

Social Media Policy

1. Introduction

This social media policy provides guidance for all general practitioners, employees, contractors, students and other workplace participants of **Gap Road Medical Centre** on the appropriate use of social media in both professional and personal contexts.

The policy aims to:

- Protect patient privacy and confidentiality
- Ensure compliance with professional, legal and ethical obligations
- Safeguard the reputation and integrity of Gap Road Medical Centre
- Identify and mitigate risks associated with social media use

This policy is informed by:

- RACGP *Standards for General Practices (5th Edition)*
- AHPRA Social Media Policy
- Privacy Act 1988 (Cth) and Australian Privacy Principles
- Relevant employment, discrimination, defamation and consumer laws

2. Scope

This policy applies to all workplace participants of Gap Road Medical Centre and covers social media use:

- During and outside working hours
- On practice-owned or personal devices
- On practice-managed or personal social media accounts
- At the workplace or elsewhere

The practice may be vicariously liable for social media conduct where that conduct impacts the workplace, patients, staff safety, or the reputation of the practice.

3. Definition of Social Media

For the purposes of this policy, *social media* refers to online platforms that allow users to create, share or interact with content, including but not limited to:

- Facebook (including Messenger)
- Instagram
- LinkedIn
- TikTok
- X (Twitter)
- Snapchat
- Blogs, forums, message boards and online reviews
- Electronic newsletters and wikis

4. Purpose and Responsibilities

All GPs and staff are legally and professionally responsible for their online activities.

A breach of this policy may result in:

- Disciplinary action
- Termination of employment or engagement
- Referral to regulatory bodies
- Legal action and/or personal liability

5. Use of Gap Road Medical Centre Social Media Accounts

5.1 Social Media Officer

Gap Road Medical Centre appoints a **Social Media Officer (Practice Manager)** who is responsible for:

- Managing and monitoring practice social media accounts
- Approving and publishing content
- Ensuring compliance with AHPRA advertising restrictions
- Removing inappropriate or non-compliant content

5.2 Content Approval

- Only authorised staff may post on practice social media accounts
- All content must be approved by the Social Media Officer
- Final approval may be required from the Practice Principal
- The practice reserves the right to edit or remove content at any time

6. Staff Conduct on Practice Social Media Platforms

When using Gap Road Medical Centre social media platforms, staff must **not** post material that:

- Is unlawful, defamatory, misleading, threatening, abusive, inflammatory or offensive
- Is racist, sexist, homophobic, transphobic, xenophobic or otherwise discriminatory
- Breaches patient confidentiality or privacy
- Discloses confidential business, staff or operational information
- Infringes copyright or intellectual property rights
- Is materially damaging or potentially damaging to the reputation of the practice or any individual
- Constitutes testimonials or endorsements prohibited under AHPRA National Law
- Impersonates another person or entity
- Sends unsolicited commercial or promotional messages
- Claims or implies authority to speak on behalf of the practice without authorisation

This list is not exhaustive.

7. Monitoring and Responding to Social Media

- Practice social media accounts are monitored regularly by the Social Media Officer
- Social media platforms are not used for clinical communication
- Messages or comments containing clinical matters are redirected to phone or secure email
- Minimum response timeframe: **one business day**

Content is updated as required for:

- Practice information changes
- Public health announcements
- Preventive health campaigns

8. Privacy, Confidentiality and Security

- Social media must **never** be used to provide clinical advice or health information
- Identifiable patient information, images or stories must not be posted under any circumstances

- Patient consent does not override privacy obligations in relation to social media
- Staff must comply with the Privacy Act 1988 at all times

9. Testimonials and Advertising

In accordance with AHPRA National Law:

- Gap Road Medical Centre does not allow testimonials that advertise health services
- Reasonable steps are taken to remove testimonials from practice-controlled platforms
- The practice is not responsible for content on third-party platforms outside its control

10. Personal Use of Social Media by Staff

Staff may engage in personal social media use provided that they:

- Do not bring Gap Road Medical Centre into disrepute
- Do not identify themselves as speaking on behalf of the practice
- Do not disclose confidential or sensitive information
- Do not post content involving patients, colleagues or workplace matters
- Comply with all applicable laws and workplace policies

Where staff identify themselves as employees of Gap Road Medical Centre, they may be required to include a disclaimer such as:

“The views expressed are my own and do not represent the views of my employer.”

11. Use of Social Media During Work Hours

Limited personal use of social media during work hours is permitted provided that it:

- Is brief and infrequent
- Does not interfere with work duties or patient care
- Complies with this policy and other workplace policies

12. Breaches of Policy

Failure to comply with this policy may result in disciplinary action, including termination of employment or engagement.

Workplace participants must:

- Cooperate with investigations
- Preserve relevant social media content when requested

Failure to do so may itself constitute misconduct.

13. Monitoring and Auditing

Gap Road Medical Centre may monitor and review:

- Use of practice IT systems
- Publicly available social media content
- Relevant personal social media activity where it impacts the workplace

Monitoring is conducted for legitimate business, safety and compliance purposes.

14. Complaints

Concerns or complaints regarding social media use should be reported to:

- **Practice Manager, Gap Road Medical Centre**

15. Relationship to Other Policies

This policy operates in conjunction with:

- Code of Conduct
- Privacy Policy

- Appropriate Workplace Behaviour Policy
- Work Health and Safety policies

Conduct that would breach policy in the workplace will also breach policy online.

16. Policy Review

This policy will be reviewed:

- At least every two years
- Earlier if there are changes to legislation, RACGP standards or AHPRA guidance

Staff will be notified of any updates via email and/or practice meetings.