

Manual Name: Administration

<b>Document Name: Social Media Policy</b>	Section: Public Relations
Effective Date: June 29, 2020	Original Date: 2018 Revisions: June 29, 2020

**Policy Statement:**

Headwaters Health Care Centre, Headwaters Health Care Foundation and Headwaters Health Care Auxiliary (collectively referred to as *Headwaters* in this policy) recognizes the importance of the internet in educating, informing and shaping public thinking about the hospital. This policy provides standards and guidelines for the use of social media, as well as clarifies what is considered to be unacceptable usage.

This policy applies to all persons working at Headwaters including senior leadership, supervisors, professional staff with Headwaters’ privileges (eg. medical, dental, midwifery and extended class nurses), full and part-time employees, consultants, contractors, student placements, casual staff and volunteers (collectively referred to as *staff* in this policy).

As social media is constantly evolving, this policy covers all current and future forms, including but not limited to: Twitter, Facebook, Flickr, Google+, Instagram, YouTube, LinkedIn, Yammer, TikTok, Snapchat, blogs and vlogs.

This policy compliments any hospital policies regarding the use of technology, computers, email and the internet. All uses of social media must follow the ethical standards that Headwaters has established for staff. The requirements apply whether working on Headwaters property or working on behalf of or representing Headwaters elsewhere.

**Scope:**

In order to protect the reputation of Headwaters and provide privacy of its patients, families and staff this policy outlines expectations for use and participation on social media.

Headwaters staff acting in a manner inconsistent with the procedures of this policy or with other related policies may be subject to disciplinary action which could include termination of employment or affiliation with Headwaters and in more serious cases Headwaters may pursue legal action as appropriate.

This policy does not apply to personal or private use of social media that **does not** involve a Headwaters related post.

## **Roles & Responsibilities:**

*Staff communicators* are officially identified by the Communications & Stakeholder Relations Department and appointed by the President & CEO. Staff communicators are the only staff able to post material on social media in Headwaters name and on behalf of Headwaters. They are expected to uphold the ethics and values of the hospital at all times. No one who is not a designated staff communicator has the authority or right to speak on behalf of the organization.

Only staff communicators are to respond to content posted or directed at Headwaters or its senior leadership. Every authored post will be in an organizational voice. Stakeholders who post questions requiring complex answers should engage with subject matter experts in drafting.

When posting as a staff communicator:

- Never post photographs, videos, names or personal information without the expressed consent of all patient, family, staff, volunteer or donor represented
- Activity on social media sites should complement and/or support your role
- Third party events or activities must relate back to Headwaters' goals or priorities, or must otherwise support the overall mission of the organization
- Adhere to all relevant regulations and legislation
- Before including a link to a third-party website, confirm that the link is suitable for Headwaters and clearly indicate to the user that they have moved to a third party's website
- If the direction of online discussion becomes heated, do not engage but seek the assistance of the President & CEO
- Do not endorse people, products, services and organizations, including politicians or those seeking an elected position where connection to Headwaters is apparent.
- Must follow established brand standards and guidelines
- Staff communicators are the only members of the organization who can set-up, manage and approve social media accounts that are directly or indirectly associated with Headwaters

Content posted on social media is accessible to the public, therefore, staff may not:

- Reference Headwaters in any way that may be deemed inappropriate
- Contain profanity, sexual content, threatening or personal attacks on the employer or an employee, and any comments that may discriminate against others based on the Human Rights Code and its definition of "freedom from harassment in the workplace by the employer or agent of the employer or by another employee because of race, ancestry, place of origin, colour, ethnic origin, citizenship, creed, sexual orientation, gender identity, gender expression, age, record of offences, marital status, family status or disability."
- Encourage illegal activity
- Compromise the safety and/or security of Headwaters, its staff, patients and/or families
- Contain pictures that have a derogatory/vexatious intent
- Breach any Headwaters policy in any way

- Dispense medical advice online as it would not be possible to understand the full context of an individual's case
- Recommend/endorse particular treatments, services or medications

**Privacy:**

Headwaters is committed to maintaining the privacy of its patients, families, staff, vendors and donors. Sharing specifics about any of these persons, even without giving their names, is considered disclosure of confidential information. For example, even mentioning that a neighbor, friend or relative was seen in the hallways of Headwaters is considered a breach of confidentiality and privacy.

To uphold the hospital's commitment to privacy, staff:

- Who are not designated staff communicators are prohibited from posting any content related to patients, families, staff or donors including: images, videos, names or personal information.
- Will not ask anyone to identify themselves as a Headwaters patient in any type of social media forum, as the rules of professional boundaries for health care professionals apply in the social media realm as clarified by regulatory bodies.
- Will not cite or reference Headwaters partners or collaborators without approval.
- Will contact their direct Supervisor, who will contact Headwaters Privacy Officer, in the event there is a breach of privacy or there is a concern that an individual's privacy may potentially be violated.

**Guidelines for Personal Use:**

Staff communicators are the only staff able to post material on social media in Headwaters' name and on behalf of Headwaters.

If you are posting on your own behalf, using a personal account, we ask that you adhere to the following guidelines:

- Staff are required to receive consent from the Communications & Stakeholder Relations team, if they are going to do so of any content taken or filmed while on hospital property
- Staff should keep in mind to always use care to ensure what is posted is reputable
- Staff should use their personal email address as their primary means of identification and for receiving notifications
- Remember content posted on social media is accessible to the public; do not have an expectation of privacy for posted information
- Staff should not send/post information that they would not want to be forwarded
- Staff should consider whether social media is the best method of communication or is it better to communicate by phone or in person
- Emotional responses can often be detrimental, and staff should always consider a 'cool down' period before responding

- Any patient requests for connection on social media (i.e. friending, following, tagging, commenting) with staff should be ignored
- Make it clear the opinions expressed are your own and not on behalf of Headwaters Health Care Centre where a connection to Headwaters is apparent. In those circumstances, use following disclaimer: “The views expressed on this [blog; website etc.] are my own and do not reflect the views of my employer.”

**Monitoring Use:**

- The equipment, services and technology used to access the internet are the property of Headwaters, which reserves the right to monitor internet traffic and monitor and access data that is composed, sent or received through its online connections and systems
- Staff should be aware that the use of social media (whether personal or professional) may be monitored
- Monitoring is carried out to the extent permitted or as required by law and as necessary and justifiable for business purposes
- Information posted online is not private and may be used in criminal and civil proceedings
- If social media is misused by staff in breach of this policy, it should be reported to the Communications & Stakeholder Relations Department who will engage Human Resources as needed to take appropriate action

Staff found in breach of this policy will be subject to disciplinary action up to and including termination of employment.

**Cross References:**

- [Privacy Policy](#)
- Code of Conduct Policy
- Discrimination and Harassment Prevention Policy
- [Privacy – Breach of Patient Confidentiality](#)
- [Media Policy and Media Consent Form](#)
- [IT Acceptable Use Policy](#)

Approval Date:	Approval Body:	Approval Signature:
June 29, 2020	Senior Management Team	