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## HUMAN RESOURCES POLICIES AND PROCEDURES

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**POLICY NAME:** Social Media Participation

**PURPOSE:** The purpose of this policy is to ensure that Main Line Health “Users” (including, but not limited to, employees, medical staff, students, GME trainees, residents, volunteers, consultants, and on-site vendors) exercise good judgment and the highest degree of professionalism and confidentiality concerning data and information posted on all online communities and social networking sites.

**POLICY STATEMENT:** The participation of a User in social networking sites can promote better communication with our colleagues and customers, the general public, traditional and non-traditional media, and other community stakeholders. However, Users should exercise good judgment and the highest degree of professionalism and confidentiality concerning data and information posted.

**DEFINITION:** Social networking sites include, but are not limited to, Facebook, LinkedIn, MySpace, YouTube, Twitter, health pages and blogs, sites that offer reviews of medical facilities and physicians, media sites, or similar types of online forums and communities.

### A. Main Line Health Official Social Media Sites

Main Line Health maintains official sites on many social networks for its entities. We encourage Users to interact with and share the content on these sites to be an ambassador for our system and hospitals.

Users should not create MLH or entity pages on any social networking site. MLH reserves the right to remove social media sites or entity pages created without permission of the Marketing team. Users should not post any content on MLH’s behalf without MLH’s consent. Users must make clear that they are speaking on behalf of themselves and not representing or speaking on behalf of MLH.

Requests for creation of MLH social networking sites and for messages to be published on existing MLH social networking sites should be made through the Marketing Department and the MLH [Communications](mailto:MLHCommunications@mlhs.org) team (MLHCommunications@mlhs.org).

The names of the entities within MLH, logos, and corporate identity are trademarked. Users should respect trademark, copyright, and other intellectual property laws when using social media. Users utilizing a MLH trademarked name or symbol without MLH consent must make clear that they are not representing or speaking on behalf of MLH. Violation of this policy may result in discipline, up to and including termination. Managers must consult Human Resources before taking any remedial actions for behaviors implicating the Social Media Policy.

### B. Participation in Social Media Sites

It is not permitted to use MLH communications technologies to access social networking sites for purposes other than pre-approved work-related projects. Communications technologies include, but are

not limited to, hardware, software, and internet services. If a User requires access to social media sites while using MLH communications technologies, they should contact the MLH Help Desk to submit a request.

Main Line Health employees who have been permitted to serve as social media moderators and use social media as part of their job function are asked to follow a set of standards to ensure patient privacy and professionalism. Approved MLH social media administrators are required to manage and post to social media only from secure password-protected devices including—but not limited to—phones, computers, and tablets. All MLH social media administrators must also sign the MLH Social Media Moderator Agreement before being allowed to post regularly on an official MLH social media site.

MLH respects the right of Users to use social networking sites as a medium of self-expression outside of the workplace. However, as a responsible health care provider, MLH also has ethical, business, legal, and regulatory obligations to protect confidential and proprietary information of its patients, Users, and business. In doing so, MLH must ensure that its Users exercise good judgment and the highest degree of professionalism and confidentiality concerning data and information posted on these sites.

Social networking sites provide prospective and existing patients with opportunities to gain information that might assist them in making health care decisions. For these reasons, MLH Users must be aware of the impression they create about MLH and others when they create and/or participate in social networking sites.

Main Line Health strongly discourages “friending” of patients on social networking sites. Staff in patient care roles generally should not initiate or accept friend requests except in unusual circumstances such as the situation where an in-person friendship pre-dates the treatment relationship.

When an individual decides to go public with his or her opinions via a social networking site, she/he is legally responsible for his or her commentary. Harassment, bullying, discrimination, and retaliation based on a protected characteristic that would not be permissible in the workplace is not permissible between Users online, even if it is done outside of work hours and without utilizing MLH’s communications technologies. Any User experiencing unlawful harassment, bullying, discrimination, or retaliation should report the incident.

Users should exercise caution before including information or data about third parties (anyone other than themselves) in their postings. Each individual participates at his or her own risk and should understand that third parties can pursue legal action for unlawful postings.

### **C. Standards of Use While on Social Networking Sites**

MLH recognizes that opportunities offered by social networking sites are subject to constant changes and enhancements. MLH will strive to continuously monitor these new opportunities and challenges and update this policy as necessary. The policies below outline the standards for all Users in connection with participation in social networking sites.

1. Unless previously authorized by his or her manager, a User is prohibited from disclosing MLH “Confidential Information” or trade secrets. Confidential Information includes, but is not limited to, patient protected health information (“PHI”). Trade secrets include, but are not limited to, clinical applications, business plans, business relationships, business-related communications, and electronic systems. That a User is not physically present at MLH’s facilities or is not using MLH’s

communications technologies while posting does not excuse any breach of Confidential Information or trade secrets. Before a User publishes, uploads, or disseminates any information related to his or her employment at MLH, that individual should consider carefully if the disclosure of such information is prohibited by this policy, any other MLH policy, or any rules and regulations of any agency that governs MLH. Even acknowledging the provision of care of a patient is an unacceptable disclosure of patient identifying information.

2. At no time and under no circumstances should a User state or imply that he or she is speaking on behalf of MLH unless given express authorization to do so by the MLH Marketing Department.

3. Users who choose to post anonymously are also responsible for complying with this policy.

4. Users may not provide medical advice or medical commentary, and may not place content to make, recommend, or increase referrals from any physicians or other practitioners.

5. Users are responsible for knowing and complying with the terms of use for any social networking site they utilize.

6. Users may not use MLH e-mail addresses to register for social networking sites.

Failure to comply with these guidelines and standards for social media participation may result in disciplinary action, up to and including termination.(see Code of Conduct and Behaviors That Undermine a Culture of Safety 2.22)

#### **D. Conduct Not Prohibited by this Policy**

This policy is not intended to restrict communications or actions protected or required by state or federal law.

#### Related Policies:

HIPAA - Confidentiality VII-3

Personal Electronic Equipment V1

Human Resources policy No. 2.2 Communications Technology Usage

Reference: Code of Conduct and Behaviors That Undermine a Culture of Safety 2.22

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