

The Royal Australian College of General Practitioners (RACGP) has developed a social media policy template for general practices. In a general practice, staff and patients are likely to be using social media to communicate internally or externally. It is important that each practice uses this template as a guide only and adapts its content to their individual procedures. This policy provides guidance for general practitioners (GPs) and general practice staff on the use of social media in compliance with the Australian Health Practitioner Regulation Agency’s (AHPRA’s) social media policy.

This template covers:

* the definition of social media
* codes of conduct for using the practice’s social media platforms
* privacy and security
* staff responsibilities
* codes of conduct for staff using personal social media platforms.

The template is designed to communicate the practice’s policies on the use of social media in the practice. The sections in red text are for you to revise and adapt to the specific procedures of your general practice.

This policy should be reviewed regularly to ensure it remains applicable to current practice procedure and legal requirements.

[Insert practice name] social media policy

Current as of: [insert date of last revision]

Name of social media officer: [insert name of social media officer. It is recommended that practices assign the responsibility of managing social media and policies to a specific job description (eg the practice manager). This section will need to be updated if the person in this role changes.]

Introduction

This policy provides guidance for members of the practice on using social media internally and externally. The policy helps identify and mitigate risks associated with social media use.

Definition

For the purposes of this policy, ‘social media’ is online social networks used to disseminate information through online interaction.

Purpose

Regardless of whether social media is used for business-related activity or for personal reasons, the following policy requirements apply to all GPs and practice staff of the practice. GPs and practice staff are legally responsible for their online activities, and if found to be in breach of this policy […]

[The practice must determine what action they will take if staff breach the policy. Options could include employment termination for serious breaches.]

Use of practice social media accounts

The practice will appoint a staff member as a social media officer responsible for managing and monitoring the practice’s social media accounts. All posts on the practice’s social media website must be approved by this staff member. The practice reserves the right to remove any content at its own discretion.

[Practices will need to determine who is permitted to post on the practice’s social media platforms – for example, is only the assigned social media officer allowed to post, or can all staff post if they obtain approval? Does the social media officer require sign-off on content from a senior management member before it is posted?]

Staff conduct on social media

When using the practice’s social media, practice staff will not:

* post any material that
* is unlawful, threatening, defamatory, pornographic, inflammatory, menacing or offensive
* infringes or breaches another person’s rights (including intellectual property rights) or privacy, or misuses the practice’s or another person’s confidential information (eg do not submit confidential information relating to our patients, personal information of staff, or information concerning the practice’s business operations that have not been made public)
* is materially damaging or could be materially damaging to the practice’s reputation or image, or another individual
* is in breach of any of the practice’s policies or procedures
* use social media to send unsolicited commercial electronic messages, or solicit other users to buy or sell products or services or donate money
* impersonate another person or entity (eg by pretending to be someone else or another practice employee or other participant when you submit a contribution to social media) or by using another’s registration identifier without permission
* tamper with, hinder the operation of, or make unauthorised changes to the social media sites
* knowingly transmit any virus or other disabling feature to or via the practice’s social media account, or use in any email to a third party, or the social media site
* attempt to do or permit another person to do any of these things
* claim or imply that you are speaking on the practice’s behalf, unless you are authorised to do so
* disclose any information that is confidential or proprietary to the practice, or to any third party that has disclosed information to the practice
* be defamatory, harassing or in violation of any other applicable law
* include confidential or copyrighted information (eg music, videos, text belonging to third parties)
* violate any other applicable policy of the practice.

[This list is not exhaustive; you may wish to add conditions specific to your own practice.]

Monitoring social media sites

The practice’s social media channels are part of our customer service and should be monitored and dealt with regularly.

[The practice should determine what are reasonable monitoring and response schedules – for example, minimum response times for enquiries or complaints, how often platforms should be updated.]

Testimonials

The practice complies with AHPRA national law and takes reasonable steps to remove testimonials that advertise their health services (which may include comments about the practitioners themselves). The practice is not responsible for removing (or trying to have removed) unsolicited testimonials published on a third-party website or in social media accounts over which they do not have control.

Personal social media use

Staff are free to personally engage in social media outside of work hours, as long as their actions do not have the potential to bring the practice into disrepute. Employees may not represent personal views expressed as those of this practice.

Any social media posts by staff on their personal social media platforms must not reveal confidential information about the practice or a person who uses the practice (eg staff should not post information relating to patients or other staff, or information concerning the practice’s business operations that have not been made public).

Staff should respect copyright, privacy, fair use, financial disclosure and other applicable laws when publishing on social media platforms.

[Practices could decide to require staff to include a disclaimer if they identify themselves as a practice employee on any social media platforms – for example, ‘The views expressed in this post are mine and do not reflect the views of the practice/business/committees/boards of which I am a member’.]

Breach of policy

All social media activities must be in line with this policy.

Policy review statement

[State that this policy will be reviewed regularly to ensure it is up to date with changes in social media or relevant legislation. State how you will notify the practice team when you amend this policy.]

**Disclaimer**

The ‘Social media policy template for general practices’is intended for use as a guide of a general nature only and may or may not be relevant to your particular practices or circumstances. The Royal Australian College of General Practitioners (RACGP) has used its best endeavours to ensure the template is adapted for general practice to address current and anticipated future social media requirements. Persons adopting or implementing its procedures or recommendations should exercise their own independent skill or judgement, or seek appropriate professional advice. While the template is directed to general practice, it does not ensure compliance with any privacy laws, and cannot of itself guarantee discharge of the duty of care owed to patients. Accordingly, the RACGP disclaims all liability (including negligence) to any users of the information contained in this template for any loss or damage (consequential or otherwise), cost or expense incurred or arising by reason of reliance on the template in any manner.

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*We acknowledge the Traditional Custodians of the lands and seas on which we work and live, and pay our respects to Elders, past, present and future.*

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