

## Department of Health: Social Media Guidelines for staff

With increased access to mobile technology and the advent of online networking tools, social media has become an effective and efficient method of communication and is changing the way that APS agencies engage with the public.

The Department of Health officially uses social media channels to communicate and engage with stakeholders and the Australian community. Departmental staff may also appropriately use social media for personal or professional reasons, or be encouraged to do so as part of official Departmental activities.

As a member of the Australian Public Service, your behaviour must at all times be in line with the APS Values and Code of Conduct. We are expected to maintain the same high standards of conduct and behaviour online as would be expected with any other kind of public comment or engagement.

These guidelines inform, guide and support staff in their use of social media in a personal, professional and official capacity. They have been updated to build on the Australian Public Service Commission (APSC) advice.

It is important that you familiarise yourself with the **APS Values, Employment Principles and Code of Conduct** and the Australian Public Service Commission (APSC) **Whole-of-Government advice and guidance on making public comment and participating online: Circular 2012/1**. These protocols focus on the APS Values and Code of Conduct and how they apply to official and unofficial communications, including online.

The guidelines aim to:

- support staff and contractors in the appropriate use of social media;
- protect the Department's interests; and
- support the Australian Government's Web 2.0 and open government agenda.

These guidelines apply to:

- all Departmental employees;
- all contractors to the Department;
- personnel on secondment or undertaking duties on the Department's behalf; and
- individuals employed by or contracted to third party organisations, or individually contracted, who have been authorised to access or manage Departmental resources.

## **What is social media?**

All internet and mobile-based tools used to generate or discuss information in text, picture or video format are considered social media. This includes blogs, social networking sites and other online media that allow user participation and interaction.

Under these guidelines, examples of social media include , but is not limited to:

- social networking sites (e.g. Facebook, Twitter, Instagram, Snapchat, LinkedIn, Yammer)
- social discovery applications (e.g. Banjo, Tinder).
- video and photo sharing websites (e.g. Flickr, YouTube, Pinterest, Periscope)
- blogs (e.g. Blogger, Tumblr, WordPress)
- blogs hosted by media outlets (e.g. 'comments' feature on theage.com.au)
- wikis and online collaborations (e.g. Wikipedia)
- forums, discussion boards and groups (e.g. Google groups, Whirlpool)
- online multiplayer gaming platforms (e.g. World of Warcraft)
- instant messaging (e.g. Microsoft Instant Messenger)
- geo-spatial tagging (e.g. Foursquare)

## **Bullying behaviour using digital technologies (cyber-bullying)**

Cyber-bullying is any behaviour, using digital technologies, that could reasonably be considered humiliating, intimidating or demeaning to a person, or group of people, and which creates a risk to health and safety. It is important that all employees read and understand the Department's **Preventing Bullying and Harassment in the Workplace Guidelines**.

Instances of cyber-bullying should be reported to Health and Safety Representatives (HSRs), Harassment Contact Officers (HCOs) or the People Management Section at

## **Before reading these guidelines further...**

### **Familiarise yourself with the relevant elements of the APS Values and Code of Conduct**

Use of social media as a public servant is governed by the APS Values and Code of Conduct. In February, 2016 the APSC released a new edition of Australian Public Service Values and Code of Conduct in practice. Section 6: Employees as citizens, contains information about making public comment, including online and on social media. The new edition contains additional considerations when participating online.

## **From Section 6: Employees as citizens:**

6.2.15 Maintaining an online presence, and making comment online, is a common practice in the Australian community. Like other citizens, APS employees make public comment on social networking sites, blogs, and online news sites. APS employees should comply with their agency's policies in relation to the use of work computers when participating in social media.

6.2.16 While the same principles apply to online comment as to any other kind of public comment, there are some additional considerations that apply to online participation. The speed and reach of online communication means that comments posted online are available immediately to a wide audience. Any information an employee posts relating to their employment, such as naming their employer or describing their role, can be located easily and quickly by a search engine.

6.2.17 Material published online is often difficult to erase, may be replicated endlessly, and may be sent to recipients that the author never expected would see it. Content posted by others may be perceived to be associated with material posted by an APS employee in a way that implies support for the views expressed. Failure to remove or contradict comments made on, for example, a blog or social media post may be seen as endorsement of those comments.

6.2.18 A site's security settings are not a guarantee of privacy. Material posted in a relatively secure setting can still be copied and reproduced elsewhere. Comments posted on one site can also be used on others under the terms and conditions of many social media sites.

6.2.19 APS employees must still uphold the APS Values, Employment Principles and the Code even when material is posted anonymously, or using an alias or pseudonym. Employees should bear in mind that even if they do not identify themselves online as an APS employee or an employee of their agency, they may nonetheless be recognised and identified.

6.2.20 It may also be clear that posts made anonymously have been made by existing APS employees given their content. Each such post erodes the level of confidence that the APS is serving the elected government faithfully and is committed to delivering government services.

6.2.21 As a rule of thumb, anyone who posts material online should make an assumption that at some point their identity and the nature of their employment will be revealed. When posting material, employees should be confident that, should their identity become known, the material does not raise questions about their ability to meet the behavioural standards set out in the APS Values, Employment Principles and the Code.

### **What are our responsibilities as employees of the Department of Health?**

Health employees are expected to maintain the same high standards of conduct and behaviour online as would be expected with any other kind of public comment or engagement including:

- being apolitical, impartial and professional;
- being sensitive to the diversity of the Australian public;
- behaving honestly and with integrity;
- acting with care and diligence;
- treating everyone with respect and courtesy, and without harassment;
- complying with all applicable Australian laws;
- complying with any lawful and reasonable direction given by someone in the Department who has authority to give the direction;
- maintaining appropriate confidentiality about dealings that you have with any Minister or Minister's member of staff;
- dealing appropriately with information, recognising that some information needs to remain confidential;
- taking reasonable steps to avoid any conflict of interest (real or apparent) and disclosing details of any material personal interest in connection with your APS employment;
- using Commonwealth resources in a proper manner and for a proper purpose;
- not providing false or misleading information in response to a request for information that is made for official purposes;
- not improperly using inside information or your duties, status, power or authority:
  1. to gain, or seek to gain, a benefit or an advantage for yourself or any other person; or
  2. to cause, or to seek to cause, detriment to the Department, the Commonwealth or any other person; and
- behaving at all times in a way that upholds the APS Values and Employment Principles, and the integrity and good reputation of the Department and the APS.

As an APS employee, when you are making public comment in an unofficial capacity it is not appropriate for you to make comment that is, or could be perceived to be:

- being made on behalf of the Department or the Government, rather than an expression of a personal view;
- compromising your capacity to fulfil your duties in an unbiased manner. This applies particularly where comment is made about policies and programmes of the Department;
- so harsh or extreme in its criticism of the Government, a member of parliament from another political party, or their respective policies, that it raises questions about your capacity to work professionally, efficiently or impartially. Such comment does not have to relate to your area of work;
- so strong in its criticism of an agency's administration that it could seriously disrupt the workplace. (APS employees are encouraged instead to resolve concerns by informal discussion with a manager or by using internal dispute resolution mechanisms, including the APS whistleblowing scheme if appropriate);
- a gratuitous personal attack that might reasonably be perceived to be connected with your employment;
- unreasonable criticism of an agency's clients and other stakeholders; or
- compromising public confidence in the agency or the APS.

### **Keep in mind the public perception and conflicts of interest**

All APS employees are required to identify and manage actual or perceived conflicts of interest at all times. Keep in mind that your personal interests, relationships or behaviour online could be seen by the public to influence the decisions you are making or the advice you are providing as part of your APS employment.

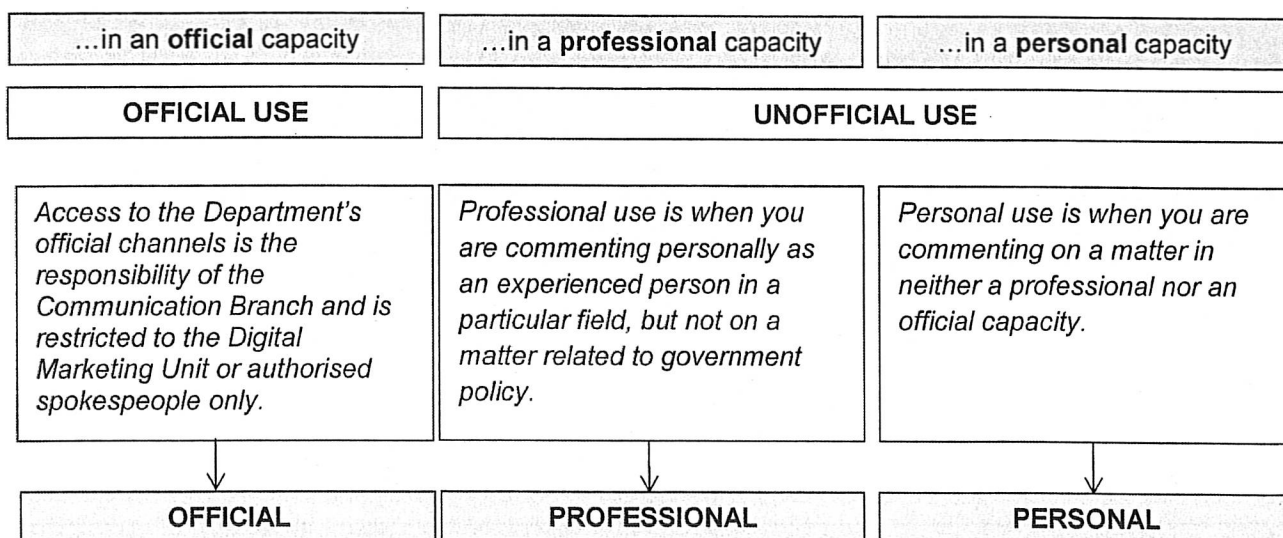
If you want to establish a social media account to comment on issues that may be related to the Health portfolio, you need to be aware that this could be a conflict of interest. You must be aware of, and manage any actual or perceived conflict of interest, by declaring these using the Department's **Declaration of Personal Interests**.

## Keep in mind use of social media and outside employment

Outside employment includes all employment performed for an employer other than the Department (this also includes self-employment). Staff members must obtain permission from the relevant First Assistant Secretary (FAS) before engaging in outside employment. If you have a social media account that earns income (e.g. such as advertising on a blog or website), be aware that you should declare this as outside employment. In these circumstances, it is important that you read and understand the Department's **Outside Employment Guidelines**.

If you have any questions, check before you post. If you would like further information on conflict of interest (real or apparent) and disclosing details of any material personal interest in connection with your APS employment, see **Declaration of Personal Interests** or seek guidance from the People Branch. If you are interested in promoting information on one of the Department's social media channels or would like to learn more about digital marketing opportunities for your programme or policy area, seek guidance from the **Communication Branch**.

### I would like to find information on the use of social media...



OFFICIAL

### **Use of social media in an official capacity**

Access to the Department's official channels is the responsibility of the Communication Branch and is restricted to the **Communication Branch**.

Making public comment in an official capacity on behalf of the Department outside of these official channels is restricted to authorised spokespeople only, as per the Department's established media protocols. The only authorised spokespeople for the Department (as required) are:

- the Secretary;
- the Chief Medical Officer;
- Heads of portfolio agencies; or
- the Media Unit.

When making comment in an official capacity, employees remain bound by the APS Values and Code of Conduct, including the duty under Public Service Regulation 2.1 not to disclose certain information without authority.

### **How the Department is using social media**

The Communication Branch is responsible for posting content on the Department's social media accounts, managing security, monitoring issues and forwarding public enquiries to policy areas for information or response. The Branch provides advice on targeted and effective use of social media to promote policies, programmes and campaigns, and manages the Department's presence on:

- Twitter ([www.twitter.com/healthgovau](http://www.twitter.com/healthgovau))
- Pinterest ([www.pinterest.com/healthgovau](http://www.pinterest.com/healthgovau))
- YouTube ([www.youtube.com/healthgovau](http://www.youtube.com/healthgovau))
- Instagram ([www.instagram.com/healthgovau](http://www.instagram.com/healthgovau))

Find out more about **how the Department is using social media** [here](#).

The Department has established and verified social media accounts with an increasing number of followers. Except under exceptional circumstances, these channels should be

used to promote the Department's policies and programmes. The Department has protocols and procedures for its use of, and management of, social media channels.

In line with the Department's Corporate Business Rules on minimum level of clearance for online content, all social media content must be approved at a minimum by the content owner's Assistant Secretary before being approved by the Assistant Secretary, Communication Branch.

Any contact from media representatives to the Department through social media channels must be referred to the Department's **Media Unit** as per any other form of media enquiry.

If you are interested in promoting information on one of the Department's social media channels or would like to learn more about digital marketing opportunities for your programme or policy area, please send an email to the **Communication Branch** at [socialmedia@health.gov.au](mailto:socialmedia@health.gov.au)

## PROFESSIONAL

### **Use of social media in a professional capacity**

Professional use of social media is when you are commenting as an individual, who is an expert in a particular field. This is done using a profile that is connected to a personal email address not a Department of Health address.

For example, some Health employees are subject matter experts in fields such as medicine and science, and may be invited to speak at a professional conference or submit an article in an academic journal in that capacity, in their own time and outside their APS role.

Your use of social media as a public servant is governed by the APS **Values** and Code of Conduct. As such, you are expected to maintain the same high standards of conduct and behaviour online as would be expected in any other form of contact with the public. This includes:

- being apolitical, impartial and professional;
- behaving with respect and courtesy, and without harassment;
- dealing appropriately with information, recognising that some information needs to remain confidential;



- being sensitive to the diversity of the Australian public;
- taking reasonable steps to avoid conflicts of interest;
- making proper use of Commonwealth resources; and
- upholding the APS Values and the integrity and good reputation of the APS.

In these circumstances, it is important for you to notify your manager of any comment you propose to make in your expert role that may reference your APS employment. This would need to be considered in light of the Department's policies and the APS Values and Code of Conduct. It is important that you also make it clear, when making public comment in this role, that you are not representing the Department of Health or the Government.

### **Keep in mind the public perception**

It is important you keep in mind that your personal interests, relationships or behaviour online could be seen by the public to be representative of the official position of the Department or influence the decisions you are making or the advice you are providing as part of your APS employment.

To ensure you never imply that you are authorised to speak as a representative of, or on behalf of, the Department or the Government, use a disclaimer such as: **"This is a personal account. Views expressed are my own."** This statement simply states that you are not authorised to speak on behalf of the Department, however, this does not in any way exempt you from your obligation as a public servant to uphold the APS Values, Employment Principles and Code of Conduct.

### **Questions to consider when making unofficial comments in social media**

When you are considering making unofficial comments online, you should reflect on the following questions:

- Could the comments reasonably be expected to cause the Department's stakeholders, including members of Parliament (whether members of the Government, the Opposition, independents, or other parties) to lose confidence in your ability to work in an impartial and professional manner?
- Would comment of this kind, without proper justification, be likely to lower or undermine the reputation of the Department or of the APS as a whole?
- Are these comments in line with how the community in general expects the public service to operate and behave?

- Are these 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?

It is important that you familiarise yourself with the Australian Public Service Commission (APSC) **Whole-of-Government advice and guidance on making public comment and participating online: Circular 2012/1**. These protocols focus on the APS Values and Code of Conduct and how they apply to official and unofficial communications, including online.

If you have any questions, check before you post. If you would like further information on conflict of interest (real or apparent) and disclosing details of any material personal interest in connection with your APS employment, see **Declaration of Personal Interests** or seek guidance from the People Branch. If you are interested in promoting information on one of the Department's social media channels or would like to learn more about digital marketing opportunities for your programme or policy area, seek guidance from the **Communication Branch**.

## PERSONAL

### **Use of social media in a personal capacity**

It is important to be mindful of the rapid speed in which information posted on social media channels can spread. You should also assume that all comments made are in the public domain, and could potentially remain so forever, so it is important to carefully consider what you post on social media and take care when participating online.

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- behaving with respect and courtesy, and without harassment;
- dealing appropriately with information, recognising that some information needs to remain confidential;
- being sensitive to the diversity of the Australian public;

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- making proper use of Commonwealth resources; and
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It is important to recognise the potential for damage to be caused (either directly or indirectly) to the Department or the APS more broadly in certain circumstances as a result of your personal use of social media, whether or not you identify yourself as a Departmental or APS employee. As such, you should comply with the APSC advice and guidance to ensure the risk of such damage is minimised.

Any information an APS employee posts online relating to their employment (such as naming their employer or describing their role) is able to be located easily and quickly by a search engine, and this information may be taken out of context. APS employees must still uphold the APS Values and Code of Conduct even when material is posted anonymously, or using an 'alias' or pseudonym, and should bear in mind that even if they do not identify themselves online as an APS employee or an employee of their agency, they could nonetheless be recognised as such.

### **Keep in mind the public perception**

It is important you keep in mind that your personal interests, relationships or behaviour online could be seen by the public to be representative of the official position of the Department or influence the decisions you are making or the advice you are providing as part of your APS employment.

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- Are these comments in line with how the community in general expects the public service to operate and behave?
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BE AWARE	BE CONSCIOUS OF...
<b>Follow the guidance.</b> Read all the documents that are available, including the Department's guidelines and the APSC Whole-of-Government guidance on making public comment online. All guidelines, as well as laws such as copyright, fair use and disclosure apply to social media.	Not conducting classified business with a stakeholder or client through your personal or other social media.
<b>Be professional.</b> Whether or not you identify yourself as a Departmental employee, you are connected to your colleagues, managers and even the Department's stakeholders. You should ensure that content associated	Not disclosing or using the Department's classified or sensitive information or that of any other person or company.

with you is consistent with your work at the Department.	
<b>Use a disclaimer.</b> To ensure you never imply that you are authorised to speak as a representative of, or on behalf of, the Department or the Government, use a disclaimer such as: "This is a personal account. Views expressed are my own."	Not commenting on Departmental or Government business.
<b>Be aware of your association with social media.</b> Ensure your profile and related content is consistent with how you wish to present yourself to colleagues and stakeholders.	Not registering accounts using the Department's brand name or any other unregistered or registered trademarks.

### Potential breaches of the APS Values and Code of Conduct

As a member of the Australian Public Service, your behaviour must at all times uphold the APS Values and Employment Principles, and the integrity and good reputation of the Department of Health and the APS.

It is important to understand that failure to adhere to the APS Values and Code of Conduct can result in a range of sanctions including reprimands, reduction in classification and termination of employment.

Examples of failure to adhere to the Code of Conduct in a social media setting include:

- A Department of Health employee makes derogatory and obscene posts about a colleague on Facebook who they may or may not be 'friends' with.
- A Department of Health employee tweets derogatory comments about external stakeholders from their personal Twitter account.
- A Department of Health employee makes derogatory comments about the Department of Health on Facebook.
- A Department of Health employee discloses non-publicly available information about a tender process on an online forum.

In situations where a staff member's online behaviour potentially breaches the APS Values or Code of Conduct, the issue will be referred to the People Branch for investigation and action.