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Owner **Randy Johnson**
Policy Area **06 Human Resources**
Applicability **MVHS**

Social Networking / Social Media Policy - MVHS, MV-06-027

PURPOSE

Social media is a way for people to use technology for social interaction through the use of words, images, audio and video. Examples of social media include, but are not limited to, websites such as Facebook, Snapchat, LinkedIn, Twitter, YouTube, and Instagram. In general, the Mohawk Valley Health System views social media sites (also referred to as social networking sites), personal websites, and web logs (“blogs”) positively and respects the right of employees to use them as a medium of self-expression, and nothing in this policy should be read to limit or interfere with an employee’s right under Section 7 of the National Labor Relations Act (“NLRA”) to discuss terms and conditions of employment with co-workers or third parties or engage in any other concerted activity protected by law. If an employee chooses to identify himself or herself as an employee of the Mohawk Valley Health System (“MVHS” or the “Organization”) on such Internet venues, some readers of such websites or blogs may view the employee as a representative of the Organization. In light of this possibility, employees who identify themselves in this manner are required, as a condition of employment, to observe the guidelines outlined in this policy when referring to the Organization, its programs or activities, or its employees, in a blog, social networking forum or website.

SCOPE

This policy applies to all MVHS employees including employees of St. Elizabeth Medical Center, Faxton-St. Luke’s Healthcare, St. Luke’s Home, Visiting Nurse Association, Mohawk Valley Home Care and Senior Network Health.

REFERENCES

n/a

DEFINITIONS / ABBREVIATIONS

HIPAA - HIPAA – Health Insurance Portability and Accountability Act

MVHS - Mohawk Valley Health System

PROCEDURE / DIRECTIVE

1. Employee Use of Social Media

1. All employees are required to disclose that they are employees of the Organization whenever they make favorable comments or recommend that others receive care at the facility.
2. If employees publish a blog or post online related to the work that they do or subjects associated with the Organization, the employees must make it clear that they are not speaking on behalf of the Organization. Employees should consider including a disclaimer such as “The postings on this site are my own and do not necessarily reflect the views of Mohawk Valley Health System.”
3. Maintaining the confidentiality of our patients and families is of utmost importance to the Mohawk Valley Health System. Employees must not use any form of social media, blogs, or personal websites to discuss confidential patient information or to post **any** details or photographs concerning patients and/or their families. Any inappropriate disclosure of patient information, whether direct or indirect disclosure, will be considered a direct violation of the Organization’s policies and HIPAA and will result in immediate termination.
4. MVHS’ reputation in the community for quality care is very important to the Organization. We provide many opportunities, within the Organization, for employees to raise concerns about patient care, safety and other issues about our medical services. Employees must not use any form of social media, blogs, or personal websites to disparage or defame the services or products provided by the Organization or its affiliates.
5. Employees are prohibited from posting on social media, blogs or personal websites any information or rumors that they know to be false about MVHS, fellow employees, patients, visitors, suppliers, or vendors.
6. Consistent with our employee conduct policies, employees must not use any form of social media, blogs, or personal websites to harass, bully or intimidate other employees or anyone affiliated with the Organization. Behaviors that constitute harassment or bullying include, but are not limited to, using obscene, profane, or vulgar language, posting obscene, profane, or vulgar or similarly inappropriate images, and comments that are derogatory with respect to race, color, creed, religion, national origin, ancestry, genetic information, sex, age, disability, sexual orientation, gender identity, gender expression, transgender status, marital status,

familial status, military/veteran status, domestic violence victim status, reproductive health decision making, political beliefs or any other protected class or status recognized by federal, state or local law; sexually suggestive, humiliating, or demeaning comments; and threats to intimidate or physically injure another employee or anyone affiliated with the Organization. Additionally, employees are expected to be respectful in all communications with any person affiliated with the Organization, including, but not limited to, patients, residents, patient/resident family members, medical staff, volunteers, employees, employee family members, board members, and independent contractors or vendors.

7. Employees must not use any form of social media, blogs, or personal websites to discuss or engage in conduct that is prohibited by Mohawk Valley Health System policy, including but not limited to the Organization's policies on sexual and other forms of harassment, electronic communications, workplace violence, and the use of alcohol and drugs.
8. Employees must not use any form of social media, blogs, or personal websites to discuss any proprietary, confidential, or attorney-client privileged information. Confidential information is information obtained from MVHS records including, but not necessarily limited to, an employee's, vendor's or affiliate's personal information, such as, date of birth, address, phone number, social security number, computer network usernames and passwords, or health or medical information. Do not post internal reports, policies, procedures or other internal business-related confidential communications. This provision does not apply to the use or disclosure of information pertaining to employees' terms and conditions of employment, as permitted under the National Labor Relations Act.
9. Employees are not allowed to access social media sites, blogs, or personal websites while on work time or using Organization equipment unless they obtain prior approval from their Department Manager. Any usage of such sites must be strictly work-related. Employees found to be accessing these sites for non-work related purposes, and without approval from their Department Manager, will be subject to discipline per the Organization's discipline policy. This includes accessing the sites from personal devices such as laptops or cell phones during work time. All policies regarding the use of such personal devices and the recording of work time will apply. Employees are also prohibited from using their MVHS email addresses to register on social networks, blogs or other online tools utilized for personal use.

2. Monitoring the Use of Social Media/Organization-Sponsored Social Media

1. Employees have no right to privacy with respect to any information sent, received, created, accessed, obtained, viewed, stored or otherwise found at any time on the Organization's computer networks or equipment. This means that any hardware, software, and all communications, files and records transmitted through and residing on those systems remain, at all times, the Organization's property and may be monitored or viewed at any time, without consent of or notice to the employee. Any information sent, received, created, accessed, viewed or discussed on social media sites, blogs, or personal websites using Organization resources or sent over the Organization's computer network may be monitored or viewed by the Organization at any time, without consent of or notice to the employee.

2. The Mohawk Valley Health System reserves the right to host or sponsor a social media / social networking site. However, an employee's commercial use of the Mohawk Valley Health System's name or logo is not allowed without written permission from Communications and Marketing. Unauthorized editing of any Organization-sponsored sites is strictly prohibited.
3. Employees must comply with the rules and guidelines of any Organization-sponsored social network accounts. The Organization reserves the right to remove an inappropriate or inaccurate content without notice and to take other action, including legal action, against individuals who violate the social networking account rules and guidelines.
4. Posting recommendations concerning former employees or other persons while acting as a representative of the Organization may indicate that the Organization is endorsing the individual being recommended.

3. Policy Violations

1. Employees who suspect or have knowledge of violations of this policy are encouraged to contact the Human Resources Department or the Compliance Hotline (1-800-954-9418) immediately. A prompt and thorough investigation will be conducted in response to a complaint in accordance with the Organization's policies regarding workplace investigations.
2. Any employee found to be in violation of any portion of this policy will be subject to disciplinary action up to and including termination of employment.

CONTENT EXPERT(S) / RESEARCHER(S) / CONTRIBUTOR(S): n/a

This Document Replaces: MV-07-001

Approval Signatures

Step Description	Approver	Date
President / Chief Executive Officer	Darlene Stromstad: President/ Chief Executive Officer [MS]	9/23/2020
Approver	Wayne Rustin: Vice President, Human Resources	9/22/2020
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