Government of **Western Australia**
WA Country Health Service

Social Media Policy

1. Purpose

Social media gives the WA Country Health Service (WACHS) the opportunity to promote the health service's achievements, events and health messages to the community, staff and stakeholders.

To enhance communication, collaboration and information exchange, WACHS supports planned official use of social media technologies. The same standards of professional practice and conduct associated with all communication activities apply.

This policy provides the standards for staff within WACHS to engage in communication using public-facing social media channels.

2. Policy

2.1 WACHS social media pages

WACHS currently uses Facebook, YouTube and LinkedIn social media channels.

Applications for new social media pages or channels must be approved by the Office of the Chief Executive or delegate. Staff must use existing pages unless there is a business need which cannot be fulfilled without the establishment of a new page.

Page requirements

All WACHS social media pages must:
- support WACHS strategic vision and align with current initiatives
- include WACHS branding and the WACHS logo
- include a summary of the page's purpose and the business unit that is responsible for the page, including contact details
- include the 'Terms of use' – see Appendix A
- restrict posting by the general public
- allow comments by the general public, all of which need to be moderated by the responsible nominated staff
- adhere to the associated platform guidelines

Page management

Nominated staff will be responsible for maintaining and moderating social media pages, as well as coordinating page content for approval. All social media pages can also be accessed by Communications, to provide guidance and oversight of all social media activity, with the ability to publish, remove or update approved content as required.

WACHS Facebook pages have been consolidated in the WACHS Meta Business Suite account to allow Communications to add and remove users on a page-by-page basis.

To manage WACHS Facebook pages, a personal Facebook profile page is required.

2.2 Posting on social media

Content of posts

All content posted on WACHS pages must support the WACHS strategic vision and priority areas.

In general, LinkedIn is used to promote WACHS as a professional organisation, inform stakeholders of WACHS events and achievements, and for recruitment purposes, whereas Facebook can be used for other purposes including health information relevant to local communities.

Business units managing social media pages are encouraged to network with staff and stakeholders seeking content for posts.

Content requirements and guidelines

When preparing WACHS social media content:
- posts and comments must adhere to the Public Sector Commission's Media and Public Communications Administrative Instruction and must be apolitical - not seen to publicly support or criticise any political party, its actions or policies
- all posts must be suitable for the page's intent and localised, where possible, to engage with the target audience
- each social media page should post weekly to maintain engagement
- to reduce the resourcing requirements, it is recommended that no more than two posts are made each day (excluding the sharing of posts)
- all posts must be approved as per the approval process below
- all non-text content must be captioned appropriately for online accessibility
- Facebook posts should include a suitable photo or graphic, video or a link (with an image included)
- LinkedIn updates should include a suitable photo or graphic, video or a link
- photos, graphics and videos must be of a high quality and at least 1000px in width (or height).
- written consent is required from all identified people in photos and videos, including WACHS staff. A consent form is available on the WACHS intranet.
- All content must either be owned by WACHS or permission to use on social media granted, including sound or music in videos.
- all posts must be made in a prompt manner to ensure the timeliness of the information.

Engaging your audience

The purpose of WACHS social media is to engage with the target audience.

The following types of content have been identified as being most effective on social media:
- Photos with local people (for example, patients and staff)
- Videos between 10 seconds and one minute in length (18 seconds is optimal)
- Infographics that are simple, easy to understand and contain minimal text.

Writing for social media

People tend to scan online content rather than read line by line, so it is important that messages are succinct and factual. Content written for WACHS social media must also be:
- readable and understandable at pre-secondary education reading levels
- include important information at the start of post content
- presented in short paragraphs.

Requesting a post

All WACHS staff and District Health Advisory Council (DHAC) Chairs are able to request a post to be placed on any of the WACHS social media pages.

Post requests must be sent to the business unit responsible for maintaining the page in the first instance, with any text, photos, links or video content included.

2.3 Moderating social media

All WACHS social media pages must be moderated by the responsible business unit between the hours of 9am and 5pm Monday to Friday. Typically, this should be at least twice a day – morning and close of business.

Business units must ensure that there is always a trained staff member available during these hours to moderate the page in the case of absence.

The purpose of moderating is to review and delete inappropriate comments, gather consumer feedback and respond to comments (if required). Responses to comments, like in other forms of media, need to be timely and approved.

Moderation should not be mistaken for censorship. Negative, but non-defamatory comments, should be addressed, where appropriate, rather than deleted.

Any comments made by the public (or WACHS staff) of a contentious nature with potential media implications must be sent to the relevant Executive Director/Manager Strategic Communications (or delegate) for escalation to Communications.

WACHS social media pages are only to be moderated on WACHS-owned hardware as opposed to personal devices such as mobile phones, to reduce the risk of unauthorised access.

Reviewing comments

Members of the public are able to comment on WACHS posts. All comments must be reviewed to ensure they meet the terms of use.

Facebook includes a 'profanity filter' option which disallows common swear words from being published. This is enabled for all WACHS pages.

Comments should only be removed – and a private message sent to the user explaining the reason why – if the comment includes:
- languages other than English

- swear words, excluding low-level swear words or slang (with consideration to the context)
- offensive, discriminatory, denigrating, out of context, violent and obscene content
- confidential information about any person, patient or employee
- a deliberate attempt to promote or advertise a business
- duplicated in error
- health or medical advice
- defamation of WACHS or WACHS staff
- bullying other users
- illegal content, advocates or links to illegal content and activities (this content should also be reported to WA Police)
- copyright text, images, music or videos.

People who repeatedly breach the terms of use must be blocked from commenting on the page, and a private message sent to them with the reason why they have been blocked. See standard responses.

Responding to comments

The responsible business unit should only comment on a post if:
- in response to a direct question by a user
- correcting an error in a post (or comment), in which case the post (or comment) must be updated with a mention of where the error was located and the change made
- responding to negative feedback, in which case the user should be directed to provide feedback on Care Opinion.

All responses to comments (excluding standard responses, such as directing users to Care Opinion) need to follow the approval process below. For advice on contentious issues, contact Communications.

Moderators are also to avoid clicking 'like' on comments made by users. 'Liking' some user's comments and not others – by choice or by accident – may be perceived as being biased in some situations.

There may be situations where comments made on external Facebook pages need a response from WACHS. Contact Communications in the first instance if a need to comment on external Facebook pages is identified.

Private messages

Facebook has the ability to send and receive private messages from users. It is important that private messages are only used to:
- inform users of a breach of the terms of use
- respond to a private message, in which case the conversation should be directed to an official channel (for example, WACHS email address or phone number)
- direct user feedback to other channels, for example, Care Opinion.

It is important that records are kept of all private messages, which can be done by copying and pasting the message content into a Word document and saving to the Records Manager, also known as TRIM. This is the responsibility of the business unit.

Approval process

All posts made on behalf of WACHS must be approved by the Executive Director/Manager Strategic Communications (or delegate).

With Facebook, it is preferable that posts are submitted to the Executive Director/Manager Strategic Communications (or delegate) in a monthly Facebook content plan. However, given the nature of social media, Facebook responses (including ad-hoc posts) are sometimes required, for example, in response to an emergency situation or in response to a user comment. In this situation, the post or response must also be approved by the Manager Strategic Communications following sign off from the Executive Director.

The exception to this is standard responses which require no approvals from the business unit.

The business unit is responsible for coordinating post content as well as proposing responses to comments (if required). For the WACHS-wide page, this is coordinated by the Online Communications Coordinator.

The Manager Strategic Communications must approve posts and comments made on behalf of WACHS on the WACHS-wide pages, with the exception of posts and responses of material significance (or of provocative, contentious or politically sensitive nature) which must be approved by Tier 2 as per the WACHS Authorisations Schedule.

Facebook content plans

It is recommended that monthly content plans are developed by the responsible business unit to ensure a consistent flow of posts and to identify opportunities for photos or videos in upcoming events or initiatives.

The Facebook content plan template must be completed and approved by the relevant Executive Director/Manager Strategic Communications (or delegate) and then emailed to Communications. This is for Communications oversight and to identify information that is more suitable as a WACHS-wide post.

Each item in the plan must include the proposed date of the post, post text and the external website link or Records Manager (TRIM) link to video/photo/graphic (if applicable). There may be situations where final photos or video cannot be provided until the day of the post (for example, where photos are to be taken at an event). In this situation, a description of the proposed photo should be provided.

Facebook response or post

There are times when information needs to be disseminated quickly, for example, in response to an emergency situation, or if a unique opportunity is presented where timely engagement with the community is essential. Another situation may be in response to a contentious public comment on a post.

The Facebook response or post template must be completed and approved by the Executive Director/Manager Strategic Communications (or delegate) and then emailed to Communications for approval before being published.

The Executive Director/Manager Strategic Communications (or delegate) must be informed immediately if there are any potential media implications associated with the reactive post or comment, for escalation to Communications. It is recommended that a follow up phone call is made to either the Executive Director/Manager Strategic Communications (or delegate) or Communications to ensure a timely response. In the event that the Executive Director/Manager Strategic Communications (or delegate) is not available, Communications must be contacted in the first instance.

Static content

Social media pages include content that is static – that is, content that the user cannot interact with (for example, comment on or 'like'). This includes, but is not limited to:

- Facebook 'About us' page
- Facebook 'Services' page (if enabled)
- LinkedIn 'About us' ('Overview')

Changes or additions to static content on social media pages must be emailed to Communications.

Following pages (Facebook only)

Facebook allows a business page to follow other organisation pages. Following pages is a good way to keep up to date with news posted by that organisation and is also for networking.

There is no approval required for a WACHS page to follow another business page, provided the page is managed by one of the following:
- a local, State or Federal Government organisation
- an organisation that is funded by a local, State or Federal Government organisation
- an organisation that is a partner of a local, State or Federal Government organisation
- relevant non-government organisations (e.g. Diabetes WA, Aboriginal Health Council of WA, Rural Health West, WA Primary Health Alliance) including international non-government organisations (e.g. World Health Organisation)

Please contact Communications for approval on following pages that do not meet these criteria.

2.4 Promoting pages

The purpose of posting updates on social media is to reach your target audience. One way to achieve this is by promoting your social media page and building up the number of people following it.

Promoting social media pages can be done by:
- informing staff of WACHS social media pages, either via official communication channels (for example, CE News) or in general discussion
- encouraging staff who have personal profiles to invite friends to follow the page/s
- inviting friends to 'like' WACHS social media pages, or mentioning the pages to friends in general conversation
- updating email signatures with links to WACHS social media pages

- networking, sharing and paid advertising (see below).

Networking and sharing

Business units are encouraged to build relationships with organisations that already have an established social media presence. These include:
- local government authorities (LGAs)
- community resource centres (CRCs)
- other State Government organisations
- relevant non-government organisations (e.g. Diabetes WA, Aboriginal Health Council of WA, Rural Health West, WA Primary Health Alliance) including international non-government organisations (e.g. World Health Organisation).

Administrators of these external pages may be willing to share WACHS-owned content on their pages, especially if the content contains important messages for their own audience, or there is an overlap in the organisation's priority areas. Business units should contact suitable organisations at the time posts are scheduled to request sharing of WACHS posts.

Alternatively, WACHS pages can share posts from other State Government agencies, or organisations funded by WA Health/WACHS, without approval, provided it aligns with the priority areas of the business unit.

It is also important for business units to build relationships with staff in health services and hospitals. Aside from being able to promote the pages to their own networks, staff will be central to providing localised content which is an effective way to engage your target audience.

2.5 Social media advertisements and paid campaigns

Facebook and LinkedIn have options for paid advertising and campaigns, which can be used to boost posts and connect with people beyond those that follow the pages. It can also be particularly useful for targeting and reaching specific demographics of users – by region, interests or age group.

Facebook advertisements are managed via the Meta Business Suite and costs must be provided by the business unit responsible for the post. Contact Communications for more information.

2.6 Reporting

Communications will provide quarterly reports on social media use by WACHS.

This will include information such as the number of posts made by each page, significant issues or highlights during the quarter and recommendations.

2.7 Recordkeeping

Social media activities must be recorded according to the WACHS Records Management Policy. Additionally, analytical data, such as the number of likes, shares, comments and reach of each post must also be recorded.

It is the responsibility of the responsible business unit to record post content, comments and private messages. Communications is responsible for recording analytical data, available via Meta Business Suite. It is recommended that analytical data be collected at least one month from the date of the post.

2.8 Risks

Risk	Consequence	Control
WACHS post is inaccurate or contentious	Loss of reputation	All posts must be approved by the Executive Director/Manager Strategic Communications (or delegate) with oversight from Communications.
Comment made by the public is negative or contentious	Loss of reputation	Business unit regularly moderates comments and informs the Executive Director/Manager Strategic Communications (or delegate) and Communications of negative or contentious comments.
WACHS staff social media account is accessed without authorisation	Defamation	Accounts should not be accessed from personal devices which will reduce this risk.
Insufficient staff to manage social media pages	Breach of policy	Quarterly reports will flag issues to Executive. Communications will coordinate activities and streamline processes.

3. Roles and Responsibilities

Facebook roles and responsibilities

Role	Responsibilities
Regional / Executive Director (or delegate)	• Approve content plans. • Approve ad-hoc posts and responses prior to Manager Strategic Communications approval. • Escalate potential media implications to Communications.
Manager Strategic Communications	• Approve WACHS-wide content plans. • Approve ad-hoc posts and responses following Executive Director (or delegate) approval. • Approve WACHS-wide posts and responses.
WACHS Communications staff	• Create pages/static content. • Prepare content plans for WACHS-wide pages and responses to comments on WACHS-wide posts (if required). • Publish WACHS-wide posts and responses. • Page moderation of WACHS-wide pages. • Oversight and support to /Executive Director (or delegates) and nominated staff.

	• Provide reports to the WACHS Executive. • Recordkeeping, promotion and networking.
Nominated staff	• Prepare content plans and send to Executive Director (or delegate) for approval. Following approval, send to Communications for oversight. • Prepare ad-hoc posts (e.g. posts suggested by staff) and send to Executive Director (or delegate) for approval. Following approval, send to Communications for approval. • Prepare responses to comments on posts (if required) and send to Executive Director (or delegate) and then Communications for approval. • Publish posts and responses following approval. • Page moderation. • Inform Communications immediately of perceived or potential contentious comments. • Recordkeeping, promotion and networking.

Platform specific roles and permissions

Role	Access	Permissions
Admin	LinkedIn	Administrate the WACHS company page, including publishing company updates, editing career pages and other content types (e.g. company leaders, employee perspectives)
Admin (Communications team members only)	Meta Business Suite	• View and change business settings. • Add and remove employees. • Manage employee permissions. • Add pages, advertising accounts and other business assets, or be assigned to manage any of these by other Admins.
Employee (for example, nominated Medical Education Unit and Baby Bumps staff)	Meta Business Suite	• View business settings. • Manage advertising accounts, pages and other business assets as assigned by the Admin.
Manage Ad Account (Admin access)	Facebook Ad Account	Control ad account settings, finances and permissions. Create and edit ads, access reports and view ads.
Manage campaigns	Facebook Ad Account	Create and edit ads, access reports and view ads.
View performance	Facebook Ad Account	Access reports and view ads.
Manage jobs	Facebook Page	Publish and manage jobs, view and manage applications, and create ads.
View Earnings Insights	Facebook Page	View the earnings insights for the Page. Includes View Page performance.

Manage Page (Admin Access)	Facebook Page	Control the Page and connected Instagram account settings and permissions. Perform any action on the Page, view all Page activity and performance, and manage Page roles. This is the most access you can grant. **Note:** Includes all functions below.
Publish content	Facebook Page	Send messages and publish as the Page, moderate comments, create ads and view Page performance.
Moderate comments	Facebook Page	Moderate comments as the Page, create ads and view Page performance.
Create ads	Facebook Page	Advertise for the Page and view Page performance.
View Page performance	Facebook Page	View all Facebook Analytics and Page Insights about the Page.

All staff are required to work within policies and guidelines to make sure that WACHS is a safe, equitable and positive place to be.

WACHS staff (with the exception of the Communications team) will only be assigned the following roles:
- Employee (Meta Business Suite).
- Publish content; Moderate comments; Create ads; or View Page performance (Facebook page).

All Facebook posts and comments made on behalf of WACHS must be approved by the Executive Director/Manager Strategic Communications (or delegate) before being published, with the exception of standard responses. In some situations, the Communications team must also approve posts and responses. See the approval process for more information.

LinkedIn updates must be approved by the Manager Strategic Communications before being published.

4. Monitoring and Evaluation

4.1 Monitoring

Monitoring of compliance with this document is to be carried out by the Online Communications Coordinator every year or sooner if necessary, by reviewing social media activity, quarterly reports and feedback from stakeholders.

4.2 Evaluation

Evaluation of the effectiveness of this policy will be undertaken by the Online Communications Coordinator via analytics and reports including – but not limited to – quarterly and ad hoc dashboard as well as the measurement and reporting of specific promotional campaigns and/or public health messaging.

5. Compliance

Failure to comply with this policy document may constitute a breach of the WA Health system Code of Conduct (Code). The Code is part of the Integrity Policy Framework issued pursuant to section 26 of the *Health Services Act 2016* (WA) and is binding on all WACHS staff which for this purpose includes trainees, students, volunteers, researchers, contractors for service (including all visiting health professionals and agency staff) and persons delivering training or education within WACHS.

WACHS staff are reminded that compliance with all policies and procedures is mandatory.

6. References

Government of Western Australia, Public Sector Commission. "Media and Public Communications Administrative Instruction." Accessed 25 May 2023. https://www.wa.gov.au/organisation/public-sector-commission/administrative-instructions

Government of Western Australia, WA Country Health Service. "WACHS Authorisation Schedule." Accessed 25 May 2023. https://wahealthdept.sharepoint.com/sites/wachs-oce/SitePages/WA-Country-Health-Service-Authorisation-Schedule.aspx

Government of Western Australia, Department of Health. "WA Health Social Media Terms of Use." Accessed 25 May 2023. https://www.health.wa.gov.au/Global-Items/Disclaimer/WA-Health-Social-Media-Terms-of-Use

7. Definitions

Term	Definition
Social media	**Social media** is the term that describes web-based applications that enable the creation and exchange of user-generated online content. Examples of social media include, but are not limited to, Facebook, LinkedIn, Instagram, Pinterest, YouTube, Tumblr and Twitter.

Document Summary

Coverage	WACHS wide
Audience	WACHS wide
Records Management	Non - Clinical: Records Management Policy
Related Legislation	*Health Services Act 2016* (WA)
Related Mandatory Policies / Frameworks	Communications Information Management MP 0128/20 Use of Official Information, Digital Services (Social Media) and Public Comment Policy MP 0124/19 Code of Conduct Policy
Related WACHS Policy Documents	Media and Communications Policy Records Management Policy Photography and Filming of Clinical Care by Patients, Carers, Relatives, Visitors or Contractors Policy
Other Related Documents	WA Health Social Media Terms of Use (external users) WACHS Style Guide for Corporate Visual Identity WACHS Written Style Guide
Related Forms	WACHS photo and video consent form Facebook content plan template Facebook response or post template
Related Training Packages	NIL
Aboriginal Health Impact Statement Declaration (ISD)	ISD Record ID: 2173
National Safety and Quality Health Service (NSQHS) Standards	6.04 Organisational processes to support effective communication
Aged Care Quality Standards	NIL
National Standards for Mental Health Services	NIL

8. Document Control

Version	Published date	Current from	Summary of changes
5.00	31 May 2023	31 May 2023	Updated terminology, links and processes
5.01	22 January 2024	31 May 2023	Minor wording update to reflect decommissioning of regional Facebook pages.

9. Approval

Policy Owner	Office of the Chief Executive
Co-approver	N/A
Contact	Online Communications Coordinator
Business Unit	Communications
EDRMS #	ED-CO-18-1438
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This document can be made available in alternative formats on request.

Appendix A: Terms of use

The text below has been modified from the WA Health Social Media Terms of Use **and must be included on WACHS social media pages.**

As a user of this site, you agree to:
- be courteous and fair
- respect other people's privacy
- contact us to make a complaint if improper material is posted or conducted by another user
- not post any material which is:
  o offensive, discriminatory, denigrating, out of context, violent and obscene content
  o a deliberate attempt to promote or advertise a business
  o defamatory
  o contains copyrighted material unless the original source is attributed
  o illegal or advocates links to illegal content or activities.
- provide feedback on WACHS services through the appropriate channels, for example, Care Opinion, and not on this site.
- Any user who continues to maintain views that we consider contrary to expert medical opinion (and are contradicted by evidence-based research and expertise), that could pose a risk to individual and community health, will be blocked from this account.

The moderator, on behalf of WACHS is to:
- moderate comments
- respond to comments between 9am–5pm Monday to Friday, if required
- intervene, delete or ban users and associated content who or which breach the Terms of Use above
- encourage and guide participation, if required
- comply with the provisions of the WA Health Code of Conduct and public sector codes of conduct
- employ courtesy, consideration and sensitivity in dealing with members of the public, patients and employees
- escalate illegal content to the relevant authorities.

Please note that by following another Facebook page, WACHS does not automatically constitute endorsement of that organisation.