

Subject: <b>MARKETING, COMMUNICATIONS AND MEDIA RELATIONS</b>	Page <b>1 of 4</b>	Policy # <b>NMHC ADM 01.0025</b>
Policy Title: <b>SOCIAL MEDIA POLICY</b>	Revision of: <b>04/01/2012</b>	Version: <b>2.0</b>
		Effective Date: <b>04/01/2017</b>
		Removal Date:

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

<input checked="" type="checkbox"/> <b>NM – Northwestern Memorial Hospital</b>	<input checked="" type="checkbox"/> <b>NM – Lake Forest Hospital</b>
<input checked="" type="checkbox"/> <b>NM – Northwestern Medical Group</b>	<input checked="" type="checkbox"/> <b>NM – Central DuPage Hospital</b>
<input checked="" type="checkbox"/> <b>NM – Regional Medical Group</b>	<input checked="" type="checkbox"/> <b>NM – Delnor Hospital</b>
<input checked="" type="checkbox"/> <b>NM – Kishwaukee Hospital</b>	<input checked="" type="checkbox"/> <b>NM – Valley West Hospital</b>
<input checked="" type="checkbox"/> <b>NM – Marianjoy Rehabilitation</b>	<input checked="" type="checkbox"/> <b>NM – Kishwaukee Physician Group</b>
<input checked="" type="checkbox"/> <b>NM – Marianjoy Medical Group</b>	

**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 forums.

**II. POLICY STATEMENT:**

- A. 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](#). This policy complies with all applicable local, state and federal laws and requirements.
- B. **Applicable To Any Social Media Use Whether during Working Time or During Non-Working Time.**
  - 1. You are personally responsible for the content you publish on social media sites. Consider that what you publish will remain public for years to come, so be careful to protect your personal privacy and that of others.
  - 2. Employees are legally responsible for their individual postings and may be held liable for misuses.
  - 3. To make our patients feel comfortable, initiating a request for “friending” of current patients on social media websites is discouraged and staff should generally not initiate friend requests except where a friendship pre-dates or post-dates the treatment relationship.

4. Employees 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. Even if an individual is not identified by name within the information you wish to use or disclose, if there is a reasonable basis to believe that the person could still be identified from that information, then its use or disclosure could constitute a violation of the Health Insurance Portability and Accountability Act (HIPAA) and NMHC policy.
  5. Respect copyright and fair use laws. As a general rule, you should not distribute or incorporate material that you have retrieved or copied from another web site or publication, unless your usage of such material meets the legal definition of "fair use." An employee who wishes to reproduce the contents of an electronic or print publication for job-related purposes should contact his or her supervisor to determine whether such use is proper.
  6. 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.
  7. If you are writing about your work and/or NMHC, please be clear that you are speaking for yourself and not on behalf of NMHC or your hospital/facility. Pursuant to NMHC policy, only specifically designated employees are authorized to serve as official spokespersons for the NMHC or your hospital/facility. You may even want to consider adding a disclaimer to your profile such as: "The views expressed on this site are my own and do not reflect the views of my employer." Because of Federal Trade Commission advertising guidelines, if you are discussing NMHC's services online, you should disclose your affiliation with NMHC and you should also state that you are speaking only for yourself and not for NMHC.
  8. 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.
  9. Employees are strongly encouraged to periodically check this policy for updates. The rapid emergence of new social networking tools requires that these guidelines continually evolve.
- C. 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 is not to interfere with work commitments and thus, 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 the rules that apply to other NMHC communications and conduct apply to social media use, including, specifically: respecting and prioritizing patient care; and protecting confidential information such as PHI.

**D. Applicable To Social Media Use When Posting On NMHC Through The Media Relations Department.**

1. The Northwestern Medicine Media Relations Department - Social Media Team is responsible for reviewing requests for NMHC-sponsored postings on NMHC's social media platforms. All NMHC's-sponsored postings on NMHC's social media platforms are subject to prior evaluation and approval by the Social Media Team.
2. The following are NMHC's-sponsored social media platforms:
  - a. YouTube – <https://www.youtube.com/user/NMHChicago>
  - b. Twitter – <https://twitter.com/NorthwesternMed>
  - c. Facebook – <https://www.facebook.com/northwesternmedicine>
  - d. LinkedIn – <https://www.linkedin.com/company/2475616?trk=tyah&trkInfo=clickedVertical%3Acompany%2CclickedEntityId%3A2475616%2Cidx%3A2-1-2%2CtarId%3A1471379089287%2Ctas%3ANorthwestern%20Medicine>
  - e. Pinterest – <https://www.pinterest.com/nmhnews/>
  - f. Instagram – <https://www.instagram.com/northwesternmedicine/>
3. Employees and members of the public are able to comment on NMHC's sponsored postings. The comments are not subject to the approval process. Section IV.A. and/or Section IV.B of this Policy apply to these comments.

**D. NMH Media Relations**

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](#).

**III. PERSONS AFFECTED:**

Employees, house staff and contractors of Northwestern Memorial HealthCare and its subsidiaries (NMHC) engaging in social media activities during working time, non-working time.

**IV. RESPONSIBILITIES:**

As outlined in Section II.

**V. DEFINITION:**

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.

**VI. POLICY UPDATE SCHEDULE:**

Every three (3) years or more often as appropriate

**VII. RELEVANT REFERENCES:**

Hospital policies as noted within the body of the policy.

**VIII. APPENDICES:**

None

**IX. APPROVAL:**

**NMHC**

Responsible Party:

Megan Augustyniak

Marketing Specialist, Reputation Initiatives

Reviewers:

Office of General Counsel

Corporate Compliance and Integrity

Additional Affiliate representatives as appropriate

Approval Party:

Mark Modesto

Vice President, Marketing and Communications

Electronic Approval: 04/11/2017

**X. REVIEW HISTORY:**

Written: 02/07/2012 – Supersedes NMH/NLFH entity specific policies

Revised: 01/16/2013, 08/2016 Title updated from Social Media/Networking/Online Communication Policy & Guidelines