

Northwell Health

Human Resources Policy and Procedure Manual

Policy Title: Social Media Acceptable Use	Part:	13	Revised/Reviewed*: 11/26/13* 04/01/16
	Section:	11	
Category: Workplace Environment	Effective Date:	2/14/12	
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Policy

It is the policy of the organization to engage in social media to promote Northwell Health, share health and wellness information, and provide programs and services to the community. Social media may be used by organization employees for business-related purposes subject to the restrictions set forth in this policy. These restrictions are intended to ensure compliance with legal and regulatory requirements, privacy rules and confidentiality agreements. The organization requires the responsible use of social media by its personnel, for business (work-related) purposes, consistent with the laws, regulations and organization policy that govern such use. As described below, no organization information may be used on personal social media sites.

Purpose

The purpose of this policy is to provide Northwell Health personnel with the requirements for participation in social media, including Northwell Health-hosted or approved social media sites, and all other social media sites in which an employee or other individual's affiliation with the organization is known, identified or presumed, and in which the views and opinions expressed are not intended to represent the official views of the organization.

Scope

This policy applies to all Northwell Health employees, independent contractors, volunteers, medical staff, students, agency staff, vendors, and companies contracted to perform work on behalf of the organization ("users"). This policy applies to the use of social media while at work. It also applies to the use of social media when away from work when the user's Northwell Health affiliation is identified, known or presumed.

Definitions

Social Media - Internet-based applications which support and promote the exchange of user-developed content. Social media can take many different forms, including weblogs, Internet forums, social blogs, micro-blogs, broadcast text messages, wikis, podcasts, pictures, videos, ratings and social bookmarks. Some current examples include, but are not limited to, Facebook, Twitter, YouTube, and LinkedIn.

Blog - A web site containing the writer's or group of writers' own experiences, observations and/or opinions, and often having images and links to other web sites.

Procedures

A. Northwell Health-Hosted and Northwell Health-Approved Social Media Sites

1. **Protect Patient Confidentiality:** A user may not disclose any patient information of any kind, including patient images (even if a patient is not identified by name), on any social media unless the employee has received specific written permission to do so from the Office of Public Relations in advance. Such patient information may not be disclosed even if the patient consents to such disclosure.
2. **Protect Proprietary Information:** A user must not, unless specific written permission is received from the Office of Public Relations in advance, do any of the following:
 - a. disclose any confidential or proprietary information of or about the organization, including, but not limited to, business, clinical, and financial information;
 - b. represent that he/she is communicating the views of the organization; or
 - c. do anything that might reasonably create the impression that communication is being made on behalf of or acting as a representative of the organization.
3. **Comply with organization policy:** A user is expected to adhere to the Northwell Health Code of Ethical Conduct when using or participating in social media. All policies that apply to other organization communications apply to the use of social media. Those policies include, but are not limited to, policies regarding respecting employees and patients; protecting the confidentiality, privacy and security of patient and organization data; and the safeguarding and proper use of organization assets.
4. **Conflicts of Interests:** If a user is offered payment for participating in an on-line forum in his or her organization role, the user shall ensure compliance with the organization Gifts and Interactions with Industry policy and the organization Conflicts of Interest policy.
5. **Be Respectful:** A user shall not post any material that is obscene, defamatory, profane, libelous, threatening, harassing, discriminatory, abusive, hateful or embarrassing to another person or entity.
6. **Content:** Organizational-hosted blogs and social media sites must focus on subjects related to the organization.
7. **Respect Copyright and Fair Use Laws:** For the protection of the organization and its employees, it is critical that copyright and fair use laws are respected by ensuring that the appropriate permission is secured before the use or reproduction of any

copyrighted text, photos, graphics, video or other material owned by others. Questions should be directed to the Office of Public Relations.

8. **Obtain Approval Before Launching a Organizational-hosted Site:** Any user must obtain specific approval from his/her supervisor and the Office of Public Relations prior to launching a Northwell Health-hosted blog or other social media site.
9. **Media Relations:** A user must immediately (i.e., before responding) notify the Office of Public Relations upon contact by a member of the media about activity on a social media site concerning the organization.
10. **References:** Managers, supervisors and human resource personnel shall not provide on-line references or recommendations.
11. **Monitoring:** User activity on social media sites is subject to monitoring to ensure compliance with organization policies.

B. All Other Social Media Sites

1. **Protect Patient Confidentiality:** A user must not disclose any patient information of any kind, including patient images (even if a patient is not identified by name), in any circumstances. Such patient information may not be disclosed even if the patient consents to such disclosure.
2. **Protect Proprietary Information:** A user must not disclose any confidential or proprietary information of or about the organization, including, but not limited to, business, clinical, and financial information, in any circumstances.
3. **Write in the First Person and Use a Disclaimer:** A user must not represent that he/she is communicating the views of the organization, or do anything that might reasonably create the impression that he/she is communicating on behalf of or acting as a representative of the organization. Where a user's affiliation to Northwell Health is apparent, the user must make clear that he or she is speaking for himself or herself and not on behalf of the organization. In those circumstances, the user shall include this disclaimer: "The views expressed on this [e.g., website, blog] are my own personal views and opinions and do not reflect the views of Northwell Health."
4. **Do not Use organization Email Address:** A Northwell Health email address may not be used to express personal views on social media sites.
5. **Respect Copyright and Fair Use Laws:** For the protection of the organization and its employees, it is critical that copyright and fair use laws are respected by ensuring that the appropriate permission is secured before the use or reproduction of any copyrighted text, photos, graphics, video or other material owned by others. This includes not violating the organization's copyright. Many images used in official Northwell Health publications and websites are subject to restrictions concerning

their use. Questions concerning the right to use an image or other material should be directed to the Office of Public Relations.

6. Report Misrepresentations: The Office of Public Relations should be contacted if a user becomes aware of a misrepresentation made about the organization by media, analysts or bloggers.

7. Personal Use: A user should not use the organizations resources to create or post content to social media sites unless doing so is part of his or her job function and has been specifically approved by his or her manager in advance. Personal use of social media-- like personal use of work computers, phones or the Internet -- shall be reserved for non-work time and carried out without the use of the organizations resources unless such use is approved by a manager.

C. Discipline

Violations of this policy may result in disciplinary action up to, and including, termination.

D. NLRA Rights

Nothing contained in this policy is intended to interfere with any rights conferred by the National Labor Relations Act or other laws or regulations.

Related Policies

- Part 05 – 3: Conduct in the Workplace/Progressive Discipline
- Part 12 – 1: Termination of Employment: Voluntary, Involuntary
- Part 13 – 3: Electronic Communication Systems