



SOCIAL MEDIA POLICY TEMPLATE FOR HEALTHCARE



INTERNAL POLICY

PURPOSE

This document defines the social networking and social media policy for **[Healthcare Organization]**, the “*Organization*.” To address the fast-changing landscape of the Internet and the way information is communicated and obtained online, the organization may consider using social media to reach a broader audience. The organization encourages the use of social media to further the goals and missions of its departments, where appropriate.

PERSONAL VS. PROFESSIONAL GUIDELINES

Personal Use

All **[Organization Name]** employees may have personal social media sites. These sites should remain personal in nature and be used to share personal opinions or non-work related information. Following this principle helps ensure a distinction between sharing personal and organizational views.

[Organization] employees must never use their **[Organization]** e-mail account or password in conjunction with a personal social media site. The following guidance is for **[Organization Name]** employees who decide to have a personal social media or who decide to comment on posts about official **[Organization]** business:

- State your name and, if relevant, role, when discussing **[Organization]** business;
- Use a disclaimer such as: “The postings on this site are my own and don’t reflect or represent the opinions of my employer.”

If social media platforms are used for official organization business, the entirety of the content posted to the **[Organization’s]** site’s, regardless of any personal views, is subject to best practice guidelines, and standards.

Professional Use

All official social media communication related to **[Organization]**, should remain professional in nature and should always be conducted in accordance with the **[Organization's]** communications policy, practices and expectations. Employees must not use official **[Organization]** social media for political purposes, to conduct private commercial transactions, or to engage in private business activities. **[Organization Name]** employees should be mindful that inappropriate use of official **[Organization]** social media can be grounds for disciplinary action.

Only individuals authorized by the **[Organization Name]** may publish content to the **[Organization's]** website or **[Organization's]** social media account.

POSTING

Information posted to official social media sites needs to be clear, precise and follow industry best practices. All content posted to **[Organization Name]** social media should be:

- Relevant – Information that engages residents and pertains to their daily lives
- Timely – Pertains to deadlines, upcoming events, or current news
- Actionable – Prompts residents to take an action

Please refer to the **[Organization Name]** style guide for specific guidelines on content format.

What Not to Post:

[Organization Name] employees may not publish content on **[Organization Name]** social media sites that includes:

- Images and videos of patients without written consent
- Any information that could allow an individual to be identified
- Photographs or videos taken inside a healthcare facility in which patients or PHI are visible
- Confidential and/or proprietary information
- Copyrighted material without permission
- Profane, racist, sexist, threatening or derogatory content or comments
- Partisan political views
- Dialogue that impersonates or obscures your identity
- Gossip about patients or coworkers
- Commercial endorsements or SPAM

RETENTION

Social media sites are subject to HIPAA regulations, as well as [applicable state and or local data retention mandates]. Any content produced or maintained on [**Organization Name**] social media referring to or revealing an individual's personal or medical data and other protected health information (PHI), including communication posted by the [**Organization**], direct messages, and communication received from individuals outside of the [**Organization**], must be retained. Any content or communications used to inform treatment decisions must be documented in the patient's medical record.

Any department maintaining an official [**Organization**] site shall preserve records pursuant to the relevant records retention schedule, in a format that preserves the integrity of the original record and is easily producible. Furthermore, retention of social media records shall fulfill the following requirements:

- Social media records are captured in a continuous, automated fashion throughout the day to minimize a potential loss of data due to deletion and/or changes on the social networking site.
- Social media records that violate personal health information (PHI) will be archived and immediately removed from the social media platform.
- Social media records are maintained in an authentic format (i.e. ideally the native technical format provided by the social network, such as XML or JSON) along with complete metadata.
- Social media records are archived in a system that preserves the context of communications, including conversation threads and rich media, to ensure completeness and availability of relevant information when records are accessed.
- Social media records are indexed based on specific criteria such as date, content type, and keywords to ensure that records can be quickly located and produced in an appropriate format for distribution (e.g. PDF).
- Each employee who administers one or more social networking sites on behalf of the district has self-service, read-only access to search and produce relevant social media records to fulfill public information and legal discovery requests as needed.

The [**Organization Name**] utilizes an automated archiving solution provided by ArchiveSocial to comply with applicable public records law, data retention requirements, or internal, legal, or Office for Civil Rights, audits, and fulfill the above record retention requirements.

REGISTERING A NEW PAGE

All [**Organization Name**] social media sites shall be (1) approved by [**contact**], (2) published using approved social networking platform and tools, and (3) administered

by the contact or their designee.

DEREGISTERING AN EXISTING PAGE

If a social media page is no longer of use, (1) notify **[contact]**, (2) ensure records have been archived according to **[Organization]** guidelines, (3) unpublish and delete page.

HIPAA COMPLIANCE

[Organization Name] recognizes the importance of maintaining the confidentiality of an individual's personal and medical data and we will not include, reference or reveal such personal data in dialogue on our Social Media sites. We expect participants in the dialogue on our Social Media sites to similarly respect confidentiality and to refrain from including, referring to or revealing individuals' personal or medical data.

Every employee must respect the privacy rights of other employees and patients. Employees will not post pictures or images of employees, providers or patients without authorization. Take care to avoid HIPAA violations. A HIPAA violation is "a is an impermissible use or disclosure under the Privacy Rule that compromises the security or privacy of the protected health information (PHI)."

The **[Organization Name]** does not use Social Media to defame the reputation of others and we will not tolerate the use of the **[Organizations]** sites by any dialogue participants in order to defame the reputation of the **[Organization]**, any individuals or groups of individuals or any organization or business entity.

CONSIDER INCLUDING

Speak to your compliance and legal department to determine what's appropriate for your Organization.

- Intellectual property. **[Organization]** will not intentionally use copyrighted material without permission or use others' business name, logo, or other trademark-protected materials in a manner that may mislead or confuse others with regard to the business's brand or business affiliation.
- Discourage "friending" of patients on social media websites. Staff in patient care roles should not initiate or accept friend requests.
- Official **[Organization]** accounts should not be used to provide endorsements for people, products, services, or organizations.
- Be professional, use good judgement and be accurate and honest in your communications.
- Be mindful of and remain in compliance with all relevant professional and legal responsibilities, as well as policies and state guidelines.

- Conduct yourself professionally, even when communicating or posting in a personal capacity. If you discover unprofessional or inappropriate content online posted by a professional colleague, notify the individual so that they may remove the post or change their methods of communicating. If the situation does not improve, report the behavior to the state medical board or other relevant authority.
- Do not engage in disruptive behavior online such as cyberbullying, and report instances of such behavior by professional colleagues to the state medical board or other relevant authority.
- Do not provide medical advice to specific patients online
- When discussing general medical issues online, identify yourself as a physician and avoid being anonymous (i.e., provide your name). Do not misrepresent your training, expertise or credentials.
- Think twice before posting. If you would not comment publicly in your professional or personal capacity, do not do so online.

EXTERNAL

PURPOSE

To build communication and trust with our residents and visitors, and encourage participation through comments and feedback.

GOALS

- **[Organization Name]** aims to effectively use Social Media Accounts to:
 - Provide information
 - Support community engagement and outreach
 - Support marketing and promotional campaigns
 - Frame the public conversation around **[Organization]**
 - Assist with recruitment efforts

Please be aware that when engaging with **[Organization]** through Social Media, you agree to the following:

MODERATION OF THIRD PARTY CONTENT

The **[Organization Name]** does not necessarily endorse, support, sanction, encourage, verify or agree with Third Party comments, messages, posts, opinions, advertisements, videos, promoted content, external hyperlinks, linked websites (or the information, products or services contained therein), statements, commercial products, processes or services posted on any Social Media Site.

This [*Organization's*] social media site serves as a limited public forum and all content published is subject to preservation and disclosure in accordance with HIPAA regulations and [*State Public Record Law*]. User-generated posts may be rejected or removed when the content includes any of the following:

- incitement of violence or violent behavior,
- defamation or gossip,
- copyrighted or commercial material
- patient public health information [PHI]
- fraudulent material or accusations, or
- obscene or illegal material.

We do not allow information intended to compromise the safety or security of the public or public systems. You participate at your own risk, taking personal responsibility for your comments, your username and any information provided.

RETENTION

Social media sites contain communications sent to or received by the [*Organization Name*] and its employees, and such communications are therefore public records subject to [*applicable public records statute and/or applicable state and or local data retention mandates*]. These retention requirements apply regardless of the form of the record (e.g. digital text, photos, audio, and video). The [*Organization*] maintaining a site shall preserve records pursuant to a relevant records retention schedule.

EMERGENCY POSTINGS

Social media sites are not monitored 24/7. If there is an emergency, contact 911.

LIKE WHAT YOU SEE?

Check out our other resources on mitigating risk online and building a social media presence, as well as our library of webinars from experts at **ArchiveSocial.com**.