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Social Media

I. Description

To address the use of social media, including but not limited to online communications by employees, health care providers, residents, students, volunteers, and contractors of the UNC Health Care System (collectively, "UNCHCS Representatives") that identify or relate to UNCHCS.

II. Rationale

The purpose of this policy is to ensure that the use of Social Media by UNCHCS Representatives, whether done on or off duty, that is directly or indirectly related to UNCHCS or that identifies the user as related to UNCHCS, is:

1. Consistent with applicable policies and federal and state laws, including laws regarding protected health information ("PHI"), personal identifying information ("PII"), privacy, confidentiality, and intellectual property;
2. Not reflected as representative of or endorsed by UNCHCS, unless the user has received the appropriate prior authorization to post or make specific comments; and
3. Ethically appropriate and factually accurate, demonstrating good judgment and professionalism.

The main principle applicable to UNCHCS Representatives' use of Social Media is that the same basic policies apply in the use of Social Media as in other types of conduct. This policy is meant to help UNCHCS Representatives understand how UNCHCS policies apply so they can communicate with confidence using Social Media. For additional guidance on the distinction between Institutional and Personal use of social media, consult **Exhibit A** to this policy.

III. Policy

The Use of Social Media

A. What is Social Media?

As used in this policy, the term "Social Media" is an umbrella term that encompasses the various activities that integrate technology, social interaction, and content creation. Social Media exists in many forms, including but not limited to blogs, microblogs, vlogs, wikis, photo and video sharing, podcasts, social networks, mashups, wall postings, and virtual worlds. Examples include but are not limited to: Facebook, LinkedIn, Twitter, YouTube, Vimeo, Vine, Reddit, Instagram, Figure 1, iTunes U, Snapchat, Yik Yak,

Second Life, Wikipedia, Pinterest, and World of Warcraft.

Because Social Media and other forms of electronic communications are rapidly evolving and changing, the examples contained in this policy are meant to be illustrative, but by no means exhaustive. As technology changes and newer forms of communication develop, this policy shall apply to the various forms of electronic communication that are available.

B. UNCHCS Use of Social Media

UNCHCS recognizes that appropriate use of Social Media can have beneficial effects both within UNCHCS and among the general public. Accordingly, UNCHCS departments and UNCHCS Representatives, with the guidance and assistance of UNCHCS's Communications, Marketing and External Affairs Department ("Marketing"), are encouraged to engage in Institutional use of the various forms of Social Media as a tool to communicate internally within UNCHCS and externally with other providers, patients, and the general public. Such Institutional use of Social Media should be preapproved by Marketing.

All Institutional use of Social Media will make available the [Terms of Use](#) which will outline what posts from community members are acceptable. The Social Media account administrator is responsible for ensuring that these terms of use are posted and followed. If there are questions, contact Marketing at paffairs@unchealth.unc.edu.

IV. Guidelines & Procedures

A. Applicable Policies

Communications using Social Media that are directly or indirectly related to UNCHCS should be consistent with the mission, values, policies, and procedures of UNCHCS, and with all applicable laws and regulations.

B. Patient Information

Communications using Social Media may not violate patient privacy and confidentiality policies and laws. Such communications must never contain any information that directly or indirectly identifies a patient unless the appropriate patient authorization has been obtained. (Consult Marketing, Privacy, or Legal for guidance.) This may include information that does not directly identify a patient, but would permit someone to identify a patient, either through the identification of a disease or health condition; an event precipitating the patient's health condition, such as an accident or other trauma; the patient's or provider's location within UNCHCS; the names and or specialties of the patient's health care team; the patient's language or country of origin; or any other detail that alone or in combination with other facts in the public or private domain might allow a third party to identify the patient.

This prohibition includes using patient photos in communications through Social Media, whether such photo directly or indirectly identifies a patient or only includes non-identifiable patient images, such as wounds, diseases, the results of diagnostic tests, or similar images. Unless in the context of providing treatment or educational use within UNCHCS, it is never permissible to photograph or disclose any photograph of a patient or his or her anatomy or test results without a signed authorization. (Consult Marketing, Privacy, or Legal for guidance.)

C. Confidential Business Information

Communications using Social Media must not contain confidential or proprietary UNCHCS information, including but not limited to business, personnel, and trade secret information.

D. UNCHCS Logo

UNCHCS Representatives may not use the UNCHCS logo or other UNCHCS trademarked information without prior approval from Marketing. If you have questions, contact Marketing at paffairs@unchealth.unc.edu.

E. Inappropriate Language

UNCHCS Representatives must never post information that is obscene, defamatory, profane, libelous, threatening, harassing, abusive, hateful, disparaging, or humiliating to fellow employees, business partners, competitors, patients, students, volunteers, or other representatives of UNCHCS on any Social Media site that references UNCHCS, including UNCHCS itself. Such communications may violate other UNCHCS policies even when posted or communicated on personal sites.

F. Reporting

Violations or suspected violations of this Policy may be reported to the UNCHCS Privacy Office by phone at 984-974-1127, or by email (including a screenshot of the violation, if possible) to privacy@unchealth.unc.edu.

V. Consequences Related to the Misuse of Social Media

Any UNCHCS Representative who, through the use of Social Media, makes any defamatory statement regarding UNCHCS or UNCHCS Representatives, shares confidential patient or business information, or otherwise violates this policy, will be held personally responsible and will be subject to corrective action consistent with UNCHCS Corrective Action policies.

Nothing in this policy is intended to prohibit or discourage any employee from exercising his or her right to express opinions about matters of public concern, or from engaging in concerted activity protected by law.

Individuals who have concerns regarding workplace conduct or inappropriate behavior regarding internet postings or the use of Social Media are encouraged to contact their immediate supervisor or one or more of the following departments: UNCHCS Employee Relations; Legal; Compliance; or the Privacy Office.

VI. Comments

Contact the UNCHCS Privacy Office at 984-974-1127. Or email the UNCHCS Privacy Office at: privacy@unchealth.unc.edu

Attachments:

[Exhibit A - Distinctions between Institutional and Personal Use of Social Media.docx](#)

Applicability

UNC Medical Center

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