

TITLE: PERSONAL USE OF SOCIAL MEDIA

PURPOSE: To provide all University Health System (Health System) employees and authorized users of Health System information assets with requirements for participation in social media, including Health System-hosted social media, and non-Health System social media, through which an employee's Health System affiliation is known, identified, or presumed. [Key words: Protected Health Information (PHI), privacy, social media, disclosure, integrity.]

POLICY STATEMENT:

The Health System acknowledges and respects the right of employees to use social media on their personal time and using personal electronic devices. Social media access through Health System-owned equipment, however, is for business purposes only and is restricted. This policy establishes boundaries for employees as they create and use personal social networking technologies.

POLICY SCOPE:

The lack of explicit reference to specific social media and attendant communications does not limit the scope of this policy. Where no explicit policy statement exists, employees should use their professional judgment and take the most prudent action possible regarding use of social media. Employees are encouraged to consult with the Corporate Communications & Marketing Department if they have any questions.

In publishing this policy, the Health System is not assuming duty to monitor social media or other public communications, but reserves the right to take appropriate action in accordance with this policy at its sole and absolute discretion.

Social media access through Health System-owned equipment is restricted to the Corporate Communications & Marketing and Information Assets departments, and other authorized, contracted users.

POLICY ELABORATION:

I. DEFINITIONS

- A. Blog** - A website that allows an individual or group of individuals to share personal commentary, observations and opinions with online audiences.
- B. Podcast** – A collection of digital media files distributed over the Internet, often using syndication feeds, for playback on portable media players and personal computers.
- C. Protected Health Information (PHI)** – Any information, whether oral, written, electronic or recorded, in any form or medium (including demographic information collected from an individual) that identifies or may be used to identify the individual and that relates to
 - 1. The past, present or future physical or mental condition of an individual;
 - 2. The provision of health care to an individual; or
 - 3. The past, present or future payment for the provision of health care to an individual.
- D. Social Media** – Any tool or service that uses the Internet to facilitate conversations or provide a forum for discussion. Social media includes items such as blogs, photo and video galleries, podcasts, discussion forums and social networks. Current examples include Facebook, MySpace, Twitter, LinkedIn, YouTube, and Flickr.

II. INFORMATION AND REQUIREMENTS REGARDING REFERENCE TO THE HEALTH SYSTEM THROUGH PERSONAL SOCIAL MEDIA

- A.** Personal blogs and social media pages containing content about the Health System must have clear disclaimers to indicate that

the employee is speaking for him/herself and not on behalf of the Health System.

- B.** All communications should be written in the first person.
- C.** Health System logos and trademarks may not be used.
- D.** Employees must respect copyright laws, and reference or cite sources appropriately.
- E.** The privacy of patient information is paramount. In all cases, patient PHI and patient images must never be published. Information published on blogs and social media pages must comply with Policy No. 2.03, Release of General and Patient Information, as well as Policy No. 2.1401, Uses and Disclosures of Patient Health Information.
- F.** Disclosure of Health System confidential or proprietary information is expressly prohibited.
- G.** Health System clients, contractors, partners or suppliers may not be identified by name. Confidential details regarding their business relationships or activities with the Health System may not be discussed without prior written permission.
- H.** Employees are prohibited from blogging or posting on personal sites while at work, according to Policy No. 2.08.02, Information Asset Security/Use.
- I.** Employees may not use their Health System email addresses (@uhs-sa.com) for personal blogs and social networking on personal or other non-Health System hosted sites.
- J.** Employees' online postings that do reference or contain content about the Health System must be consistent with the Health System's mission, vision, values and/or brand. Employees are prohibited from posting anything obscene, vulgar, defamatory,

threatening, discriminatory, harassing, abusive, hateful or embarrassing to or about fellow employees.

III. POLICY VIOLATIONS

- A.** Users encountering violations of this policy should immediately report the incident to their supervisors and/or the Integrity Office. Information Services should be notified immediately in cases where assets may be at risk. The supervisor is responsible for notifying the Integrity Office if the violation was not reported.
- B.** Each incident will be reviewed on an individual basis and, where appropriate, the supervisor may need to contact Human Resources and take disciplinary action, up to and including termination of the employee. In addition, Information Services may revoke access to computer systems assets if the violation is determined to put such resources at risk.
- C.** Violations of state and federal laws may subject persons to penalties of fines or imprisonment or both. The Health System reserves the right to pursue legal action as appropriate.

REFERENCES:

Corporate Policy No. 2.03, Release of General and Patient Information,

Corporate Policy No. 2.08.02, Information Asset Security/Use

Corporate Policy No. 2.1, Integrity Program

Corporate Policy No. 2.14.01, Uses and Disclosures of Protected Health Information

University Health System Employee Handbook

OFFICE OF PRIMARY RESPONSIBILITY:

Vice President, Strategic Communications & Patient Relations