

# POLICY AND PROCEDURE

Rochester Regional Health

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Rochester, New York

<b>Policy # : HR</b>	<b>Social Media Policy</b>		
<b>Dept of Origin:</b>	<b>Human Resources</b>		
<b>Date of Origin: 04/01/2010</b>	<b>P &amp; P Date: 3/13/19</b>	<b>Effective Date: 3/13/19</b>	

**Goal:** Rochester Regional Health (RRH) respects the rights of its employees to use weblogs (blogs), and other social media tools available through the internet, not only as a form of self-expression, but also as a means to further RRH's mission.

It is important that all employees are aware of the implications of engaging in forms of social media and online conversations that reference RRH and employees recognize when the system might be held responsible for their behavior. What RRH employees need to remember about blogs, podcasts, discussion forums and social networking sites (ex. Facebook, Twitter, Instagram, YouTube and other public commentary) is that the same basic policies apply in these spaces as in other areas of their lives.

**Department/ Personnel Impacted:** All employees

## **Procedure:**

Our Expectations for Employee's Personal Behavior in Online Social Media

### **Work-Related Blogging**

Some RRH staff may be interested in engaging in internet conversations for work-related purposes, or may be asked by supervisors or leadership to participate, in support of RRH's organizational objectives. Such engagement on behalf of RRH, including establishment of official external sites representing RRH must be approved and coordinated through the Community Relations Department. The Community Relations department will provide oversight and assistance to guide development of new social media platforms, sharing knowledge and instituting best practices for successful implementation.

Internet postings that are authorized by Rochester Regional Health must comply with the Information Technology Appropriate Use Policy (Policy 6.4). The computers and software programs such as email and outlook are system property. The Information Services department has set protocols and procedures in place monitoring employee's actions ensuring proper use.

### **Personal Blogging**

Personal blogging is not a business-related activity and should be done during personal (non-work) time only.

There is a difference in speaking "on behalf of the system" and speaking "about" the system. This set of principles refers to those personal or unofficial online activities where you might refer to RRH.

- 1. Adhere to the Code of Conduct, Information Technology Appropriate Use and other applicable policies.** All employees, from the President and CEO to every intern, are subject to RRH's Code of Conduct in every public setting. In addition, other policies, including HIPAA Confidentiality, govern employees' behavior with respect to the disclosure of information; these policies are applicable to your personal activities online. Among the policies most pertinent to this discussion are those concerning Code of Conduct, political activity, computer, e-mail & Internet use, photography and video, release of patient information to media, Standards of Behavior and patient confidentiality.
- 2. You are responsible for your actions.** Employees other than authorized system personnel should use caution when taking, posting or distributing photos of other employees to ensure proper consent where needed has been obtained. We do support your participation in the online social media space, but urge you to do so properly, exercising sound judgment and common sense.
- 3. Write in the first person.** Where your connection to RRH is apparent, make it clear that you are speaking for yourself and not on behalf of RRH. In those circumstances, you must include this disclaimer: "The views expressed on this {blog; website} are my own and do not reflect the views of my employer." Add this language in an "About me" section of your blog or social networking profile.
- 4. Note to managers and executives.** This standard disclaimer does not by itself exempt RRH managers and executives from a special responsibility when blogging. By virtue of their position, managers and executives must consider whether personal thoughts they publish may be misunderstood as expressing RRH positions. A manager should assume that his or her team will read what is written. A blog is not the place to communicate RRH policies to employees.
- 5. If you communicate in the public internet about RRH or RRH related matters, disclose your connection with RRH and your role at RRH.** Use good judgment and strive for accuracy in your communications; errors and omissions reflect poorly on RRH, and may result in liability for you or RRH.
- 6. Be on the lookout for compliments and criticism.** Even if you are not an official online spokesperson for RRH, you are one of our most vital assets for monitoring the social media landscape. If you come across positive or negative remarks about the system online that you believe are important, consider sharing them by forwarding them to the Community Relations Department or [contactus@rochesterregional.org](mailto:contactus@rochesterregional.org).

7. **Let the designated system spokesperson respond to negative posts.** You may come across negative, disparaging or misrepresentation posts by patients or their family members about the services provided by the organization, avoid temptation to react yourself. Forward the post(s) along to the Community Relations Department to address such comments.
8. **Use a personal email address** (not your RRH.org address) as your primary means of identification. Just as you would not use RRH stationary for a letter to the editor with your personal views, do not use your RRH e-mail address for personal views.
9. **Respect copyright, fair use and financial disclosure laws.** Employees may not post content or conduct any activity that fails to conform to any and all applicable state and federal laws.
10. **Be conscientious when mixing your business and personal lives.** Online, your personal and business personas are likely to intersect. The system respects the free speech rights of all of its employees, but you must remember that patients, family members, co-workers and supervisors often have access to the online content you post. Keep this in mind when publishing information online that can be seen by more than friends and family, and remember that information originally intended just for friends and family can be forwarded on.
11. **When in doubt, do not post.** Employees are personally responsible for their words and actions, wherever they are. Employees should be warned that postings regarding: (1) proprietary and confidential company strategic plans and objectives; (2) discriminatory statements including obscene, profane, physically threatening, harassing, or sexual innuendos regarding co-workers, management, customers, or vendors will not be tolerated and will subject the employee to progressive corrective action.
12. **Know that the Internet is permanent.** Once information is published online, it is essentially part of a permanent record, even if you “remove/delete” it later or attempt to make it anonymous. If your complete thought, along with its context, cannot be squeezed into a character-restricted space (such as Twitter), provide a link to an online space where the message can be expressed completely and accurately.
13. **Ask the Marketing/Communications Department** if you have any questions about what is appropriate to include in your blog or social networking profile. Remember that if you wouldn't want your manager or others at RRH to see your comments, it is unwise to post them to the internet. If you have any questions about these guidelines or any matter related to your site that these guidelines do not address, please direct them to the organization's Compliance Officer, Chief Information

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Officer, Human Resources Department or Marketing Department as appropriate.

14. **You may not provide a link from your site to the Hospital's website** without express written permission from Marketing/Communications.

Employees who fail to abide by this policy may be subjected to discipline up to and including termination.

Nothing in the policy will prohibit employees from exercising rights under any federal and state laws, including any rights employees have under Section 7 of the National Labor Relations Act.