

## **Greenwood Leflore Hospital Marketing and Communications, Social Media Usage**

### **Scope**

This policy applies to all Greenwood Leflore Hospital (“GLH” or “Hospital”) Workforce who use social media tools, websites and other similar networks and whose online identity is or may be affiliated with GLH.

### **Purpose**

GLH recognizes the value of on-line social media sites and blogs as vital resources to promote in a positive manner the organization’s mission and values, operational goals, marketing and recruitment activities, as well as a forum for exchange of information by its Workforce. GLH has established and maintained an organizational presence on popular social media sites to facilitate communication opportunities for patients, employees, and other stakeholders in the communities GLH serves. This policy provides GLH’s Workforce (as defined below) with an explanation of GLH’s requirements for acceptable use of social media. These requirements are intended to ensure compliance with legal and regulatory privacy restrictions.

The purpose of this policy is to protect GLH workforce and patients from any harm that might result through the misuse of social media. Nothing in this policy is intended to or should be construed as restricting an employee’s rights to speak on matters of public concern that may be protected by the First Amendment of the United States Constitution. “Matters of public concern” usually includes speech that addresses political, social, or other concerns to the community. It does not include an employee’s personal grievances with hospital decisions. Any such grievance should be pursued through GLH’s internal grievance procedures and not on social media websites. “Matters of public concern” further does not include any speech that would identify any patient and/or treatment that the patient may receive at GLH.

### **Policy**

It is the GLH’s policy to maintain social media pages that promote the mission, vision and positive culture of the hospital through engaging in social media with the utmost professionalism.

### **Procedure**

#### Definitions

1. Social Media or social networking refers to but is not limited to online networks such as Facebook, Myspace, Twitter, and LinkedIn; Wikis; Video/photo sharing websites such as YouTube and Instagram, and any other form of online publishing, including: blogs, discussion forums, newsgroups and email distribution lists.
2. Workforce shall include all workforce members – employees, physicians employed by GLH, contract workers, and volunteers who provide services for GLH.

3. Protected Health Information (“PHI”) is defined under the Health Insurance Portability and Accountability Act (“HIPAA”) as all individually identifiable information created, transmitted, or maintained by GLH or any health care provider in any media – oral, written, or electronic (including images) related to the past, present, or future physical or mental health or condition of an individual. If the information is individually identifiable and is health information, then it is protected by HIPAA. Information is considered to be PHI where there is a reasonable basis to believe that it can be used to identify the individual. This encompasses common identifiers such as name, address, age, or social security number. PHI also includes employee healthcare information protected under HIPAA.
4. Proprietary Information includes any non-public information spoken, printed, electronic, or any other form related to GLH business functions, internal reports, policies and procedures or other internal communications.

### **Social Media Policy Guidelines**

GLH supports its Workforce’s use of social media for personal and professional use, recognizing that GLH’s Workforce has a strong voice in representing the Hospital; however, there are guidelines that must be met to ensure compliance with laws, regulations and GLH policies:

1. **Use of GLH e-mail address** – GLH’s Workforce is prohibited from signing up for social media (Facebook, MySpace, Twitter, blogs, or other types of social interactive sites) using their GLH email address. Use a personal e-mail address as your primary means of identification. Just as you would not use GLH stationery for a letter to the editor with your personal views, do not use your GLH e-mail address for personal views.
2. **Use of GLH Time** – Unless your job responsibilities require you to utilize social media on GLH’s behalf, GLH’s Workforce is prohibited from using social media or engaging in personal blogging during work hours. Any employee found to be using social media or engaging in personal blogging during work hours are subject to discipline, up to and including, termination. Volunteers may lose their right to provide volunteer services to GLH.
3. **Content** – You are personally responsible for your posts. Any member of the Workforce engaging in personal or professional social media communications that reference GLH-related content shall do so in a manner consistent with the organization’s mission and values, administrative policies and procedures, and safeguards to ensure the privacy and security of patient health information, as well as proprietary business information. Be careful that your communications cannot be construed as violating privacy rights or practicing medicine online. These rules apply whether employees, contract employees, and/or volunteers of GLH are posting to a GLH site, their own sites or commenting on other sites.
4. **Compliance with policies** GLH’s Workforce shall adhere to all Hospital policies pertaining to internet and email use, privacy and security, and the Code of Conduct.
5. **Disclaimer** – Any member of the Workforce who is not designated as a GLH spokesperson must include a statement that the opinions expressed are his/her own and not those of GLH

or its services. GLH's Workforce should always write in the first person. Where your connection to GLH is apparent, make it clear that you are speaking for yourself and not on behalf of the GLH. This may be accomplished by posting the following disclaimer – "The views expressed on this blog/website, are my own and do not necessarily reflect the views of Greenwood Leflore Hospital."

6. **Disclosure** – GLH's Workforce shall disclose his/her affiliation, connection or role at the Hospital while communicating in the public internet about GLH or GLH -related matters.
7. **Honest Communication** – GLH's Workforce shall be professional, use good judgment, be accurate and honest in all communications. Errors, omissions or unprofessional language or behavior reflect poorly on the Hospital, and may result in liability for the individual posting the communication or the Hospital. Employees engaging in such unprofessional behavior may be subject to discipline, up to and including discharge. GLH also reserves its rights to refuse the services of any individual volunteering to perform services on GLH's behalf.
8. **Conduct** – Because your site is a public space, be respectful to GLH, other employees, patients, Physicians business partners, and competitors. Employees who identify themselves as affiliates of GLH are prohibited from using social networking to harass, abuse, discriminate against, threaten violence against or make malicious, obscene or defamatory statements about GLH employees, affiliated physicians, other healthcare providers, volunteers, students, patients, guests, vendors or contractors. GLH's Workforce shall be respectful at all times in all posts. Harassment includes, but is not limited to, offensive social media posts or other offensive content which could contribute to a hostile work environment on the basis of race, sex, disability, religion, national origin, age, citizenship or any other status protected by law. This policy further restricts any form of "bullying" even if the bullying and/or harassment is not based on a protected class. Employees who violate GLH policy shall be subject to corrective action, up to and including termination. Volunteers may lose their privileges to provide volunteer services to GLH, and GLH may refuse the services of any individual volunteering for GLH. In addition, breach of confidential patient health information may also be subject to legal proceedings and/or criminal charges.
9. **Links** – GLH's Workforce shall not provide a link from his/her site to GLH's website without express written permission of the Marketing and Communications Department.

10. **Community Pages** – GLH’s Workforce shall not create community pages and/or rogue sites that reference or appear to be supported by GLH.
11. **Political or Controversial Content** – Employees who have identified themselves as affiliated with GLH shall not engage in political conversations, activities or controversial subjects without the addition of **re-posting** the disclaimer -- “The views expressed on this blog/website, are my own and do not necessarily reflect the views of Greenwood Leflore Hospital.”
12. **Privacy** – All uses and disclosures of patient identifying health information shall be carried out in a manner compliant with applicable patient privacy policies, regulations, and standards. Prior to sharing patient identifying health information or images through GLH sponsored social media and Blogs, the individual responsible for the project involving the sharing of that information shall contact the Hospital Privacy Officer to obtain a written authorization for the use and disclosure of the information from the patient/patient’s legal representative. This written authorization shall remain on file with the Privacy Officer. Those posting any information about a patient must also be mindful that identification may be determined by the content of the post even if the poster does not specifically name the patient. These posts are likewise prohibited unless the patient and/or the patient’s representative has provided a written authorization to allow such a post.
13. **Laws and Regulations** – GLH’s Workforce shall respect copyright, fair use and financial disclosure laws. Any individual who posts on GLH’s social media sites will not:
- violate any local, state, federal and international laws and regulations, including but not limited to copyright and intellectual property rights laws;
  - transmit any material (by uploading, posting, email or otherwise) that is unlawful, disruptive, threatening, profane, abusive, harassing, embarrassing, , tortious, defamatory, obscene, libelous, or is an invasion of another's privacy, is hateful or racially, ethnically or otherwise objectionable as solely determined in GLH’s discretion;
  - impersonate any person or entity or falsely state or otherwise misrepresent your affiliation with a person or entity; transmit any material (by uploading, posting, email or otherwise) that you do not have a right to make available under any law or under contractual or fiduciary relationships;
  - transmit any material (by uploading, posting, email or otherwise) that infringes any patent, trademark, trade secret, copyright or other proprietary rights of any party;
  - transmit (by uploading, posting, email or otherwise) any unsolicited or unauthorized advertising (including advertising of non GLH services or products), promotional materials, "junk mail," "spam," "chain letters," "pyramid schemes" or any other form of solicitation;
  - transmit any material (by uploading, posting, email or otherwise) that contains software viruses, worms, disabling code, or any other computer code, files or programs designed to interrupt, destroy or limit the functionality of any computer software or hardware or telecommunications equipment;
  - harass another; or collect or store, or attempt to collect or store, personal data about third parties without their knowledge or consent; or to share confidential pricing information of any party; and/or

- cite or reference business associates or coworkers without their approval.
14. **Oversight** – When GLH’s Workforce posts on the Hospital’s social Media site, GLH reserves the right to monitor, prohibit, restrict, block, suspend, terminate, delete, or discontinue any individual’s access to the Hospital’s social media site, at any time, without notice and for any reason and in its sole discretion. GLH may remove, delete, block, filter or restrict by any other means any materials in GLH’s sole discretion. GLH’s Workforce understands and agrees that GLH may disclose their communications and activities with GLH in response to lawful requests by governmental authorities, including Patriot Act requests, judicial orders, warrants or subpoenas, or for the protection of GLH rights. GLH’s Workforce agrees that, in the event that GLH exercises any of its rights hereunder for any reason, GLH will have no liability to you.
  15. **Authorized Use** – Personnel in Administration, Marketing and Communications, Human Resources and others departments may be authorized by GLH to use social media in the course of their duties on behalf of GLH during working time to perform job duties for approved, business-related purposes.
  16. GLH strongly discourages “friending” of patients on social media websites. Staff in patient care roles generally should not initiate or accept friend requests except in unusual circumstances such as the situation where an in-person friendship pre-dates the treatment relationship.
  17. GLH discourages staff in management/supervisory roles from initiating “friend” requests with employees they manage. Managers/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.
  18. Greenwood Leflore Hospital does not endorse people, products, services and organizations on social media websites such as LinkedIn, where your affiliation to GLH is known. Personal recommendations or endorsements should not be given or requested if you have indicated an affiliation with the Hospital.
  19. Unless approved by GLH’s Marketing and Communications Department, GLH’s Workforce’s social media name, handle and URL should not include Greenwood Leflore Hospital or any clinic name or logo.

Should questions arise about what is appropriate to include in a social media profile, please contact the Marketing and Communications Department.

**Related Policies**

Human Resources Personnel Policies: Internet Blogging  
Information Services: Internet/Email usage

**Review/History**

Origination date 6/20/2013

Review – when necessary or every three years

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