

# **WEISMAN CHILDREN'S REHABILITATION HOSPITAL (WCRH)**

## **ADMINISTRATIVE MANUAL**

**SUBJECT:** Social Media Policy

**NO:** AM 3.31

**EFFECTIVE DATE:** May, 2011

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**REVIEWED/REVISED:** 5/12; 1/13; 1/14, 5/16; 1/18; 1/21; 1/24

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### **PURPOSE:**

The purpose of this policy is to ensure (1) communications in online communities made on behalf of WCRH are consistent with the Hospital's policies and procedures, including laws concerning privacy, confidentiality, copyright and trademarks; (2) that employees' personal opinions in online communities express the fact that they are not representatives of WCRH; and (3) uses of WCRH sponsored online communities are appropriate and that communications are accurate.

### **POLICY:**

WCRH recognizes the value of online Social Media sites and Blogs ("Social Media") as vital resources to promote the Hospital's mission and values, marketing and recruitment activities. Social Media may promote communication with WCRH colleagues and customers, the general public, traditional and non-traditional media and other community stakeholders. WCRH encourages posting, comments, and hopes to engage users in discussions. Such participation may include, but is not limited to, postings in online forums, blogs, microblogs, wikis or social media e.g. Facebook, LinkedIn, Instagram, YouTube, Twitter, health pages and blogs, media sites or similar types of online forums.

Communications produced by WCRH employees, physicians, volunteers or associates on behalf of or identifying themselves as an employee of WCRH in the online community must be consistent with WCRH policies and applicable laws, including laws concerning protected health information, privacy, confidentiality, copyright and trademarks.

WCRH may require that an employee, physician, volunteer or other associate discontinue use of WCRH-sponsored online communities or stop acting on behalf of WCRH if it believes their communications are in violation of Hospital policies, values or local, state or federal laws, including state and federal patient privacy laws.

### **PROCEDURE:**

#### **A. General Guidelines**

- 1. Communication should be consistent with WCRH values, policies and applicable laws.**

**2. Patient trust**

Disclosing confidential patient Protected Health Information (PHI) in an inappropriate manner is a federal offense. The penalties include significant fines and/or arrest. WCRH employees should never publicly make comments about the care of a specific patient, especially online. Even acknowledging the care of a patient is an unacceptable disclosure of PHI.

**3. Be professional**

Individuals may be held personally liable for defamatory, proprietary or libelous commentary.

**4. Be Honest**

Ensure content is current, accurate and authentic. Give credit where it is due if you are passing along information from another source.

**5. Ensure your social media involvement does not interfere with job commitments and responsibilities**

E-mail and internet access is provided to support WCRH business purposes. While users who are given access to these tools may make use of them, they may not make extensive personal use of them. Each user's manager has the right and responsibility to determine what is "extensive use," counsel their staff and revoke access privileges for abuse of the system, if necessary.

**B. Unofficial Participation in Online Forums**

1. Unless an individual is serving as an approved, official spokesperson for WCRH in online communications, such communication are the individual's personal opinions and do not reflect the opinion of WCRH. Each individual employee, physician, volunteer or other associate of WCRH is personally responsible for his/her posts (written, audio, video or otherwise).
2. If employee, physicians, volunteers or other associates of WCRH acknowledge their relationship with WCRH in an online community, and are not designated as an official spokesperson, they shall include disclaimers in their online communications such as "I am not speaking officially on behalf of the Hospital", "I am not an official spokesperson of WCRH", or "My opinions are not necessarily the opinions of the organization".
3. Employees should notify any questionable or inappropriate material found on social media to their direct supervisor, a human resources representative, or the Administrator of WCRH for evaluation.

### **C. Official Spokesperson or Other Job-specific Participation in Online Forums**

1. If a member of the media or non-traditional online media contacts an employee, physician, volunteer or other associate of WCRH about the business of the Hospital of any kind, prior to responding, the individual must contact the Director of Communications in order for the individual permission to serve as an official spokesperson. Once an individual has approval to serve as an official spokesperson for WCRH, the individual must clearly identify himself/herself as spokesperson for the Hospital and clearly identify his/her level of expertise.
2. In some instances, the Communications/Marketing Department of WCRH may ask an individual or group of individuals, to participate in particular online forums in other functional, job-specific capacities. Examples might include posts on WCRH Facebook, as a recruitment officer or to share best practices related to health care quality or the participant's profession. Prior to participation, the individual should discuss involvement with his/her supervisor, receive approval and agree on parameters for the project as well as the length of participation. Posts and other information created by that individual or group should be saved and approved by the Director of Communications or another employee designated by the Director of Communications, before submitting anything in a public forum.
3. Employees and others associated with WCRH may not post any material that includes confidential/proprietary information or trade secrets; or information that is obscene, defamatory, profane, libelous, threatening, harassing, abusive, hateful or humiliating to another person or entity. This includes, but is not limited to comments regarding WCRH, WCRH employees, customers, partners or patients/families. Individuals should ask their managers if they have any questions about what is appropriate to include in Web-based communications.

### **D. Use of WCRH Sponsored Sites**

1. Individuals using WCRH sponsored online communities should refrain from using copyrighted materials (written, audio, video and all other electronic forms), as well as, language that is obscene, defamatory, derogatory, profane, libelous, threatening, harassing, abusive, hateful, or humiliating to another person or entity.
2. Individuals who have concerns regarding workplace conduct or inappropriate behavior are encouraged to contact their immediate supervisor, human resource representative or the Administrator of WCRH. Online forums are not an effective way to resolve such issues.

## **E. Other Social Media Guidelines**

### **1. Do not think your postings are private.**

Even though there are privacy controls on sites such as Facebook and other Social Media sites, you should assume that anything posted on a website would be seen by the public, as well as your employer.

Remember:

- “Friends” can copy your posts and make them available in public
- Your friends may be our patients/families
- It is easy for your privacy settings to be set to something other than what you had planned.

### **2. Friend requests**

WCRH discourages “friend requests” or related terms, of patients on social media websites. Staff in patient care roles should not initiate or accept requests. An exception to this would be if a friendship existed prior to the treatment relationship.

WCRH discourages staff in leadership or supervisory roles from initiating “friend requests” or related terms, of employees they manage. Leadership or supervisors may accept requests if initiated by the employee.

### **3. Use of WCRH name and Logo**

Unless approved by the Director of Communications, your social media name, handle, or URL should not include the WCRH name or logo

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Administrator