

Health Center Social Media Policy & Guidelines SAMPLE

This template is meant to guide your organization's social media guidelines and policies.

- Policies contained in your organization's employee handbook should govern the use of electronic communication systems, equipment, and resources. They should also outline expectations relating to staff conduct in terms of social media.
- ***DISCLAIMER*** These are only suggested guidelines and not legal advice. It is recommended that your organization's legal counsel review any formal policies before they are implemented.

1. Purpose

<Health Center Name> recognizes today's widespread use of social media and the importance of the internet in shaping a positive image and brand of our organization and health centers overall. Social media is an opportunity to:

- Build and strengthen relationships with our patients as well as other health centers, state primary care associations, advocates, influencers in the health care sector, and other organizations and individuals with shared or similar missions.
- Expand <Health Center Name>'s ability to reach, educate and mobilize potential supporters and policymakers.
- Be a source of information related to health care delivery to medically underserved communities and the health centers that serve them.
- Boost traffic to <Health Center Name>'s website other social media channels.

However, it is because of the widespread influence of social media and the impact it has on our health center that guidelines are needed to protect the reputation of <Health Center Name>, its staff, and its patients.

The purpose of this policy is to outline <Health Center Name>'s expectations and guidelines with respect to staff's responsible and appropriate use of social media including staff's posting of information relating to <Health Center Name> under a staff member's personal social media account or the posting of content under one of <Health Center Name>'s official social media accounts.

2. Policy

<Health Center Name> encourages staff to share information with coworkers and with those outside the company for the purposes of gathering information, generating new ideas, and learning from the work of others. Social media provides inexpensive, informal, and timely ways to participate in an exchange of ideas and information in real time. However, information posted on a website is available to the public, and therefore, <Health Center Name> has established this policy and guidelines for staff participation on their personal social media accounts and <Health Center Name>'s official social media accounts.

“Social media,” as used in this policy, applies to any web-based or mobile technology, in use now or developed in the future, that enables individuals or entities to disseminate or receive information, communicate, or interact with other individuals or entities through a website, platform, tool, or application. Without limitation social media includes forums, blogs, online chat services, email, text messaging, social networking sites, and video/photo posting sites such as Facebook, Twitter, LinkedIn, YouTube, Instagram, TikTok, Snapchat, etc.

3. Guidelines

A. Guidelines for All Staff Members

1. The policy guidelines in this Section A apply to all staff members with respect to their use of their personal social media accounts and, if authorized, their use of **<Health Center>**'s official social media accounts.
2. No staff member may post on a **<Health Center Name>** social media account without the prior written approval of the **<Health Center>**'s authorized organization contact.
3. Staff may only engage in social media activity during work time provided it is: (a) directly related to their work; (b) approved by their manager; and, (c) does not identify or reference **<Health Center Name>**'s patients, partners, or vendors without **<Health Center Name>**'s express prior written permission.
4. Personal activities during the work hours, regardless of the communication device used, can interfere with staff's productivity and distract co-workers and patients. Accordingly, staff may not use their personal social media accounts during work hours or at any time with **<Health Center Name>**'s IT equipment, devices or internet networks. To the extent staff accesses their personal social media accounts during the workday, they must do so on their free time (*e.g.*, during meal or break periods) using their own devices and network.
5. **<Health Center Name>** expects its staff to demonstrate respect for the dignity of the health center as well as for its personnel, patients, and vendors. As such, **<Health Center Name>** expects all staff to act ethically and professionally and use good judgment when communicating on social media.
6. Staff may not discuss or disclose confidential/proprietary or organizational information online (or through any other means) to anyone including, but not limited to, all entities and individuals that have a relationship with **<Health Center Name>** through affiliations or contracts.
7. **<Health Center Name>** employees must respect the privacy rights of other employees and patients. At no time shall any staff member violate the Privacy Rule under the Health Insurance Portability Accountability Act of 1996 (HIPAA) or disclose any protected health information (PHI) as defined by HIPAA including, but not limited to, any information relating to: (i) an individual's past, present or future health condition; (ii) the provision of healthcare services to an individual; or (iii) any payment made by an individual for the provision of healthcare services.

8. Staff should not post any messages that can be viewed as malicious, obscene, threatening or intimidating, knowingly false, or deliberately offensive with respect to **<Health Center Name>** and its employees, officers, constituents, vendors, or suppliers.
9. Staff should not engage in harassing or discriminatory behavior on social media that targets other staff members or individuals because of their protected class status, bullying, or any other behavior that violates any federal, state or local law or **<Health Center Name>**'s policies. (See Employee Handbook)
10. Staff who identify themselves as **<Health Center Name>** employees or discuss matters related to **<Health Center Name>** on a personal social media site must include a disclaimer on the front page stating that the staff member does not express the views of **<Health Center Name>** and that the staff member is only expressing a personal view. (For example, "The views expressed on this website are mine alone and do not necessarily reflect the views of my employer." Staff members should place this disclaimer in a prominent position and repeat it for each post expressing an opinion related to **<Health Center Name>**. Staff members should consider that if they post information on a social media site that is in violation of **<Health Center Name>** policy and/or federal, state, or local law, the disclaimer will not shield them from disciplinary action. Staff members may not speak on behalf of **<Health Center Name>** without the prior written approval of the **<Health Center Name>**'s authorized organization contact.
11. Staff members should not use social media to criticize **<Health Center Name>**'s competition and should not use it to compete with **<Health Center Name>**.
12. Staff members should not start a social media account or launch any website that may give the impression that such account or website belongs to or is in any way affiliated with **<Health Center Name>**.
13. Staff members may not use or reproduce **<Health Center Name>**'s trademarks, copyrights, or logos on a social media site without first obtaining written permission from the authorized organization contact.
14. Supervisors are cautioned against connecting via social media with staff they manage, as blending professional and personal relationships can create actual and/or perceived challenges in the workplace.
15. Official **<Health Center Name>** news and statements are to be *first* shared through official organizational social media accounts. Information that an employee thinks might be suitable for social networking distribution should be emailed to **<Health Center Name>**'s authorized organization contact. Should the material be approved for social media use, the employee is free to share or re-post the information. External inquiries via online channels as they relate to **<Health Center Name>** and its activities should be referred to the authorized organization contact.
16. Nothing in this policy is meant to, nor should it be interpreted to, in any way limit a staff member's rights under any applicable federal, state, or local laws, including a staff member's rights under the National Labor Relations Act to engage in protected concerted activities with other employees to improve or discuss terms and conditions of

employment, such as wages, working conditions, and benefits. Staff members have the right to engage in or refrain from such activities.

17. Staff members who violate this policy and its guidelines are subject to discipline up to and including the immediate termination of their employment with **<Health Center Name>**.

B. Guidelines for Posting on <Health Center Name>'s Social Media Accounts

1. Staff members who are authorized to post on **<Health Center Name>**'s social media accounts must adhere to the guidelines set forth in in Section A as well as those guidelines set forth in this Section B.
2. The staff members listed below are responsible for the editing and approval of all social media content, as well as the management and monitoring of **<Health Center Name>**'s social media accounts. Authorized contact responsibilities include review/editing to ensure accuracy and appropriateness of content in accordance with **<Health Center Name>**'s policies and procedures.

<Health Center Name> staff authorized as an **AUTHORIZED ORGANIZATION CONTACT** are:

- **List name, title and contact information**
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3. **<Health Center Name>** has established style guidelines in relation to corporate branding that carryover to social media. Below are other guidelines that apply to health center social media content:

- a. Whenever possible, spell out Community Health Centers (capitalized) and/or Federally Qualified Health Centers (capitalized). Acceptable shortened forms are health centers (not capitalized) and FQHC or FQHCs, CHC or CHCs. Do not abbreviate the word "health" or the word "center" inside a post, comment, status update or "tweet" about health centers.

- b. Use hashtags to enhance searchability. The hashtag that has been adopted by health centers is **#ValueCHCs**.

- c. Whenever possible "tag" partner organizations and elected officials using their unique social media identifier (example: @HCAdvocacy) as this will amplify your organization's post with their followers.

- d. Be clear about your organization's comment/sharing policy by including ground rules—when necessary—to keep online conversations constructive. Your policy should explain to followers what information is appropriate and inappropriate, as well as what posts will be deleted, and why a follower may be blocked from the page/group.

- e. Be mindful of legal implications:

- i. Fair use/copyright: Do not copy or use another person's or entity's intellectual property as though it were your own. Properly attribute works that you reuse. The internet affords ample opportunity to link to whatever materials you deem important to your audience. Note: "Fair Use" doctrine in U.S. law allows limited use of copyrighted material without permission from the rights holder, speaking specifically to use for nonprofit or educational purposes.
- ii. Handling of confidential personal or industry-related data: Staff may not discuss or disclose online (or through any other means) confidential and/or proprietary organizational information. Also, the Health Insurance Portability and Accountability (HIPAA) law *always* applies. **Personal medical information about patients cannot be released without their, or their guardian's, written consent.** This includes information about a patient's condition and the use of a patient's likeness or voice (photography, video, audio, etc.), as well as information that may identify a person as a patient.
- iii. Laws forbidding any partisan political activity: As a 501(c)(3) organization, certain legal restrictions apply to **<Health Center Name>** with respect to lobbying and partisan political activity. The organization should never endorse any social media page/feed of an elected official, candidate for office or partisan political cause.