



Policy Title: Social Media Policy	Original Effective Date: August 1, 2012
Policy Number: 12.0	Revision Dates: August 20, 2018 Last Revision: June 17, 2019
Excluding: None	Approved by: Vice President, Deputy General Counsel

PURPOSE: The purpose of this policy is to provide a framework for how BJC HealthCare, its hospitals and service organizations, and their employees will participate in Social Media sites while upholding the BJC Code of Conduct, BJC Policies and BJC’s obligation to protect our patients and their privacy.

PURPOSE

The purpose of this policy is to provide a framework for how BJC HealthCare, its hospitals and service organizations, and those who participate in Social Media on their behalf or using BJC’s sites and portals will participate in Social Media sites while upholding the BJC Code of Conduct, BJC Policies and BJC’s obligation to protect our patients and their privacy as well as BJC’s confidential and proprietary information, reputation and brands. BJC reserves the right to update or change this policy at any time.

SCOPE

This policy applies to all BJC and its service organizations’ employees, medical staff, residents, volunteers, agency employees, students, contract staff and vendors (collectively “BJC”) who participate in Social Media on behalf of BJC or using BJC’s sites and portals. BJC should follow these guidelines whether participating in Social Media personally or professionally, or whether using personal or employer-issued electronic devices. This policy does not apply to protected concerted activity defined in Section 7 of the National Labor Relations Act.

DEFINITIONS

Social Media: A general term describing web-based, mobile, or other technologies for social networking and for sharing content and information, such as (but not limited to) through e-mail, instant messaging, posting informational web pages, or video and picture exchange services. Examples of Social Media sites include, but are not limited to, Facebook, BJC Workplace, LinkedIn, Instagram, Snapchat, YouTube, Twitter, personal websites, blogs and micro-blogs, community forums and chat rooms and list serves.

Site Administrator: Person responsible for maintaining BJC’s Social Media site(s).

POLICY

I. Official BJC Participation on Social Media Sites

A. Generally

1. Official BJC and hospital and health service organization representation on Social Media sites must be approved by and coordinated in conjunction with the BJC Communications and Marketing Department. The establishment or creation of Official BJC sites on YouTube, Facebook, Twitter, etc. are not permitted unless developed by and authorized by the BJC Communications and Marketing Department. Any sites or pages existing without prior authorization will be subject to review, and may be amended or removed.
2. Official BJC participation in or on Social Media sites may be created by, assigned to, and maintained by other departments under the guidance of the BJC Communications and Marketing Department.
3. All official BJC Social Media participation must have an assigned Site Administrator responsible for content and adherence to relevant policies and procedures. The Site Administrator's name shall be reported to the BJC Communications and Marketing Department and kept current by the department responsible for the Social Media website.
4. The Site Administrator will ensure that:
 - a. Content is appropriate, accurate and timely.
 - b. Appropriate consent is obtained and documented for content, including words, graphics, photos, video, images, presentations, artwork and any other included elements.
 - c. Content does not constitute advertising unless specifically approved in advance by the BJC Communications and Marketing Department.
 - d. Content is monitored, and postings and comments adhere to all policies.
 - e. Offered links are deemed appropriate.
 - f. All content, postings and links comply with all BJC standards, guidelines, policies and procedures.
5. Only individuals designated by the BJC Communications and Marketing Department are authorized to establish BJC accounts in Social Media or professional networking websites.
6. BJC reserves the right to restrict or limit access to Social Media sites through the BJC network.

B. Guidelines for BJC Blogs and Comments on BJC Social Media sites

1. BJC blogs and Social Media sites should be accurate and factual, and/or fairly represent current BJC policies or positions on issues addressed by the author.
2. The permitted/authorized author shall correct errors immediately and note corrections with the original post on the BJC blog or Social Media site. BJC may make such corrections or remove the inaccurate information, article or posting if the author fails to do make such correction(s) in a timely manner.
3. BJC blogs shall be written and coordinated by BJC staff and shall not be written anonymously or by third-party entities without the supervision and approval of BJC staff.
4. All blogs will contain a notice that BJC blogs and posts on BJC Social Media

- sites do not constitute medical, legal or other professional advice.
5. Comments on BJC Social Media sites that contain any of the following are subject to editing, rejection or deletion:
 - a. References to first/last names, identifying locations or other personal or patient information.
 - b. Profanity, racist, sexist, discriminatory, harassing, threats of violence, defamatory remarks, or other derogatory content.
 - c. Plagiarism, false claims or infringement upon or violation of the rights of third parties such as copyright, trademark, trade secret, confidentiality, intellectual property, or patent.
 - d. Spam, spyware, virus or other component or computer code or script that is or could be harmful.
 - e. Ads, promotions or solicitations.
 - f. Any comments or information that is inconsistent with, misrepresent, or is/are contrary to, BJC policy or its mission or values.
 6. Before submitting comments on any BJC Social Media site, each poster must agree to accept the BJC site Terms of Use Agreement or the Terms and Conditions of the Social Media site.
 7. All links posted are subject to review.

C. BJC Social Media Participation Disclaimer

Please use the following disclaimer for any social media participation from patients, including without limitation comments, responses, forums and/or virtual support groups:

“By participating in this social media forum, you acknowledge and agree that you may be voluntarily sharing aspects of your protected health information, as that term is defined by the Health Insurance Portability and Accountability Act of 1996 and its supporting regulations, and that BJC is not responsible for the release of this information within this forum, nor does BJC represent that this information is accurate. Any information you receive through this forum does not constitute medical advice, medical recommendations, diagnosis or treatment. Do not rely on the information in this forum in place of seeking professional medical advice. BJC HealthCare, its providers and affiliated entities shall not be responsible or liable for any advice, arranging for a course of treatment or follow-up treatment, diagnosis or any other information that you obtain through this forum. You are encouraged to talk to your doctor with regard to information you shared or is otherwise contained within this forum. Reliance on any information within this forum is solely at your own risk. Please be aware that you may be identifying yourself to others in this forum who may seek to contact you based on the information provided here.”

II. Employee Responsibilities

Employees who participate in Social Media on behalf of BJC, as a representative of BJC, or who identify themselves or are identified on personal sites as an employee of BJC, must uphold the BJC Code of Conduct and these Social Media guidelines and any other BJC policy. Additionally, employees’ use must be consistent with job responsibilities and all Human Resources policies addressing work time use, standards of conduct and responsibilities. When participating in Social

Media, employees shall follow these BJC Social Media guidelines:

A. On BJC Hosted Social Media Sites

1. Follow all existing BJC policies, procedures and guidelines including, without limitation, policies addressing HIPAA, release of information, conflict of interest, intellectual property, non-solicitation, internet security and e-mail usage, interactions with vendors and routine department approvals as applicable. The Internet is simply an extension of the workplace under these circumstances, and expectations are the same as if you are at work.
2. Be professional and respectful in all postings. Always strive to be fair and courteous to co-workers, managers and others who work for BJC. If you decide to post or display comments about coworkers, supervisors or BJC, avoid using statements, photographs, video or audio that reasonably could be viewed as malicious, vulgar, obscene, threatening, intimidating or harassing; that disparage co-workers, managers and others who work for BJC; or that might constitute harassment or bullying. Examples of such conduct include offensive posts meant to intentionally harm someone's reputation or posts that could contribute to a hostile work environment on the basis of race, color, ancestry, national origin, sex, religion, age, disability, sexual orientation, gender identity, genetic information, military or veteran status or any other status protected by law or BJC policy. Remember, all online postings should be considered public and freely visible to patients, co-workers, managers, competitors and others.
3. When representing BJC, disclose your association with BJC and your role. Use good judgment in these instances, and strive for accuracy. Errors and omissions could result in liability for you or for BJC.

B. On Non-BJC Hosted Social Media Sites

Employees have every right to their personal opinions. When your association with BJC is shared or apparent, make it clear that your opinions are personal and do not represent the position of BJC and that your comments are not on behalf of BJC. If your personal blog, views or comments are inconsistent with or would negatively impact BJC, you should carefully consider whether to refer to or identify your connection with BJC/member organizations.

C. On All Sites

1. Do not provide or post any confidential information about patients, including protected health information.
2. Make sure your online activities do not interfere with the completion of your job responsibilities.
3. Do not provide or post BJC's proprietary or confidential information, including internal reports, policies, procedures or other internal business-related confidential communications.
4. Always read and follow the particular Social Media site's User Terms and Conditions.
5. Be smart about protecting yourself, your privacy and BJC's confidential information. What you publish is widely accessible and will be available indefinitely, so consider the content carefully.
6. Follow copyright, fair use and financial disclosure laws.

7. Check with the BJC Communications and Marketing Department, Corporate Compliance, Legal Services, Human Resources or IS Security if you have any questions.

III. VIOLATIONS

Employees who violate this policy will be subject to discipline, up to and including termination of employment. Disclosure of patient information that violates HIPAA may also result in civil and criminal penalties.

IV. RELATED POLICIES

1. BJC HealthCare Code of Conduct
2. IS Security Policies and Standards
3. HR Policy 6.05: Solicitation and Distribution
4. HR Policy 7.08: Equal Employment Opportunity, No Discrimination, No Harassment
5. HR Policy 7.09: Use of Social Media
6. HR Policy 7.10: Use of Internet/Intranet and Electronic Mail Systems
7. HR Policy 7.11: Use of Phones, Cell Phones and Electronic Devices
8. HR Policy 7.15: Confidentiality
9. HR Policy 8.04: Workplace Violence and Threat Assessment
10. HIPAA Privacy Compliance Policies
11. Corporate Compliance Policy 10: Vendor/Product Promotional or Marketing Endorsement Policy