



## Social Media Policy (Sample Policy Template)

### Description:

This tool provides an example of a policy on social media use in a health organization.

### How it can be used:

Social Media is a powerful force that brings people together; however, it can also be used improperly by employees. There are especially potential risks in the health field where confidential client information may be compromised. Use and adapt the sample below to develop a policy for your organization that provides guidance and direction. In addition, consider how you will ensure there is effective orientation and training on the policy for employees.

---

## Social Media Policy

### DATE:

### DATE DUE FOR REVIEW:

#### 1. Policy Statement

Social media may be used by (Name of Organization) employees for work-related purposes subject to the restrictions set forth in this policy. These restrictions are intended to ensure compliance with legal and regulatory restrictions and privacy and confidentiality agreements. Social media includes media such as blogs, podcasts, discussion forums, and social networks.

#### 2. Purpose

The purpose of this policy is to provide (Name of Organization) employees with requirements for participation in social media, including (Name of Organization)-hosted social media, and in non-(Name of Organization) social media in which the employee's (Name of Organization) affiliation is known, identified, or presumed.

#### 3. Scope/Coverage

This policy covers all employees, volunteers, and visiting health professionals working or employed by (Name of Organization).

#### 4. Definitions

**Electronic Media** – Non-computing, e.g., flash memory drives, CDs, DVDs, tapes, hard disks, internal memory, and any other interchangeable, reusable, and/or portable electronic storage media on which electronic information is stored, or which are used to move data among computing systems/devices.

**(Name of Organization) Information** – Information in any form or media that is created by or on behalf of (Name of Organization) in the course and scope of its work, regardless of whether that information is maintained or stored by (Name of Organization) and others on (Name of Organization) behalf. Examples of (Name of Organization) information include, but are not limited to, patient and member records,



personnel records, financial information, (Name of Organization)-developed intellectual property, and email messages.

**Member/Patient Identifiable Information** – Any individually identifiable information regarding a member/patient of (Name of Organization) collected, received, created, transmitted, or maintained in connection with his/her status as a member or patient. Identifiable information includes, but is not limited to, information about a member/patient’s physical or mental health, the receipt of health care; name, address, Social Insurance Number, security code, driver’s license number, phone numbers, and other personal identifiers. Identifiable information does not include individually identifiable information in (Name of Organization) employment records; however, it may be subject to other provincial and federal privacy protections. Identifiable information does not include individually identifiable information (such as a cell, home or business phone number) that a (Name of Organization) employee obtains, transmits, or maintains about another (Name of Organization) employee in connection with a personal or employment-related relationship with that person.

**Podcast** – A collection of digital media files distributed over the Internet.

**Social media** – Includes but is not limited to blogs, podcasts, Facebook, Twitter, YouTube, Instagram, discussion forums, on-line collaborative information and publishing systems that are accessible to internal and external audiences (i.e., Wikis), video sharing, consumer ranking sites such as Yelp.

**Blog** – A website that allows an individual or group of individuals to share a running log of events and personal insights with online audiences.

**Wiki** – allows users to create, edit, and link Web pages easily; often used to create collaborative Web sites and to power community Web sites.

## 5. Provisions for (Name of Organization)-hosted sites

### Social Media

Employees are expected to adhere to (Name of Organization) compliance requirements and the (Name of Organization) Code of Ethics/Code of Conduct when using or participating in social media. All the rules that apply to other (Name of Organization) communications apply here, specifically: respecting members, patients, clients, partners, stakeholders, funders and one another; protecting confidentiality, privacy and security; and safeguarding and proper use of (Name of Organization) resources.

### Be Respectful

Employees may not post any material that is obscene, defamatory, profane, libelous, threatening, harassing, abusive, hateful, or embarrassing to another person or entity when posting on (Name of Organization)-hosted sites.

### (Name of Organization)-hosted blogs and website

(Name of Organization)-hosted blogs and webpages must focus on subjects related to the organization.

### Abide by the law and respect copyright laws

Employees may not post content or conduct any activity that fails to conform to any and all applicable state and federal laws. For (Name of Organization) and our employees’ protection, it is critical that everyone abide by the copyright laws by ensuring that they have permission to use or reproduce any copyrighted text, photos, graphics, video or other material owned by others.



## Obtain pre-approval before setting up (Name of Organization)-hosted sites

Employees must seek approval from their supervisor before setting up a (Name of Organization)-hosted blog, webpage or other social media content created to communicate information about (Name of Organization).

## 6. Provisions for non-(Name of Organization)-hosted sites

### Proprietary Information

Employees may not disclose any confidential or proprietary information of or about (Name of Organization), its affiliates, vendors, or suppliers, including but not limited to organizational and financial information, or represent that they are communicating the views of (Name of Organization), or do anything that might reasonably create the impression that they are communicating on behalf of or as a representative of (Name of Organization).

### Client/Patient Confidentiality

Employees may not use or disclose any client/patient identifiable information of any kind on any social media without the express written permission of the client/patient. Even if an individual is not identified by name within the information you wish to use or disclose, if there is a reasonable basis to believe that the person could still be identified from that information, then its use or disclosure could constitute a violation of the Health Information Protection Act (HIPA) and (Name of Organization) policy.

### Self-Hosted Sites

Employees must not say or suggest that the views and opinions they express related to (Name of Organization) and health care topics represent the official views of (Name of Organization).

## 7. Requirements Applicable to (Name of Organization) and Non-(Name of Organization)

### Hosted Sites

This policy applies to employees using social media while at work. It also applies to the use of social media when away from work, when the employee's (Name of Organization) affiliation is identified, known, or presumed. It does not apply to content that is non-health care related or is otherwise unrelated to (Name of Organization).

### Suggested practices

- It is strongly recommended you use a disclaimer if you publish a blog, post a comment, or share an image and it has something to do with the work you do at (Name of Organization). Whether you publish a blog or participate in someone else's, make it clear that what you say is representative of your views and opinions and not necessarily the views and opinions of (Name of Organization). The following standard legal disclaimer language may be used:

*"The postings on this site are my own and don't represent (Name of Organization) positions, strategies or opinions."*

- Take responsibility: You are personally responsible for what you post. Be mindful that what you write will be public for a long time.
- Be accurate. Respect the facts and link to the trusted sources that validate your opinions.



- Ensure that your social media activity does not interfere with your work commitments.
- (Name of Organization) discourages “friending” of clients and patients on social media. Staff in patient care roles generally should not initiate or accept friend requests except in unusual circumstances such as the situation where an in-person friendship pre-dates the treatment relationship.
- Don’t pick fights. When you see misrepresentations made about (Name of Organization), alert the Executive Director.
- Be the first to respond to your own mistakes. If you make an error, be up front about your mistake and correct it quickly. If you choose to modify an earlier post, make it clear that you have done so. Do not delete posts.
- Use your best judgment and remember that there are always consequences to what you write. If you’re about to post something that makes you uncomfortable, review the suggestions above and think about why that is. Ultimately, you have sole responsibility for what you choose to post online. You should make sure that it doesn’t interfere with your job or commitments to clients and patients.
- Be professional. All communications and statements made online must treat (Name of Organization) and its employees, clients and partners with respect.
- Be mindful of the world’s longer memory. Everything you say is likely to be indexed and stored forever.