

# Social Media Policy

# I. PURPOSE

To provide University of California, Davis Health (UC Davis Health) workforce members with standards and guidelines for participating on social media.

#### II. SETTING

**UC Davis Health** 

### III. DEFINITION

Social Media--includes blogs, podcasts, and other social networking sites, including but not limited to platforms like Facebook, LinkedIn, Instagram, Snapchat, TikTok, Twitter, and YouTube. The standards and guidelines contained in this policy apply whether workforce members are posting to their own sites, managing an official UCDH site, or commenting/posting on other non-UCDH sites.

### IV. POLICY

- A. Workforce members are expected to comply with all applicable UCDH policies while using social media. For example, workforce members must not share confidential or proprietary information about UCDH and must protect patient privacy at all times, even within closed or "private" online groups. The policies and principles most pertinent to this social media policy discussion are patient confidentiality, mutual respect, political activity, computer/e-mail/internet use, government affairs, photography and video, graphic standards, advertising, and release of patient information to media.
- B. Privacy laws prohibit workforce members from disclosing Protected Health Information (PHI) or Medical Information on social media without patient authorization. This includes language or text about a patient and images or videos of the patient. While there may be instances where a patient could not be readily identified in a social media post (e.g., patient is not named), a reasonable basis to identify a patient may emerge (e.g., unique birthmark, tattoo, or date, day, or specific/unique conditions of care, etc.) thereby leading to a privacy incident or privacy violation. As such, for any patient that is referenced, quoted, described or in any way otherwise identifiable on any social media platform, prior to the content being posted the patient must sign the appropriate HIPAA Authorization form (for educational purpose or for media purpose) as indicated in Policy and Procedure 1426, Authorization and Consent for Photography and Recording. Patients should expressly authorize on the form that social media is an approved use for the PHI/Medical Information. Please contact the Public Affairs and Marketing team for access to the form at hs-publicaffairs@ucdavis.edu.
- C. If on social media it is apparent that the workforce member has a connection to UCDH, the workforce member should make it clear that they are speaking for themselves and not on behalf of UCDH. In those circumstances, the workforce member should include the following disclaimer: "The views expressed on this (blog, website, Twitter account], etc.) are my own

- and do not reflect the views of my employer." Workforce members should also consider adding this recommended language in the "About me" section of their social media profile, as available.
- D. If a workforce member expressly indicates affiliation with UCDH, or if it is clear the workforce member is affiliated with UCDH, the workforce member's social media activities should be consistent with UCDH's standards of professional conduct.
- E. If a workforce member communicates publicly over the internet about UCDH or UCDH-related matters, the workforce member must disclose their connection and role with UC Davis Health.
- F. Workforce members should always be professional, use good judgment, and be accurate and honest in their communications. Workforce member errors, omissions, unprofessional language, or behavior will likely reflect poorly on UCDH and may result in liability for the workforce member or UCDH. Workforce members should be respectful and professional to fellow workforce members, employees, business partners, competitors, students, patients, and the general public.
- G. Workforce members must ensure that their social media activity does not interfere with their work commitments and obligations.
- H. UCDH strongly discourages workforce members from "friending" or "following" patients on social media. Workforce members in patient-care roles generally should not initiate or accept friend or follow requests from patients except in unusual circumstances, such as when an inperson friendship pre-dates the treatment relationship.
- I. UCDH discourages staff in management/supervisory roles from initiating "friend" or "follow" requests with workforce members they manage. Managers/supervisors may accept friend or follow requests if initiated by the workforce member and if the manager/supervisor does not believe it will negatively impact the work relationship.
- J. UCDH does not endorse people, products, services or organizations (see UC Davis Health Policy and Procedure 1318, Advertising). Official UCDH accounts should not be used to provide such endorsements. For personal social media accounts where a connection to UCDH is apparent, the workforce member should be careful to avoid implying that an endorsement of a person or product is on behalf of UCDH, rather than a personal endorsement. As an example, workforce members that are LinkedIn users may in their private capacity endorse individuals or companies but may not use UCDH's name in connection with the endorsement, state or imply that the endorsement is on behalf of UCDH, or state specifically that the endorsement is based on work done at UCDH.
- K. For an individual account where a workforce member represents themselves, the workforce member's, social media name, handle, and URL should not include UCDH's name or wordmark.
- L. If a workforce member would like to establish a social media account for a department/unit associated with UCDH, they must contact <a href="mailto:hs-socialmedia@ucdavis.edu">hs-socialmedia@ucdavis.edu</a> prior to doing so. The workforce members must receive approval from Public Affairs and Marketing and adhere to established policies and guidelines prior to setting up a new account. Public Affairs and

Marketing reserves the right to determine appropriateness of the use of social media for any department/unit.

- 1. In order to maintain an active account for a department/unit associated with UCDH, the department/unit must:
  - a. Register and maintain an active account owner with the Public Affairs and Marketing Social Media Team
  - b. Adhere to brand and communication standards as laid out by the Public Affairs and Marketing department
  - c. Maintain a minimum number of posts (8x month, 2x week) per platform
- M. Workforce members may not use the University name, seals, or trademarks when establishing websites, blogs, or social media representation (such as a Twitter account, Facebook group podcast or domain names) unless authorized to do so by the University. (See UC Davis Policy and Procedure Manual (PPM) 310-65, Use of University's Name, Seal, and Other Trademarks for more information).
- N. Additional guidance and information regarding social media use can be found on *The Insider* under "Communication Tools."
- O. Workforce members may not post content or conduct any activity that fails to conform to any and all applicable state and federal laws, including copyright laws.
- P. Violations of this policy or state and/or federal privacy laws may result in disciplinary action up to and including dismissal and the risk of civil and criminal fines under applicable state and/or federal laws.
- Q. For information on appropriate steps when a patient has posted on social media about a provider or workforce member's care or treatment, please see Policy and Procedure 1426, Authorization and Consent for Photography and Recording, including the FAQs attached to that policy.

### **REFERENCE**

**UC Electronic Communications Policy** 

UCD Health P&P 1426, Authorization and Consent for Photography and Recording

# UCD PPM

310-23, Communications and Technology, Electronic Communications--Allowable Use 310-65, Communications and Technology, Use of the University's Name, Seal, and Other Trademarks

### Administrative Policies

Administrative Policy, 1426 Authorization and Consent to Photograph or Interview Administrative Policy, 1318 Advertising

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