

HCCA ALASKA VIRTUAL SAMPLE SOCIAL MEDIA POLICY [HEALTH CARE ENTITY]	PAGE: 1 OF 5	SAMPLE ONLY
POLICY SUBJECT: Social Media	APPROVAL DATE:	EFFECTIVE DATE:
	FUNCTION/OWNER: Marketing & Communications OR Compliance/HR	

I. BACKGROUND

Social media (including but not limited to websites, emails, blogs, chat rooms, and social networks, such as Facebook, LinkedIn, Instagram, Pinterest, OnlyFans, YouTube, and any other form of public or semipublic electronic communication) are venues commonly used for communication and self-expression. As a health care entity, INSERT NAME (“Organization” or “Company”) is involved with social media from two angles. 1.) We strive to make appropriate use of social media to engage positively with patients and staff. 2.) We strive to ensure social media is used by staff in a manner that is compliant and respectful, especially since we are required to protect patient information under federal and state privacy laws. In addition, online communication can cause professional and reputational harm, disturb patients or patient families and/or conflict with the interests of Organization/Company. Consequently, the following policy applies:

II. POLICY

Organization/Company’s other policies and procedures also apply to online activities. Ultimately, the person posting is fully responsible for their online activity. Before creating online content, stop to consider the risks involved. Social media communication that in any way relates to patients, patient care or Organization/Company may be acceptable, but only if the communication is professional, harms or insults no others, and complies with all other our policies and procedures as well as federal and state law.

III. DEFINITIONS

Social Media – A collective term for websites and applications that enable communication, marketing, community based input, interaction, content-sharing, and collaboration. Includes but is not limited to public facing social media such as Instagram, YouTube or Facebook, as well as semi-public, membership, or fee based venues such as OnlyFans.

Social Media Participation -- This includes all forms of digital communication or expression on venues available, or potentially available to patients, individuals or the general public. Participation includes both creating a new and individual photos, graphics or conversation, liking or commenting on a pre-existing public or private conversation, regardless of whether the conversation is directly associated or affiliated with Organization/Company.

IV. SCOPE AND APPLICABILITY

This policy applies to all team members, temporary or supplemental team members, students, volunteers, vendors and contractors of Organization/Company [and any of its member organizations or medical groups.]

HCCA ALASKA VIRTUAL SAMPLE SOCIAL MEDIA POLICY [HEALTH CARE ENTITY]	PAGE: 2 OF 5	SAMPLE ONLY
POLICY SUBJECT: Social Media	APPROVAL DATE:	EFFECTIVE DATE:
	FUNCTION/OWNER: Marketing & Communications OR Compliance/HR	

This policy also applies irrespective of where the communication or expression occurs or who owns the device.

V. UNDERSTAND AND FOLLOW THESE RULES AND GUIDELINES

Carefully read this policy, and ensure all online activity is consistent with this policy. Those noted in scope and applicability above are required to follow this policy, whether engaging in social media or electronic communication on-duty or off-duty, and while using a personal electronic device or an Organization/Company electronic device. When posting on social media, Organization/Company expects you to:

- (a.) **Understand and Comply.** Carefully read this policy, and ensure your behavior is consistent with this policy.
- (b.) **Comply with all Organization/Company Policies and Procedures.** Your social media content must not violate Company’s policies or procedures, including but not limited to, Confidentiality of Patient Information, Information Security, INSERT OTHER KEY POLICIES.
- (c.) **Speak for Yourself and Use Disclosures.** Do not create a link from a personal blog, website, or other social media site to a Company website without identifying yourself as an Organization/Company employee or representative. And do not create such a link unless you have authorization to do so.
- (d.) **Express Only Your Personal Opinions.** Do not represent yourself as a spokesperson for Organization/Company without authority to do so. If Organization/Company is a subject of content you are creating, be clear about your status with the Organization/Company and make it clear that your views do not represent those of Organization/Company, other employees, patients, or others working on behalf of Organization/Company. If you post online related to the work you do or on subjects associated to work, make it clear that you are not speaking on behalf of Company. Consider including a disclaimer such as “These views are my own and do not necessarily reflect the views of Organization/Company.”
- (e.) **Respect the Privacy of Others and Comply with HIPAA and State Privacy Laws**
 - i. Never share patient information, including pictures of patients or information that relates to patients. One may think that the information posted is de-identified, or permissible because it does not contain the patient’s name, but information can often be pieced together. Sharing patient information, even information that that does not appear to identify the patient, could be a violation of federal or state privacy laws and our policies and procedures.
 - ii. Maintain the confidentiality of patients, co-workers, and others. You must always comply with our policies pertaining to confidentiality of patient information.
 - iii. Confidentiality of Organization/Company trade secrets and private, proprietary or confidential information must also be maintained. Trade secrets may include information regarding the

HCCA ALASKA VIRTUAL SAMPLE SOCIAL MEDIA POLICY [HEALTH CARE ENTITY]	PAGE: 3 OF 5	SAMPLE ONLY
POLICY SUBJECT: Social Media	APPROVAL DATE:	EFFECTIVE DATE:
	FUNCTION/OWNER: Marketing & Communications OR Compliance/HR	

development of systems, processes, products, know-how and technology. Do not post internal reports, policies, procedures or other internal business-related confidential communications. You must also comply with financial disclosure laws.

(f.) Be Honest and Accurate

- i. Make sure you are honest and accurate when posting information or news, and correct mistakes quickly. Be open about any previous posts you have altered. The Internet archives almost everything, so even deleted or edited postings can be searched.
- ii. Never post information that you know to be false about Organization /Company, peers or colleagues’ officers, directors, or others working on behalf of Company or competitors.

(g.) Post Only Appropriate and Respectful Content Due to the nature of health care work, Organization’s/Company’s employees may be exposed to unusual or sensitive situations and information. Only post appropriate and respectful content. Even if information may not seem to identify a patient, the information may not be appropriate and respectful to post. Pause before posting and consider whether the benefit outweighs the risk, and how the post may appear to anyone who sees it, especially if it relates to patients in any way.

- i. Always be fair and respectful to team members, patients, and others.
- ii. Work-related concerns are much more likely to be resolved by speaking directly with team members or Human Relations rather than by posting on social media. However, if you decide to post complaints or criticism, avoid using statements, photographs, video or audio that reasonably could be viewed as malicious, obscene, threatening or intimidating; that have potential to disparage patients or employees; or that might constitute harassment or bullying. Examples of such conduct could include offensive posts meant to intentionally harm an individual’s reputation or posts that could contribute to a hostile work environment based on race, age, sex, or any other protected status.
- iii. If you disclose your affiliation with Organization/Company in an online communication, then treat all communications associated with the disclosure as professional communications governed by this and other Organization/Company policies.
- iv. Postings that include discriminatory remarks, harassment, threats of violence or similar inappropriate or unlawful conduct will not be tolerated and may subject you to disciplinary action, including termination.
- v. Use caution when commenting on a post or a tweet. Depending on various social media settings, comments may be seen by many people. An original post may not violate privacy laws or policy, but subsequent comments might go on to taint the entire communication.

(h.) Using Social Media at Work Do not use social media while on work time or on equipment we provide, unless it is work-related, authorized by your manager, or consistent with Organization /Company Equipment Policy. Do not use your Organization/Company email addresses to register on social networks, blogs, or other online tools that are personal.

HCCA ALASKA VIRTUAL SAMPLE SOCIAL MEDIA POLICY [HEALTH CARE ENTITY]	PAGE: 4 OF 5	SAMPLE ONLY
	APPROVAL DATE:	EFFECTIVE DATE:
POLICY SUBJECT: Social Media	FUNCTION/OWNER: Marketing & Communications OR Compliance/HR	

i. Outside the workplace, you have a right to participate in social media using your personal email address. Separating personal activity from professional activity helps prevent problems.

- (i.) **Organization/Company Social Media** Only authorized employees may prepare and modify content for Organization/Company websites or social media sites. All team member responses and interaction on our social media should be professional and appropriate to the circumstances.
- (j.) **Personal Liability** Team members and those noted above under scope are personally liable for all that they publish online. All persons can be held personally liable if they make statements that violate federal or state privacy laws, an obligation of confidentiality, violate the rights of others, violate trademark or copyright laws, or for defamatory, libelous, or obscene statements.

(k.) Examples of Conduct that May Violate Policy

- Communicating about a patient being routinely late to appointments and disparaging that patient for her rudeness, even without naming the patient.
- Posting a picture of a patient's x-ray, even without the patient's name.
- Commenting on a co-worker's Facebook post with messages they could consider to be threatening or harassing.
- While on or off-duty, taking a picture of the backside of an attractive person in the ED waiting room and posting it to Facebook, stating "I like what I like," even if the person is not identified and their face can't be seen.
- Reposting a photo of a bloody but empty trauma room previously used to treat a person hit by a car with the hashtag #manvsscar.
- Posting seminude selfies from a hospital bathroom on an OnlyFans account.

(l.) Right to Review and Audit. Organization/Company maintains the right to review and audit all activity on any of its networks. No team member or other applicable person should have an expectation of privacy when using an Organization/Company network.

(m.) Violations. Violations of this policy should be reported to a supervisor, manager, compliance or privacy officer, or the compliance line. Appropriate action, up to and including termination, or similar action may be taken against any covered person determined to have violated this policy.

(n.) Retaliation is Prohibited. Taking adverse action against any person who in good faith reports a violation of this policy is prohibited. A person who retaliates against another person for reporting a possible violation of this policy, or for cooperating in a related investigation will be subject to disciplinary action, up to and including termination or similar action.

(o.) National Labor Relations Act (NLRA) Nothing in this policy is designed or intended to restrict an employee's right to engage in protected activity under the NLRA.

HCCA ALASKA VIRTUAL SAMPLE SOCIAL MEDIA POLICY [HEALTH CARE ENTITY]	PAGE: 5 OF 5	SAMPLE ONLY
POLICY SUBJECT: Social Media	APPROVAL DATE:	EFFECTIVE DATE:
	FUNCTION/OWNER: Marketing & Communications OR Compliance/HR	

VI: REFERENCES LIST ALL RELEVANT POLICIES – FOR EXAMPLE:

- Communications Policy: Photography/Video/Filming of Patients Policy
- HIPAA – [Cite Name of Policy/Policies]
- Acceptable Use [Cite Name of Policy/Policies]
- Policy: Code of Conduct [Cite Name of Policy/Policies]
- HR Policy: Equal Employment Opportunity/Fair Treatment [Cite Name of Policy/Policies]
- HR Policy: Harassment/Sexual Harassment [Cite Name of Policy/Policies]
- HR Policy: Workplace Violence [Cite Name of Policy/Policies]
- HR Policy: Behavioral Standards [Cite Name of Policy/Policies]