media allows the HPCA and Councils to engage with practitioners and students, health consumers, other regulatory bodies, training providers and professional associations. This policy guides staff, members and delegates in their use of social media to:

- Establish a culture of openness, trust and integrity when using social channels
- Highlight the difference between personal and professional use of social media.

## MANDATORY REQUIREMENTS

All employees, Council members and hearing members who plan to post content on behalf of a Council or the HPCA need to complete the HPCA Social Media Training and obtain the required approvals.

## DEFINITIONS

**Employees:** Ongoing, temporary or contingent workers, contractors or consultants, working in a full-time or part-time capacity.

**Members:** Includes any member of a health professional Council, Committee or Panel, appointed under the Law except who are appointed to Tribunals by NCAT.

**Council representatives:** Employees and members as defined above.

**Social media:** Websites and applications that enable users to create and share content or to participate in social networking. Social media may include but is not limited to:

- Social networking application for video and photo sharing (Facebook, Twitter, Instagram, LinkedIn, YouTube, Snapchat, Tik Tok)
- Blogs, including corporate or personal blogs, vlogs, vodcasts and podcasts
- Websites hosted by media outlets with the opportunity to engage ('comments' or 'your say' feature on theage.com.au)
- Collaboration and sharing tools (MS Teams, Yammer, SharePoint, and Slack)
- Live broadcasting (Periscope, Facebook Live, Instagram Stories and Meerkat)
- Wikis and online collaborations (Wikipedia)
- Forums, discussion boards and groups (Google groups, Facebook, Eventbrite and LinkedIn Groups)
- Review pages (Google Reviews, Rate MDs, Yelp)

**Personal use of social media:** Council representatives' personal social networking accounts (both public and private), and capacity to make personal comments on social networking applications.

**Personal social media accounts:** Personal use is use of social media in any context which is outside a staff member's professional duties. This includes personal use of social media at work.

**Professional use:** is use of social media as part of staff or Council duties on behalf of the HPCA, Ministry of Health or a health professional Council.

**Professional use of social media:** Council representatives authorised to:

- Post content on a Council or HPCA social media channel (posting, monitoring and responding to comments) and other social media networks; or
- Participate in social listening activities by responding to content on behalf of the HPCA or a Council

## IMPLEMENTATION

The NSW Government encourages agencies to use social media in a way that is consistent with five guiding principles. When engaging with social media all HPCA and Council representatives should be open, collaborative, responsive, reliable, and appropriate.

**Open:** Use social media to share and promote access to information and services, be transparent and accountable, and raise awareness of government strategic directions and initiatives.

**Collaborative:** Create opportunities to listen to, and engage, with employee, the public, local communities, and industry in community and capacity building, policy design and implementation and service delivery.

**Responsive:** Empower public sector staff to use social media to respond quickly to customers and emerging issues, promoting increased customer satisfaction.

**Reliable:** Support a consistent and quality experience.

**Appropriate:** Use social media in a manner that is consistent with public sector values, legal requirements, related policies, and our codes of conduct.

## SOCIAL MEDIA USAGE

There are two capacities in which Council representatives can use social networking sites - personal use and professional use.

### Personal use

Council representatives should be aware of their obligations under the NSW Health Code of Conduct when accessing personal social networking site and making personal comments.

Refer to the [NSW Health Code of Conduct](#)

The NSW Health Code of Conduct outlines that employees should be mindful of any public comments made on social media channels, and that personal comments made are not seen to be representative of any NSW Health organisation. All conduct of NSW Health staff will reflect on the NSW Health system, and staff need to act lawfully. Staff behaviour should also reflect the Core values of collaboration, openness, respect and empowerment.

Council representatives are subject to the directives and communication policies set out by NSW Health.

Refer to the:

[NSW Health Public Communication Procedures](#)

[Communications - Use & Management of Misuse of NSW Health Communications](#)

### **Professional use**

All Council representatives can only post to a social media network in a professional capacity after completion of the mandatory HPCA Social Media Training.

All Council representatives must not present their personal views on social media as those of the Council or HPCA.

Members posting material specific to a Council need prior written approval from the Council's Executive Officer and/or the relevant Communications Officer (HPCA, Medical, or Nursing and Midwifery).

When using social media, practitioner members on Councils must also be aware of their obligations as defined by their National Board's Code of Conduct and/or social media guidelines. The steps for posting on behalf of a Council are:

- Disclose you are a Council representative and use an approved official account or avatar
- Disclose and comment only on information classified as public domain information. Public domain information is material which is publicly accessible
- Ensure that all content published is accurate and not misleading and complies with all relevant HPCA and Council policies
- Ensure you are not the first to make an official announcement unless you have received the appropriate clearance and approval
- Ensure comments are respectful of the online community
- Adhere to the terms of use of the relevant social media platform/website, as well as copyright, privacy, defamation, contempt of court, discrimination, harassment and other applicable laws
- Promptly identify and correct any mistakes
- Understand and apply the rules of engagement, as specified by each Council

### **Escalation process**

An employee, Council representative or member who observes an inappropriate post on social media should refer the matter to their line manager, an Executive Officer and/ or the relevant Communications Officer (HPCA, Medical, or Nursing and Midwifery).

### **Guidelines**

To further assist Council representatives when using social media, the HPCA may develop guidelines to specifically inform the use of Social Media. These guidelines provide detail which include the objectives or purpose for the use of social media, approvals to create and use social media, responsibilities for the overall management for social media and the creation and retention of records that may be created or developed through using social media.

This Policy should be read in conjunction with any guidelines that are developed for the use of social media.