

## Policy Name Here

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| SUBJECT: Use of social media by employees | PREPARED BY: Tyler McCollum, Sr. Mgr. Digital and Web, CNE           | EFFECTIVE DATE:  | POLICY NUMBER: CNE-MC-004 |
| PAGE: 1 of 1                              | REVIEWED BY: Elizabeth Rodgers, Sr. Mgr. Branding and Campaigns, CNE | APPROVED BY: Jessica McCarthy, VP Marketing, PR and Communications | REPLACES:                 |

**I. Purpose.** The purpose of this *Social Media Policy* (this “**Policy**”) is to ensure that CNE and its affiliated organizations comply with ethical and legal obligations, as well as maintain a positive brand image in social media. The intent of this Policy is to encourage the flow of appropriate and useful information that serves patients, caregivers and communities, while minimizing risk to CNE, its employees, licensed independent practitioners, its customers and its affiliated organizations. Furthermore, this Policy aims to clarify what constitutes official CNE use of social media, to establish guidelines for the official use of electronic social networking, and to clarify the personal responsibilities and legal implications of personal use of electronic social networking while at work or while posting information about CNE and its affiliated organizations. **Scope.** This Policy applies to Care New England (“CNE”) and all Care New England hospitals, Care New England healthcare entities, and each other Care New England entity that is a direct or indirect subsidiary of Care New England (each a “CNE Affiliate” and collectively, “CNE Affiliates”).

**II. Policy.** It is the policy of Care New England and each CNE Affiliate and its’ employees shall comply with the Social Media Policy. It is the Policy of CNE that the use of social media by employees of CNE and its member organizations will meet certain basic standards and be subject to the restrictions set forth in this Policy. This Policy is established to assure compliance with legal and regulatory restrictions, including privacy and confidentiality agreements.

This Policy is not intended to restrict employees from discussion, transmission or disclosure of wages, hours and working conditions in accordance with applicable federal and state laws.

**III. Definitions.** Terms not already defined in this Policy have the following meanings:

- (a) **Social Media** is defined as the online technologies and practices used to share opinions, insights, experiences, and perspectives. Social Media can take many different forms, including words, images, sound, and video. Social media typically uses technologies such as networking sites, smart phones, blogs, message boards and podcasts to allow users to interact.
- (b) **Official Use of Social Media:** CNE marketing department maintains a series of official social networking accounts for various facilities, departments, key spokespeople, and events that are organized and coordinated by CNE marketing only. These official social media pages are managed by designated CNE marketing employees only.

- (c) **Personal Use of Social Media:** Any CNE workforce member who chooses to share his/her own personal opinions via any social networking channel, personal blog or website, or by posting information on someone else's social networking website.
- (d) **Web-Based Communications:** Electronic communication technologies, including but not limited to electronic mail (e-mail), text messaging, instant messaging and web-based technologies (Internet, Intranet and Extranet).

#### IV. Procedure.

- (a) **Any social media request must follow the below procedure to ensure that we are in compliance with permissions, PHI and branded content. Only the marketing department publishes any content through our approved channels:**

- (1) Submit: Submit request for your social media post to be designed, approved and executed within our channels using this web link to connect with the marketing department: <https://bit.ly/2IFcjIW>
- (2) Obtaining Approval: Only department heads or heads of organizational service lines or functions may request work from the marketing department.
- (3) Reporting Concerns: Workforce members should report social media concerns to the Marketing director for the operating unit.
- (4) Respect Copyright Laws and Obtain Necessary Releases: All official use of social media must comply with applicable copyright laws and any photos/videos requiring subject release forms are the responsibility of the designated site owner to obtain.
- (5) CNE Code of Conduct: The Code of Conduct applies to workforce members' use of Web-Based Communications and Social Media. (Reference: CNE Code of Conduct)

- (b) **Personal Use of Social Media**

- (1) **Legal Liability:** It is important for workforce members to remember that they can be held personally and legally responsible for their publicly made opinions and comments, even on personally maintained sites and pages. This means workforce members cannot share confidential, or proprietary information, photographs or videos about CNE on personal sites and workforce members are required to maintain patient privacy by following CNE Privacy and Security policies and standards and HIPAA rules at all times. Examples of such confidential or proprietary information that cannot be shared include: protected health information (PHI), personally identifiable information (PII), business plans, and other information or data whether conveyed in writing or orally, that is known to be confidential or proprietary. An exception to this rule is that workforce members are allowed to post or share information found on an official CNE public site (e.g. CNE Internet, Facebook or Twitter account.)
- (2) **CNE Privileged and Confidential Information:** Employees cannot include any confidential or proprietary information workforce members may be privy to is not to be included in any external electronic communications (Reference: CNE-PRIV-001, Notice of Privacy Practices; CNE-GC-A).
- (3) **CNE and Affiliated Organizations' Logos and Trademarks:** Use of CNE and affiliated organizations' logos or trademarks for any commercial purpose, or in any way that reasonably would mislead others into thinking that the

communication is an official CNE communication, is strictly prohibited.

(Reference CNE Brand Guidelines)

- (4) **Sharing as an Employee:** When creating a personal site or commenting on other sites, if workforce members who include their relationship to CNE or its affiliated organizations must make it clear that they are speaking for themselves and not on behalf of CNE. That can be accomplished by adding a line to the bio field that your opinions do not represent those of your employer. All opinions are your own. In order to ensure that anyone reading a blog, posting or other online activities understands that the employee is not speaking on behalf of CNE, workforce members must use a personal email address (not a CareNE.org address) as their primary means of identification on personal sites. If a workforce member's blog, posting or other online activities would disparage the reputation or brand of CNE, or an affiliated organization and/or its sponsors, leadership, employees, or services, workforce members should not refer to or identify their connection to CNE. (Reference CNE-CC-08, Compliance Services Confidentiality Agreement; CNE-GC-A).
- (5) **Respecting CNE's Partners:** All Social Media posts should be respectful and professional to business partners, competitors and patients. Those who identify themselves as connected to CNE and/or its affiliated organizations in their postings and comments can be liable for statements that are made. Workforce members are asked to think about how their comments may affect fellow team members, supervisors, physicians, nurses, co-workers, etc.
- (6) **CNE Code of Conduct:** The Code of Conduct applies to workforce members' use of Web-Based Communications and Social Media (Reference CNE Code of Conduct).

#### **REFERENCES:**

N/A

#### **APPROVAL/REVISION:**

03/16/2017: Initial Version of Policy approved by Elizabeth Rodgers, Sr. Mgr. Branding & Campaigns, CNE

03/16/2017: Revision approved by Tyler McCollum, Sr. Mgr. Digital & Web, CNE; Approved prior to Converge Point Upload

03/17/2017: Revision approved by Jessica McCarthy, VP Marketing, PR and Communications

#### **REPLACES:**

CNE-MC-004 Social Media December 17, 2017