

<b>Title:</b>  <b>SOCIAL MEDIA USE AND BEHAVIOR</b>	<b>Policy Number:</b> <b>RH-HR-HR 60:10:34</b>
<b>Review Responsibilities:</b> Human Resources and Office of Integrity and Compliance	<b>Origination Date:</b> January 11, 2010  <b>Effective Date:</b> January 2010

## **I. PURPOSE**

The purpose of this Policy is to establish clear expectations for the use of online networking or “social media” and staff behavior in the social media environment. All of the people served and employed by the Employer deserve to be treated with dignity and respect. This Policy is meant to ensure that these values will be upheld through employees’ professional and personal use of social media.

This Policy establishes fundamental rules of appropriate business decorum that apply to all social media use that implicates Regions Hospital (or a related organization), its people, patients, members, services, products, customers or businesses in the social media environment, regardless of whether this is done for business reasons or for personal reasons.

However, when an employee uses social media for job-related reasons as part of his or her work for the Employer, more stringent rules apply, as set forth below. Different rules may also apply, depending upon whether the employee is using social media during working time or personal time, and depending upon whether the employee is using a device or system that is provided by the Employer or the employee’s own personal device and system. Ultimately, each employee is solely responsible for what he/she posts online.

### **1. DEFINITIONS**

“Material” means any words, comments, photographs, video, audio or other content, images or sound that is posted or published or transferred on or to any social media.

“Social media” means the use of web-based or other electronic technology for the purpose of interacting and communicating with people, companies and communities through the use of an electronic identity. Examples of social media include, but are not limited to:

Social networking sites, such as Facebook, LinkedIn and MySpace  
 Video, photo and audio sharing sites, such as YouTube and Flickr  
 Blogs and blogging tools, such as Blogger and WordPress  
 Micro-blogging tools, such as Twitter and Yammer  
 Collaborative forums (open or closed), such as Yahoo!Groups, SharePoint and SecondLife  
 Interactive encyclopedias, such as Wikipedia  
 Comment-enabled online tools on webzines, online news sites and listserves  
 Personal web mail accounts, such as Yahoo or gmail  
 And any other web sites or electronic media that allow individual users or companies to publish or post

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material

“Staff” or “Employee” means any person who works for or represents Regions Hospital, or who works in a facility owned or operated by Regions Hospital. This includes, but is not limited to, employees, privileged medical staff, residents, students, volunteers, temporary workers/employees, consultants, and board members.

### III. POLICY

In general, the Employer does not prohibit the use of social media, even at work. In fact, there may be times when some employees will be encouraged to use social media as part of their jobs. But in order to protect the privacy of employees and the people served, preserve the reputation of the organization and promote a respectful and productive work environment, there are important rules that must be followed when using social media for personal or professional reasons, whether at work or outside of work. These rules are described in this Policy.

#### ***A. Using Social Media in General***

The following rules apply to all employee social media use, without regard to time or place or the owner of the equipment used:

- **Protect Patient and Member Privacy.** All uses and disclosures of protected health information (“PHI”) shall be carried out in a manner compliant with applicable patient privacy policies, regulations, and standards. In accordance with federal and state laws regarding patient privacy, employees are prohibited from posting any content that is considered PHI, including patient names, images, and diagnoses, without a written authorization for the use and disclosure of the information from the patient/patient’s legal representative. Note that information about a patient or member may be individually identifiable, even if the employee does not refer to the patient or member by name.
- **Keep Confidential Information Confidential.** Employees must not post or disclose any confidential or protected information obtained from the records of the Employer that is not necessary for the employee to perform his/her duties. Employees must not post internal reports, policies, procedures or other internal business-related confidential communications, including confidential business negotiations or plans.
- **Respect Employer’s Property Rights.** Employees must maintain the confidentiality of the Employer’s trade secrets and those of Regions Hospital. Trade secrets may include information regarding the development of systems, processes, products, know-how and technology. Employees must not use any logos, signage or trademarks of Regions Hospital or a related organization in ways that infringe on the intellectual property interests of Regions Hospital, unless the Employer has specifically authorized that use.
- **Be Safe and Respectful.** The Employer encourages employees to be fair and courteous to patients, members, fellow employees and anyone who works on behalf of the Employer or Regions Hospital. The Employer also expects employees to promote the safety and security of the Employer’s premises and those who have access to it.

Keep in mind that employees may be more likely to resolve work-related concerns by speaking directly with their leaders and/or co-workers, rather than by posting complaints to a social media outlet. Nevertheless, employees who decide to post complaints, criticism, or negative commentary about the Employer or its products or services via social media must avoid using statements, photographs, video or audio that reasonably could be viewed as unlawful, obscene,

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profane, malicious, abusive, coercive, threatening, offensive, intimidating, bullying, harassing, sexist, racist, or discriminatory. Some examples of such conduct might include false and malicious posts meant to intentionally harm someone's reputation or offensive posts that could contribute to a hostile work environment on the basis of race, sex, disability, religion or any other status protected by law or the Employer's policies.

Employees must also avoid posting content that could compromise the safety and security of the Employer's premises or systems or those who have access to them.

- **Be Honest and Accurate.** Never post information or rumors that you know to be false about Regions Hospital, the Employer or related organizations, employees, contractors, patients, or persons working on behalf of Regions Hospital or its competitors.
- **Do Not Represent Yourself as Employer's Spokesperson.** Employees must not claim or imply in any way that they speak for Regions Hospital or any of its related organizations unless they have been expressly authorized by their leader to do so. Employees should not speak to the media on the Employer's behalf without contacting The Communications Department at 651-254-4727 during regular business hours, or by paging 651-629-0411 outside regular business hours and on weekends and holidays. Employees also must not use or co-opt the identity of any patient or member or any other employee (or consultant, resident, volunteer, etc.) of Regions Hospital, a related organization, a business partner or a competitor.

The foregoing rules apply regardless of when or where the employee is using social media, and regardless whether the Internet connection, computer or other device (such as a smart phone) that the employee is using is provided by the Employer or the employee.

## ***B. Using Social Media as Part of Work***

Social media can be an important tool in the work done by the organization. It can help the organization communicate with patients, members, customers and each other. It can help the organization improve service, respond to concerns and identify care and business opportunities. But like all tools, social media must be used properly. In addition to the rules that apply to all social media use, in Section II.A above, the following considerations and rules also apply when employees use social media for job-related reasons, as part of their work for Employer.

1. **When Is It Appropriate to Use Social Media as Part of Work?** There are so many possible ways the organization could use social media to help with its work, but that does not mean that the organization should be using it for everything. In general, employees may use social media as part of their work if:
  - The activity fills a legitimate need related to marketing, patient care, member service, employee engagement or community benefit;
  - The activity is consistent with the Mission, Vision and Values of the organization;
  - The activity is performed during regularly scheduled working hours or during approved times outside of regular working hours, unless performed by exempt employees; and
  - The organization will have the ability to regularly monitor the proposed site and content, and to edit or remove objectionable content at its discretion.

If employees have an idea for how using social media can help with their jobs or the work done by the organization – for example, a work-related blog, a virtual meeting or online content sharing – the employee must first work with his/her leader and the Communications Department to gain their initial approval. After the leader's approval, employees must follow the instructions

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on the Social Media Approval Process Form on Brand Central and then work with the Brand Team to determine appropriate use, content, and administration. **All requests must be reviewed and approved by Brand Team PRIOR to implementation.**

## **2. How Should Employees Behave When Using Social Media for Business Reasons?**

- **Follow the Employer's Policies.** It might seem a little strange to talk about "behavior" in the online world, but just as people behave in the "real" world, people also behave in the "virtual" world. In general, all organizational policies that govern employees' "real world" behavior also govern their behavior in the social media and electronic world. This means, for example, that when using social media for professional reasons as part of work, employees must follow all applicable organizational policies, including but not limited to:

- Code of Conduct
- Privacy Policy, Standards and Guidelines
- Security Policy and Standards
- Internet Use and Email Use Policies
- Human Resources Policies

But there are some unique aspects of the "virtual" world that are in fact different from the "real" world. For example, it can be difficult to determine the true identity of an online user. Also, online postings are generally considered public, can be disseminated easily and rapidly, and often cannot be deleted – ever. For these reasons, the Employer requires employees to follow some additional rules when using social media as a part of their jobs:

- **Represent Themselves and Regions Hospital Honestly.** When using social media as part of their jobs, employees must:
  - Use their real name and disclose that they are an employee of Regions Hospital (or consultant, resident, volunteer, Medical Staff member, etc.); be clear about which part of the organization they work for and what their general role and responsibilities are.
  - Disclose only information and images that are already available to the public. Employees using social media as part of work may not post material related to, or comment on, confidential Regions Hospital information or images, such as patient or member information, financial information, business performance, business plans, legally protected information or employee or staffing information. *If employees have any question about what is considered confidential Regions Hospital information, or what is or is not already available to the public, employees must get guidance from their leader; leaders, in turn, are responsible for consulting with Communications, Human Resources, Integrity and Compliance, Finance, and Legal, as appropriate.*
- **Be Responsible.** When using social media as part of their jobs, employees must:
  - Make sure that any material they post or publish is factually accurate and complies with all related organizational policies, such as Code of Conduct and privacy-related policies.
  - Not make any announcements or statements about Regions Hospital or a related organization unless they have received the specific direction of the Communications Department to do so.
  - Only offer opinions, support or guidance about matters that fall within their area of responsibility at Regions Hospital. If employees become aware of an opportunity to engage in a social media interaction related to the work of Regions Hospital or a related organization that falls outside their area of responsibility, they should bring this to the attention of a leader in the

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relevant area so that the leader can evaluate the matter and follow up as appropriate.

- Not disclose other people's personal information or images in social media (or any other format) and make sure that they comply with the Employer's privacy-related policies, guidelines, standards and expectations related to caregiver professionalism. This includes (but is not limited to) not discussing specific patients/members or employees, displaying or posting their information or images on social media, even if they do not refer to the patient, member, or employee by name or other details.
- Obey copyright, privacy and other applicable laws when using social media. Employees must seek advice from their leaders if they are not certain about what they are permitted to post or publish on a social media platform.
- Observe standards of professionalism and professional boundaries.
- **Be Respectful.** When using social media as part of work, employees must:
  - Be respectful of all individuals and communities with which they interact.
  - Be polite and respectful of others' opinions, even if they disagree in the midst of heated debate and discussion.
  - Obey the Terms of Use and the cultural and behavioral norms of the social media platform being used.
  - Make sure that they do not post any material that is obscene, defamatory, threatening, harassing, discriminatory, hateful to another person or organization.

### **C. *Using Social Media for Personal Reasons***

The Employer recognizes that many of its employees will choose to use social media for purely personal reasons. When employees use social media for personal reasons, the same general rules apply as described above in Section II.A of this Policy. In addition, the following rules apply to personal social media use:

#### **1. If using social media on work time or while using a device or system that belongs to Regions Hospital, employees must:**

- Limit their use to occasional and incidental personal use;
- Make sure that their use does not interfere with the organization's business activities or the job performance or productivity of themselves or others;
- Not pursue or promote any outside job or business activity not associated with the organization;
- Not engage in gaming (whether legal or illegal) or post or respond to personal ads.
- Make sure that their use does not violate the Code of Conduct, this Policy or any other organizational policy; and
- Use Employer resources responsibly. The Employer's computers, e-mail system, Internet connection and other technological devices and systems are the property of the Employer

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and intended primarily for work purposes. Accordingly, if employees use social media while using Employer-provided Internet access or while using a device or system that belongs to Regions Hospital, employees must comply with the Employer's policy regarding E-Mail, Internet Access and Electronic Devices Use.

**2. In addition, whether employees use personally-owned or Employer-provided devices or systems, and whether employees use social media on work time or their own personal time, employees must also follow these rules for personal social media use:**

- **Be Transparent.** Employees who refer to Regions Hospital, a related organization, its people, products, services, business partners or competitors, and who endorse Regions Hospital products or services, should identify themselves as an employee (or consultant, resident, volunteer, Medical Staff member, etc.). For example, if an employee receives medical care at Regions Hospital, and the person posts a comment about the excellent care that was provided, the employee should clearly identify him/herself as an employee of Regions Hospital. Do not create a link from your blog, website or other social networking site to a Regions Hospital website without identifying yourself as an Employee.
- **Speak for Yourself.** If employees regularly refer to their work or the activities of Regions Hospital or a related organization in their personal social media interactions (for example, if they maintain a personal blog about their profession), it is best to include a permanent disclaimer that their comments and opinions are their own and not those of Regions Hospital or its related organizations.
- **Remember that Other Policies May Still Apply.** This Policy is in addition to, and not in place of, the Employer's other policies. If employees engage in misconduct in violation of the Code of Conduct or other Employer policies while using social media, even outside of work, such conduct may be subject to discipline to the same extent as it would otherwise be. For example, a sexually harassing comment made outside of work may have work-related implications that constitute an independent violation of the Code of Conduct, whether or not the comment is also posted online in violation of this Policy.

This policy does not restrict an employee's right to engage in protected concerted activities.

#### **IV. PROCEDURE(S)**

The Employer reserves the right to monitor and review employees' use of social media on any Employer-owned or issued device or system. The Employer also reserves the right to access publicly available Internet content as permitted by law. In the event the Employer identifies any material posted by or at the request of a person subject to this Policy that it deems inappropriate under this Policy, the Employer may demand the removal of such content.

In consultation with Human Resources and the Law Department, business unit leaders may adopt more restrictive policies and procedures relating to employees' use of social media in order to protect the organization or its patients, members, employees, business partners or customers.

#### **V. COMPLIANCE**

Failure to comply with this Policy may result in suspension or removal of internet or email privileges

Regions Hospital management retains the right to interpret and/or change current policies as necessary. These policies and procedures are not an employment contract and should not be interpreted as creating an employment contract or contractual rights.

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and/or may result in disciplinary action, up to and including termination. If the violation of this Policy results in Regions Hospital or a related organization's incurring any cost, the Employer can recover those costs from the employee. If employees break the law, they may also be personally liable.

**VI. ATTACHMENTS**

None

**VII. OTHER RESOURCES**

- Code of Conduct, other policies (privacy, security, internet, email, etc.)
- Privacy Policy, Standards and Guidelines
- E-mail and Internet Use Policy #RH-HR-HR 60-10-25
- Confidentiality of Patient/Member Information Policy – Employee Access and Use Policy #RH-HR-HR-60-10-32

**VIII. APPROVAL(S)**



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