

The Ottawa | L'Hôpital Hospital | d'Ottawa

CORPORATE POLICIES AND PROCEDURES

SOCIAL MEDIA No: 00672 (Formerly ADMIII390)

ISSUED BY: V.P. Communications	DATE OF APPROVAL: 2013/03/20
APPROVED BY: Senior Management Committee	LAST REVIEW/REVISION DATE: 2013/03/20
CATEGORY: Communications	IMPLEMENTATION DATE:

POLICY STATEMENT:

The Ottawa Hospital will ensure that staff adheres to the following guidelines when using social media at TOH. The purpose of the social media policy is to outline the behavioural expectations of TOH staff when using social media and the potential repercussions when these expectations are not met.

This policy applies to all staff, physicians, volunteers and students who engage in social media while at work and to non-TOH social media in which the user's hospital association is known or identified.

DEFINITION(S):

- **1. Staff:** All permanent or temporary, full time, part time or casual workers, physicians, researchers, volunteers, trainees, students or contractors at The Ottawa Hospital.
- 2. Social Media: Media designed to be disseminated through social interaction, created using highly accessible and scalable publishing techniques using Internet and web-based technologies. A few prominent examples of social media websites include Facebook, YouTube, Twitter, LinkedIn, Connections and blogs.
- 3. Personal Use of Social Media: Use of social media that is conducted during staff non-work time for purposes other than accomplishing official or otherwise authorized activities.
- **4.** Non-Work Time: Time when staff members are not otherwise expected to be addressing official hospital business (i.e. lunches and breaks).

- 5. Personal Health Information: Information in any form that concerns an individual's health, medical history or past or future medical treatment and is in a form that enables or could enable the individual to be identified.
- 6. **Personal Information:** Information in any form that identifies an individual or could enable the individual to be identified.
- 7. User: Staff (see above definition) who use social media.
- 8. Management: Individuals directly supervising the work of employees. For the purposes of this policy, the term manager includes, but is not limited to, supervisor, manager, chief, director and vice-president.
- **9.** Administrator: Staff member designated as the person responsible for running one (or several) of the Hospital's official social-media applications.

ALERTS: N/A

PROCEDURE:

Each work-related corporate social-media application or page set up by an Ottawa Hospital staff member, unit or department, and visible to the public must be approved by the relevant manager, director and vice-president, then reviewed by the Communications Department to ensure alignment with corporate goals.

1. Staff Responsibilities

- i. Social media users are responsible for all communications using their personal social media accounts when referring to TOH or representing themselves as a TOH staff member.
- **ii.** Users with TOH listed as their place of employment should keep in mind that their actions reflect on the Hospital.
- **iii.** Users must refer to the guidelines found in **Appendix A** for responsibilities as well as acceptable and improper use.

2. Administrator Responsibilities

- i. Every Hospital social-media webpage and application must be run by a dedicated administrator.
- **ii.** Every administrator must post a disclaimer clearly stating that the page is not the official corporate page for TOH.
- **iii.** If an administrator leaves the employment of the Hospital, another staff member must be assigned as administrator or the social media website/page/online group must be shut down. (It is the manager/director's responsibility to make sure this is done.)
- **iv.** Use of the site must follow all TOH policies including the Code of Conduct and conduct policies of the applicable professional colleges.

- v. Administrators must be aware of the privacy and ownership policies of the social media sites and applications being used.
- vi. Risks and benefits of the social media site, as known, are to be communicated to participants especially the likely permanence of anything posted on the internet.
- vii. Administrators must understand and adhere to all applicable privacy legislation relating to personal health information.
- viii. Safeguards and lack of safeguards of the website or application should be communicated to participants.
- ix. The administrator is to monitor the site and its content and any links made to the site, to ensure its' conformity to the site's mission and to prevent any inappropriate use.
- **x.** He must report any improper use to the manager/director responsible. Further action will be taken in accordance with this policy.

3. Manager Responsibilities

- i. Once informed of the presence of improper content (refer to **Appendix A**) on a Hospital social-media website or application, the responsible manager must review the information in order to determine whether an intervention by Human Resources is required.
- **ii.** Because it is not The Ottawa Hospital's intention to regulate staff activities during non-work time, managers must consult Human Resources before taking any action with an employee related to social media use, including, but not limited to: requesting an employee remove a posting, coaching/counseling an employee verbally or in writing regarding a posting, etc.

RELATED POLICIES / LEGISLATION:

- 1. Personal Health Information Protection act (PHIPA)
- 2. Corporate Administration Policy # 00175 Administration Privacy
- Corporate Administration Policy # 00271 Information Systems Information Systems and Technology Security
- 4. Corporate Administration Policy # 00362 Human Resources Code of Conduct
- Corporate Administration Policy # 00268 Information Systems E-Mail Access and Usage
- 6. Corporate Administration Policy # 00276 Information Systems Internet Use
- Corporate Administration Policy # 00187 Communications TOH Official Languages Policy

- Corporate Administration Policy # 00361 Human Resources Disciplinary Process for Unionized Employees
- **9.** Computer Applications (Old Policy # ADM VII 140)
- **10.** Computing Services (Old Policy # ADM VII 150)
- 11. Network Services (Old Policy # ADM VII 170)
- 12. Remote Access (Old Policy # ADM VII 180)
- 13. TOH Standards of Behaviour

REFERENCES:

COMMENTS / SIGNIFICANT REVISIONS:

APPENDIX A GUIDELINES FOR USING SOCIAL MEDIA

Social Media users are responsible for all communications using their personal social media accounts when referring to TOH or representing themselves as a TOH staff member. Users with TOH listed as place of employment should keep in mind that their actions reflect on the hospital.

The Information Services (IS) Department and the Communications Department of The Ottawa Hospital are committed to providing a secure and safe computing environment to its staff while ensuring Hospital interests are maintained. Improper Internet and social media use exposes TOH to risks that may include virus attacks, compromise of network systems and services, privacy issues, legal litigation, and damage to reputation. Users should be responsible and productive, and protect the interests of TOH.

Users may not use TOH logos as a part of their postings.

The Communications Department will maintain and monitor TOH's corporate presence on a variety of social media platforms including Twitter and Facebook.

The IS department monitors and logs internet usage and will perform routine audits of social media use.

Management reserves the right to take administrative and/or disciplinary action where there is a contravention of this policy. Any individual who violates this social media policy will be subject to appropriate remedial action and/or discipline up to and including termination.

Acceptable Use of Social Media

- Ensuring suitable privacy settings are added to applicable social media accounts.
- Posting meaningful, respectful comments that are on topic and relevant no spam or offensive remarks. When disagreeing with others' opinions, use respectful and polite language and focus on helping others learn and become more informed, rather than venting or drawing attention to themselves.
- Posting in a manner that protects proprietary information and content, and confidentiality.
- Conducting TOH research.
- Accessing informational databases as required.
- Using social media to develop and strengthen relationships between TOH, its partners and the community.
- Communicating with fellow staff, partners, and patients within the context of an individual's assigned responsibilities.
- Performing educational or professional development activities as required.
- Sharing information and communicating corporate information that is appropriate for a public audience.

Improper Use of Social Media

• Improper use of social media is prohibited. If inappropriate use is discovered, the individual's Manager, Director or Human Resources representative will be contacted. Violations include but are not limited to:

- Any violation of laws, federal and/or provincial, governing privacy, copyright, defamation, discrimination and other forms of written communication.
- Information that may compromise the hospital in a legal, ethical or reputational way.
- Usage that interferes with the work of other staff or seriously disrupts the TOH Network.
- The use of a Hospital computer or mobile device to access social media during work hours for reasons unrelated to one's work.
- Activities in contravention of TOH's Code of Conduct or Standards of Behaviour.
- Transmitting or posting of inappropriate information and/or pictures (e.g. pornography, patient images).
- Posting of personal videos filmed on TOH property and/or involving TOH equipment (e.g. parodies, dance routines, contest entries).
- Messages that are non-courteous, unprofessional, and/or non-businesslike.
- Messages that disclose confidential patient information/data.
- Acts that waste or monopolize computer resources (including but not limited to nonhospital related mass mailings, spamming, bulk e-mail, chain letters, subscribing to excessive mailing lists, use of tracking options, creating excessive unnecessary traffic on the servers).
- Using social media to store, post, send or distribute patient or confidential information, copyright material or other content which is subject to third party intellectual property rights.
- Using social media to compromise the security or integrity of any TOH network or system.
- Using social media to conduct on-line gambling activities during work hours.
- Using social media to comment on anything related to legal matters, litigation.
- If staff members witness improper use of social media sites, they should report it to their manager, who will then contact the Vice-President of Communications and Outreach. There will be no retaliation against individuals who raise good faith concerns about actual or potential violations of this policy.
- Priority for access to computers is for work-related issues and anyone using TOH computers for personal use during their break must relinquish the computer if requested.