



Administrative
 Departmental

SUBMITTED BY: Adriene McCoy
Adriene McCoy
Assistant Vice President
Human Resources
Leadership & Talent
Management

APPROVED BY: Mercedes del Rey
Mercedes del Rey
Chief Privacy Officer

APPROVED BY: Corey Heller
Corey Heller
Corporate Vice President and
Chief Human Resources
Office

Responsible Department: Human Resources
APPROVED BY: Roymi V. Membiela
Roymi V. Membiela
Corporate Vice President
Marketing & Public
Relations

Creation Date: 7/29/09
Review Date: _____
Revision Date: 2/8/13

POLICY TITLE:
Social Media

SUMMARY & PURPOSE:
The purpose of the Baptist Health South Florida ("Baptist Health") Social Media Policy is to assist Baptist Health employees, employed physicians, contractors, vendors and volunteers ("Users") in making responsible decisions about the appropriate use of social media. In the rapidly expanding world of electronic communication, social media can mean many things. Social media includes all means of communicating or posting information or content of any sort on the Internet, including to your own or someone else's web log or blog, journal or diary, personal web site, social networking or affinity web site, web bulletin board or a chat room, whether or not associated or affiliated with Baptist Health, as well as any other form of electronic communication.

POLICY:
Baptist Health recognizes that social media can be a fun and rewarding way to share your life and opinions with family, friends and co-workers around the world. However, use of social media also presents certain risks and carries with it certain responsibilities. Because the First Amendment right to free speech applies only to government employees and not to employees of private employers such as Baptist Health, Baptist Health has established these guidelines for appropriate use of social media in order to assist Users in making responsible decisions about your use of social media. Users are prohibited from using social media to disclose any protected health information, Baptist Health business records, information which is confidential or proprietary as defined in this policy, or for any other prohibited use described in this policy. Users using social media who indicate they are associated with Baptist Health must clearly specify that any opinions

All references to Policies must go to the BHSF Master Copy on the BHSF Intranet; do not rely on other versions / copies of the Policy.

expressed by them are their own, and not those of Baptist Health. All external representations on behalf of Baptist Health must first be authorized, in writing, by the VP Marketing & Public Relations or her/his designee.

SCOPE/APPLICABILITY:

This policy applies to all User's activity on the intranet or internet during working or non-working time, whether using a Baptist Health or personal email account, whether at work, at home or elsewhere, and whether using Baptist Health equipment or personal equipment (including but not limited to computers or a hand-held device such as a smart phone, iPad or tablet which has internet capability and the ability to send and receive emails).

PROCEDURES TO ENSURE COMPLIANCE:

1. Understand the Rules. Carefully read this Policy, the Baptist Health Code of Ethics, and the following policies:
 - a. Use of Computer, Email, Instant Messaging and Voicemail (BHSF 104);
 - b. Internet Security and Usage (BHSF 105);
 - c. Unauthorized Release of Confidential Information (BHSF 5225);
 - d. Personal Use of Healthcare Information (BHSF 102);
 - e. Use or Disclosure of Medical Record Information (BHSF 400);
 - f. No Solicitation/No Distribution on Baptist Health Premises (BHSF 6175);
 - g. Policy Prohibiting Harassment and Discrimination (formerly Employee Dignity and Respect) (BHSF 5075);
 - h. Equal Employment Opportunity (BHSF 1020);
 - i. Employee Conduct (BHSF 5250);
 - j. Bulletin Boards and Binders (BHSF 6300);
 - k. Cell Phones (BHSF 6400);
 - l. Release of News to the Media (BHSF 301); and
 - m. Unified Corporate Policy on HIPAA Compliance (BHSF 001.00)
2. Follow the Rules. Ensure your postings are consistent with this Policy and the above 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.
3. Protect confidential and proprietary information. Do not post personally identifiable information (PII) or protected health information (PHI), including identifiable photographs of Baptist Health patients, students, employees, donors, applicants or Board Members unless you have explicit, written permission to do so.
 - a. *Confidential Information* includes, but is not limited to information regarding patients, contractual relationships with third party payors and others, the medical staff, and information regarding the Company and its affiliates' business, affairs, plans, employees, methods and systems, trade secrets and management philosophy relating to Baptist

All references to Policies must go to the BHSF Master Copy on the BHSF Intranet; do not rely on other versions / copies of the Policy.

Health or its affiliates' business practices for corporate purposes only. Examples of Confidential Information include:

- i. Employee and Patient account and billing information, including but not limited to Social Security Numbers.
 - ii. Employee and Patient medical information and records.
 - iii. Patient and customer lists.
 - iv. Individual rates of pay.
 - v. Corporate financial long and short range strategies.
 - vi. Financial information.
 - vii. Payroll information.
 - viii. Productivity measures.
 - ix. Short and long range staffing plans.
 - x. Managed care contract strategy and information.
 - xi. Computer software and data ideas.
 - xii. Magnetic, image and text electronic information.
 - xiii. Trade secrets.
 - xiv. Marketing and advertising methods.
 - xv. Personal employee information, including but not limited addresses, telephone numbers, credit/debit card information, bank account information, benefit information, and Social Security Numbers.
 - xvi. Network ID's and passwords.
- b. *PII* is information that can be used to distinguish or trace an individual's identity. Examples include social security number, medical record number, credit card number, address, phone number or any information that, when combined or used with other identifying information, is linked or linkable to a specific individual.
- c. *PHI* is individually identifiable health information which relates to the past, present or future physical health, mental health or condition of an individual. PHI either identifies or could be used to identify the individual and has been transmitted or maintained in any form or medium (electronic, paper or oral). Examples include identifiers such as name, medical record number, social security number or other demographic information used in conjunction with health information such as treatment, diagnosis or medications.
4. Only Post Appropriate and Respectful Content. Always be fair and courteous to fellow employees, physicians, volunteers, vendors, Board Members, patients, visitors and others who work on behalf of Baptist Health. Also, keep in mind that you are more likely to resolve work related issues by speaking directly with your leader, Human Resources or by utilizing our Compliance Hotline or Resolution of Grievances Policy than by posting complaints to a social media outlet. Nevertheless, if you decide to post complaints or criticism, avoid using statements, photographs, video or audio that reasonably could be viewed as malicious, obscene, threatening or intimidating, that disparage employees, physicians, volunteers, vendors, Board members, patients, visitors and others who work on behalf of Baptist Health South Florida, or that might constitute harassment or bullying. 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 Baptist Health policy.

- a. Maintain the confidentiality of Baptist Health's private or confidential information. Do not post internal reports, policies, procedures or other internal business-related confidential communications.
 - b. Do not create a link from your blog, website or other social networking site to a Baptist Health website, without prior written authorization by the VP Marketing/Public Relations or his/her designee.
 - c. *Express only your personal opinions.* Never represent yourself as a spokesperson for Baptist Health. If Baptist Health is a subject of the content you are creating, be clear and open about the fact that you are a Baptist Health employee, employed physician, contractor, vendor or volunteer and make it clear that your views do not represent those of Baptist Health, its employees, physicians, volunteers, vendors, Board members, patients, visitors and others who work on behalf of Baptist Health. If you do publish a blog or post online related to the work you do or subjects associated with Baptist Health, make it clear that you are not speaking on behalf of Baptist Health. It is best to include a disclaimer such as "The postings on this site are my own and do not necessarily reflect the views of Baptist Health South Florida."
 - d. Do not use any Baptist Health logo, trademark, name, etc., without prior written authorization by the VP Marketing/Public Relations or his/her designee.
 - e. Do not post or share photos of Baptist Health patients or visitors.
 - f. Use of social media must not interfere with working time, Baptist Health's business or the employees, employed physicians, contractors, vendors and volunteers' performance.
5. Be honest and accurate. 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 Baptist Health, its employees, physicians, volunteers, vendors, Board members, patients, visitors and others who work on behalf of Baptist Health South Florida
 6. Using social media at work. Use of social media must not interfere with working time, Baptist Health's business or the employees, employed physicians, contractors, vendors and volunteers' performance. Do not use Baptist Health email addresses to register on social networks, blogs or other online tools utilized for personal use.
 7. Retaliation is prohibited. Baptist Health prohibits taking negative 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.
 8. Media contacts. Users should not speak to the media on Baptist Health's behalf without contacting the Marketing and Public Relations Department. All media inquiries should be directed to the VP Marketing & Public Relations or her/his designee.
 9. Questions, concerns or for more information. If you have questions or need further guidance, please contact your leader, your Human Resources consultant, the Baptist Health Privacy Office or call the Baptist Health Compliance Hotline.

All references to Policies must go to the BHSF Master Copy on the BHSF Intranet; do not rely on other versions / copies of the Policy.

10. Nothing in Baptist Health's social media policy is designed to interfere with, restrain, or prevent employee communications regarding wages, hours, or other terms and conditions of employment. You have the right to engage in or refrain from such activities.

SUPPORTING/REFERENCE DOCUMENTATION:

- Use of Computer, Email, Instant Messaging and Voicemail (BHSF 104);
- Internet Security and Usage (BHSF 105);
- Unauthorized Release of Confidential Information (BHSF 5225);
- Personal Use of Healthcare Information (BHSF 102);
- Use or Disclosure of Medical Record Information (BHSF 400);
- No Solicitation/No Distribution on Baptist Health Premises (BHSF 6175);
- Policy Prohibiting Harassment and Discrimination (formerly Employee Dignity and Respect) (BHSF 5075);
- Equal Employment Opportunity (BHSF 1020);
- Employee Conduct (BHSF 5250);
- Bulletin Boards and Binders (BHSF 6300);
- Cell Phones (BHSF 6400);
- Release of News to the Media (BHSF 301);
- Unified Corporate Policy on HIPAA Compliance (BHSF 001.00).

RELATED POLICIES, PROCEDURES, AND ASSOCIATED FORMS:

N/A

ENFORCEMENT & SANCTIONS:

Violation of this policy may lead to disciplinary action up to and including immediate termination.