

## BC 6.815 SOCIAL MEDIA POLICY

### POLICY

It is the policy of Baystate Health (BH) to ensure procedures are in place to:

1. Minimize the business, legal and personal risks that may arise from an individual's use of social media, both during work time and non-work time;
2. Protect the privacy and safety of our employees and patients; and
3. Ensure workforce compliance with all laws and regulations.

### PURPOSE

The purpose of this policy is to provide Social Media use rules and guidelines to be followed in order to protect Baystate's reputation, confidential information and patient privacy.

### SCOPE

This policy applies to all Baystate Health employees, physicians, vendors, contractors, volunteers or students accessing, creating, contributing or commenting on any Baystate and Non- Baystate Sites (as defined below) during work and non-work time, when the person's affiliation with the Baystate Health network of care is identified, known or presumed. This policy also applies whether our workforce members are posting on their own sites or commenting on other sites.

### DEFINITIONS

**Social Media:** Social media is any tool or service that facilitates conversations over the internet. Sites such as Facebook®, Workplace ©, Google+®, Instagram®, Pinterest®, LinkedIn®, or MySpace®, blogs and other online journals and diaries, discussion boards and chat rooms, microblogs such as Twitter®, 3rd party rating sites such as Yelp®, smartphone applications, multimedia host sites (such as YouTube® or Flickr®) and similar media. Social networking activities may also include the permission or refusal of posts by others where an individual can control the content of postings.

**Blog:** Short for "Web log" a site that allows an individual or group of individuals to share a running log of events and personal insights with online audiences; may include video formats (vlogs).

**Baystate Health Sites:** Any internet or intranet site sanctioned, created, branded, and maintained by Baystate Health such as baystatehealth.org, facebook.com/baystatehealth, twitter.com/Baystate\_Health, youtube.com/baystatehealth, eWorkplace blogs, Workplace ©, SharePoint sites and collaboration sites, and discussion boards.

**Non-Baystate Health Sites:** Any internet site not created and maintained by Baystate Marketing, Communications & External Relations such as personal social networking sites (i.e., Facebook). Personal sites must be clearly identifiable as personal, and not use BH brand visuals or messaging.

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### PROCEDURE

#### I. USE OF BAYSTATE SITES

- All social media content, web pages or links that promote Baystate or uses Baystate's brand name or logo for Baystate business purposes must comply with the terms of the BC6.7000 Baystate Health Web Content policy.
- No individually identifiable information about Baystate patients in any form (including photo, video or written content) may be posted to a Baystate site except with the patient's express written authorization on a Baystate authorization form and with the prior approval of the Marketing and Communications Department.
- Baystate employees may not post any content to any BH Social Media Site, as a guest or otherwise, that is spam, copyrighted material or material that is unlawful, disruptive, threatening, profane, abusive, harassing, embarrassing, defamatory, obscene, libelous, hateful, or racially, ethnically or otherwise objectionable as determined by BH.

#### II. USE OF SOCIAL MEDIA AT WORK

- The computers, electronic media (including e-mail and social media access) and data services provided by Baystate to its employees are primarily for business use. Very limited, occasional, or incidental use of electronic media for personal, non-business purposes is acceptable so long as it does not interfere with the work responsibilities of the employee or the employee's co-workers, and does not negatively impact Baystate's information systems or business functions. Such non-business use is a privilege that may be withdrawn if abused.
- All contents of Baystate's electronic systems and devices are Baystate property. Employees should have no expectation of privacy in any data, information or communications, including social media posts, that are transmitted to, received or printed from, accessed through, stored on, or recorded on Baystate electronic systems or devices, even if for personal use.
- Baystate reserves the right to monitor all usage of its electronic systems and to intercept, review, use, and disclose any and all aspects of its electronic systems and all files, documents, data or other information contained on or accessible through its electronic systems for any reason and at any time and without notice. Employees should not use Baystate's electronic systems for any personal matter that they want to keep private or confidential.
- Workplace distractions (including but not limited to: cell phone use, texting, Internet searches, social media) that cause an employee to be less productive or affect an employee's performance will be addressed through corrective action.
- Employees should not be checking or posting to personal social media sites while performing work duties or in the presence of patients and visitors. Even if the social media access is related to work, it can be perceived by our patients and visitors as neglectful of patient care, rude and/or bad customer service.
- Management may restrict access to any website, including social media sites, on select workstations.

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### III. PERSONAL USE OF SOCIAL MEDIA

- Baystate understands that employees' time outside of work is their own. However, employees' social media activities that take place completely outside of work may still affect Baystate's legitimate business interests.
- Employees shall not use social media for personal purposes in any way that might reasonably create the impression that the content is authorized or controlled by Baystate. Examples of this include placing a Baystate name, logo or trademark prominently on a personal Facebook page in a manner that makes the page appear to be endorsed by Baystate. Employees may not use Baystate's name, logos, trademarks or proprietary graphics in a way which suggests that they are representing Baystate or while engaging in conduct that violates any Baystate policy.
- If users identify themselves as being associated with Baystate on a social media site and if the nature or context of social media activity on such site could reasonably be misconstrued as representing the views of Baystate, then users must post a disclaimer such as, "My posts reflect my personal opinions and are not approved or authorized by Baystate Health."
- In the absence of prior written authorization from Baystate's Senior Vice President of Marketing, Communications & External Relations, you should not represent yourself as a spokesperson for Baystate.
- If Baystate is a subject of the content you are creating, be clear and open about the fact that you are an employee. If it will not be obvious from the context of your post that you are speaking on your own behalf, make it clear that your views do not represent those of Baystate. You can do so by including a disclaimer such as "The posts on this site have not been reviewed or approved by Baystate Health."
- Employees are reminded that off duty conduct, including conduct on social media sites (such as posting any content that is obscene, discriminatory, threatening or otherwise unlawful) that Baystate believes in its sole discretion, impairs the employee's ability to effectively fulfill and perform his or her job duties or reflects negatively on the reputation of Baystate Health within the community is subject to corrective action in accordance with the HR804 Corrective Action Policy.
- Baystate-issued email addresses may not be used to create, register for or administer any social media or other Internet accounts or to post content to any Internet site, unless it is for Baystate business purposes.

### IV. PATIENT PRIVACY

- You may not disclose patient information in any form (including photo, video or written content) on social media sites. Even if a patient is not identified by name, a disclosure could still violate Baystate policies if there is a reasonable basis to believe that the patient could be identified from the disclosure.
- You are discouraged from communicating with, connecting with, "following" or "friending" patients on social media. This may inappropriately blur the personal and professional relationship, result in an invasion of privacy, or create potential liability for employees or Baystate.
- Personal phones, personal cameras and other personal devices shall not be used to photograph, film or record Baystate patients or to receive, store or transmit individually identifiable information of Baystate patients, except in accordance with BC 7.430.

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### V. INTELLECTUAL PROPERTY AND CONFIDENTIAL INFORMATION:

Employees shall not use social media to disclose any intellectual property or confidential information of Baystate. Employees may not post internal reports, policies, procedures or other internal business-related confidential communications on any Non –Baystate Health Sites. Do not disclose personally identifying information of employees, donors, or vendors that may be confidential (such as personal contact information obtained by virtue of your job responsibilities).

### VI. PROTECTED ACTIVITIES BY BAYSTATE EMPLOYEES:

Nothing in this policy is intended or shall be deemed to limit the rights of Baystate employees under federal or state law, including an employee’s right to discuss the terms and conditions of employment with colleagues or management or to provide information to any government agency in accordance with applicable law.

### VII. ENFORCEMENT:

Baystate will, in its discretion, review social media activity to the fullest extent permitted by applicable law. Employees are solely responsible for their social media activity and will be held accountable for violating this Policy. Violation of this policy may lead to disciplinary action up to and including suspension and/or termination of employment, contract, or medical staff appointment.

### VIII. REFERENCES

BC 1.150/GO.11 – Organizational Values and Ethics Policy

BC 3.600 – Hospital Advertising and Promotions Policy

BC 6.7000 - Baystate Health Web Content

BC 6.810 - Internet Usage Policy

BC 6.820 - Information Security Policy

BC 6.860 - Information Security Incident Reporting and Responsibility Policy

BC 7.420 - BHS Corporate Marketing to Patients Policy

BC 7.430 – Patient Photography, Videotaping, Other Imaging and Audio Recording

HR 100 – Employee Relations Philosophy

HR 802 – Confidentiality

HR 804 - Corrective Action

HR 810 Harassment in the Work Place

HR 821 – Use of Communication Systems

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		Date:
Approved:	Policy Management Committee	6/19/2017
Policy Owner (department name)	Compliance Department	
Revising Author	Renee Wroth, Chief Compliance and Privacy Officer	
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