

# Social Media

## POLICY AND PROCEDURE

### 1. Purpose

To create transparency and guidelines around the use of social media for all employees in the workplace and at home where a user's affiliation with Subee Newlake is known.

The objectives of this social media policy are to help you with the following:

- Maintain your brand identity consistently across all channels
- Treat legal and regulatory sensitivities with awareness
- Prevent a security breach
- Prevent a full-blown PR crisis (and how to act quickly if one does happen!)
- Be upfront with your employees regarding their own social media responsibilities
- Encourage your employees to own and amplify your brand's message

### 2. Scope

This policy applies to social media hosted by Subee Newlake and independent platforms where the employee's affiliation is known, identified or presumed.

This policy applies to all social media platforms. It also applies to all users, whether on company property, connected from remote via any networked connection, or using company equipment.

References to Privacy and Confidentiality are informed by Subee Newlake respective policies.

### 3. Definition

Social media are interactive computer-mediated technologies that facilitate the creation or sharing of information, ideas, career interests and other forms of expression via virtual communities and networks.

Blog – short for 'Web log', is a site that allows an individual or group of individuals to share a running log of events and/or personal insights with an (unknown) online audience.

Electronic media – non-computing devices such as flash memory drives, CDs, DVDs, tapes, hard disks, internal memory and any other interchangeable, reusable and/or portable electronic storage media on which (1) electronic information is stored, or (2) used to move/share data between computing systems/devices.

Subee Newlake Information – Information in any form or media that is created by or on behalf of Subee Newlake in the course and scope of its business, regardless of whether that information is maintained or stored by Subee Newlake and others on its behalf. Examples include, but are not limited to, client records, employee records, financial information, company competitive information, Subee Newlake developed intellectual property and business email messages.

Podcast - A collection of digital media files distributed over the Internet, often using syndication feeds, for playback on portable media players and personal computers.

RSS feeds or Syndication feeds - A family of different formats used to publish updated content such as blog entries, news headlines or podcasts and "feed" this

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information to subscribers via e-mail or by an RSS reader. This enables users to keep up with their favourite web sites in an automated manner that's easier than checking them manually (known colloquially as "really simple syndication").

Social media - Include but are not limited to blogs, podcasts, discussion forums, on-line collaborative information and publishing systems that are accessible to internal and external audiences (i.e., Wikis), RSS feeds, video sharing, and social network like MySpace, Twitter, Facebook and the like.

Wiki - allows users to create, edit, and link Web pages easily; often used to create collaborative web sites (called "Wikis") and to power community Web sites.

### 4. Responsibility and Authority

The Quality Manager has responsibility and authority to ensure this procedure is followed.

All employees are responsible for knowing and following this procedure.

### Procedure

Employees are expected to respect clients, their families and one another; protecting confidentiality, privacy and security; and safeguarding the proper use of Subee Newlake assets.

Employees must not use social media to comment about their work at the Subee Newlake whether it has the potential to identify any clients in their care, and/or harm the image and reputation of the organisation.

No photographs of any clients, staff and Subee Newlake facilities can be taken and posted on any social media and other websites without informed consent from the individuals involved and/or the business owner in the case of facilities.

Employees may not post any material that is obscene, defamatory, profane, libellous, threatening, harassing, abusive, hateful, or embarrassing to another person or entity when posting to a Subee Newlake hosted site.

Subee Newlake - hosted blogs must focus on subjects related to the organization.

Employees may not post content or conduct any activity that fails to conform to any and all applicable State and Federal laws. For Subee Newlake and our employees' protection, it is critical that everyone abide by the copyright laws by ensuring that they have permission to use or reproduce any copyrighted text, photos, graphics, video or other material owned by others.

Employees must seek approval from the Business Owner or Company Director before setting up a Subee Newlake blog or other social media site.

Employees may not disclose any confidential or proprietary information of or about SUBEE Newlake, its affiliates, vendors, or suppliers, including but not limited to business and financial information, represent that they are communicating the views of SUBEE Newlake, or do anything that might reasonably create the impression that they are communicating on behalf of or as a representative of SUBEE Newlake.

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Employees must not discuss, disclose or post information of any kind regarding incidents and events that occurred at any SUBEE Newlake site on any social media and other websites.

Employees may not use or disclose any client identifiable information of any kind on any social media as per the Privacy Policy.

Self-Hosted Sites - Employees must not say or suggest that the views and opinions they express related to Subee Newlake and generic aged care or disability topics represent the official views of Subee Newlake.

Employees may not use or disclose any client identifiable information of any kind on any social media as per the Privacy Policy.

Self-Hosted Sites - Employees must not say or suggest that the views and opinions they express related to Subee Newlake and generic aged care or disability topics represent the official views of Subee Newlake.

Employees may not list Subee Newlake as their place of employment as a link on any kind of social media site.

### **Restrictions on using the internet**

Anti-discrimination, anti-harassment and work health and safety legislation make it illegal to use electronic media in our workplace in order to –

- visit Internet sites that contain obscene, hateful or other objectionable materials.
- send or receive any material that is obscene or defamatory or which may annoy, harass or intimidate another person.
- make or post indecent remarks, proposals or materials

### **Related Legislation and Quality Standards**

NDIS (Provider Registration and Practice Standards) Rules 2018

Attendant Community Industry Standard ACIS:2018  
*Privacy Act 1988 (Cth) Privacy Act*

Australian Privacy Principles (APPs).

*National Disability Insurance Scheme Act 2013 (Cth) (NDIS Act)*

National Disability Insurance Scheme (Protection and Disclosure of Information) Rules 2018

Aged Care Quality Standard 1 (3)f

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