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**Name:** HPEI Social Media Policy

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## Policy and Procedures Manual

### SOCIAL MEDIA

<b>Health PEI</b>		<b>POLICY &amp; PROCEDURES</b>
<b>Applies To:</b>	Healthcare Workers	
<b>Monitoring:</b>	Executive Director of Human Resources	
<b>Approving Authority:</b>	Executive Leadership Team	
<b>Date:</b>	Effective: October 18, 2016 Next Review: <b>September 30, 2022</b>	
<p><b>This is a CONTROLLED document. Any copies of this document appearing in paper form should always be checked against the electronic version prior to use.</b></p>		

#### 1.0 POLICY

- 1.1 Social media is fundamentally changing the way Health PEI operates and offers new ways to engage with colleagues, patients/clients/residents and the public at large. Health PEI shall designate and authorize staff with responsibility to use social media for work purposes. Designation is the responsibility of the CEO or his/her designate.
- 1.2 Healthcare workers are strictly prohibited from using social media sites during work time unless authorized to use or access for work purposes.
- 1.3 Healthcare workers who post or contribute to social media during non-work time shall not:
  - (a) Disclose personal or health information related to Health PEI's patients, clients or residents on social media, in accordance with the *Health Information Act*, the *Freedom of Information and Privacy Act*, Health PEI's Pledge of Confidentiality, Health PEI's Privacy and Confidentiality of Health Information, and any other applicable legislation or policies.
  - (b) Disclose the name or other identifying information about other healthcare workers on social media without their consent.
  - (c) Violate any related Health PEI's policies or professional practice regulations including, but not limited to:
    - Internet and Computer Acceptable Use;
    - Respectful Workplaces;
    - Privacy and Confidentiality of Health Information;
    - Health PEI Code of Conduct;
    - Pledge of Confidentiality; or
    - Applicable professional codes of conduct and/or standards of practice

- (d) Belittle, intimidate, harass or threaten any patients, clients, residents, or employees of Health PEI (even if the individual is not identified).
  - (e) Post content that reflects negatively on Health PEI's reputation or the healthcare worker's own professional integrity.
  - (f) Post content relating to or describing internal workplace concerns or issues. These issues are addressed at the work site, through appropriate channels, and **not** publicly via personal use of social media.
- 1.4 Personal opinions expressed by healthcare workers on social media during non-work time cannot violate the duty of loyalty owed to Health PEI as the Employer. A breach of this Policy, and the duty of loyalty, is violated if the healthcare worker posts content on social media that is:
- (a) factually inaccurate;
  - (b) defamatory (including libelous or slanderous); or
  - (c) damaging to Health PEI, its policies, or reputation.
- 1.5 Healthcare workers, who publicly identify as an employee of Health PEI, must clearly indicate that posts on social media are of a personal or professional nature, and in either case are not made by or on behalf of Health PEI.
- 1.6 Health PEI email addresses are not permitted for the use of Healthcare worker's personal social media accounts.

## 2.0 DEFINITIONS

<b>Defamation:</b>	Defamation is a statement or communication tending to harm a person.
<b>Duty of Loyalty:</b>	The Duty of Loyalty is violated when an employee engages in public criticism which is detrimental to Health PEI's legitimate business interests.
<b>Healthcare Workers:</b>	A person involved in providing care and/or services within Health PEI facilities and programs. This includes all employees (i.e., casual, permanent, temporary, full-time and part-time employees), physicians (salaried and fee-for-service, contract, and locum), students, volunteers and contract workers.
<b>Libel or Libelous:</b>	A defamatory statement expressed in writing, a picture, a sign, or electronic broadcast.
<b>Patient:</b>	Any person receiving services from Health PEI. Also includes those referred to as clients and residents and, where appropriate, legal guardians, authorized substitute decision makers, or legal proxy of the patient. <i>(Source: Patient Safety Incident Reporting Policy)</i>  A generic term used to describe any person receiving care including patients, clients, and residents from a health care provider(s) affiliated with Health PEI. <i>(Source: Patient Rights and Responsibility Policy)</i>
<b>Posting or Postings:</b>	The act of uploading, adding, contributing or linking content on a blog, social media site, or on the internet in general.

<b>Slander or Slanderous:</b>	Is defamation in an oral or transitory form (e.g. speech or gesture).
<b>Social Media:</b>	An internet or mobile device application, location, or site that provides users with the opportunity and means to participate in, develop, or share content or views and opinions with others (e.g., Facebook, Twitter, MySpace, LinkedIn, Snapchat, YouTube, blogs etc.).
<b>Work Time:</b>	A time period when you are required to work (i.e., when not on a break), includes volunteer shifts.
<b>Workplace:</b>	Includes: <ul style="list-style-type: none"> <li>(a) all property owned and/or occupied by Health PEI and every location where Health PEI maintains an office or facilities or otherwise assigns healthcare workers to perform regular duties of their position, including in a client's home and in transit between one or more Workplaces, and</li> <li>(b) at training events, conferences, business travel, work related social gatherings, or other location(s) where an employee is actively engaged in activity associated with their employment.</li> </ul>

### 3.0 PURPOSE/SCOPE

The purpose of this policy is to outline Health PEI's regulations and expectations of healthcare workers to interact responsibly when using Social Media as a work duty/function and during non-work time.

### 4.0 APPLICATION

This policy applies to all Healthcare Workers, Health PEI.

### 5.0 PROCEDURES

5.1 Health care workers are required to:

- Know and understand this policy;
- Comply with this policy and its related policies;
- Notify their manager if they believe that they or any another healthcare worker may have violated this policy;
- Consult their manager if uncertain about how to interpret or apply this policy;
- Review the attached social media guidelines document (See [Appendix A](#)).

5.2 Managers and directors are required to:

- Know and understand this policy;
- Comply with this policy and its related policies;
- Offer guidance to any health care workers that have questions regarding the use of social media, and how to interpret or apply this policy;
- Inform human resources of any violation of this policy;

- Take necessary next steps including investigation and management;
- Review the attached social media guidelines document (See [Appendix A](#)).

## 6.0 MONITORING

- 6.1 The Executive Director of Human Resources and Pharmacare is responsible for ensuring this policy is reviewed every three years as per Health PEI's policy review cycle and standards.
- 6.2 The Executive Director of Human Resources and Pharmacare is responsible for enforcing this policy and collecting feedback related to this policy and making amendments to this policy as per Health PEI's policy review cycle and standards.
- 6.3 Healthcare workers found in breach of this policy will be subject to disciplinary action, up to and including termination.

## 7.0 REFERENCES

### Related Documents

Acceptable Use Agreement for Government-Provided Computer Technology, Government of Prince Edward Island  
 Code of Conduct, Health PEI  
 Personal Wireless Communication Device Usage, Health PEI Policy  
 Pledge of Confidentiality, Health PEI  
 Privacy and Protection of Personal Health Information, Health PEI  
 The Prevention and Resolution of Harassment in the Workplaces, Health PEI Policy

### References

Bruyere Continuing Care. Social Media Policy and Procedure COMM 05, (2013). Ottawa, ON.

Capital Health. Computer End-User Acceptable Use CH-50-020 (2003). Halifax, N.S.

Capital Health. Non-Occupational Use of Social Media. Halifax, N.S.

Central East Community Care Access Centre. Social Media, (2015).

Eastern Health. Social Media Policy, (October 11, 2017). St John's, NFLD.

IWK Health Centre. Social Media Guidelines, (2010). Halifax N.S.

Kingston General Hospital. Administrative Policy Manual - Social Media.

Lakeridge Health. Administration Manual - Social Media Policy and Procedures, (2012). Ontario.

Providence Care. Administrative Manual - Social Media ADM-CR-3, (2013).

Providence Health Care. Social Media Policy, (2017). Vancouver, BC.

Saskatoon Health Region. Social Medial Policy, (2013).

South Lake Regional Health Centre. Administrative Manual - Social Media – Use of, A S001 (2013). Newmarket, Ont.

St. Tomas Elgin General Hospital. Social Media Policy, (2014).

Vancouver Coastal Health Authority. Social Media, Websites and Online Communication Policy, (October 20, 2017). Vancouver, BC.

### Appendices

[Appendix A – Health PEI Social Media Guidelines](#)

**8.0 STAKEHOLDER REVIEW**

<b>Group/Committee</b>	<b>Dates of Review</b>
<i>Senior Management Group</i>	<i>Oct. 18, 2016</i>
<i>HR Legal Counsel</i>	<i>August, 2016</i>
<i>Human Resources</i>	<i>July 2018</i>

**9.0 REVIEW HISTORY**

**Review Dates:**            August 2019  
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## Appendix A – Social Media Guidelines

## Social Media Guidelines

**DO**

- **DO protect a patient's privacy.** Everything that is written and spoken about a patient is considered confidential.
- **DO contribute to conversations.** Share your expertise. Provide information about Health PEI that is informed and factual. Be constructive with opinions or criticisms that add to conversations, and be ready for the response – some people will agree with you, some won't and they won't hesitate to tell you.
- **DO be up front about whom you are and what you do.** Make it clear that your opinions are your own and that they do not represent the views of Health PEI. Only designated individuals are responsible to represent Health PEI on social media.
- **DO be professional,** whether posting for work purposes or privately, on your own time. Boundaries between personal, public and professional spaces are blurry. Always treat your colleagues with the same respect they are due in the workplace and maintain a professional image. Consider your professional standards and code of ethics at all times.
- **DO take your time.** Pause before you post to consider how your actions on social media may be perceived by the general public. Also, each new social media platform has its own quirks and conventions. Get to know how people relate in each and how what you post in visible to other users or visitors.
- **DO ensure work is your focus when you're on the job.** Whether or not you can access social media sites at your desk or on a smart phone/tablet, personal social media activity is only to be conducted on breaks or outside work hours.
- **DO speak with your supervisor/manager if you see something on line that may be of concern.**

**DON'T**

- **DON'T post, repeat or share** via social media anything you hear, see or learn about any patient, client or resident, inside or outside Health PEI worksites. You must not refer to clients online
- **DON'T post items that could negatively reflect** on Health PEI or your own professional integrity, or that of others. Consider whether you would make the same comment in a public face to face meeting.
- **DON'T offer specific medical advice.** While your general expertise on a health issue is valuable to share through these media, they are not the places to suggest diagnoses, treatments, how to use medications, etc., to other users. Doing so may expose you or Health PEI to liability.
- **DON'T vent or air work-related complaints or issues** you have on social media or to refer publicly to concerns regarding your employer, supervisor, colleagues or patients.
- **DON'T overstep professional boundaries.** Consider the impact that viewing a patient's information on a social media site, accepting a "friend request," or commenting on a patient's posts or blog might have on the therapeutic relationship between you as a health care worker, and the patient and their family with whom you have no personal relationship.
- **DON'T rely on privacy controls to keep you out of trouble.** Take steps to limit who can see information or media you post, but consider that anything you post may remain online forever and be shared beyond your control.
- **DON'T compromise personal safety/IT security.** Do not post personal information that could make you a target for fraud, identify theft or abuse, or use the information of others in this way. Ensure you are always in compliance with the "Acceptable Computer Use Agreement" that you signed upon hiring.