

Department/Category: MARKETING, COMMUNICATIONS AND MEDIA RELATIONS	Page 1 of 6	Policy # ADM 01.0025 Version: 2.0
Title: SOCIAL MEDIA	Review of: 04/01/2017	Effective Date: 04/30/2021
		Next Review: 04/30/2026

SCOPE: Applies to entities indicated below as well as their subsidiaries and affiliates

<input checked="" type="checkbox"/> NM – Northwestern Memorial Hospital	<input checked="" type="checkbox"/> NM – Lake Forest Hospital
<input checked="" type="checkbox"/> NM – Northwestern Medical Group	<input checked="" type="checkbox"/> NM – Central DuPage Hospital
<input checked="" type="checkbox"/> NM – Regional Medical Group	<input checked="" type="checkbox"/> NM – Delnor Hospital
<input checked="" type="checkbox"/> NM – Kishwaukee Hospital	<input checked="" type="checkbox"/> NM – Valley West Hospital
<input checked="" type="checkbox"/> NM – Marianjoy Rehabilitation	<input checked="" type="checkbox"/> NM – Home Health & Hospice
<input checked="" type="checkbox"/> NM – Palos Community Hospital	<input checked="" type="checkbox"/> NM – System Functions / NMHC Employees
<input checked="" type="checkbox"/> NM – Huntley Hospital / <input checked="" type="checkbox"/> NM – McHenry Hospital / <input checked="" type="checkbox"/> NM – Woodstock Hospital	
<input type="checkbox"/> NM – Other **See “Scope/Persons/Areas Affected” Section below**	

I. PURPOSE:

- A. To outline requirements, recommendations, and suggestions for employees, house staff and contractors of Northwestern Memorial HealthCare and its subsidiaries (NMHC) engaging in social media activities during working time, non-working time, and as spokespersons for NMHC. The policy is intended to offer guiding principles for responsible interactions on social media platforms, including NMHC-sponsored social media, and in non-NMHC social media platforms.
- B. To also outline potential responsibilities and liabilities for those who participate in social media.
- C. This policy does not override the governance of personal conduct, confidentiality and private use as set forth in other NMHC policies, including but not limited to the [NMHC Administrative Policy: Privacy and Confidentiality](#). Further, this policy is intended to comply with all applicable local, state and federal laws and requirements.

II. SCOPE/PERSONS/AREAS AFFECTED:

This policy applies to all regular and temporary, full-time, part-time and casual employees of NMHC, its subsidiaries and affiliates, and all physicians, independent contractors, students (including residents and fellows), volunteers, or third parties conducting business on NMHC property on behalf of NMHC.

III. DEFINITIONS:

- A. **Protected Health Information (PHI):** Any patient or individually identifiable medical information. Individually identifiable information is any information that can be used to identify the individual. This includes:

1. Name
 2. Address (all geographic subdivisions smaller than state, including street address, city county, and zip code)
 3. All elements (except years) of dates related to an individual (including birthdate, admission date, discharge date, date of death, and exact age if over 89)
 4. Telephone numbers
 5. Fax number
 6. Email address
 7. Social Security Number
 8. Medical record number
 9. Health plan beneficiary number
 10. Account number
 11. Certificate or license number
 12. Vehicle identifiers and serial numbers, including license plate numbers
 13. Device identifiers and serial numbers
 14. Web URL
 15. Internet Protocol (IP) Address
 16. Finger or voice print
 17. Photographic image - Photographic images are not limited to images of the face.
 18. Any other characteristic that could uniquely identify the individual. Examples include:
 - a. Tattoos
 - b. Birthmarks
 - c. Scars
 - d. Rare diseases
 - e. Hairstyles
 - f. Surroundings such as pets or family members
- B. Health Insurance Portability and Accountability Act (HIPAA): Further information on HIPAA can be found in the [NMHC Administrative Policy: Privacy and Confidentiality](#)

IV. POLICY STATEMENT:

- A. **Applicable To Any Social Media Use Whether During Working Time Or During Non-Working Time.**
1. Employees are personally responsible for the content published on social media sites. Consider that what is published will remain public for years to come, so employees should be careful to protect their personal privacy and the privacy of others.
 - a. If at any point an individual feels their privacy has been compromised (otherwise known as Doxxing) in any way that impacts their employment or the reputation of NMHC; they should contact NMHC Marketing, The Office of General Counsel, and their supervisor as soon as possible.
 2. Employees are responsible for their individual postings and may be held liable for misuses. Respect all laws including but not limited to copyright and fair use laws.

- a. An individual who wishes to reproduce the contents of an electronic or print publication for job-related purposes should contact their supervisor to determine whether such use is proper.
 3. Individuals may not comment about or discuss patients under their care in any postings. Disclosure of patients' Protected Health Information (PHI) as defined above and by NMHC Administrative Policy: Privacy and Confidentiality, or any other information or image that could reasonably be expected to lead to the identification of a patient, as well as other protected information, is strictly prohibited subject to Section III.C.4.
 4. Disclosure of legally protectable confidential or proprietary information of NMHC or its subsidiaries or branded programs, including but not limited to NMHC confidential financial information, NMHC-developed intellectual property, patient information and other PHI, is strictly prohibited. Subject to exceptions under III.C.4.
 5. Employees are prohibited from practicing medicine and giving medical advice via social media, blog, website, etc. Conversations with patients about their personal care or anything related to their care outside of the appropriate patient communication channels such as MyChart, are prohibited. Refer to [NMHC Administrative Policy: Privacy and Confidentiality](#) for more information. Employees should include a disclaimer that they are not offering medical advice when speaking generally about a condition.
 6. Unless approved by NMHC marketing department, an employee's social media name, handle and URL should not include the NMHC name or logo.
 7. "Friending" and "Following":
 - a. "Friending" of patients on social media websites is prohibited. Staff in patient care roles should not initiate or accept friend requests except in unusual circumstances such as the situation where an in-person friendship pre-dates the treatment relationship.
 - b. Respect privacy of accounts by patients, colleagues and staff. Those who are in management/supervisory roles should refrain from initiating "friend" requests with employees they manage/supervise. Managers/supervisors may accept friend requests if initiated by the employee, and if the manager/supervisor does not believe it will negatively impact the work relationship.
 - c. It is acceptable for colleagues of all roles to follow public accounts.
 8. If an employee is writing about their work and/or NMHC, they should be clear that they are speaking for themselves and not on behalf of NMHC or their hospital/facility. Pursuant to NMHC policy, only specifically designated employees are authorized to serve as official spokespersons for the NMHC or their hospital/facility. Employees not designated to serve as official spokespersons should add a disclaimer to their profile such as: "The views expressed on this site are my own and do not reflect the views of my employer." Federal Trade Commission advertising guidelines, require that employees discussing NMHC's services online they should disclose their affiliation with NMHC, and should also state that they are speaking only for themselves and not for NMHC.
 9. NMHC does not endorse people, products, services and organizations. Employees' social media account(s) should not be used to provide endorsements. Individuals should refrain from implying that an endorsement of a person or product is on behalf of NMHC.
 10. Nothing in this policy or elsewhere is intended to prohibit communications with others regarding wages, benefits, or other terms and conditions of employment, or to prohibit communications that are legally protected under the National Labor Relations Act or any other applicable state or federal law.
 11. Employees should periodically check this policy for updates.
- B. Applicable To Any Social Media Use During Working Time.**
1. NMHC allows for limited social media use during working time.

2. Personal use of social media should not interfere with work commitments. Therefore social media use during working time should be kept to a minimum. NMHC employees have no expectation of privacy when using the information security resources of NMHC even when personal or password protected web sites are accessed.
 3. Personal use of NMHC-provided Internet access, including public WiFi, may be monitored and limited per [NMHC IS Policy: Information Security](#). All rules that apply to other NMHC communications and conduct also apply to social media use, including specifically: respecting and prioritizing patient care; and protecting confidential information such as PHI.
- C. Applicable To Social Media Use When Posting On NMHC-Sponsored Social Media Platforms, Subsidiaries or Approved Marketing Initiatives**
1. Employees should ensure that their social media activity does not interfere with their work commitments.
 2. The NMHC social media team is responsible for reviewing requests for NMHC-sponsored postings on NMHC’s social media platforms. All NMHC-sponsored postings on NMHC’s social media platforms are subject to prior evaluation and approval by the social media team.
 3. The following are NMHC-sponsored social media platforms:
 - a. Facebook – <https://www.facebook.com/northwesternmedicine>
 - b. Twitter – <https://twitter.com/NorthwesternMed>
 - c. Instagram – <https://www.instagram.com/northwesternmedicine/>
 - d. LinkedIn – <https://www.linkedin.com/company/northwestern-medicine>
 - e. Pinterest – <https://www.pinterest.com/nmhnews/>
 - f. YouTube – <https://www.youtube.com/user/NMHChicago>
 4. Upon approval to post patient-related content from the NMHC social media team, the following is applicable:
 - a. Patient cases or stories may be posted with written consent. Consent forms are available in English and Spanish. A patient’s written consent must be obtained prior to posting any information about the patient. Forms can be obtained through a patient’s EPIC account under “media.” Verbal consent is not valid when posting information about a patient. In the event a patient requests that a post with their information be removed, it must be done immediately. Please tag the applicable department and Northwestern Medicine on all patient cases. If an employee wishes to “share” a patient story posted by the patient on a public platform, such as re-gramming on Instagram, permission must be given in writing. This can be done on the platform it was posted. Please tag the applicable department and Northwestern Medicine in the shared post.
 5. Employees and members of the public are able to comment on NMHC’s sponsored postings. The comments are not subject to the approval process. Sections IV.A and IV.B of this Policy apply to these comments.
- D. NMHC Media Relations**
1. Employees, house staff and contractors who are contacted by news media or blog contributors who are seeking commentary from a person speaking on behalf of NMHC in an official/spokesperson NMHC capacity must refer the requestor to NMHC Media Relations, ext. 6-7432 for assistance as required in [NMHC Administrative Policy: Communicating with the Media](#).

V. RESPONSIBILITIES:

N/A

VI. POLICY UPDATE SCHEDULE:

This policy is reviewed or updated every five (5) years or more often as appropriate.

VII. RELEVANT REFERENCES:

Hospital documents as noted within the body of this policy.

VIII. APPENDICES:


N/A

IX. APPROVAL:

Responsible Party: Megan Augustyniak
Manager, Social Media

Reviewers: Office of General Counsel
Corporate Compliance and Integrity
Additional Affiliate representatives as appropriate

Committee: None

Approval Party: Posh Charles

Senior Vice President, Administration
Electronic Approval: 04/27/2021

X. REVIEW HISTORY:

Written: 02/07/2012 – Supersedes NMH/NLFH entity specific policies
Revised: 04/01/2017
04/30/2021
Reviewed: 08/22/2021 – Palos Inclusion