

MEMORIAL HEALTHCARE SYSTEM

STANDARD PRACTICE

Date: June 2010

Date Reviewed: June 2010; July 2010; June 2013; March 2020

Date Revised: June 2010; July 2010; April 2013; March 2020

Title: **Social Media Guidelines for Memorial Healthcare System Workforce**

Policy:

The reputation of Memorial Healthcare System is built upon the collective efforts of thousands of individual employees, medical staff members, volunteers, contractors, and agents.

As a general rule, when participating in any online social networking site, you must refrain from conduct detrimental to Memorial Healthcare System's operation or good standing in the community. Memorial's Corporate Communications Department is exclusively authorized to speak on behalf of the organization. Employees and other parties must refrain from making official statements on behalf of Memorial, unless authorized by Corporate Communications. Only those officially designated can use social media to speak on behalf of Memorial Healthcare System in an official capacity, though employees may use social media to speak for themselves individually. Please follow all applicable Memorial Healthcare System policies.

The purpose of these guidelines is to help the workforce understand how Memorial Healthcare System policies apply to newer technologies for communication. What follows are some guidelines for the Memorial Healthcare System workforce. If you would like additional guidance or have any questions that are not answered by these guidelines, please consult the Marketing and Corporate Communications Department at (954) 265- 3455.

This document also provides guidance to Memorial employees and outside parties (i.e. vendors, contractors, etc.) on the use of social networking platforms. Social Media and networking platforms are considered public forms of communication; therefore, employees and parties doing business with Memorial Healthcare System are required to follow patient confidentiality policies and privacy program [http://intranet.mhs.net/documents/center/Memorial Healthcare System/Standard Practice Manual/Information Management/Privacy Program, 3-2010.pdf](http://intranet.mhs.net/documents/center/Memorial_Healthcare_System/Standard_Practice_Manual/Information_Management/Privacy_Program, 3-2010.pdf).

This Standard Practice applies to all of the hospitals and facilities owned and operated by the South Broward Hospital District d/b/a Memorial Healthcare System including, but not limited to, Memorial Regional Hospital, which includes Joe DiMaggio Children's Hospital and Memorial Regional Hospital South, Memorial Hospital Pembroke, Memorial Hospital West, and Memorial Hospital Miramar, unless otherwise stated.

Employees are required to follow standard practice of behavior <http://intranet.mhs.net/pdf/StandardsOfBehavior.pdf> within these social media channels, as well as the standard practice in release of information to news media.

http://intranet.mhs.net/documents/center/Memorial_Healthcare_System/Standard_Practice_Manual/Administration/Release_of_Information_to_the_News_Media,_1-2005.pdf

Patient Information/Consent

All uses and disclosures of patient identifying health information shall be carried out in a manner compliant with applicable patient privacy policies regulations and standards.

http://intranet.mhs.net/documents/center/Memorial_Healthcare_System/Standard_Practice_Manual/Information_Management/Privacy_Program,_3-2010.pdf.

Prior to sharing patient information or images taken inside the hospitals or patient care areas throughout Memorial for the distribution on Memorial social media channels, the individuals responsible for the collection of this content should forward this material to the Corporate Communications Department for consideration and follow-up dissemination. You must have obtained a written authorization for the use and disclosure of the information from the patient/patient's legal representative.

- At no time shall any employee or party connected to Memorial share confidential patient information or proprietary medical/healthcare system information on any social media venue without prior written consent from the patient or legal representative and without the direction and involvement of Memorial's Corporate Communications Department.

Company Information

- You must not share confidential or proprietary information about Memorial Healthcare System, its clients, partners and suppliers
 - Confidential and proprietary information includes trade secrets, such as Memorial's construction projects, growth/expansion plans or a vendor's formulas, methods, or procedures that are not known to others, and which have value because of their secrecy. This includes investigational studies, trademarks and other information Memorial defines as proprietary
- You must not comment on legal matters or litigation related to Memorial Healthcare System without the express authorization of corporate counsel

- You must notify the Memorial Healthcare System Corporate Communications Department at (954) 265-3455 any time you receive a media inquiry related to Memorial Healthcare System or a healthcare topic through any social media channel.

Employee Accountability

Failure to abide by Memorial Healthcare System policies can result in disciplinary action, up to and including discharge, and/or legal action.

- When engaged in social networking, make it clear that you are speaking for yourself and not on behalf of Memorial Healthcare System. In those circumstances, you should include a disclaimer, for example: "The opinions expressed are my own, not my employer's." Consider adding this language to your social networking profile.
- If you have permission to communicate in the public Internet about Memorial Healthcare System or Memorial Healthcare System-related matters, disclose your connection with Memorial Healthcare System and your role at Memorial Healthcare System. Use good judgment and strive for accuracy in your communications; errors and omissions reflect poorly on Memorial Healthcare System, and may result in liability for you or Memorial Healthcare System. Make sure that you have composed a succinct message. Spell check your work before posting
- Unless you are conducting official Memorial Healthcare System business, use a personal e-mail address (not your mhs.net address) as your primary means of identification. Do not use your Memorial Healthcare System e-mail address for personal views.
- If you are contacted by the news media concerning a story about Memorial Healthcare System or a healthcare topic, please immediately notify the Memorial Healthcare System Corporate Communications Department at (954) 265-3455. The same holds true if you are the one who wishes to initiate contact with the news media. Not only does our Corporate Communications Department need to be actively involved in the strategic planning of all interactions with the news media and social media, it can provide you with valuable tips about effective communication with journalists.
- Be respectful and professional to fellow employees, business partners, competitors and patients. Avoid using unprofessional online personas.

- Remember that virtually anything you post on the Internet has the potential to be accessed by the public or traced back to you, no matter how careful you are to safeguard your identity and the privacy of your personal viewpoints.

Employee participation in social media

Memorial Healthcare System recognizes that many employees, including physicians or affiliated physicians, are quite engaged in one or more social media channels. Although is not encouraged to spend time on any of these channels during working hours, employees may engage after working hours on these venues or through their mobile devices.

No employee or physician is allowed to engage in any live social media event (i.e. Live Tweeting, Twitter Chat, Twitterview, Twitter Town Hall, Facebook Live, advertising, Flickr photo sharing or You Tube video postings) on behalf of Memorial Healthcare System without explicit and clear permission from the Corporate Communications Department. Social media posts on behalf of MHS are considered advertising by the Federal Trades Commissions (FTC).

Videos/Photos: No mobile recording via Smartphone is allowed in the hospital by any employee unless proper consent has been provided by Memorial's Corporate Communications Department and consent from the patient and parties involved. No postings of videos or photos can be uploaded by employees without consent from both Corporate Communications Department and patient's written consent.

Restriction on lobbying and political activity: Memorial Healthcare System social media venues are meant to engage with customers/patients and for sharing Memorial-related information. No political lobbying or activity is allowed in Memorial's social media venues.

Harassment of other employees: Sexual or racial harassment is a form of misconduct which undermines the integrity of the employment relationship. The Healthcare System strongly supports a policy that allows all employees to work in an environment free from harassment. It shall constitute a violation of Healthcare System policy for any officer, manager, supervisor, or employee to engage in an act or behavior defined as sexual or racial harassment.

http://intranet.mhs.net/documents/center/Memorial_Healthcare_System/Human_Resources_Policies_and_Procedures/E-19_Sexual_and_Racial_Harassment_9-2005.pdf

“Friending” – Memorial Healthcare System discourages “friending” of patients in social media sites. Likewise, it discourages managers, directors and other staff in management from initiating a “friend” request with subordinates.

Physician Guidelines in the use of Social Media

Physicians must recognize that actions online and content posted may negatively affect their reputations among patients and colleagues, may have consequences for their medical careers and can undermine public trust in the medical profession. It is important that physicians monitor their online reputation and understand that what they do in the online arena can have consequences and repercussions.

- Patient privacy must be maintained at all times and in different environments, including online. Physicians must refrain from posting identifiable patient information.
- When using social media venues, physicians should be cognizant of privacy settings to safeguard personal information and content as best as possible. Physicians are encouraged to routinely monitor their own online presence to ensure any information about them is accurate and appropriate.
- Physicians must maintain appropriate boundaries of the patient-physician relationship in accordance with professional ethical guidelines online, as they would in any other context.
- When a physician sees content posted by other colleagues that appears unprofessional in any of Memorial’s social media venues, he or she is responsible for notifying the Corporate Communications Department so the content can be removed accordingly.

Clearance and Approval for New Accounts:

From time to time, some members of the Memorial Healthcare System workforce express an interest in starting a departmental/program social networking site, website, or even a personal social networking page or website, to solicit new business or to help promote some aspect of Memorial Healthcare System. Such engagement on behalf of, or in conjunction with, Memorial Healthcare System, including establishment of official external sites representing Memorial Healthcare System or any Memorial Healthcare System facility or department, must be approved and coordinated through the Corporate Communications Department. This department provides oversight and assistance to guide development of new social networking platforms and strategy, sharing knowledge and best practices for successful implementation.

1. The Corporate Communications Department must be notified at least one month in advance prior to the launch of the profile. To notify the department and officially request a profile, send an e-mail to contactus@mhs.net
2. The Facebook Page or Social Media profile will be created by the Corporate Communications Department and later transitioned to the official administrator of the page
3. Page administrator must sign formal agreement provided by the Corporate Communications Department and take accountability of the page
4. Page administrator or account holder must meet periodically with a representative from the Corporate Communications Department to ensure planning and development of the social media platform is on course and following other institutional standard practices.



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