



# Social Media

## 1. Introduction

Social Media in health care can enable an efficient way for fostering engagement and expanding the current dialogue for improved, meaningful person-centered care and services. If used inappropriately, the same technology and resources may pose significant privacy and confidentiality risks to Providence Health Care (PHC), staff, patients, residents, or their families.

### 1.1. Purpose

The purpose of this policy is to define acceptable conduct and practices in order to ensure that staff usage of Social Media:

- Is consistent with the Mission, Vision and Values of PHC. Social Media must not jeopardize the trust and reputation of PHC, the health care profession, patients, residents, families, or staff;
- Is consistent with existing PHC policies and guidelines;
- Maintains professional boundaries and compliance with the professional and ethical obligations as outlined by the respective Professional College or Association's commonly accepted standards and best practices;
- Maintains confidentiality & privacy and compliance with the BC Freedom of Information and Protection of Privacy Act ([FIPPA](#)), bylaws and other provincial laws (e.g. content, copyright infringements, intellectual property, patent, trademark, trade secrets, disclosure laws, fair use, inaccurate information, defamation, victimization, discrimination or harassment).

### 1.2. Scope

This policy applies to all [Staff](#) employed by and affiliated with PHC.

## 2. Policy

PHC expects all staff to behave with the highest standards of conduct and respect amongst themselves, patients, residents, families, and other members of the public. PHC staff must follow the Social Media policy as outlined below and be aware of the professional, ethical and legal implications of using Social Media.

### 2.1. Corporate Use of Social Media

Staff interested in participating in Social Media on behalf of PHC (some staff may be asked by leaders to participate in support of PHC's mission) must contact and be approved by the Communications & Public Affairs team to be designated an official spokesperson.

Any department or program wanting to launch Social Media activities must consult with and receive approval from the Communications & Public Affairs department. Contact



Communications & Public Affairs at [communications@providencehealth.bc.ca](mailto:communications@providencehealth.bc.ca) for more information.

Staff approved for managing an official department or program-specific Social Media account, (e.g. Twitter, Instagram, Facebook group/page, or blog) must visibly display a disclaimer stating affiliation to Providence Health Care and PHC's [logo](#) in the "About" or "Information" section on the website.

PHC reserves the right to edit and remove inappropriate information and or contributions to corporate Social Media.

## 2.2. Personal Use of Social Media

Staff are permitted to use Social Media and mobile devices at work to assist with work related duties, but must manage personal matters on their time away from work or during approved breaks. Staff must not allow the usage of Social Media, Internet, mobile devices or any other non-work-related activities to:

- Affect the ability to perform regular duties;
- Pose a risk to the safety of staff, patients, residents, families, or the public.

Staff have the right to free speech as private citizens, but they are still bound by existing organizational policies and **must not disclose** any confidential or personal Information with PHC content (including photos and video) that they are not specifically authorized to disclose.

Staff are permitted to identify their affiliation with PHC on Social Media however, staff must not speak on behalf of PHC unless authorized by Communications & Public Affairs.

In addition, Staff must:

- Use a private email address on non-work-related Social Media;
- Acknowledge their connection and role with PHC when posting about PHC-related issues;
- Make every reasonable effort to make it clear that their contribution to Social Media sites is as a private individual and not as a representative of PHC;
- Include a disclaimer when posting about PHC-related issues such as: "The views I share are mine and do not reflect the views of my employer." Also state this in the "About Me" section or profile;
- Only authorized spokespersons may release information to the media or public on behalf of PHC and its programs as per the [PHC Media Policy](#).
- Be clear that they are not speaking on behalf of PHC by writing in first person (e.g. use "I", "me", "mine" etc., **not** "we" or "our").



### 2.3. Privacy and Confidentiality

Staff must not disclose [confidential](#) or personal information, or any information containing personal [identifiers](#), such as medical information, photos or any other information which could allow a specific person to be identified.

### 2.4. Accuracy

As with any health-related advice provided in the workplace, strive for accuracy with all content disclosed online by referencing a trusted and credible source.

If you are uncertain about how to address a question posed to you, it's best to say you are not sure and refer to your leader or contact the [Communications & Public Affairs](#) team.

### 2.5. Respect

Be respectful and professional when referring to patients, residents, families, health professionals, professions, or the organization. Do not use unprofessional online personas - how you make comments and interact online not only affects the reputation, confidence and trust of your profession or organization, but also reflects on your character.

### 2.6. General Social Media Questions

Staff should contact the Communications & Public Affairs team for any general questions related to Social Media or content authorization.

### 2.7. Reporting Content that Questions PHC's Credibility

Staff are strongly encouraged to immediately report content that questions PHC's credibility by contacting PHC Communications & Public Affairs:

[communications@providencehealth.bc.ca](mailto:communications@providencehealth.bc.ca) or 604-806-8022.

### 2.8. Reporting Privacy Breaches

Staff must immediately report the actual or potential theft, loss or disclosure of Personal Information or other confidential or sensitive information, regardless of its format (i.e. verbal, written, or electronic) by contacting the Information Access & Privacy Office at:

[privacy@providencehealth.bc.ca](mailto:privacy@providencehealth.bc.ca) or 604-806-8336.

Please refer to [Managing Privacy Breaches](#) policy for additional details regarding the reporting of privacy breaches

## 3. Responsibilities

### 3.1. Staff

- Knowing and complying with PHC's Information Privacy & Confidentiality, Acceptable use of Technology, Code of Conduct and other existing related policies, and the FIPPA;
- Complying with professional and ethical obligations as outlined by the respective Professional College or Association's commonly accepted standards and best practices;



- Protecting Social Media accounts or mobile devices, i.e. changing passwords frequently, never sharing passwords with anyone and logging-out after use;
- Ensuring that information provided about PHC or its affiliated partners is informed and factual;
- Only providing accurate and credible information or comments that are within the professional scope of practice, or area of expertise;
- Contacting Communications & Public Affairs immediately for any content that questions PHC's credibility;
- Contacting Information Access & Privacy immediately for any privacy and confidentiality breaches.

### 3.2. Leaders

- Authorizing staff in their area of responsibility to engage with PHC Communications-approved Social Media applications on behalf of the department, program, service, or organization;
- Ensuring staff in their area of responsibility abide by the PHC Social Media policy, guidelines and all relevant codes of conduct;
- Ensuring staff in their area receive suitable training and regular reminders of privacy and security requirements when using Social Media;
- Referring issues to PHC Communication & Public Affairs as appropriate. If the Leader believes that staff may have violated the terms of this policy, he/she may review the information in order to determine whether Human Resources' intervention is appropriate.

### 3.3. Organization

- Defining, approving and updating Social Media controls and appropriate use policies and guidelines;
- Ensuring that privacy compliance controls are defined for monitoring and auditing Social Media usage;
- Ensuring that appropriate staff education and communication processes are provided to promote and increase awareness of policy and guidelines.

## 4. Compliance

Failure by staff to comply with this policy (e.g. breach of privacy and confidentiality, inappropriate use of Social Media, the Internet, mobile devices or any other non-work-related activities) may result in disciplinary measures from the organization or regulating Professional College/Association, up to and including, the loss of computing privileges, termination of employment, loss of privileges as a student placement or volunteer role, prosecution and restitution for damages, or other legal actions.



## 5. Supporting Documents

### 5.1. Related Policies

[Acceptable Use of Information Technology](#)  
[Cellular Phone and Smartphones](#)  
[Emailing](#)  
[Information Privacy & Confidentiality](#)  
[Information Security](#)  
[Internet Access](#)  
[Managing Privacy Breaches](#)  
[Media Relations](#)  
[Respect at Work](#)  
[Standards of Conduct](#)  
[Visual Identity](#)  
[Wireless \(WiFi\) Network](#)

### 5.2. Guidelines/Procedures/Forms

[Social Media Guidelines](#)

## 6. Definitions

**“Confidential Information”** means any personal or Corporate-related, financial or administrative information. Includes information and data, in any form or medium, relating to PHC, its business, operations, activities, planning, personnel, labour relations, suppliers and finances that is not generally available to the public and information that is identified as Confidential Information in accordance with PHC policies.

**“FIPPA”** is the British Columbia [“Freedom of Information and Protection of Privacy Act”](#), which prevents the unauthorized collection, use or disclosure of personal information by public bodies.

**“Identifiers”** means any information including, but not limited to the individual’s name, address and telephone number; the individual’s race, national or ethnic origin, colour, or religious or political beliefs or associations; the individual’s age, sex, sexual orientation, marital status or family status; any identifying number, symbol, or other particular assigned to the individual; the individual’s fingerprints, blood type or inheritable characteristics; information about the individual’s health care history, including a physical or mental disability; information about the individual’s educational, financial, criminal or employment history; anyone else’s opinion about the individual; the individual’s personal views or opinions, except if they are about someone else.

**“Organization”** is defined as Providence Health Care (PHC).

**“Personal Information”** means any recorded information about an identifiable individual that can be linked back to or can identify a specific individual through association or inference (see Identifiers). These include, but are not limited to, patients/residents/clients, members of the public or Staff (see definition). It does not include business contact information (e.g. person’s title,



business telephone number, business address, email or facsimile number).

**“Social Media”** means interactive social networks of communication, which includes both internal PHC affiliated, and external, non-PHC associated Social Media, in which the staff member’s relationship to PHC is recognized, identified or assumed. These include, but are not limited to, email, blogs, Listservs, Twitter, Facebook, Instagram, TikTok, Snapchat, Pinterest, LinkedIn, Smugmug, YouTube, online forums, wikis, text messaging, RSS feeds, video sharing, podcasts and other forms of online publishing or discussion.

**“Staff”** means all employees (including management and leadership), medical staff (including physicians, midwives, dentists, and nurses), residents, fellows and trainees, health care professionals, students, volunteers, contractors, researchers and other service providers engaged by PHC.

## 7. References

This policy was created with information from many sources, policies and documents from other Organizations. Please refer to these sources for more detailed information:

1. Barton, A.J., Skiba, D.J. (2012). Creating Social Media policies for education and practice. NI2012:11<sup>th</sup> International Congress on Nursing Informatics.
2. BC Freedom of Information and Protection of Privacy Act.
3. BCIT School of Health Science (March, 2012). Policy for use of Social Media technologies for health care providers.
4. Canadian Medical Association: Physician Guidelines for Online Communication with Patients.
5. Centers for Disease Control and Prevention (July, 2011). Health Communicator’s Social Media Toolkit: [http://www.cdc.gov/socialmedia/Tools/guidelines/pdf/SocialMediaToolkit\\_BM.pdf](http://www.cdc.gov/socialmedia/Tools/guidelines/pdf/SocialMediaToolkit_BM.pdf)
6. Cleveland Clinic Social Media Policy: [http://my.clevelandclinic.org/social\\_media\\_policy.aspx](http://my.clevelandclinic.org/social_media_policy.aspx)
7. College of Licensed Practical Nurses of British Columbia Standards of Practice.
8. College of Occupational Therapists of British Columbia Standards of Practice.
9. BC College of Nurses and Midwives Social Media Policy.
10. Northern Health Authority, (November 1, 2010). Social Media Policy.
11. Vancouver Coastal Health (May 2, 2022). Social Media, Websites, and Online Communications policy.



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