

TEMPLE UNIVERSITY HEALTH SYSTEM ADMINISTRATIVE POLICIES AND PROCEDURES

NUMBER: 950.573
TITLE: SOCIAL MEDIA POLICY
EFFECTIVE DATE: 2/1/12
LAST REVIEWED: 2/1/12
LAST REVISED: 2/28/12
REFERENCES: A. Policy Against Workplace Harassment and Violence (950.559), B. Corrective Action/Discipline Policy (950.544), C. Non-Discrimination in Employment (105.00), D. Electronic Devices and Cell Phone Usage (950.147), E. Patient Privacy and Confidentiality (220.00), F. Technology Usage Policy (400.00), and G. Temple University Health System Standards of Conduct Corporate Compliance Program, contained in the HIPAA Privacy and Security Compliance Supplement.
ISSUING AUTHORITY: TUHS Vice President of Human Resources

SCOPE

This policy shall apply to Temple University Health System, Inc. (“TUHS”) and all TUHS subsidiary corporations. Any reference to TUHS shall mean TUHS and its subsidiaries. This policy applies to all TUHS employees unless superseded by provisions of a collective bargaining agreement. The provisions of a collective bargaining agreement will prevail except in the case of leaves regulated and protected by government mandate.

Nothing in this policy shall be construed to limit, in any way, an employee’s rights under any applicable federal, state, or local laws.

All the rules that apply to other TUHS communications apply to the use of social media, including respecting co-workers, supervisors, patients and one another; protecting confidentiality, privacy, and security; and safeguarding and proper use of TUHS assets.

DEFINITIONS

Blog. Short for “web log,” blogs are web sites that allow an individual or group of individuals to post commentary online. A blog is usually maintained by an individual with regular entries of commentary, descriptions of events, or other material such as graphics or video.

Microblog. Microblogs allow users to exchange small elements of content such as short sentences, individual images, or video links.

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NOTHING IN THIS POLICY CONSTITUTES A CONTRACT, EXPRESS OR IMPLIED. TEMPLE UNIVERSITY HEALTH SYSTEM, IN ITS SOLE DISCRETION, MAY MODIFY, ALTER, DELETE, SUSPEND, OR DISCONTINUE ANY PART OR PARTS OF THE POLICY AT ANY TIME, WITH OR WITHOUT PRIOR NOTICE TO ITS EMPLOYEES.

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Promotional Content. Promotional content is defined as communications which are designed to endorse, promote, sell, advertise or otherwise support TUHS and its mission.

Social Networking or Social Media. “Social networking” or “social media” include various modes of publishing content online, including but not limited to:

- Social networking sites, such as Facebook and MySpace
- Video and photo-sharing websites, such as YouTube;
- Micro-blogging, such as Twitter;
- Blogs; and
- Online discussion forums, such as Google Groups.

The absence of, or lack of explicit reference to, a specific site does not limit the extent of the application of this policy. As other forms of social networking are developed, this policy will apply to them too.

PROCEDURES

A. General Procedure

1. **Social Networking at Work.** Employees may not engage in social networking when on duty on TUHS premises or when using the TUHS Internet server or other communication systems, unless such social networking is work-related. This includes downloads or notifications to or from a social network site. If employees are authorized by the TUHS Marketing Department to use social media to promote TUHS or its services, it is required that they do so separately from any personal social networking.
2. **Social Networking Outside of Work.** When engaging in personal social networking away from work, TUHS employees should use personal accounts, such as a personal e-mail address or profile. Supervisors and managers should not discuss the performance of their subordinates in social media or otherwise breach confidentiality. When engaged in personal social networking, TUHS employees should refrain from doing anything that might reasonably create the impression that they are communicating on behalf of or as a representative of TUHS. Further, employees should not say or suggest that the views and opinions they express related to TUHS represent the views of TUHS. If employees are engaged in social networking for personal purposes and their comments could be construed to be a reflection of TUHS, they are encouraged to include a statement to the following effect, “The views expressed by me on this site are mine alone and do not necessarily reflect those of my employer.”

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3. **Posting Promotional Content.** If employees wish to engage in social networking to post promotional content as part of their job, they must first obtain permission from the TUHS Marketing Department to ensure that they comply with TUHS requirements. Employees are not authorized to use the TUHS trademark or logo or any representation of the trademark or logo such as a sign or image or photograph unless approved by the TUHS Marketing Department.
4. **Maintaining Confidential/Proprietary Information.** As is the case with other forms of communication, employees may not use or disclose confidential and/or proprietary information including, but not limited to, strategic decisions, long-term plans, employment matters, or any other organization-sensitive matter, which was acquired in the course of employment with TUHS.
5. **Protecting Patient Information.** TUHS employees may not use or disclose any patient information of any kind on any social media; including a patient's name, picture, or any other identifier from which their identity could be ascertained. The unauthorized disclosure of that information would constitute a breach of TUHS Policy and a violation of the Health Insurance Portability and Accountability Act (HIPAA). Users may be personally liable for civil and criminal penalties in the event of a breach.

Application of Other TUHS Policies. Employees who identify themselves as TUHS employees on social networking sites are subject to other policies contained in the TUHS Employee Handbook, including, but not limited to: Policy Against Workplace Harassment and Violence (950.559), Corrective Action/Discipline Policy (950.544), Non-Discrimination in Employment (105.00), Electronic Devices and Cell Phone Usage (950.147), and the TUHS Corporate Compliance Program, including its Standards of Conduct and HIPAA Privacy and Security Compliance Supplement.

B. Appropriate Use of Social Media

Designated TUHS employees may be expressly approved and authorized by TUHS leadership to participate in social networking for specific work-related purposes and in support of TUHS' organizational objectives.

C. Monitoring and Disciplinary Procedures

1. **Privacy.** TUHS, at its sole discretion, may review the social networking activities of its employees under reasonable circumstances to ensure compliance with this policy. TUHS employees should therefore have no expectation of privacy regarding their social networking activities if they choose to make information publicly accessible through the Internet.

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2. **Disciplinary Measures.** Violations of this policy will result in appropriate corrective action, which may include discipline, up to and including discharge. In addition, if the violation involves patient information, the violation may be deemed a security breach reportable to the Department of Health and Human Services Secretary. Employees may be subject to civil and criminal penalties and criminal prosecution at the discretion of the Department of Health and Human Services.

APPROVALS

Recommended by:

Pamela Teufel
Vice President for Human Resources
Temple University Health System, Inc.

Approved by:

Verdi J. DiSesa, MD, MBA
Chief Operating Officer
Temple University Health System, Inc.

Date: 2/1/12

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