

Social Media and Online Communication

1. Introduction

Description

This policy describes responsibilities and expectations for Staff using and developing various Social Media and Online Sites. The purpose of the policy is to minimize privacy and confidentiality risks to VCH, patients, residents and clients as well as to offer guidance on how Staff can communicate in a professional manner that upholds the reputation of the organization.

Scope

This policy applies to all VCH Staff.

2. Policy

VCH supports the use of Social Media and Online Sites as a way to engage Staff, patients and the public in conversations about their health care system. These sites also allow health care professionals to collaborate and share information with one another. However, Staff using Social Media and Online Sites for personal or work purposes must comply with VCH's Social Media and Online Communication policy in a manner consistent with the organization's image, mission and values.

2.1 Developing and Participating on VCH Sites

The following applies to any activity on an official VCH Social Media or Online Site. This includes, but is not limited to, VCH's Twitter, Facebook, blog, websites and newsletters.

2.1.1. Developing a Social Media or Online Site for VCH

- Staff interested in creating and managing a Social Media or Online Site on behalf of VCH must first present a business case to VCH's [Communications and Public Affairs Department](#) (C&PA). The business case must outline why the site is being created, how it can support and enhance VCH's brand and reputation, why existing communication channels are not effective, and what resources will be available to support ongoing site maintenance.
- The C&PA Department must be informed of any major changes in the direction of content or design on existing sites.
- Posts that do not adhere with VCH policies must be removed and users who make disrespectful, obscene, libelous or threatening comments must be blocked.
- Emails and postings should be replied to when appropriate.
- Site managers must ensure that appropriate photo and video waivers are signed.

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- C&PA retains the right to remove sites, comments, posts or users at any time.
- All usernames and passwords must be provided to C&PA. Only those individuals authorized by C&PA can access VCH's Social Media and Online Sites.
- All sites must conform to VCH's Branding Guidelines available at: brand.vch.ca.

2.1.2. Participating on VCH sites

- When participating on VCH Social Media and Online Sites, Staff must not post content that contains offensive materials, [Confidential or Personal Information](#) about VCH/PHC patients, clients, residents or other third parties.
- All use of VCH Social Media and Online Sites must conform to VCH policies including Code of Conduct and Acceptable Use of Technology policy.
- Content posted by Staff must not promote or endorse businesses or services that are not affiliated with VCH; state any political position or views; or violate any copyright laws.

2.2. **Personal Use of Social Media and Online Sites**

The following applies to any activity on non-VCH Social Media or Online Sites.

2.2.1. Identifying as a VCH Staff member

- When publicly identifying as an employee of VCH, Staff must make it clear that their contribution to any Social Media or Online Site is as a private individual and not as a representative of VCH. In this case, Staff must include a disclaimer in their "About Me" section or somewhere on their profile, such as:

The views and opinions expressed here are my own and do not necessarily represent those of my employer.

- When Staff identify their affiliation with VCH on Social Media, they must be consistent with VCH's image, values and standards of professional conduct.
- Staff must not speak on behalf of VCH unless authorized by C&PA.
- Staff must not use Social Media or Online Sites to provide medical advice online.
- Any personal Social Media and Online Sites belonging to Staff (website URL, or Social Media name, handle and URL) must not include VCH's name or logo, or the name or logo of any VCH owned and/or operated facilities or services.
- Staff must not use their VCH email address for any personal Social Media or Online accounts.

2.2.2. Using mobile devices at work

- Staff can access Social Media and Online Sites using VCH mobile devices at work to help with work-related duties, but must manage personal matters on their own time and with their personal devices.

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- Staff must not allow the personal use of Social Media, Internet, mobile devices or any other non-work related activity to pose a risk to the safety of Staff, patients, clients, residents or the public, or to affect their ability to perform regular duties.

2.2.3. Privacy and confidentiality

- Staff must not disclose confidential patient or business-related information or reference any [Identifiers](#) or information that could be used to identify individual patients, clients or residents receiving care at VCH, as well as fellow Staff members or suppliers.
- Staff must not collect Personal Information from Social Media sites or other Online Sites, even if they receive consent to do so.
- Staff must not refer to patients, clients, residents, students or volunteers in a disparaging manner online, even if the individual is not identified.
- Staff must not disclose the name of or other information about other Staff online without their consent.
- Staff must not take photos or videos of patients/clients/residents on personal devices, including mobile phones for posting on Social Media or Online Sites unless it is for business purposes and the appropriate photography consents have been obtained. Refer to the Cellular Phone and Blackberry Devices policy Guidelines to Special Consent Situations and related form, Consent for Photography and Other Recordings.

2.2.4. Maintaining professional relationships

- Staff must not engage in any sort of personal relationship with patients, clients or residents online. This includes initiating or accepting friend requests on various Social Media channels.

2.2.5. Clinical use of Social Media and Online Sites

- Staff must ensure any health resource information obtained from Social Media, apps or the Internet (e.g. medical websites) used for patient care/education is from reliable and credible sources.

2.2.6. Reporting Abuse

- Any suspected privacy breach should be immediately reported to your Supervisor or Manager and to the Information Privacy Office who will then initiate an investigation.
- Any other suspected abuses of this policy can be reported to C&PA.

2.3. Responsibilities

2.3.1. Staff

- Know and comply with VCH's [existing related policies](#) concerning the use of technology for work purposes.
- Comply with professional and ethical obligations as outlined by the respective [Professional College or Associations commonly accepted standards and best practices](#).
- Provide information about VCH that is informed and factual. Activities on Social Media and Online Sites must not jeopardize the trust and reputation of VCH, the health care profession, patients, residents, clients or Staff.
- Contact the [Information Privacy Office](#) immediately for any privacy and confidentiality breaches.
- Report abuse to management as directed in this policy (see 2.2.6 Reporting Abuse)

2.3.2. Management

- Allow Staff in their area to use/manage Social Media and Online Sites on behalf of the department, program, service or organization.
- Must not take disciplinary action against Staff members for opinions and disagreements expressed on VCH Social Media and Online Sites when those contributions align with existing VCH policies such as Code of Conduct, Acceptable Use of Technology and Information Privacy & Confidentiality.
- Ensure Staff in their area abide by this Policy and all relevant codes of conduct.
- Ensure Staff receive appropriate training and support, as well as regular reminders of privacy and security requirements when using Social Media and Online Sites.
- Refer questions, concerns or issues to C&PA when appropriate.
- Report abuse as directed in this policy (see 2.2.6 Reporting Abuse)

2.3.3. Communications & Public Affairs

- Approve all requests for VCH Social Media and Online Sites.
- Ensure all Social Media and Online Sites align with VCH's brand, reputation and existing policies.
- Maintain up-to-date records of all approved Social Media and Online Site usernames, passwords and site managers.
- Remove inappropriate sites, comments, posts or users.
- Provide guidance, education and if necessary, training, on the proper use of Social Media and Online Sites.

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2.3.4. VCH

- Define, approve and update Social Media and Online Site controls and appropriate use policies and guidelines.
- Ensure that privacy compliance controls are defined for monitoring and auditing Social Media and Online Site usage.
- Ensure appropriate Staff education and communication processes are provided to promote and increase awareness of policy and guidelines.

2.3.5. Privacy Office

- Will investigate any reported breach of privacy or confidentiality.

2.4. **Compliance**

Failure by Staff to comply with this Policy (e.g. breach of privacy and confidentiality, inappropriate use of Social Media, websites, the Internet, mobile devices or any other non-work-related activities) may result in disciplinary measures from VCH or regulating Professional College/Association, up to and including, the loss of computing privileges, termination of employment, termination of contract, loss of privileges as a student placement or volunteer role, prosecution and restitution for damages, or other legal actions.

3. References

Tools, Forms and Guidelines

None

Related Policies

[Acceptable Use of Information Technology](#)

[Cellular Phone and Blackberry Devices](#)

[Corporate Identity and Branding](#)

[Electronic Mail \(Email\) Usage](#)

[Information Privacy & Confidentiality](#)

[Internet Access](#)

[Media Policy and Procedures](#)

[Respectful Workplace and Human Rights](#)

[Standards of Conduct, Conflict of Interest & Whistleblowing Protection](#)

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Keywords

Social Media, Facebook, Twitter, blogs, LinkedIn, FlickrR, YouTube, Website

Definitions

“Confidential Information” means any personal or Corporate-related, financial or administrative information. Includes information and data, in any form or medium, relating to VCH, its business, operations, activities, planning, personnel, labour relations, suppliers and finances that is not generally available to the public and information that is identified as Confidential Information in accordance with VCH policies.

“Identifiers” means any information including, but not limited to the individual’s name, address and telephone number; the individual’s race, national or ethnic origin, colour, or religious or political beliefs or associations; the individual’s age, sex, sexual orientation, marital status or family status; any identifying number, symbol, or other particular assigned to the individual; the individual’s fingerprints, blood type or inheritable characteristics; information about the individual’s health care history, including a physical or mental disability; information about the individual’s educational, financial, criminal or employment history; anyone else’s opinion about the individual; the individual’s personal views or opinions, except if they are about someone else.

“Personal Information” means any recorded information about an identifiable individual that can be linked back to or can identify a specific individual through association or inference. These include, but are not limited to, patients/residents/clients, members of the public or Staff. It does not include business contact information (e.g. person’s title, business telephone number, business address, email or facsimile number).

“Social Media and Online Sites” mean all types of social networks of communication, including both internal VCH affiliated and external, non-VCH affiliated Social Media, where the Staff member’s relationship to VCH is recognized, identified or assumed. These include, but are not limited to, websites, email, blogs, Twitter, Facebook, Pinterest, LinkedIn, FlickrR, YouTube, Google+, Instagram, online forums, wikis, text messaging, RSS feeds, video sharing, podcasts and other forms of online publishing or discussion.

“Staff” means all employees (including management and leadership), Medical Staff Members (including physicians, midwives, dentists and Nurse Practitioners), residents, fellows and trainees, students, volunteers, contractors and other service providers engaged by VCH.

Questions

Contact: [Communications and Public Affairs Team](#)

Issued by:			
Name:	<u>Clay Adams</u>	Title:	<u>VP, Communications and Public Affairs</u>
		Date:	<u>April 1, 2014</u>
Signature of issuing official			

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