

Children's Hospital and Health System Human Resource Policy and Procedure

This policy applies to the following entity(s):

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| <input checked="" type="checkbox"/> Children's Hospital of Wisconsin | <input checked="" type="checkbox"/> Children's Hospital of Wisconsin-Fox Valley | <input checked="" type="checkbox"/> CHHS Corporate Departments |
| <input checked="" type="checkbox"/> Children's Medical Group | <input checked="" type="checkbox"/> Children's Service Society of Wisconsin | <input checked="" type="checkbox"/> Children's Hospital of Wisconsin Foundation |
| <input checked="" type="checkbox"/> Children's Community Health Plan | <input checked="" type="checkbox"/> Children's Physician Group-Regional Services | <input checked="" type="checkbox"/> Surgicenter of Greater Milwaukee |
| <input checked="" type="checkbox"/> Children's Specialty Group | | |

Subject: Social Media

PURPOSE

Children's Hospital and Health System ("Children's") is committed to complying with all applicable laws, regulations and Children's policies in the conduct of its operations and to ensuring that all operations are consistent with our mission and values. This policy recognizes the highly regulated environment in which Children's operates and defines Children's position on Users' participation in the sharing of information through various forms of social media. Children's fully respects the legal rights of both Users and our patients, families and clients, and has created these guidelines to protect the interests of all parties.

POLICY

The following guidelines apply to all Children's entities, including all Children's employees, medical staff, contractors, students and volunteers who utilize social media ("Users"). Social media includes all means of communicating or posting information on the Internet, including but not limited to Web logs (blogs), micro blogging sites such as Twitter, social networking sites such as Facebook, LinkedIn, MySpace and YouTube, as well as all web message boards and chat forums.

Children's recognizes and supports its Users' right to use social media for their own purposes. Nothing in this policy prohibits Users from doing so, or from engaging in legally protected activity while doing so. But whether at work or in their own home, Users have an obligation to ensure that their social networking activities do not violate Children's policies or applicable state and federal laws designed to protect the dignity and privacy of our patients, clients and families, as well as laws designed to protect the organization and Users themselves. The procedures in the policy provide basic rules for protecting those interests.

PROCEDURE

1. Users should recognize that most content published online can be publicly viewed indefinitely. Consistent with applicable law, social media content may be subject at any time to scrutiny by Children's representatives to ensure compliance with Children's policies, mission and values.
2. Both at and outside of work, Users are expected to adhere to all Children's policies when using social media, including but not limited to Children's Harassment, Professional Boundaries, Privacy and Information Services policies.
3. Safeguarding our patients' protected health and clients' services information (PHI) is a priority at Children's and is required under The Health Insurance Portability and Accountability Act as well as State confidentiality laws. Users must not disclose any identifiable information related to a patient's or a client's past, present or future care. Release of any information that could permit identification (for example, name, picture, diagnosis or characteristic) of a patient or client is prohibited unless a patient's or client's parents or guardians have signed Children's Authorization to Release Images/Protected Health Information for Public Relations and Marketing form; even then, any release of information cannot exceed the scope of the applicable authorization and must be overseen by Children's staff in the Marketing and Communication Department.

4. Children's discourages staff from initiating or accepting a relationship on social media sites with patients, clients or their family members with whom staff have come into contact due to the patient/family/client's use of services provided through Children's Hospital of Wisconsin. Children's reminds Users that professional boundaries and related ethical commitments limit the scope of Users' relationship with patients, clients or their family members, including situations when a User might otherwise feel free to send or accept invitations such as "friend" requests on Facebook, or connection requests on LinkedIn. A preexisting personal relationship between a User and a Children's patient, client or their family members, predating the establishment of a treatment relationship, could constitute a limited exception, keeping in mind that Users must always maintain ethical professional boundaries. Refer to Children's "Professional Boundaries with Patients/Families/Clients" policy for additional information.
5. Users are strongly discouraged from searching the internet or social media sites of patients, clients or their family members for any reason. Refer to Children's "Professional Boundaries with Patients/Families/Clients" policy for additional information.
6. Children's discourages staff in leadership roles from initiating or accepting social media relationships with employees they manage. To be consistent with Children's References policy, management/supervisory employment recommendations referencing an individual's role at Children's should not be provided on social media sites, such as LinkedIn. All requests for verification of employment, pay or other employment-related information are to be directed to Human Resources.
7. Users may not create social media sites, profiles or channels that could be interpreted as representing Children's without authorization from the Vice President Marketing and Communication.
8. Unless authorized by the organization to speak on behalf of Children's (e.g., a media spokesperson in the Marketing and Communication Department), Users who identify themselves as Children's employees or affiliates on any social media site profile or posting must make it clear that they are speaking for themselves and not on behalf of Children's. Where a User's connection to Children's is apparent, a disclaimer such as the following should be included somewhere in the User's site profile: "The views expressed on this [blog or site] are my own and do not reflect the views of Children's."
9. Users should be professional and respectful to fellow co-workers, suppliers or people who work on behalf of Children's. If a User posts complaints or criticism, that User should avoid using statements, photographs, video or audio that reasonably could be viewed as malicious, obscene, threatening or intimidating, that disparages other employees or Children's patients/clients, or 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 Children's policy. In general, Users are encouraged to use internal and face-to-face communication options when they have complaints or concerns involving fellow Users or Children's itself. Such personal communication can be more effective than communication via social media, which can be prone to misinterpretation or being misunderstood.
10. Users should be honest and accurate in communications and never post any information or rumors which they know to be false about Children's, fellow co-workers, suppliers or people who work on behalf of Children's. Inaccurate information reflects poorly on Children's and may result in liability for the User or Children's.
11. Users must be sure not to violate patient confidentiality if responding to online ratings or postings related to care provided at Children's. Users may post a response designed to move the communication offline, such as: "Thank you for the feedback. Please contact our [name of program] so we can address your concerns directly."
12. Users may not disclose or post online Children's trade secrets, or proprietary or confidential business information, without permission from the Marketing and Communication Department. Some examples of such information are strategic initiatives or plans, internal reports, or other internal business-related confidential communications. This prohibition also includes information about visits from celebrities or

political figures prior to the point at which Marketing and Communications, which controls information announcing such visits, makes that information public.

13. If Users write a review or recommendation on social media regarding any of Children's services or programs (e.g., on Yelp), Federal trade laws require employees to disclose that they are employees. Users also should not comment anonymously or use a pseudonym when writing such a review or recommendation, as doing so could violate the law. Users should not imply any official endorsement, approval or sanction of any individual, product or organization on behalf of Children's.
14. Users should be careful to comply with copyright laws when posting online.
15. Users must ensure their social media activity does not interfere with work commitments. Users who utilize social media on company-issued equipment should have no expectation of privacy. Social media usage while a User is at work should ordinarily be limited to break periods, unless social media usage relates to a User's job and has been previously approved by the User's leader.
16. Medical providers should refrain from providing medical advice to friends on social media as this can give the appearance of a provider-patient relationship and could result in legal liability. If offering medical advice, a User must include a disclaimer indicating that the information is not intended to create a professional relationship, make clear that the advice is being offered in the User's personal capacity rather than as a representative of Children's, and accompany the advice with a recommendation that the individual seeking the advice should consult with a physician.
17. Users who witness social media postings that could harm a patient's privacy, rights or welfare should immediately report such activity to their leader or the Children's Privacy Officer immediately. Children's prohibits taking any negative action or retaliating against an employee for reporting a possible deviation from this policy or for cooperating in an investigation involving this policy.
18. Violations of this policy may result in requests to cease postings that violate this policy as well as corrective action, up to and including termination. Certain violations may also result in sanctions by licensing and professional organizations, or expose the User to personal liability for violation of applicable law.

LEADERSHIP NOTES

Potential violations of this policy should be discussed with a Human Resource Consultant or a Human Resource leader prior to discussing with the employee(s). Human Resources can provide guidance to ensure Children's would not be violating an employee's rights under the National Labor Relations Act or other applicable law.

Thomas J. Shanahan
Chief Human Resources Officer

Related policies:

- Harassment / Bullying / Disruptive Behavior
- Professional Boundaries with Patients/Families/Clients Privacy - Confidentiality - Patient Information
- Information Security