



POLICY

Policy Name:	EHS Social Media Policy				
Policy #:	8316.1062	Policy Dept.:	Office of Compliance/Privacy & Information Security		
Approval Authority:	Executive Compliance Committee		Effective:	09/2011	Reviewed: 12/2018
Responsible Executive:	Alana Sullivan		Revised:	05/2016, 12/2016, 12/2018	
Responsible Office:	Office of Compliance		Contact:	Chief Compliance Officer	

I. Policy Statement

Erlanger Health System (EHS) respects the rights of its Workforce to participate in blogs and online communities and to use social networking sites during non-working hours. However, all online communications produced by Erlanger Workforce members must be consistent with EHS' Code of Conduct, policies, and procedures, and with all applicable laws, including those concerning Protected Health Information (PHI), privacy, confidentiality, harassment, copyright and trademarks.

II. Who Should Read This Policy?

Members of the EHS Workforce—including employees, physicians on our medical and professional staff, nurses, volunteers, students, trainees, and others who are associated with EHS, whether paid or unpaid. This policy applies to individuals, not to practice or professional groups within EHS.

III. Purpose

To clarify the rights and responsibilities of EHS Workforce Members with regard to personal use of Social Media when it implicates or involves EHS.

IV. The Policy

A. Personal use (Not Related to EHS Business)

To assist EHS Workforce members in making responsible decisions about the use of Social Media, EHS has established guidelines for appropriate use when the content involves or implicates EHS.

EHS Workforce members may not use EHS email addresses to register on any Social Media website for personal use. Any personal Social Media postings regarding EHS by a Workforce member must be consistent with the Code of Conduct and with all EHS policies, including but not limited to anti-harassment and non-discrimination policies, and policies regarding privacy and confidentiality. Online postings or communications that include discriminatory remarks, harassment, threats of violence, or similar inappropriate or unlawful conduct will not be tolerated and may subject an employee to disciplinary action up to and including termination.

EHS reminds Workforce members that work-related complaints are more likely to be resolved by speaking directly with co-workers and/or managers, and by following the procedures set forth in applicable EHS policies. If a Workforce member creates or responds to Social Media or other online content concerning or mentioning EHS, the member must disclose that s/he is a

Workforce member and state that her/his views do not represent those of EHS (e.g., “The views and comments stated herein are personal and do not necessarily reflect the views of my employer.”).

Under no circumstances should an EHS Workforce member post patient information online, including blogs, chat rooms, Social Media sites, private messages, and all other online forums, even if the patient is not specifically identified, without first obtaining the express written consent of the patient on an EHS-approved release form.

Workforce members should refrain from accessing Social Media sites on personal communication devices during scheduled work time, except for approved lunch and break times. Use of EHS equipment or Internet services for personal posting or accessing Social Media sites is prohibited.

Workforce members may not set up or use groups within Social Media platforms (e.g., public or private Facebook groups) using EHS’s name, logo, intellectual property, or proprietary information, nor may they use any such group to conduct EHS business without written approval from Erlanger’s Marketing Department. Under no circumstances may the Protected Health Information (PHI) or Personally Identifiable Information (PII) of EHS patients, associates, or other Workforce members be posted.

B. Professional Networking Sites

EHS encourages its Workforce members to develop professional networks and to join professional networking communities. Workforce members who join websites maintained for the purpose of professional networking (e.g., LinkedIn, Doximity) are permitted to identify themselves as EHS employees or associates and to use corporate email addresses as contact or biographical information within those sites. However, EHS email addresses should not be used as a username or password when registering with such sites. In accordance with the EHS User Password Policy (See Policy 8316.1108), and in order to protect the security and integrity of EHS systems, Workforce members may not use a password on any EHS system that they have used on an external system.

C. Management Responsibility

1. General Use of Information and Participation in Social Media:

- a. Managers may occasionally become aware of information they believe violates this policy. If a manager has reason to believe a Workforce member has violated the terms of this policy, the manager may review the information in order to determine whether escalation to Human Resources is appropriate.
- b. However, Managers may not access restricted websites, including Social Media sites, without authorization. Under no circumstances should the implicated Workforce member be asked to provide a password or facilitate access to a private site.
- c. If a Manager confirms violation of this policy, he/she must consult Human Resources before taking any adverse action, including, but not limited to: requesting removal of a post, coaching/counseling a Workforce member verbally or in writing regarding online posting, etc.
- d. Managers must consult Human Resources before approving, denying, or limiting leaves of absence on the basis of information from a Workforce Member’s Social Media or other online posting.
- e. Any evaluations, recommendations or comments by a manager related to an individual’s job performance must follow EHS’ official processes for providing such feedback. General comments about a team’s or group’s performance are permissible on Social Media or Professional Networking sites, but individual reviews or recommendations must follow EHS policy on references.

2. Use of Information in the Hiring Process:

- a. Managers engaged in hiring are prohibited from conducting Social Media checks of prospective employees. Any and all such checks will be coordinated and completed by Human Resources following EHS hiring policies and procedures.
- b. A Social Media check of candidates for hire may only be conducted after: 1) the individual has been deemed to meet minimum qualifications, and 2) the HR/Recruitment professional intends to move the candidate forward in the interview process. Social Media checks must be conducted in consultation with Human Resources.
- c. Any rejection of a candidate based on information discovered on Social Media or any other online source will be clearly documented to ensure that the decision did not violate any EHS policies.

3. Discipline

Any Workforce member who violates this policy will be subject to appropriate action and/or discipline, up to and including termination. Please refer to EHS Policy 8327.0802 Discipline and 8316.1023 HIPAA Sanctions Policy.

V. Definitions

The following key terms are defined in the 8316.1101 Privacy and Information Security Definitions Policy:

Social Media Site
Weblog or Blog
Wiki
Discussion Boards and Forums
Chat Rooms
RSS
Protected Health Information (PHI)
Personally Identifiable Information (PII)

Other key terms within this policy:

Post: The act of submitting or publishing a message, image, text, or other content to a message board, electronic mailing list, website, or other online forum.

Professional Networking Site: A type of social network service or site whose primary focus is on interactions and relationships of a professional nature, rather than personal, non-professional interactions. The goal of such sites is to build, reinforce, and maintain professional relationships and further professional goals.

Committee Approval

Approved by : _____ Date _____