

AdvocateAuroraHealth

Title: AAH SOCIAL MEDIA USE		Document Number: 2570
Document Type: <input checked="" type="checkbox"/> Policy <input type="checkbox"/> Procedure <input type="checkbox"/> Guideline <input type="checkbox"/> Other		Last Review/Revision Date: 10/29/2019
Content Applies to Patient Care: (Select all that apply)	Content Applies to: (Select One)	Next Review Date: 10/29/2022
<input type="checkbox"/> Adults <input type="checkbox"/> Pediatrics (Under 18)	<input type="checkbox"/> Clinical <input checked="" type="checkbox"/> Administrative	Effective Date: 10/29/2019
Scope: <input checked="" type="checkbox"/> AAH System <input type="checkbox"/> AAH IL Only <input type="checkbox"/> AAH WI Only <input type="checkbox"/> Site Only (Location Name): <input type="checkbox"/> Department Only (Department Name):		

I. PURPOSE

The goal of this policy is to ensure that all team members of Advocate Aurora Health (along with its affiliates, Advocate Health Care, Aurora Health Care, "Advocate," "Aurora," "Advocate Aurora") (including, employed physicians) comply with ethical and legal requirements. In all its official communications, Advocate Aurora seeks to maintain a positive brand image on social media networking sites (i.e. Facebook, Twitter, Instagram, YouTube, Snapchat, Pinterest, LinkedIn, etc.) The intent of this policy is to encourage the flow of appropriate and useful information in support of serving patients, clinicians, team members and communities, while still minimizing the risk to Advocate Aurora, its team members, its patients and affiliated organizations. Therefore, this policy establishes three things: (i) what constitutes official Advocate Aurora use of social media; (ii) the guidelines for the official use of electronic social networking; and (iii) the personal responsibilities and legal implications for Advocate Aurora team members related to their personal use of electronic social networking whenever posting information about Advocate Aurora, both while at work and on non-worktime.

II. SCOPE

This policy applies to all Advocate Aurora Health, Inc. employed and non-employed team members and physicians; and any entity or facility owned and controlled by Advocate Aurora Health.

III. DEFINITIONS/ABBREVIATIONS

Disparage – To cheapen, condemn, degrade, denigrate, discredit, downgrade, libel, malign, ridicule, slander, smear and/or vilify.

Social Media Ambassador – An Advocate Aurora team member who voluntarily promotes Advocate Aurora through social media or a member of the Public Affairs and Marketing team.

IV. POLICY

A. Overview

1. Advocate Aurora depends upon not only the strong formal competencies of its team members, but also the trust and support of the communities it serves. While we encourage open communication both internally and externally and acknowledge that team members have the right to express their opinions and views, all such communications must comply with this Policy. To be clear, any such communication which violates our patients' privacy and trust and/or violates any laws is also a violation of this Policy.
2. External communications or unauthorized internal communications about a patient that violate the Health Insurance Portability and Accountability Act (HIPAA) are ALWAYS forbidden, and may be grounds for corrective action, up to and including termination and legal action. Similarly, external communications that disclose confidential proprietary information about Advocate Aurora or violate the Code of Business Conduct are also forbidden and may result in corrective action, up to and including termination.

B. Applicability

1. This policy applies to all Advocate Aurora team members and covers all publicly accessible communications, whether via the Internet, or otherwise, relating to Advocate Aurora. The range of these communications includes, but is not limited to: Facebook, Twitter, YouTube, Instagram, LinkedIn, Pinterest, Snapchat, Glassdoor, Google My Business, live video streaming platforms, Wikipedia, other online social networks or any other form of online publishing or discussion blogs, online review sites, discussion forums, newsgroups and e-mail distribution lists, newspapers, media interviews, letters to editors, publicly distributed emails, etc.

C. Reporting Concerns

1. Advocate Aurora team members should report social media concerns to their site's (or business unit's) Human Resources Department, the Advocate Aurora Privacy Office, or public affairs/digital/social media department, as appropriate. In addition, social media concerns regarding HIPAA matters should be reported directly to the Advocate Aurora Privacy Office so that the appropriate remedial action, if any, can be taken to address the concern.

D. SOCIAL MEDIA GUIDELINES

1. Team members whose job duties do not entail the use of social media are strongly encouraged to only access social media platforms, whether by smart phones, tablets or computers during non-working time (break times and meal periods).
2. When permitted by a supervisor, team members may access social media platforms to participate in Advocate Aurora's Social Media Ambassador Program. Any such access or communications whether acting as a volunteer or as part of work duties must comply with the Social Media Guidelines below.
3. The Social Media Guidelines require that all covered access and communications:
 - a) Comply with Advocate Aurora's current Code of Business Conduct.
 - b) Do not misrepresent or make false statements about Advocate Aurora's services or products in personal online communications.
 - c) Do not include negative or disparaging comments about the professional competency or capabilities of any team member.
 - d) Do not violate copyright, trademark and other intellectual property rights of Advocate Aurora or others. For example, pulling an image or logo from Google Images, does not mean that you are authorized to republish that image or logo on a different site, whether yours or Advocate Aurora's.
 - e) Do not make endorsements of any kind including, but not limited to political endorsements, without clarifying that the individual is not speaking on behalf of Advocate Aurora.
 - f) Do not disclose Advocate Aurora's confidential financial data, or other non-public proprietary company information, confidential-proprietary information or trade secrets. NOTE: If you are unsure whether information is confidential-proprietary, consult a human resources leader or the Advocate Aurora Privacy Office before it is posted.
 - g) Do not disclose a patient's confidential or HIPAA protected information on any social media or online web site. NOTE: If you are unsure whether information relates to a patient's confidential or HIPAA protected information, consult a human resources leader or the Advocate Aurora Privacy Office before it is posted.

- h) Do not disclose confidential, non-public information regarding Advocate Aurora's business partners, vendors or suppliers.
 - i) Do not include photos or videos of patients or anyone else unless such person has fully completed the photography/media release form and, in the case of patients, fully completed a HIPAA authorization form granting you permission to use their likeness.
 - j) Do not include photos of patient care areas such as nursing stations, IT closets, clinical areas or patient rooms.
4. If your postings online become the subject of a third-party litigation involving Advocate Aurora, notify the Legal and Risk Management Departments immediately and do not delete the postings that are the subject of the litigation nor alter previous posts.

E. PERMITTED USES OF YOUR ADVOCATE AURORA CONNECTION

1. If for some reason you must reference Advocate Aurora in a personal online communication, or if you have the legal right to do so (e.g., you are engaged in a protected concerted activity), write in the first person, identify yourself by stating your first and last name, state your role at Advocate Aurora, and use a disclaimer that makes it clear that you are speaking for yourself and not on behalf of Advocate Aurora in the social media post. You may use a disclaimer like this: "The postings on this site are my own and don't necessarily represent Advocate Aurora's positions, strategies or opinions."
2. If you identify yourself as an employee of Advocate, Aurora or Advocate Aurora through social networking sites or websites (i.e., your profile "About Me" section listing your position title and Advocate, Aurora or Advocate Aurora as your employer), ensure that your profile and related content are in accordance with our mission and values.
3. Nothing in this policy should be construed to limit team members' rights to discuss their terms and conditions of employment with other team members through social media, nor does this policy prohibit employees from engaging in other forms of protected concerted activity,
4. If you do identify that you are an Advocate Aurora team member on your social media profiles, refer to the following guidelines:
 - a) Do not use ethnic slurs, personal insults, or obscenity, or engage in any threats of violence, other unlawful conduct, or

form of harassment, including derogatory or inflammatory remarks about an individual's race, age, disability, natural origin, sexual orientation or health condition.

b) Do make it clear that you, the Advocate Aurora team member, are speaking for yourself and not on behalf of Advocate Aurora.

5. From time to time, Advocate Aurora may check a team member's online profiles and posted content if an issue arises or a post is made discussing or tagging Advocate Aurora. If a team member's use(s) of social media violates Advocate Aurora's policies and procedures, then the team member may be subject to corrective action, up to and including termination of employment.

F. CREATION OF SOCIAL MEDIA ACCOUNTS REPRESENTING ADVOCATE AURORA HEALTH

1. The Advocate Aurora Health social media team is the only approved department to establish and operate social media accounts using the Advocate Aurora Health name or any of its sub names (i.e. Advocate Health Care, Aurora Health Care, Advocate or Aurora site location names, departments or services). Team members are not permitted to utilize any social media account identifiers, usernames or domain names that include the Advocate Aurora Health name or any of its sub names. Any social media account that has been created by any team member utilizing a social media account identifier, username or domain name that includes the Advocate Aurora Health name or any of its sub names or uses the trademarks or logos of an Advocate Aurora service outside of the approved brand accounts, will be reviewed and deactivated.

V. PROCEDURE

Not Applicable

VI. CROSS REFERENCES

Not Applicable

VII. RESOURCES AND REFERENCES

Copyright Compliance

Confidentiality Policy for Business Information

Media Relations

Consent for Publication

Publications

Use of Advocate Logo & Graphic Identity Standards

Internet Use

Information Security Standards for Personal Computing

Corrective Action

Patient and Associate Information Confidentiality

Code of Business Conduct

Business Conduct Program

Glossary of Defined Terms Used in HIPAA Policies and Procedures

Mitigation of Improper Disclosures of Protected Health Information

Obtaining Patient Authorization for Uses and Disclosures Other Than Treatment, Payment, and Health Care Operations

VIII. ATTACHMENTS

Not Applicable