

I. PROCEDURE

A. GUIDELINES FOR PROFESSIONAL USE OF SOCIAL MEDIA

Using social media at work (see definitions in associated policy) is a privilege and a responsibility that employees should take seriously. Before accessing social media sites during work hours and on work computers, read these guidelines and ensure that you understand them.

- **Your job comes first.** Don't do anything that interferes with your ability to perform your job and provide the best possible service to children and families. Social media is available for use during working time and on Children's-provided equipment if such use is directly related to, and necessary for, you to perform your job. However, consistent with Children's no-solicitation rules, it is permissible to access social media on non-working time.
- **Use good judgment** when using social media as part of your job. Don't post anything that you are not authorized to post on behalf of Children's National or that could be damaging to CNMC. If you are uncertain, consult with your supervisor.
- **Protect patient privacy at all times.**

B. GUIDELINES FOR ESTABLISHING A DEPARTMENTAL SOCIAL MEDIA SITE

Children's National supports the use of social media to, among other things, educate the public about health issues, support public relations and marketing strategies, improve access and service, and build supportive communities for our patients and their families. Children's National Medical Center maintains corporate accounts on Facebook, Twitter, YouTube, and other social media sites.

Many departments and programs have expressed interest in having individual accounts. Depending on your goals, this may or may not be the best communications channel. Before submitting a request for a separate social media presence for your specific department or program, consider whether you would be better served by working within Children's National's primary social media presence. Think about your goals and audience with whom you are trying to connect.

Creating a social presence requires a commitment to maintaining it and keeping it updated on a regular basis. This means monitoring it daily and posting at least weekly. One key aspect to creating a successful social media presence is listening. If you would like to create a separate account for your department, you must develop an outline of how you plan to monitor and respond to comments quickly.

Any department or employee seeking to establish a departmental social media site on behalf of Children's must go through the following process:

1. First notify the Public Relations and Marketing Department by completing a *request form*, which can be found on the Intranet. All official social media platforms (i.e., Facebook pages, Twitter accounts, LinkedIn pages, etc.) representing Children's entities must be initiated and/or authorized by the Public Relations and Marketing Department. The Public Relations and Marketing Department will help ensure that any social media site adheres to Children's mission, vision, and values.
2. If an individual request is approved, the site administrator must sign the Social Media Agreement. The site administrator must be an employee of Children's. Once the social site is developed, a member of the PR & Marketing team must be given administrator rights (to be able to monitor, not actively manage).

The PR & Marketing Department reserves the right to terminate any social media sites if any of these procedures are not followed.

C. GUIDELINES FOR PERSONAL USE OF SOCIAL MEDIA

Always maintain the privacy of patients and their family members. It is not appropriate to publicize specific patients or patient personal events even if their names are not revealed. If you have the slightest doubt about the appropriateness of sharing certain information involving patients and their families, discuss this with your supervisor or the Legal or Compliance departments.

- Social media use should be consistent with all applicable Children's National policies and procedures, including the Code of Conduct, Harassment/Discrimination Policy and Procedure, Violence Free Workplace Policy and Procedure, Confidentiality Policy and Procedure, and Employee Conduct Policy and Procedure. Children's National's IT department has the right to monitor employee access and use of social networking sites using its computer and network resources while at work to ensure compliance with these and other policies and procedures.
- Understand guidelines that affect your privacy and rights. Remember that all data and information that is entered, created, received, stored, or transmitted via Children's National electronic resources, including its computer systems, is the property of Children's National, and employees should have no expectation of privacy with respect to such data and information.

- Exercise good judgment. You are personally responsible for your online activity, both at work and away from work. Children's National does not wish to intrude on employees' personal lives and activities outside of work, but you should be aware that your personal and online life may be perceived as linked to your professional life. Consider what you post online to be public and that it could remain available to the public for a long time.
- Do not post anything negative about other hospitals, Children's National partners, or other related organizations which do not relate to your employment.
- It is strongly recommended that providers and caregivers not accept invitations to join social networking sites of patients and families. You are not permitted to initiate contact with patients or their family members through social media sites. If a patient or family member invites you to join their social media network (for example, if they ask you to "friend" them on Facebook), you should decline the offer if the basis of your relationship was developed as part of your role at Children's National. Patients and family members should be encouraged to communicate with providers in person, by telephone, or by other secure messaging sites. An appropriate response to an invitation from a patient or family might be: *"Thank you for asking me to join your network, but Children's National recommends that providers and caregivers not accept social networking invitations from patients and families. We do not want to cause a strain on the clinician, patient, and family relationships that we value so much."*
- Disclose your affiliation on relevant websites. If you have a personal blog or website that's related to your job function at Children's National, you should disclose your affiliation with Children's National and make it clear that your comments are your own. Consider adding language on your blog or website such as: *"The views expressed on this [blog/website/page] are my own and do not reflect the views of my employer."*
This can go in an "About Me" section or other appropriate place on your site.

1. What You Can Do When Using Social Media

- Be responsible. You are responsible for everything that you post on sites.
- Be respectful. The words and images you post on social networking sites can be viewed by many other people, so consider how your message will be perceived.
- Be particular about your "friends" and associations. Check your privacy and security settings and know their rules. Some of the most damaging missteps on social media sites have resulted from people sending messages or images to people unintentionally.
- Maintain appropriate professional and personal boundaries. Do not use your Children's National email address for your personal social networking accounts. Your page is personal, and you should only use your work address for professional activity.
- Strive for accuracy in your communications. Errors and omissions reflect poorly on you and on Children's National when you are posting as a representative of the institution. Even unintentional errors can result in liability for you or the institution.

- Support the Children's National social networking sites. While it is voluntary, you can support Children's National by "liking" its Facebook page, following our Twitter and Google+ accounts, and viewing our videos on YouTube. You are also permitted to recommend our sites and content to your friends and networks. If you blog, post, or comment about Children's National's services (which the Company permits, but does not encourage), you must clearly and conspicuously disclose your relationship with Children's National.
- Consider alternative means of communication.

2. What You Cannot Do

- Don't post content or conduct any activity that falls to conform to any and all applicable state and federal laws.
- Don't use social networking while engaged in patient care or work activities. Time spent online should not distract from your care of patients or other work obligations.
- Don't spend an excessive amount of time on social media sites. CNMC's equipment and computer systems are provided for work-related use. Limit the time you use social media during working time, consistent with the guidelines above. The IT department monitors employee use of Children's National equipment and systems, including use of the Internet and social media sites, and may inform managers of behavior that may be excessive or in violation of Children's National policies or procedures.
- Don't communicate in a manner that violates Children's National policies and procedures, including the Code of Conduct. Harassment/Discrimination Policy and Procedure. Violence Free Workplace Policy and Procedure. Confidentiality Policy and Procedure. and Employee Conduct Policy and Procedure.
- Don't misrepresent yourself or others. Be who you are and disclose your affiliations on your social media accounts, personal blogs, and websites. Consider adding a disclaimer that the views of your account, page, or site are your own and do not necessarily reflect the views and opinions of your employer.
- Don't share or post confidential information about patients or patients' families without their consent, including but not limited to:
 - Protected health information (PHI), including sensitive medical or psychological information,
 - Confidential, personally identifiable information, such as names, addresses, phone numbers, and Social Security numbers,
 - Photos or other images of patients or families (unless written permission has previously been obtained in accordance with our policies). Do not take pictures of our patients with your cell phone and post them.
- Don't post content about Children's National as part of your job function unless you have received authorization from the appropriate people or departments. Children's National information that is non-public, confidential, and proprietary may not be posted without appropriate approval. Posting any information on behalf of Children's National also requires authorization

- Don't respond to inquiries from the media on behalf of Children's National without approval from Public Relations & Marketing. Notify Public Relations & Marketing if you are contacted by media representatives regarding the content of any material that you have posted on behalf of Children's National - and do not respond on behalf of Children's National without prior authorization

D. EMPLOYEE RIGHTS

Children's National does not intend through this procedure or otherwise to prohibit free speech or other legally protected actions by employees or representatives. The requirement that employees work with the PR/Media team before talking with media is not intended to control employees' speech, but rather to ensure that your time is well spent, that institutional priorities are reflected in media coverage about Children's National, and that your comments in news stories reflect positively on both you and the institution.

Children's National wants to remind employees that it offers internal mechanisms for employees to have work-related concerns addressed, including the Employee Grievance Policy and Procedure.

Nothing in this procedure, including the guidelines, is intended to limit restrict, or affect any rights employees may have under the National Labor Relations Act (NLRA) to communicate with other employees or the public about their wages, hours, or other terms and conditions of employment, or any other rights employees may have under the NLRA, and this policy will not be applied to interfere with such rights. Employees will not be disciplined, discriminated against, retaliated against, or subjected to adverse consequences by Children's National Health System as a result of exercising rights under the NLRA or any other law when using social media.

E. CONSEQUENCES FOR VIOLATING THESE POLICIES

Inappropriate use or excessive personal use of online social networking during working time and/or using Children's National-provided equipment or systems is not acceptable and will result in the full range of disciplinary actions under Children's National policy - up to and including unpaid suspension, termination of employment, termination of medical staff privileges, termination of computer privileges, or other sanctions as deemed appropriate under the circumstances. Disciplinary actions will be determined with the input of the employee's supervisor(s), the compliance officer, Human Resources, IT, and the legal office, as appropriate.

II. REVIEW OR REVISION DATE

Original: March 2012
Revised: May 17, 2013
Revised: February 11, 2014

III. REFERENCES

Code of Conduct

CNMC A:45 Social Media/Social Networking Usage Policy

CNMC A:3 and CNMC A:3P: Corporate Identity and Printed Materials

CH A-27: Information System Security

CH A-32: and CH A-32P: Appropriate Use of Information Resources

A:04 and 04P: Harassment and Nondiscrimination?

CH:A:38P Non-medical Filming

CH:FI:07P Release of Statistical and Financial Information