1.0 PURPOSE:
1.1 Hoag Memorial Hospital Presbyterian ("Hoag") takes no position on its employees’ decisions to participate in social media/networking activities. However, it is the right and duty of Hoag to protect itself from unauthorized disclosure of information. This policy serves to protect Hoag, its patients, visitors, employees and other individuals associated with Hoag. It is intended to provide employees with guidelines to ensure that their conduct, while participating in various forms of social media, does not violate Hoag policies and procedures or state or federal law. It is further intended to provide employees with guidelines to ensure that their conduct, while participating in various forms of social media, does not reflect poorly upon the image of Hoag, its facilities, affiliates, or staff, and that it is consistent with our mission, values, Code of Conduct and policies.

2.0 POLICY:
2.1 Use of Hoag communication systems is restricted to business use necessary for the performance of job responsibilities. Reasonable, highly limited personal use of these systems, although not encouraged, is permissible when following the guidelines set forth in the Hoag Electronic Communications policy (4.04). This policy is in addition to and complements any existing or future policies regarding the use of technology, computers, email and internet.

2.2 During Working Hours:
Employees may not participate in social media/networking activities for personal use during working hours or using any of Hoag’s electronic resources.

2.3 Outside of Working Hours:
When participating in social media/networking activities outside of working hours, employees are expected to protect the privacy of Hoag, its employees, patients, clients/vendors, and are prohibited from disclosing other proprietary or nonpublic information to which employees have access. Such information includes but is not limited to patient information, financial information and strategic business plans.

2.3.1 Social media/networking means any facility for online publication and commentary, including but not limited to blogs, wiki’s, social networking sites such as Facebook, Myspace, Friendster, Twitter, and YouTube, messaging applications, chat rooms, online bulletin boards and website comments or feedback.
2.3.2 Comply with the terms of service required by any site used. A person who contributes in any way to a social media or other online site is personally responsible for the content he/she posts.

2.3.3 Use your personal email address for personal posts, business or views.

2.3.4 Exceptions to the restrictions of the Social Media policy are subject to the review of Human Resources.

2.4 Employees cannot post company-privileged or proprietary information, confidential or proprietary information of clients, partners, vendors and suppliers, or company intellectual property, including the Hoag logo, copyrighted information or company-issued documents, emails or other internal forms of communication.

2.5 All postings on any form of social media/networking, must comply with Hoag's Confidentiality policy (4.05) and not be in violation of any other Hoag policy, including but not limited to the Discrimination and Harassment Prevention policy (#07-3-540) and the Hoag Code of Conduct.

2.6 If your social media/networking content includes any information related to Hoag, including but not limited to identifying yourself as an employee, clearly indicate with a disclaimer that you are not an authorized representative or posting information at the direction of Hoag, and the views expressed are yours alone and do not reflect the views or opinions of Hoag.

2.7 Resolution of concerns: Employees are more likely to resolve workplace concerns by speaking directly with their Supervisor, Human Resources, or other management-level personnel than by posting complaints on the internet.

2.8 In alignment with the Media Relations policy (SC-47), all inquiries received from external media regarding Hoag business must be referred to the Marketing and Corporate Communications Department.

3.0 PATIENT CONFIDENTIALITY

3.1 Employees cannot use or disclose any information containing patient names, identification numbers, room numbers, photographs, diagnosis or any other information that could be considered a violation of patient privacy at any time, or without the express written permission of the patient. Even if an individual is not identified by name, if there is a reasonable basis to believe that the person could still be indentified from that information, then its use or disclosure could constitute a violation on the Health Insurance Portability and Accountability Act (HIPAA) and Hoag policy.

4.0 EMPLOYER MONITORING

4.1 Employees do not have any expectation of privacy in the use of Hoag Communication Systems or in content. Social media/networking activity can be reviewed by anyone, including Hoag. Hoag reserves the right to monitor, access,
review, and audit any content, whether or not password protected. This includes comments or discussions about the company, its employees, and patients, in email or posted on the Internet by anyone, including employees and non-employees. Information posted or accessed while at work may be stored and later retrieved.

5.0 DISCIPLINE FOR VIOLATIONS

5.1 Hoag investigates and responds to all reports of violations of this Social Media policy and other Hoag policies. Any information posted on a social media/networking site by or at the direction of any Hoag employee which is considered unlawful, discloses proprietary or confidential Hoag information, violates Hoag policy, Code of Conduct, implies Hoag opinion, or reflects unfavorably on, or negatively impacts the reputation of Hoag or its facilities, affiliates, or employees may result in corrective action up to and including separation of employment.

5.2 Hoag reserves the right to take legal action where necessary against employees who engage in prohibited/unlawful conduct.

5.3 This policy is not intended to prohibit communications covered under the National Labor Relations Act or any other Federal or State laws.

Policy Originator: Human Resources
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