



External Communication Policy and Procedures

STATEMENT

The Paraplegic & Quadriplegic Association of South Australia Ltd (PQSA) recognises the value of using social media and general communications to build meaningful relationships with workers, clients, other relevant stakeholders and the broader community. We also have a responsibility to protect our reputation and the reputation of those associated with our company.

<p>Approved by:</p>  <p>Chief Executive Officer</p>	<p>Date: March 2021</p>
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In this policy, 'us' 'we' or 'our' refers to The Paraplegic & Quadriplegic Association of South Australia Ltd ACN 644 670 977, which is a Company Limited by Guarantee and conducts its business through Lifestyle Support and HomeCare+ services.

Please note that printed copies are not able to be controlled and the Shared Drive should always be referred to for the most current version.

SCOPE

Compliance with this policy is a condition of appointment for all workers engaged to provide services on behalf of PQSA.

DEFINITIONS

Refer to the PQSA Policy and Procedure Definition Glossary

RESPONSIBILITIES

This Policy is designed to ensure all workers are aware of their responsibilities, both professionally and personally, in regards to the acceptable and legal use of social media and PQSA communication channels. The release of any information relating to PQSA or our clients shall be managed in a professional, ethical and legal manner.

It is our responsibility to communicate our policies and procedures to all workers on a systematic basis. Individual Managers and Supervisors are responsible for monitoring workers' understanding of their obligations and need for compliance with policies and procedures. Workers are responsible for complying with our policies and procedures.

It is the responsibility of all Managers, Supervisors and workers accessing social media and PQSA communications to understand and comply with this Policy and associated procedures.

POLICY

PQSA uses social media and other communications to share information about the company, promote our stories, support the delivery of exceptional client services, promote consumer engagement, generate public support, recruit quality workers and to foster and strengthen our ties to the community.

This policy is designed to support this by providing clear direction for all PQSA workers around the use of PQSA hosted and non-PQSA hosted social media, where PQSA is known, identified or presumed within the content. The policy also sets out the obligations and requirements that ensure compliance with legal and regulatory restrictions and privacy and confidentiality agreements.

When using social media, it is important that a person is clear about whom is being represented and takes responsibility for ensuring that any reference to PQSA is factually correct and accurate and does not breach confidentiality or privacy requirements.

Any communication that refers to or relates to PQSA or a person's relationship with PQSA (including working relationships with individual clients and other organisations/government departments) will be considered a PQSA communication regardless of the intent of the communication (i.e. personal or work related). A worker is personally responsible for the public content published by them in any form of social media account/page.

PQSA maintains the right to scrutinise any social media sites that contain information regarding PQSA, its services and associated activities.

Media releases can only be approved by the Chief Executive Officer.

Any requests for interview by the media are to be forwarded to the Chief Executive Officer for consideration and approval. In general, the Chief Executive Officer or PQSA Chairperson will conduct any interviews though this can be delegated to relevant staff for issues that pose no risk to our reputation (as determined by the Chief Executive Officer).

PROCEDURES

A worker must not:

- post material that is offensive, obscene, defamatory, threatening, harassing, bullying, discriminatory, hateful, racist, sexist or promoting violence
- imply that they are authorised to speak on behalf of or are speaking as a representative of PQSA or give the impression that any views expressed are those of PQSA, if that authority does not exist
- make any comment or post any material that might otherwise cause damage to our reputation or public image or bring our Company into disrepute.
- breach any other PQSA policy through use of social media or external communications
- breach any legal or regulatory requirement, such as the NDIS Code of Conduct.

Professional use of social media on behalf of PQSA

PQSA's Communications Team manages our official websites, social media and social networking pages on behalf of PQSA. There are designated workers within the Communications Team and PQSA Directors who are responsible for engaging online with workers, clients and the public in an official capacity and for determining appropriate individuals/organisations to visibly follow on social media platforms.

In some cases, workers from across the Company may be asked to assist the Communications Team with this work. The Communications Team will provide training and will check online interactions for compliance, accuracy and appropriateness on an ongoing basis.

Our social media accounts are monitored on a regular basis. The Communications Team aims to reply to comments with haste; however, if the matter requires urgent attention or is a private matter, external users are urged to communicate via private message or email (public@pqsa.asn.au).

The images which we post on social media accounts may only be posted with full permission of those depicted and within legal parameters (e.g. copyright and privacy); however, workers must be mindful of who is tagged and what personal information is shared. We will remove information that is deemed to be sensitive to an individual's privacy, beliefs or culture.

Bringing issues to the attention of PQSA

If a worker finds information online to which they believe PQSA should respond, the worker should contact the Senior Communications Consultant, who will arrange a response from a relevant subject matter expert (generally the Chief Executive Officer or delegate).

Note: PQSA social media sites are monitored during business hours. Any matters that require urgent assistance should be referred to our Emergency After Hours contact on 1300 559 331. They will then contact the Director on-call.

When providing information on behalf of PQSA, an authorised worker will:

- only disclose publicly available information or other information that they are authorised to release
- only offer information, support or comments on topics that fall within their area of responsibility
- ensure that any content they publish is factually accurate and complies with our Privacy Policy and Procedures

- ensure that they obtain final approval from the appropriate Director or delegate prior to uploading information to the social media account/web page/publication
- only use authorised images (refer to the Communications Team).

Any derogatory comments made by a person providing information on behalf of PQSA will not be sanctioned and will result in a full investigation and could lead to disciplinary or other action.

Personal use of social media

Any worker can (and is encouraged to) share ideas and information sourced from social media generated by PQSA for the purposes of collaboration. Each of these media sites has their own sets of rules governing behaviour to which they must adhere.

Our Communications Team monitors discussions in PQSA forums and we will delete any comments posted which have content that breaches this Policy or the individual site's terms of use. In that instance, workers of PQSA may be required to participate in a full investigation which could lead to disciplinary or other action.

PQSA supports the use of social media in a private capacity; however, all workers should be aware that content published on social media sites is publicly available, even on personal accounts.

As such, a worker should ensure:

- they are mindful that their behaviour is still bound by PQSA's Code of Ethical Behaviour, Client Rights and Responsibility and Privacy policies, legislation and other statutory requirements such as the NDIS Code of Conduct even outside business hours
- they do not make comments that are offensive, obscene, defamatory, threatening, harassing, bullying, discriminatory, hateful, racist, sexist or promoting violence in relation to work or about colleagues or clients
- they do not claim to be associated with PQSA if their employment/volunteering ceases (e.g. LinkedIn – any worker must immediately amend employment status with PQSA once that ends)
- all usernames, identities or log-on identification do not incorporate our business/trading names or branding
- their comments are not or could not be perceived to be:
 - made on behalf of PQSA.
 - a personal criticism in relation to their employment.
 - a criticism of PQSA, PQSA's clients, workers and/or other stakeholders
 - compromising public confidence in PQSA and any individual connected to PQSA..

Any derogatory comments made on or in relation to PQSA, its workers, clients or other stakeholders on personal social media sites will not be tolerated and will result in full investigation and where deemed necessary, action may be taken.

PQSA reserves the right to remove or update posts on PQSA's webpages/social media that are deemed offensive, obscene, defamatory, threatening, harassing, bullying, discriminatory, hateful, racist, sexist, promoting violence, illegal, incorrect, misleading or overtly promotional (spam). We also reserve the right to remove posts and block individuals that are deemed to be trolling, stalking, or deliberately causing disturbance on our webpages/social media.

Email

PQSA will not tolerate the use of PQSA email accounts to:

- set up personal businesses or send chain letters
- forward confidential PQSA messages to unauthorised external locations
- distribute, disseminate or store images, text or materials that might be considered indecent, pornographic, obscene or illegal
- distribute, disseminate or store images, text or materials that might be considered discriminatory, offensive or harassing/abusive, or where there is an attack on particular individuals.
- distribute copyrighted information in a way that violates the copyright
- broadcast unsolicited personal views on social, political, religious or other non-business related matters
- transmit unsolicited commercial or advertising material
- undertake deliberate activities that are designed to waste staff effort or networked resources
- introduce any form of computer virus or malware into the corporate network.

Emails at work are not private and may be reviewed by PQSA Management without notice, or permission. All incoming and outgoing emails are automatically archived to a server and can be accessed by PQSA at any time. We are legally responsible for all email communications and reserve the right to review emails.

Workers must not use email for personal or private communications that interfere with their duties and responsibilities at work. PQSA will discipline workers for excessive private use of the email system including sending unsolicited junk email or advertising or excessive copying of emails to others.

If an email is received which contains inappropriate material, links or attachments, or breaches this or another PQSA policy, it must be reported immediately to the Director, Payroll and Information Technology or Chief Executive Officer.

Bullying or harassment of any nature via the PQSA email system or social media accounts/pages, will not be tolerated. There will be no circulation of pornographic or lurid emails.

Improper use of the email system may result in the commencement of disciplinary procedures, including termination. Use of the PQSA email system is a privilege not a right.

Appeals and Grievances

Any complaints regarding external communications will be dealt with in line with PQSA Clients Complaints and Workers Grievance Policies and Procedures.

RELATED LEGISLATION

- Equal Opportunity Act 1984
- National Standards for Disability Services
- Privacy Act 1988
- Work, Health and Safety Act 2012

SUPPORTING PQSA DOCUMENTATION

- Bullying in the Workplace Policy and Procedures
- Client - Rights and Responsibilities Statement
- Code of Conduct and Ethical Behaviour
- Complaint/Concern Management Policy and Procedures (Client Complaints)
- Complaint/Concern (Worker) Management Policy and Procedures
- Discipline and Termination of Employment Policy and Procedure
- Equal Opportunity Policy
- Privacy – Private Information Management Policy and Procedures

BREACHES OF THIS POLICY

A **breach** of this policy is grounds for disciplinary action, up to and including termination of employment. Ignorance of these procedures will not generally be accepted as an excuse for non-compliance. Only in extreme circumstances and where such ignorance can be demonstrated to have occurred through no fault of the individual concerned will PQSA accept such an argument.

DISTRIBUTION AND REVIEW

PQSA will ensure all persons engaged to provide services either paid or unpaid will be aware of this policy and will have easy access to it in an appropriate format. All policies are to be reviewed on a periodic basis or when legislation or government policy determines.