Eastern Health

SOCIAL MEDIA	Communications COM-110

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Overview

Social media refers to communication technology tools that enable users to create and share content. Social media includes websites, applications or platforms such as Facebook, YouTube, Twitter and many others that facilitate 'social' interaction between users.

Eastern Health (EH) recognizes that patients, clients, residents, employees, physicians and other stakeholders are likely to engage in social media. Eastern Health supports the use of social media in line with this policy to facilitate communication and to inform about programs and services offered at EH.

This policy covers appropriate uses of social media within EH, and provides guidelines for EH employees, physicians, volunteers and other representatives who engage in social media for their personal, professional or corporate use.

The emergence and wide-spread use of social media offers opportunities and poses challenges within the health-care environment. Corporate use of social media within EH can:

- increase access to audiences and improve the accessibility of timely communication and engagement efforts;
- enable more participatory relationships with publics, partners and stakeholders;
- offer greater scope to adjust or refocus communications quickly, when necessary;
- increase brand awareness;
- increase the speed of public feedback and input;
- reach specific audiences on specific issues; and
- reduce dependence on traditional media channels and provide a way to correct, as required, inaccurate news coverage.

Other benefits and risks associated with use of social media include:

Benefits
- Timely communication
- Professional networking
- Facilitation of learning
- Treatment, research and collaboration
- Fostering communities and partnerships

Risks
- Privacy and confidentiality concerns, including unauthorized recording and sharing of videos, images, voices and information.
- Added workplace distractions leading to increased errors and decreased productivity.
- Release of poor information quality (e.g. inaccurate, incomplete, inappropriate, etc.)
- Damage to the organization's reputation due to inappropriate use of social media.

POLICY

General use of social media

Eastern Health's values, policies and guidelines are applicable to social media communication and use (see Linkages section).

Unauthorized recordings and/or disclosure of organizational, business, health, and/or personal information, including photographs and video, of EH patients, clients, residents, employees and other representatives, documentation or spaces

on social media is strictly prohibited, and in accordance with the *Privacy and Confidentiality Policy (*ADM-030*).*

Representatives must be authorized by Eastern Health to comment, represent and/or speak on behalf of the organization (e.g. to present themselves, or to be perceived to present themselves, as official EH spokespeople online).

Representatives re required to act with professionalism, ethical standards and critical thinking in their interactions, whether online or in person.

Representatives do not engage in abusive or threatening behaviour online.

Unauthorized sharing or disclosure of personal or personal health information on social media is considered a privacy breach. *Privacy Breach Management* (ACP-200) must be followed if a privacy breach occurs.

Personal use of social media by employees, physicians, volunteers or students

Unless authorized, representatives clearly indicate that their online comments and/or social media activity are of a personal and/or professional nature, and in either case, not on behalf of the organization (see Guidelines section).

Personal social media accounts do not use EH email addresses. Unless authorized, social media names, handles and URLs do not include EH's name or logo.

Personal use of social media in the workplace is limited to breaks, and does not occur in the presence of patients, residents, clients or visitors.

Personal use of social media does not interfere or cause a delay with the provision of care and service delivery, or with one's ability to safely perform work-related responsibilities without distraction.

Work-related concerns or issues are addressed at work, through appropriate channels, and not publicly via personal use of social media.

Unless authorized by Corporate Communications, EH services, initiatives or events, including live tweeting, are communicated on EH social media accounts and not on personal social media accounts (see Procedures 4.2).

Personal use of social media on EH-owned devices is permitted by the *Appropriate Use of Computer Resources/Services Policy* (HTM-030).

Personal use of social media on personal-owned devices, while at work, is permitted by the *Safe Use of Cellular Telephones and Other Cellular Devices in Eastern Health Facilities Policy* (ADM-125), and the *Personal Cellular Telephone and Camera Use Policy* (3542(Ground)-OPS-110).

Use of social media by professional practitioners

Professional practitioners:

- Apply codes of ethics, standards of practice and laws when using social media.

- Do not allow the use of social media to impact their professional judgement and critical thinking. As with the use of any other tools, professionals are accountable for their professional decisions (e.g. clinical/care decisions).

- Do not offer medical or professional advice on social media when representing Eastern Health; if relied upon, such advice could lead to professional liability.

- Maintain professional boundaries when using social media (e.g. when accepting "friend requests" from clients on Facebook, searching for clients or making comments on client's posts or blogs for whom you have no other personal relationship).

- Do not accept compensation for contributions to an online forum regarding work-related matters without the express written consent of EH.

Corporate use of social media by Eastern Health

Corporate Communications oversees EH's online presence, including EH social media accounts, as well as online and social media advertising on behalf of EH. The department is responsible for developing the governing processes for the use of social media by EH.

Information posted on EH social media platforms enhances communication and information about programs and services offered at EH, not substitute for professional advice or direct patient care/medical advice.

Employees, physicians and volunteers seeking work-related information (e.g. storm closures) use internal processes and appropriate communication channels, and liaise with their supervisor; they do not use EH social media accounts.

Unless specified, EH social media platforms are monitored during regular business hours, Monday to Friday from 8:30 a.m. until 4:30 p.m. (excluding holidays).

To protect privacy and confidentiality, EH does not engage in social media conversations when corporate or employee issues or patient care is in dispute. Significant issues should be conveyed to Corporate Communications for potential issues management support.

Eastern Health's IT branch, via the NL Centre for Health Information, determines if there are any risks posed to EH by the use of social media and can disable access to any social media platform where there is reason to believe EH's networks, information, technology infrastructure or systems are at substantial risk or there has been a violation or perceived violation of any applicable EH policies, guidelines or procedures.

Legal compliance

Personal, professional and corporate social media use must adhere to applicable laws. Defamation, including libel and slander, applies to any information shared on social media.

Participating anonymously or using a pseudonym on social media does not protect against the possibility of a breach of confidentiality or defamation.

Scope

This policy applies to all EH employees, physicians, students, volunteers, and other agents employed or affiliated directly or indirectly to Eastern Health (hereinafter called "**representatives**").

Purpose

- To provide direction and management on the personal, professional and corporate use of social media.
- To minimize the risks and leverage the benefits of social media within EH.

Procedure

1. **Management of EH Social Media Accounts**

   1.1. Corporate Communications manages the corporate social media accounts for EH (e.g. Facebook, Twitter, LinkedIn, YouTube, etc.). Corporate Communications accepts requests to post content on these

platforms from departments and program areas across the organization. Relevant information is also available on EH's intranet.

1.2. Corporate Communications retains sole discretion to authorize new and/or deactivate EH social media accounts, including open or private (member-only) platforms intended for internal or external audiences, based on demonstrated communication needs, benefits and risks, and in consultation with other programs as appropriate. EH does not support short-term EH social media accounts for the purposes of campaigns, events or similar initiatives.

1.3. Social media account administrators are approved by and receive training from Corporate Communications on how to represent EH in the online domain prior to engaging in communication on an EH social media account.

1.4. EH social media accounts are registered with Corporate Communications.

2. Privacy and Security

2.1. EH social media accounts are attached to a general EH email address, and not to an employee's personal or work email address.

2.2. EH social media accounts do not use the name or title of an employee or physician as the administrator unless the purpose of the social media account is to feature a specific individual on behalf of EH (e.g. President and Chief Executive Officer).

3. Content Management

3.1. Content posted on EH social media platforms aligns with EH's vision, values, strategic priorities, and meets appropriate corporate and departmental approvals processes, including obtaining signed consents prior to the posting of photos, videos, etc., and by the *Privacy and Confidentiality Policy (*ADM-030*).* Corporate Communications reserves the right to remove or request removal of content where it is determined to be not factual and/or have a negative impact on the organization.

3.2. Approved social media account administrators respond to public comments and legitimate queries on behalf of EH in accordance with corporate guidelines and in an honest, respectful and timely manner. Legitimate public feedback shall not be deleted or edited; unless in extraordinary circumstances, if it is determined by EH to have a negative

impact on the security, privacy or safety of EH representatives or the organization, or as outlined in 3.2.1.

3.2.1   Social media account administrators remove comments from an EH social media platform as soon as they are discovered, if they:

a)   contain inappropriate or vulgar language;
b)   are not relevant to EH or the subject matter;
c)   are spam or another form of advertising;
d)   are in violation of federal or provincial law;
e)   contain personal, health or confidential business information;
f)   are abusive towards EH employees, physicians, students or volunteers.

3.2.2   Social media administrators block users who repeatedly use abusive, profane, derogatory or offensive content on EH social media platforms.

4. Intellectual Property

4.1. EH's logos, photos, graphics and videos are used to brand authorized EH social media accounts, and follow EH Graphic Standards.

4.2. Representatives are encouraged to use their personal social media accounts to engage with content posted on EH social media accounts and to promote EH programs and services by sharing, liking, commenting, following, etc.

4.3. Copyrighted or trademarked materials posted to EH social media accounts comply with applicable laws and EH policies and guidelines.

5. Social Media Harassment or Bullying

5.1. If a representative is the subject of social media harassment or bullying as a direct result of their work or affiliation to EH:

a.   Report the abusive post to the social media channel, e.g. Facebook.
b.   Do not engage in abusive or disrespectful discussions on social media; this may escalate the issue and reflect poorly on both you and the organization.
c.   Speak with your manager or director and/or if applicable, seek advice from your professional body.
d.   Consult with Corporate Communications as necessary.

6. Inappropriate Use of Social Media

6.1 Inappropriate use of social media is managed the same way as other inappropriate behaviour in accordance with Human Resources policies, guidelines and procedures, including the *Conflict Management Policy (NR-OH-050), Prevention and Resolution of Harassment in the Work Environment policy (HR-OH-100)* and/or other applicable.

Guideline

Guidelines for the personal use of social media

Be real
- Be authentic and honest about who you are and what you do.
- Make it clear that your views are your own by using a disclaimer such as: "Opinions shared are my own and do not reflect the views of Eastern Health."
- If you are asked to comment or represent the organization in a social media setting, ensure that you are approved to do so first. Only those officially designated by EH have a right to speak on behalf of EH.

Be professional
- Keep comments positive, contribute to, and share constructive conversations.
- Consider your professional standards and codes of ethics when commenting or sharing information online.

Be informed
- Prior to use, understand how social media works and become familiar with its advantages and disadvantages.
- Strict privacy settings do not prevent online content from being copied and redistributed.
- Review your own social media account privacy terms regularly, as they change often.
- Libel, slander, defamation and breach of confidentiality all apply to information shared on social media, whether you participate anonymously or through a pseudonym.

Protect information
- Never discuss patient, client or resident information on a social media platform.
- Do not take, post or share photographs or videos of patients, residents, clients, visitors, employees, physicians, volunteers or other representatives without appropriate written consent (see Linkages).

Respect sensitive information

- Do not share organizational business information online. If that information is not readily available on EH's website, consider whether it is confidential and not intended for distribution.
- Remember, it is unacceptable to vent or air work-related grievances you may have on social media or to refer publicly to concerns regarding your employer, supervisor, colleagues or patients, residents and clients.

Pause before you post

- The public may perceive representatives, either through knowledge of their profession or workplace, their actions and behaviours or through their presence or commentary in an online forum (i.e. profile information), to be speaking on behalf of EH, even if that is not the case. Consider this perception before using social media.
- All content posted on social media becomes public, searchable and can be immediately shared. Thoughts and opinions shared can remain online forever, and can spread beyond your control quickly (become viral).

Supporting Documents *(References, Industry Best Practice, Legislation, etc.)*

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Linkages

- Access to Information and Protection of Privacy Act (ATIPPA)
- Appropriate Use of Computer Resources-Services Policy (HTM-030)
- Appropriate use of Electronic Communications Policy (HTM-035)
- Collection of Personal Health Information Policy (ISP-020)
- Civility and Respect Policy (HR-OH-050)
- Conflict of Interest Policy (HR-ER-007)
- Consent for photographs, films and sound recordings (CH-0254)
- Consents Policy (LEG-050)
- Copyright Act (R.S.C., 1985, c. C-42)

- <u>Eastern Health Graphic Standards</u>, Corporate Communications intranet
- <u>Government of Newfoundland and Labrador, Social Media Policy</u>
- <u>Guidelines for Personal Use of Social Media</u>, Eastern Health, Corporate Communications intranet.
- Media Relations Policy (COM-075)
- Newfoundland and Labrador Personal Health Information Act (PHIA)
- Occurrence Reporting and Management Policy (QRM- 080)
- Personal Cellular Telephone and Camera Use Policy (3542(GROUND)-OPS-110)
- Prevention and Resolution of Harassment in the Work Environment (HR-OH-100)
- Privacy and Confidentiality Policy (ADM-030)
- Privacy Breach Management (ISP-200)
- Safe Use of Cellular Phones and Other Cellular Devices in Eastern Health Facilitates Policy (ADM-125)
- Security of Patient / Resident / Client Personal Health Information Policy (RM-CV(VI)-100)

Key Words

Social media, social networking, Facebook, Twitter, LinkedIn, YouTube, Blog, Blogging, *StoryLine*, communications, public relations, digital communications, digital media, communications technology, professional practice, website communications, video, wiki, instant messaging, chat rooms, forums, human resources, social media accounts, social media platforms, corporate social media, EH SM, SM, corporate SM, social media policy, employee social media, HR and social media, social media for professional practitioners.

Definitions & Acronyms

Defamation	Defamation is communication about a person that tends to hurt the person's reputation. It causes the reader or listener to think less of the person. If defamation is spoken, then it is called *slander*. If it is written, it is called *libel*. (The Canadian Bar Association, BC, 2017 <u>https://www.cbabc.org/For-the-Public/Dial-A-Law/Scripts/Your-Rights/240</u>)
Department	Means any department, division, business unit, clinic, program, portfolio, sector, section, or service within the EH organizational structure.
Handle	In the online world, a *handle* is another word for a username. It can refer to the name you use in chat rooms, web forums, and social media services like Twitter (2011).

Libel	Libel is the type of defamation with a permanent record, like a newspaper, a letter, a website posting, an email, a picture, or a radio or TV broadcast (The Canadian Bar Association, BC, 2017 https://www.cbabc.org/For-the-Public/Dial-A-Law/Scripts/Your-Rights/240).
Professional Boundaries	Professional boundaries are the spaces between a health professional's power and the client's vulnerability. Professional boundaries support key elements of the health practitioner-patient relationship including: trust, compassion, mutual respect, and empathy and serve to keep lines of communication open (National Council of State Boards of Nursing, 2014).
Professionalism	Qualities or typical features of a profession or professional including: knowledge, spirit of inquiry, autonomy, collegiality and collaboration, accountability, advocacy, innovation and visionary, ethics and values. A collection of attitudes and actions; it suggests knowledge and technical skill (RNAO, 2007).
Slander	Slander is the type of defamation with no permanent record. Normally it is a spoken statement. It can also be a hand gesture or something similar. (The Canadian Bar Association, BC, https://www.cbabc.org/For-the-Public/Dial-A-Law/Scripts/Your-Rights/240)
Representative	Individuals who are employed by the organization and not employed but perform specific tasks at or for the organization, including: • Credentialed professional with medical appointment pursuant to Eastern Health's Medical By-laws (e.g. physicians) • Credentialed professional with non-medical appointment pursuant to Eastern Health's Non-Medical • By-laws (e.g. midwives, dentists) • Students • Volunteers • Contractors or contracted workers who may be members of a third party contract or under direct contract with the organization • Individuals working at the organization but funded through an external source.

Social Media	Internet-based applications and websites that promote the sharing of user-generated content, communication, and participation on a large scale (Cooper, 2015). Social media includes, but is not limited to, social networking, blogging, microblogging, video hosting, wikis, and social bookmarking.
Social Media Account Administrators	Social media account administrators are employees who have been authorized by Eastern Health to manage (e.g. monitor, post content, respond to queries, etc.) social media platforms on behalf of the organization (i.e. EH social media accounts).
Social Networking	Social networking is defined as 'the use of dedicated websites and applications to interact with other users or to find people with similar interests to one's own' (Nursing and Midwifery Council (NMC), 2015 in Peate, 2015). Generally, it includes all types of postings and/or interactions on the internet including, but not limited to, social networking sites (such as Facebook ©, and LinkedIn ©), blogs and other online journals and diaries, discussion boards and chat rooms, microblogs such as Twitter ©, third 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 the postings.
URL	Stands for "Uniform Resource Locator." A URL is the address of a specific webpage or file on the Internet. For example, the URL of EH's website is www.easternhealth.ca (2015).