



Hospital: System-Wide

Division: Human Resources

Policy & Procedure	
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Administrative Approval:	<u>Melanie Stith</u>
Administrative Title:	<u>VP and CHRO</u>
Originator (Title):	<u>Director, Human Resources</u>

Policy: Social Media / Online Sharing

APPLICABILITY: This policy applies to Roper Hospital, Bon Secours St. Francis Xavier Hospital, Roper St. Francis Mount Pleasant Hospital, Roper St. Francis Hospital-Berkeley, and any departments owned or operated by these Hospitals, as well as Roper St. Francis Physician Partners Network, and Roper St. Francis Medshare.

POLICY: Social media and online sharing creates new communication opportunities; however, it also creates new responsibilities. Teammates' use of social media can pose risks to Roper St. Francis Healthcare's confidential and proprietary information, brand identity, integrity, reputation, and has the potential to expose RSFH to discrimination and harassment claims. To minimize these risks, to avoid loss of productivity from teammates' job performance, and to ensure RSFH's resources and communication systems are used appropriately, RSFH expects its teammates to adhere to this policy, which applies to social media/networking sites including but not limited to Facebook, Twitter, Instagram, Snapchat, Tumblr, dating sites, etc., (collectively referred to in this policy as "Social Media / Online Sharing") regardless of whether the forum is open to the public or by invitation only.

PURPOSE: To establish appropriate guidelines for professional use of social media/online sharing, while minimizing actual or potential legal risks, whether used inside or outside the workplace.

PROCEDURES:

Guidelines for RSFH-Authorized Social Media / Online Sharing

- 21.1 Only authorized teammates can prepare and modify content for Roper St. Francis Healthcare social media sites or online sharing forums during work time and/or with RSFH equipment. The RSFH Marketing Department must issue express authorization for any teammate to participate in social media or online sharing as part of their job.
- 21.2 Communications must be limited to business purposes. RSFH may request that teammates avoid certain subjects or withdraw certain posts if it believes that doing so will help ensure compliance with applicable laws or RSFH strategy.
- 21.3 RSFH reserves the right to remove any posted comments that are not appropriate for the topic discussed or that violate any of our policies.
- 21.4 A teammate may not receive compensation from a third party for participating in an online forum in their capacity as a RSFH teammate without prior written approval from the RSFH Marketing Department and Corporate Compliance Department.

- 21.5 Use of social media/online sharing must not interfere with a teammate's work performance, as determined by the leader. It is highly recommended that teammates refrain from social media usage while on paid work time.

Guidelines for Personal Use of Social Media / Online Sharing

- 21.6 Teammates should maintain professionalism, honesty and respect when they present themselves as RSFH teammates in social media/online forums. Teammates should be mindful of RSFH's Mission, Standards of Behavior and Code of Conduct. All content contributed to social media/online forums becomes immediately searchable and can be shared once it leaves the writer's control. Teammates should be cognizant of what they say in online forums and how it may negatively reflect upon oneself, upon RSFH, and be perceived by fellow teammates, leaders, patients, donors and the community. Any concerning social media content will be reviewed for specific contradiction to our Mission, Vision, and Values.
- 21.7 Social media should never be used in a way that violates any other RSFH policy or teammate responsibility. Teammates who violate a RSFH policy through social media may be subject to corrective action, up to and including termination. The RSFH Mission, Standards of Behavior, Code of Conduct, and policies prohibiting harassment, discrimination and retaliation apply to online activity regardless of whether the activity involves, is directed to, or is about RSFH teammates, patients, or third parties.
- 21.8 Teammates should use personal email addresses and not RSFH email addresses in social media/online sharing unless acting in an official RSFH capacity.
- 21.9 If teammates identify themselves as RSFH teammates in any online forum, they must make it clear that they are not speaking on behalf of RSFH, and that what they say is representative of their own personal views and opinions and are not necessarily the views and opinions of RSFH.
- 21.11 Communications should not include RSFH logos or trademarks unless such use has been approved by the RSFH Marketing Department.
- 21.12 Patient information is strictly prohibited from being used or disclosed, and teammates are prohibited from any online disclosure of protected health information (PHI) to include discussing or acknowledging current or former patients, their illness or their care, or posting patient photos or stories to any online presence. All HIPAA and Privacy policies continue to apply, as do all sanctioning provisions for the misuse or improper disclosure of patient information or other confidential information. Teammates must be mindful that patients may be identifiable even without using their name.
- 21.13 Social media/online sharing must not be used to provide medical advice to patients. This policy is not meant to govern those who are appropriately participating in RSFH's virtual care platform.
- 21.14 Communications must not contain any sensitive, confidential, privileged, proprietary, copyright, trade-secret, protected health information (PHI) or images of RSFH, other than what is publicly available in RSFH press releases. Any online communication regarding company-sensitive matters such as strategic decisions, pre-announcing information not yet released to the press or other announcements deemed inappropriate for uncoordinated public exchange are prohibited. Communications must not contain false or misleading statements about the products or services of RSFH.

- 21.15 RSFH strongly discourages leaders from entering into social media/online relationships with direct reports. For example: a leader should not invite a direct report to be a “friend” on Facebook nor should he/she accept a “friend” request from a direct report.
- 21.16 Some sites, such as LinkedIn, allow members to “recommend” current or former teammates. All requests for employment references are to be directed to the Human Resources Department. If a teammate decides to use social media/online sharing sites to make a recommendation in his/her individual capacity, RSFH considers that action outside the scope of employment and the teammate will be solely responsible for any repercussions that may arise, legal or otherwise.
- 21.17 If a teammate receives an inquiry from the media or press about posts/communications made in online forums that relate to RSFH in any way, it must be referred to RSFH Corporate Communications for response.
- 21.18 RSFH reserves the right to block access to sites where abuses occur. Subject to applicable laws, RSFH may restrict or remove any content that, in its sole discretion, it deems disruptive, illegal or in violation of any RSFH policy or applicable law.
- 21.19 Teammates should immediately report violations of this policy to their leader and/or Human Resources. Policy violations will be reviewed on a case-by-case basis and may result in corrective action up to and including termination of employment. Legal action also may be taken for violations of law.
- 21.20 This policy is not intended to restrict or interfere with Federal or State labor law rights, including any rights under the National Labor Relations Act, Whistleblowers Protection Act or any other Federal or State law.