

**CENTER OF SPECIAL CARE
POLICY AND PROCEDURES**

TITLE: SOCIAL MEDIA POLICY		DOCUMENT TYPE: POLICY
ENTITY: CSC AND HSC	CITATION: N/A	DEPARTMENT: DEVELOPMENT & COMMUNICATIONS
AUTHORED BY: VP, DEVELOPMENT & COMMUNICATIONS	RESPONSIBILITY: VP, DEVELOPMENT & COMMUNICATIONS	APPROVED BY: PRESIDENT AND CEO
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POLICY MANUAL: ADMINISTRATION		

PURPOSE:

- 1) To support the responsible personal and professional use of social media among all members of the Hospital for Special Care (HSC) workforce (including all employees, medical staff members, volunteers, trainees, certain contractors and contracted staff and other persons whose conduct reflects directly on HSC, whether or not they are paid by HSC).
- 2) To foster an environment that respects the privacy and dignity of Hospital for Special Care patients and employees, as well as other persons affiliated with HSC.
- 3) To sustain a positive culture and effective relationships with all key stakeholders and all communities served by HSC.

POLICY:

- 1) All workforce members are personally responsible for the content they publish on social media (Facebook, Twitter, LinkedIn, YouTube, SnapChat, etc.), blogs or any other form of user-generated media. Only workforce members authorized by the President and CEO, Vice President of Development and Communications, or the acting Public Information Officer (PIO) during an emergency, may publish social media content or other online content on behalf of HSC and its affiliates.
- 2) HSC workforce members should include a disclaimer on social media profiles, personal blogs or websites that identify them as HSC employees. Example: Views expressed are my own and do not necessarily reflect those of my employer.
- 3) HSC workforce members must comply with HIPAA requirements and other relevant privacy laws. It is important to note that authorization to use or disclose photographs, recordings or other personal information signed by patients, visitors, employees or others conveys authorization for use to HSC and its affiliates only. These authorizations do not permit personal use of this information by any HSC workforce member.
- 4) Sharing content published or posted through HSC official social media channels or those of collaborative organizations, is appropriate.
- 5) HSC strongly discourages “friending” of patients on social media websites. Staff generally should not initiate or accept friend requests except in unusual circumstances such as the situation where in- person friendship pre-dates the treatment relationship.
- 6) Social media, including social media groups and messaging platforms, are not HIPAA compliant and are never appropriate tools for communicating protected health information. Posting of photographs, recordings or real-time transmission (such as FaceTime or Skyping™) that involves sending patient images to third parties (other than to family members, etc. for purposes related to patient care/training) is prohibited without proper written authorization.
- 7) HSC discourages staff in management/supervisory roles from initiating “friend” requests with employees they manage. Manager/supervisors may accept friend requests if initiated by the employee, and if the manager/supervisor does not believe it will negatively impact the work relationship. HSC recommends that managers/supervisors guide employees to professional

social media resources such as LinkedIn or similar resources in these instances whenever possible.

- 8) If you are an HSC employee, you must adhere to Hospital for Special Care's Standards of Conduct, as well as the following related policies:
- Human Resources "Conduct of Employees" policy
 - Computing Ethics and Acceptable Use of Computer Resources policy
 - Electronic Communication (including E-Mail) policy
 - HIPAA policies & procedures

- 9) Compliance: Failure to comply with this policy will result in corrective or disciplinary action, up to and including termination of employment. Workforce members will be educated on this policy and the attached expectations and recommendations.

If you have any questions about these guidelines, or any matter related to social media at HSC, please direct them to:

- Senior Vice President of Legal Affairs/Chief Legal Officer
- Vice President, Development and Communications

This policy is not intended to infringe on any employee's right to engage in protected concerted activity regarding wages, terms and conditions of employment.

Definitions/Key:

Social Media: For the purposes of this policy, social media is an on-line social structure made up of individuals or organizations that are tied by one or more specific types of interdependency, such as values, visions, ideas, financial exchange, friendship, business operations, professional exchange, etc. Social media sites operate on many levels, from families up to the level of nations, and play a crucial role in the way information is exchanged.

Blog: A blog is a website maintained by an individual or organization with regular entries of commentary, descriptions of events, or other materials such as graphics or video. Blogs may provide commentary or news on a particular subject; others function as more personal on-line diaries.

Workforce: Under HIPAA, the workforce is defined to include employees, medical staff members, volunteers, trainees, and other persons whose conduct, in the performance of work for the Hospital for Special Care or any other affiliate of Center of Special Care, is under the direct control of such entity, whether or not they are paid by the Hospital/Center.

Background:

The healthcare industry, like many other industries, has embraced the use of social media and blogs. Social media sites and blogs facilitate communication, education, collaboration with others, research, business travel, remote work, etc. For many, the Internet is a tool to aid in daily business practices that improves work quality and job satisfaction. The Internet provides a wide array of resources, services, and interconnectivity to HSC employees and members of the Hospital for Special Care community. However, there are also risks associated with inappropriate Internet access and use which must be addressed through appropriate safeguards, policies and practices, education and training, and appropriate corrective action when necessary.

*Personal Use of Social Media
Our Expectations and Recommendations*

- You are responsible for the words, images, actions and other content you generate, publish or share. Express yourself responsibly; use sound judgement and common sense.
- Social media is, by definition, not private. Be aware that information you share will most likely be available to far more people and entities than you ever intended, regardless of your privacy settings.
- Be an ambassador. Social media can have an incredibly powerful positive impact or can be highly destructive. Set a good example.
- Be conscientious when mixing your business and personal lives. Your online conduct can reflect on yourself, your family, your community, your co-workers and your employer.
- Be smart. Use strong passwords. Protect your personal information and your personal/financial information.
- Be thoughtful. Not everything you see online is true, accurate or fair. Think before you retweet or share.
- Remember that not all speech is protected. When you voice your opinion on social media, rules relating to sexual harassment, discrimination, violation of an individual's privacy, defamation, etc. can be enforced by local law enforcement and government agencies in the same way as printed media or any other type of public forum.