



ST. JOSEPH HOSPITAL

Original: 06/2010
 Review: 09/2014
 Next Review: 09/2017
 Policy Champion: Wesley Layne: Director of Human Resources
 Policy Area: HR - Employment
 Applicability: Nashua St. Joseph Hospital

Social Media Use, HR-18

Purpose:

St. Joseph recognizes that social networking (such as personal web sites, blogs, Facebook, MySpace, Twitter, online group discussions, message boards, chat rooms, etc.) can be used by employees for personal reasons as well as legitimate business purposes. St. Joseph also understands how the use of internet social network sites and blogs can shape the way the public views our employees and our organization. St. Joseph respects the right of any employee to maintain a blog or post a comment on social networking sites. However, it is also committed to ensuring that the use of such communications serves the needs of our business by maintaining the Company's identity, integrity, and reputation in a manner consistent with our values and policies.

This policy establishes a set of rules and guidelines for any activity and participation in "social media" by all St. Joseph "users." These rules are intended to be adaptable to the changes in technology and norms of online communication and behavior, and may be amended by St. Joseph at any time, for any reason, without notice to users.

By adopting this policy, St. Joseph is not seeking to limit the free flow of communication or any of the legal rights held by its employees or restrict employees from discussing their wages, hours and working conditions with co-workers and others while not at work, nor would it be interpreted or applied so as to interfere with employee rights to self-organize form, join, or assist labor organizations, to bargain collectively through representatives of their choosing, or to engage in other concerted activities for the purpose of collective bargaining or other mutual aid or protection, or to refrain from engaging in such activities. Rather, this policy is intended to protect St. Joseph's legitimate interest. For example, do not post internal reports, policies, procedures or financial information regarding St. Joseph, or other internal business-related confidential communications containing proprietary information.

Additionally, nothing herein should be construed to prohibit communications which would be permitted under applicable law, including but not limited to the National Labor Relations Act.

For purposes of this policy:

- The term "social media" applies to any web-based and mobile technologies, in use now or developed in the future, that enable individual or entities to disseminate or receive information, communicate, or otherwise interact, and includes, without limitation, email, texting, messaging, social networking, blogging, micro-blogging, web bulletin boards, chat rooms, and so on , through providers such as Facebook, LinkedIn, MySpace, Twitter, YouTube or others, whether or not affiliated with St. Joseph.
- The term "users" refers to employees, directors, volunteers, and interns.

Please carefully read these guidelines and St. Joseph's policies regarding Harassment and Discrimination, Conflict of Interest and Business Ethics, Rules of Conduct and Discipline, and Confidentiality of Information, Telephone and Computer Resources, and ensure your postings are consistent with these policies. Inappropriate postings that may include discriminatory remarks, harassment, and threats of violence or similar inappropriate or unlawful conduct will not be tolerated and may subject you to disciplinary action up to and including termination.

POLICY:

St. Joseph has established the following set of rules and guidelines for all "online social media" (which includes but is not limited to e-mail, social networking sites, blogs, microblogs (Twitter), bulletin boards, etc.).

PROCEDURE:

1. The same principles and guidelines found in St. Joseph's personnel and employment policies apply to your activities online. You are personally responsible for any of your online social media activity conducted using a company e-mail address, or on a company website or page, and/or which can be traced back to a company domain and/or which uses St. Joseph's assets, such as electronic resources.
2. You should also be mindful of your online conversations and social network postings during your own time. In general, what you do on your own time is your affair; however, your conduct, even while off-duty, can reflect on and affect St. Joseph. We expect that you will conduct yourself in a professional manner both on and off duty. We also ask that you exercise personal responsibility whenever you blog or use social networking websites.
3. Before creating online content, consider some of the risks and rewards that are involved. Keep in mind that any of your conduct that adversely affects your job performance, the performance of fellow employees or otherwise adversely affects customers, patients, vendors, people who work on behalf of St. Joseph or St. Joseph's legitimate business interests may result in disciplinary action up to and including termination.
4. Please also be mindful of the following guidelines:
 - a. Maintain the confidentiality of St. Joseph's private and confidential business information. **For example**, do not post internal reports, policies, procedures or **financial information regarding St. Joseph**. The company's confidentiality policies still apply, even if you are not on work time. See Policy "[Confidentiality of Business Information, HR-43](#)" for a detailed definition of what is considered to be "confidential business information" and Policy "[Telephone, Phonemail, E-Mail and Internet Usage, MG-16](#)".
 - b. You are prohibited from including your company e-mail address in your personal profiles on social networking sites.
 - c. Express only your personal opinions. Never represent yourself as a spokesperson for St. Joseph. Only those officially designated by St. Joseph have the authority to speak on its behalf.
 - d. Be respectful of your potential readers including fellow employees, customers, patients, vendors or people who work on behalf of St. Joseph. Also, keep in mind that you are more likely to resolve work-related complaints by speaking directly with your co-workers or by utilizing our Dispute Resolution Policy (HR-15) than by posting complaints to a social media outlet. Nevertheless, if you do decide to post complaints or criticism, avoid using statements, photographs, video or audio that reasonable could be viewed as discriminatory, malicious, obscene, defamatory, threatening or

intimidating, that disparage customers, patients, co-workers, former employees, vendors or St. Joseph competitors. Examples of such conduct might 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, sex, disability, religion or any other status protected by law or Company policy. The company's anti-harassment and discrimination policies still apply, even if you are not on work time. Please, see "[Harrassment, HR-40](#)", "[Problem Reporting Non-Retaliation, OIE-08](#)" and "[Rules of Conduct and Discipline, HR-26](#)".

- e. Make sure you are always honest and accurate when posting information or news, and if you make a mistake, correct it quickly. Be open about any previous posts you have altered. Remember that the Internet archives almost everything; therefore, even deleted postings can be searched. Never post any information or rumors that you know to be false about St. Joseph, fellow employees, customers, patients, vendors, people working on behalf of St. Joseph or competitors.
- f. Managers and supervisors are prohibited from any informal review systems on social networking sites such as LinkedIn, etc.
- g. Managers, supervisors and employees in a supervisory role are prohibited from requesting or entering into on-line friendships with ("friending") on social networking sites other employees subordinate to them or whom they supervise. St. Joseph prohibits retaliation in any form whatsoever against any employee who declines or ignores a "friend" request from a manager, supervisor or employee to whom they directly report.
- h. Requesting or entering into an on-line friendship ("friending") with on social networking sites with patients of St. Joseph's is prohibited.
- i. Any conduct which under the law is impermissible if expressed in any other form or forum is impermissible if expressed through a blog or social network account. Specifically, employees are obligated to comply with all federal, state and local laws related to privacy and confidentiality, including, without limitation, HIPAA. Most websites, including Facebook and others, have rules concerning the use and activity conducted on their sites. These are sometimes referred to as "Terms of Use." You must follow the established terms and conditions of use that have been established by the venue and not do anything that would violate those rules. Employees are prohibited from posting any patient or employee related information on blogs or social networking accounts.
- j. When participating in any social media, be completely transparent and disclose your true identity for your personal protection. Additionally, when commenting on or promoting St. Joseph product or service on any form of social media, you must clearly and conspicuously disclose your relationship with St. Joseph to the members and readers of that social media. Do not use your own personal online relationship or St. Joseph's network to influence polls, ranking, or web traffic. This is called "astroturfing" or "sock-puppeting" and is highly unethical. You are not to use the size and breadth of the St. Joseph network to unduly influence posses, ranking, or web traffic where said traffic is a measure of success or popularity of a particular political opinion.
- k. These policies apply to postings, blogging and texting occurring at any time, on any computer or electronic device, whether or not it is the property of St. Joseph.
- l. St. Joseph reserves the right to take disciplinary action, up to and including termination, if an employee's electronic communications violate St. Joseph policy.
- m. St. Joseph has the right but not the duty to monitor the use of all electronic resources, including but not limited to internet usage, for the purpose of protecting its interests. Employees should have no expectation of privacy in the use of the company's electronic resources. As such, when using such

systems, you should have no expectation of privacy with regard to time, frequency, content or other aspect of your use, including the websites you visit and other Internet/Intranet activity. The reasons the Company accesses and monitors these systems include, but are not limited to: maintaining the system; preventing or investigating allegation of system abuse or misuses; assuring compliance with software copyright laws; and complying with legal and regulatory requirements.

- n. When publishing any online material through social media that includes another's direct or paraphrased quotes, thoughts, ideas, photos, or videos, always use citations and link to the original material where applicable.
- o. St. Joseph respects the right of any employee to participate in social media, such as maintaining a blog or participating in online forums. However, to protect St. Joseph's interests and to oversee employees' focus on their job duties, employees must avoid use of social media during work time or at any time with St. Joseph equipment or property unless doing so is expressly permitted by St. Joseph.

If you have any questions about this policy, please feel free to seek guidance from your supervisor or Human Resources

Retaliation is Prohibited. St. Joseph prohibits taking negative or retaliatory action against any employee for reporting a possible deviation from this policy or for cooperating in an investigation. Any employee who retaliates against another employee for reporting a possible deviation from this policy or for cooperating in an investigation will be subject to disciplinary action, up to and including termination. (see also Policy "[Problem Reporting Non-Retaliation, OIE 08](#)")

If you have questions or need further guidance, please contact your HR representative.

RESPONSIBILITY:

All Employees

Attachments:

No Attachments

Approval Signatures

Committee	Approver	Date
Director of Human Resources	Shirley Lussier: Director of Human Resources	09/2014