

Subject: Electronic Social Media	Policy Number: PROV-COMM-604	
Department: Communications	<input type="checkbox"/> New <input checked="" type="checkbox"/> Revised <input checked="" type="checkbox"/> Reviewed	Date: 4/1/2015 9/24/15
Executive Sponsor: President-CEO	Policy Owner: Chief Communication/PR Officer	
Approved by: Rod Hochman, MD - President/CEO	Implementation Date: 8/1/2010	

Scope: This policy applies to all Providence Health & Services (“Providence”) and its Affiliates’¹ (collectively known as “Providence”) Workforce Members and licensed independent practitioners credentialed through a Providence (or affiliated organizations’) medical staff office (LIPs) who maintain social networking Web sites and/or blogs that contain information, news, or discussion about Providence’s operations or Workforce Members, whether for official Providence use or personal use. In addition, this policy also applies to all Workforce Members and LIPs that post responses, opinions or information about Providence and its affiliated organizations on the blogs, social networking Web sites or news sites of others. This is a management level policy recommended by Leadership Council, approved and signed by the President/CEO.

Purpose: The goal of this policy is to ensure that Providence and its affiliated organizations comply with ethical and legal obligations, as well as maintain a positive brand image in social media. The intent of this policy is to encourage the flow of appropriate and useful information in support of serving patients, caregivers and communities, minimizing the risk to Providence, its employees and LIPS, its customers, and its affiliated organizations. . Therefore, this policy aims to clarify what constitutes official Providence use of social media, to establish guidelines for the official use of electronic social networking, and to clarify the personal responsibilities and legal implications of personal use of electronic social networking while at work or while posting information about Providence and its affiliated organizations.

Policy: Social media may be used by Providence and its affiliated organizations for business-related purposes and its Workforce Members for business and other purposes subject to the restrictions set forth in this policy. This policy is established to assure compliance with legal and regulatory restrictions and privacy and confidentiality agreements.

Workforce Members using social media for personal use must follow local policies regarding breaks and mealtimes.

¹ For purposes of this policy, “Affiliates” is defined as any entity that is wholly owned or controlled by Providence Health & Services or Western HealthConnect (for example, Swedish Health Services, Swedish Edmonds, Kadlec Regional Medical Center, PacMed Clinics and Inland Northwest Health Services).

This policy is not intended to restrict employees from discussion, transmission or disclosure of wages, hours and working conditions in accordance with applicable federal and state laws.

Definitions:

1. **Social Media (or Social Networking Web Sites):** Web-based media designed to be disseminated through social interaction, using highly accessible and scalable publishing techniques. Social media are characterized by open two-way communications between the host and the audience. Examples include Facebook, LinkedIn, YouTube, Twitter, and blogs.
2. **Official Use of Social Media:** Providence maintains a series of official social networking Web sites for various regions, facilities, departments, key spokespeople, and events that are organized and coordinated by a Providence ministry (e.g. Providence Alaska Medical Center, Providence Heart Center, Providence Health & Services Alaska, Providence O'Christmas Trees). These official social media pages are managed by designated Providence employees.
3. **Personal Use of Social Media:** Any Providence Workforce Member who chooses to share their own personal opinions via any social networking Web site, personal blog or Web site, or by posting information on someone else's social networking Web site.
4. **Web-Based Communications:** Electronic communication technologies, including but not limited to electronic mail (e-mail), text messaging, instant messaging and Web-based technologies (Internet, Intranet and Extranet).
5. **Workforce Members:** Employees, volunteers, trainees, and other persons whose work performance for a Providence hospital, clinic, nursing facility or home health ministry is under the direct control of the ministry, whether or not they are paid by the ministry. As used in this policy only, the term Workforce Members will include LIPs.

Requirements:

A. Official Use of Providence Social Media Requirements:

Official use of Providence and its affiliated organizations' social media shall be subject to prior written approval by the local or system communications department and shall adhere to this policy.

1. **Approval:** Any program or entity must obtain written approval from Regional Marketing and Communications or Providence Strategic and Management Services (PSMS) Communications leadership prior to the site being launched or materially changed from its original purpose.

2. **Obtaining Approval:** To obtain written approval for an official use of social media the proposer shall present a business case and maintenance plan. The proposer shall provide a brief statement of:
 - a. The business plan or objectives.
 - b. The brand management of Providence logos, colors and styles, and naming conventions (Reference [PROV-COMM-602: Use of Providence Name](#)).
 - c. The maintenance plan to ensure effectiveness.
 - d. The monitoring and response plan to ensure material and content is appropriate.
 - e. The cost to implement and maintain over time.
3. **Reporting Concerns:** Workforce Members should report social media concerns to their local communications department.
4. **Respect Copyright Laws and Obtain Necessary Releases:** All official use of social media must comply with applicable copyright laws and any photos/videos requiring subject release forms are the responsibility of the designated site owner to obtain (Reference [PROV-ICP-714: Copyright Compliance](#)).
5. **Providence Code of Conduct:** The Code of Conduct applies to Workforce Member's use of Web-based communications and Social Media (Reference [Providence Code of Conduct](#)).
6. **Ethical and Religious Directives:** The Ethical and Religious Directives apply to Workforce Member's use of Web-based communications and Social Media (Reference Ethical and Religious Directives).

B. Personal Use of Social Media

1. **Legal Liability:** It's important for Workforce Members to remember that individuals can be held personally and legally responsible for their publicly made opinions and comments, even on personally maintained sites and pages. This means Workforce Members cannot share confidential, or proprietary information, photographs or videos about Providence on personal sites and Workforce Members are required to maintain patient privacy by following Providence Privacy and Security policies and standards and HIPAA rules at all times. Examples of such confidential or proprietary information that cannot be shared include: protected health information (PHI), personally identifiable information (PII), business plans, and other information or data whether conveyed in writing or orally, that is known to be confidential or proprietary. An exception to this rule is that Workforce Members are allowed to post or share information found on an official Providence public site (e.g. Providence Internet, Facebook or Twitter account.)

2. **Providence Privileged and Confidential Information:** Any confidential or proprietary information Workforce Members may be privy to is not to be included in any external electronic communications (Reference [PROV-ICP-716: Confidentiality](#) and [PROV-PSEC-806: Protected Health Information](#)).
3. **Providence and affiliated organizations' Logos and Trademarks:** Use of Providence and affiliated organizations' logos or trademarks for any commercial purpose, or in any way that reasonably would mislead others into thinking that the communication is an official Providence communication, is strictly prohibited.
4. **Sharing as an Employee:** When creating a personal site or commenting on other sites, if Workforce Members include their relationship to Providence or its affiliated organizations, they must make it clear that they are speaking for themselves and not on behalf of Providence.

In order to ensure that anyone reading your blog, posting or other online activities understands that you are not speaking on behalf of Providence, Workforce Members must use a personal email address (not a providence.org address) as their primary means of identification on personal sites.

If a Workforce Member's blog, posting or other online activities would disparage Providence's, or an affiliated organizations' reputation or brand and/or its sponsors, leadership, employees, or services, Workforce Members should not refer to or identify their connection to Providence.

5. **Respecting Providence's Partners:** Be respectful and professional to business partners, competitors and patients. Those who identify themselves as connected to Providence and its affiliated organizations in their postings and comment can be liable for the statements that are made. Workforce Members are asked to think about how their comments may affect fellow team members) supervisors, physicians, nurses, co-workers, etc.).
6. **Endorsing Candidates for Public Office;** Workforce members who endorse or oppose a candidate for public office in Web- based communications must do so as private individuals and without reference to Providence Health & Services and its affiliated organizations. (Reference [PROV-GOV-211: Lobbying and Political Activities](#)).
7. **Providence Code of Conduct:** The Code of Conduct applies to Workforce Member's use of Web-based communications and Social Media (Reference [Providence Code of Conduct](#)).
8. **Ethical and Religious Directives:** The Ethical and Religious Directives apply to Workforce Member's use of Web-based communications and Social Media (Reference Ethical and Religious Directives).

References: Ethical and Religious Directives - The “Ethical and Religious for Catholic Health Care Services” describes the principles and ethical standards Providence ministries follow in providing health care to those we serve.

[Providence Code of Conduct](#) - A code of conduct helps identify appropriate behavior and actions in the workplace. The Providence Code of Conduct supports our Missions and Values and our commitment to integrity as a Catholic health care and education ministry.

[PROV-COMM-602: Use of Providence Name](#) - To establish a policy to proscribe the use of the Providence name and logo by third parties.

[PROV-GOV-211: Lobbying and Political Activities](#) - To assure compliance by Providence with rules relating to lobbying and political activities by tax exempt organizations.

[PROV-ICP-714: Copyright Compliance](#) - To assure Providence compliance with applicable federal copyright law.

[PROV-ICP-716: Confidentiality](#) - Provide guidance and direction with respect to the management, use and disclosure of confidential and proprietary information of Providence.

[PROV-PSEC-805: Privacy Glossary](#) - To ensure consistent use of the terms utilized under the Health Insurance Portability and Accountability Act (HIPAA or Privacy Rule) throughout the Providence Ministry.

[PROV-PSEC-806: Protected Health Information](#) - To outline the requirements for how Providence will comply with the Health Insurance Portability and Accountability Act (HIPAA or Privacy Rule) pertaining to uses and disclosures of PHI.