

# Public Display With Social Media

## Policy Number

FH-HR.004

## Purpose

The purpose of this policy is to provide guidelines for the proper use of social media websites or other media to protect the interests of Froedtert (FH) and its affiliates, staff and patients.

## Definitions

- A. Froedtert Health (FH) and its affiliates include all entities within the health system. Also referred to as the system.
- B. Public Display: Includes the posting of any information about FH, its patients or staff members through any electronic means including, but not limited to social networking sites, blogs, instant messaging and tweeting.
- C. Social Media is a website or medium that allows users to generate or share content online. Social media includes, but is not limited to, blogs, discussion forums, online review sites, podcasts, video sharing, wikis and social networks such as Facebook, Google+, LinkedIn and Twitter.

## Policy

- A. In general, FH views the public display of information on social media positively and understands that its staff use social media as a means of self-expression. However, staff need to understand that their actions captured via images, posts, or comments can reflect on FH. If staff choose to identify themselves as staff of FH on such Internet public display venues, some readers may view the staff as a representative or spokesperson of FH.
- B. FH maintains an organizational presence on popular social media sites and through blogs. This presence facilitates communication opportunities for patients, staff, and other members of the communities served by FH and its affiliates.

## Procedure

### A. Guidelines for personal use of Social Media

- 1) FH staff are to observe the following guidelines when identifying themselves as FH staff/affiliate or referring to the organization, its programs or activities, its patients, and/or other staff, in any social networking medium.
  - a) Staff may not share confidential or proprietary information about FH and are to maintain patient privacy. This

applies to comments posted on blogs, forums, and social networking sites. Staff are not to post pictures or any other information that could identify patients directly (name, social security number, etc.) or indirectly (date of birth, diagnosis, etc.).

b) Whenever staff comment about Froedtert Health in social media, they should disclose their connection to the system and their role. Where staff's connection to FH is apparent, he or she needs to make it clear that he or she is speaking for himself or herself and not on behalf of FH. It is also recommended that the staff member include this disclaimer: "The views expressed on this [blog; website] are my own and do not reflect the views of my employer." Staff should consider adding this language in an "About me" section of the blog or social networking profile.

c) The use of FH copyrighted logos, trademarks, and intellectual property (which includes those of affiliated hospitals and clinics) is not allowed without written permission of the Vice President of Marketing.

d) Personal social media activities should not interfere with work commitments and job duties and should be limited to non-work hours unless official FH participation is requested as noted below. If staff use FH-issued equipment or FH-provided web space to participate in social media activities, staff is reminded that there is no expectation of privacy with respect to this use.

e) Staff are encouraged to engage in professional and respectful conduct on social media. Social media posts are public or semi-public, and are often permanent.

f) Staff are not to use blogs or personal Web sites to harass, bully, or intimidate other staff or patients. Behaviors that constitute harassment and bullying include, but are not limited to, comments that are derogatory with respect to age, ancestry, national origin, race, religion, gender, sexual orientation, marital status, color, or disability; sexually suggestive, humiliating, or demeaning comments; and threats to stalk, haze, or physically injure another staff or patient. See Rules of Conduct/Corrective Action Policy; Harassment Free Workplace Policy; Internet and Email Usage Policy.

#### B. Guidelines for Official FH Participation:

1. Some FH staff members may need to engage in external Internet communication or may be asked to participate on behalf of FH. Any establishment of external sites representing FH or social media participation on behalf of FH are to be pre-approved and coordinated by the Vice President of Marketing. All use of external websites for work-related purposes are to be pre-approved by the Vice President of Marketing.

2. Social networking activities on behalf of FH are to comply with all FH policies and guidelines, including human resources, patient confidentiality, release of patient information, solicitation, and consent for recording, photographing and videotaping patients.

3. When sharing patient identifying health information or images through social media and blogs 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.

C) The absence of or lack of explicit reference to a specific site does not limit the extent of the application of this policy. Where no policy or guideline exists, staff should use their professional judgment and take the most prudent action possible.

D) Any staff found to be in violation of any portion of this staff Public Display with Social Media Policy will be subject to disciplinary action, up to and including termination of employment. Inappropriate disclosure of patient information may also result in civil and criminal penalties for patient privacy breach.

E) Staff who become aware of violations of this policy are to bring such information to their manager's attention. Managers are to bring this information to the Human Resources site director.

F) FH will not be responsible for any staff posting on any social media site not approved by the Vice President of Marketing. Staff are responsible for reading, knowing and complying with the Terms of Service of the sites they use. Questions concerning this policy should be brought to the attention of the Vice President of Marketing.

G) Nothing in this Public Display with Social Media Policy should be interpreted or applied in a manner that would interfere with any rights under the National Labor Relations Act or any other state or federal law.

## **Issuing Authority**

FH Corporate Policy Committee

## **Distribution**

Froedtert Health

## **category**

Human Resources,