

Name:	SOCIAL MEDIA POLICY
Approval Date:	25 August 2025
Version	3

POLICY STATEMENT

Glasshouse Country Care respects each care recipient's right to privacy, dignity and confidentiality including the collection use and disclosure of personal information which includes the use of social media.

PURPOSE

The purpose of this policy is to document Glasshouse Country Care's approach to managing the privacy and confidentiality of care recipients about its practices and services.

This policy provides guidance to employees of Glasshouse Country Care about engaging in social media. All employees are responsible for being aware of the policy and understanding their responsibilities around using social media in their professional and personal capacity.

LEGISLATIVE AND POLICY FRAMEWORK

NDIS Commission

<https://www.ndiscommission.gov.au/>

Aged Care Commission

<https://www.agedcarequality.gov.au/>

Privacy Act 1988 (link)

<https://www.legislation.gov.au/Details/C2018C00034>

10 Steps to Protecting Other People's Privacy (link)

<https://www.oaic.gov.au/agencies-and-organisations/business-resources/privacy-business-resource-9>

Charter-of-care-recipients-rights-and-responsibilities-home-care

https://consultations.health.gov.au/aged-care-policy-and-regulation/the-australian-charter-of-aged-care-rights/supporting_documents/Charter%20of%20care%20recipients%20rights%20and%20responsibilities%20%20home%20care.pdf

SCOPE

This policy applies to all Glasshouse Country Care Board Members and employees (full-time, part-time, fixed term, casual, voluntary and temporary) for the duration of their employment.

ORGANISATIONAL COMMITMENT

Glasshouse Country Care is committed to fair, effective and efficient processes where all care recipients have the right to privacy, dignity and confidentiality. Glasshouse Country Care follows the principles outlined in the *Privacy Act 1988* and has in place procedures that ensure compliance with the legislation.

Overview and principles

Online communication and new media tools are important communication channels that provide the organisation with the opportunity of engaging with network partners and the public directly.

These tools can be used to inform the community about the Glasshouse Country Care services; to provide information about programs and to create new channels to open up a two-way conversation and consultation.

The objective of this policy is to set the parameters for the use of social media, where it forms part of the employee's professional responsibilities; inform employees of their responsibilities, when using social media in a personal capacity and to manage risks associated with the use of these tools.

It is essential that employees understand that comments published via social media platforms are treated the same way as public statements and should be made by an authorised spokesperson in the same way that comments are made in any public forum or to the media.

The intention of this policy is to establish a culture of openness, trust and integrity in activities around social media.

The objectives of this policy are compatible with the Glasshouse Country Care Standards of Conduct Policy and the Charter of Human Rights and Responsibilities Act 2006.

Policy Application

This policy does not apply to staff members' personal use of social media where no reference is made to Glasshouse Country Care and/or such usage has no connection to the workplace or work related matters.

Compliance

Depending on the circumstances, non-compliance with this policy may constitute a breach of contract of employment or other contractual obligations, misconduct, sexual harassment, discrimination, or some other contravention of the law.

Failure to comply with the policy may result in disciplinary action and, in more serious cases, may result in termination of employment.

Identifying inappropriate use

Where an employee becomes aware of inappropriate or unlawful online content that relates to the organisation or clients, or content that may otherwise have been published in breach of this policy the situation and circumstances should be reported immediately to the General Manager.

Definition of Social media

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

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

- social networking sites (for example Facebook, Myspace, LinkedIn)
- video and photo sharing websites (for example Flickr, Youtube, Snapchat)
- blogs, including corporate blogs and personal blogs
- blogs hosted by media outlets
- micro-blogging (for example Twitter)
- wikis and online collaborations (for example Wikipedia)
- forums, discussion boards and groups (for example Google groups, Whirlpool)
- vod and podcasting

- online multiplayer gaming platforms (for example World of Warcraft, Second life)
- instant messaging (including SMS)

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

Becoming authorised to comment

- Before engaging in social media in relation to Glasshouse Country Care employees must become authorised to comment.
- Employees may not comment unless authorised to be a representative spokesperson of Glasshouse Country Care.
- To be authorised to comment or be an authorised spokesperson, employees must have the explicit approval of the Directors and/or General Manager.

Rules of engagement

Authorised representatives must:

- disclose that they are an employee/contractor of Glasshouse Country Care, and use only their own identity, unless authorised to use an approved official account
- disclose and comment only on information classified as public domain information
- ensure that all content published is accurate and not misleading and complies with all relevant organisational policies and other relevant requirements
- ensure they are not the first to make an announcement (unless specifically given permission to do so)
- comment only on their area of expertise and authority
- ensure comments are respectful of the community in which they are interacting online

Authorised representatives must not:

- post or respond to material that is offensive, obscene, defamatory, threatening, harassing, bullying, discriminatory, hateful, racist, sexist, infringes copyright, constitutes a contempt of court, breaches a court suppression order, or is otherwise unlawful
- use or disclose any confidential or secure information
- comment or post any material that might otherwise cause damage to Glasshouse Country Care's reputation or bring it into disrepute

Personal use of social media

This policy does not to discourage nor unduly limit employees using social media for personal expression or other on-line activities in their personal life.

Employees should be aware of and understand the potential risks and damage to Glasshouse Country Care that can occur, either directly or indirectly from their personal use of social media and should comply with this policy to ensure that the risk is minimised.

Employees are personally responsible for content published in their personal capacity on any form of social media platform. When in doubt, employees can seek guidance from Glasshouse Country Care on how to comply with the following obligations.

To avoid breaching this policy employees must:

- only disclose and discuss publicly available information
- ensure that all content published is accurate and not misleading and complies with all relevant organisational policies and requirements
- expressly state that stated views are personal and are not representative of Glasshouse Country Care
- behave politely and respectfully

- adhere to the terms of use for using the social media platform or website, and adhere to legislation including copyright, privacy, defamation, contempt of court, discrimination, harassment and any other applicable laws, and Glasshouse Country Care Privacy Policy

Employees must not:

- post material that is offensive, obscene, defamatory, threatening, harassing, bullying, discriminatory, hateful, racist, sexist, infringes copyright, constitutes a contempt of court, breaches a Court suppression order, or is otherwise unlawful
- imply that they are authorised to speak as a representative of Glasshouse Country Care nor give the impression that the views expressed are those of Glasshouse Country Care
- use their work email address or any logos or insignia that may give the impression of official support or endorsement of their personal comment
- use or disclose any confidential information or personal information obtained in their capacity as an employee or contractor of Glasshouse Country Care
- post material that is, or might be construed as, threatening, harassing, bullying or discriminatory towards another employee or contractor of Glasshouse Country Care
- comment or post any material that might otherwise cause damage to Glasshouse Country Care's reputation or bring it into disrepute

Guidance for navigating legal issues

The following is offered as general guidance to assist employees in complying with the obligations set out in this policy. When in doubt, employees should seek further guidance from the General Manager.

Privacy, confidentiality and information security

- Employees should only use personal information obtained in the course of your employment or engagement with Glasshouse Country Care in a manner consistent with Glasshouse Country Care's Privacy Policy and Information Management Policy.
- Users should not publish or report on conversations or information that is deemed confidential or classified or deals with matters that are internal in nature.
- Client personal information should not be made available on social media

Copyright

- Employees must respect copyright laws and fair use of copyrighted material.
- All employees are expected to attribute work to the original author or source wherever possible.

Defamation

Employees are to refrain from publishing material that may cause injury to another person, organisation, association or company's reputation, and should seek further legal guidance if publication of such material is thought to be necessary.

RESPONSIBILITY

The Board of Directors is responsible for the endorsement of this policy and the General Manager has primary responsibility for the management of staff and services covered by this policy.

RELATED DOCUMENTS:

Standards of Conduct Policy

Privacy and Confidentiality Policy

Clients Rights and Responsibilities Policy

I hereby acknowledge receipt of a copy of the *Social Media Policy* and agree to abide by this Policy in relation to all dealings undertaken on behalf of **Glasshouse Country Care.**

I understand that if I am in breach of this policy that it may result in termination of my employment.

Name of Employee/Volunteer		Signature	Date
Date	Version Number	Changes	Review Date
25/8/2021	3	Added version control box, added review date Checked and updated legislation and links	December 2023