INOVX HEALTH SYSTEM

Policy Name: IHS Social Networking/Communications Policy
Effective Date: January 12, 2011

BACKGROUND

Widespread use of social media (including blogs, Facebook, Twitter, etc.) has increased the odds of employer involvement in different kinds of claims and litigation related to employees' use of it. Confidential information can very quickly reach a wide audience, and defamatory (or at least inflammatory) statements can spread to the general public very rapidly, given the viral and geometric nature of social networking. In addition, because social networking communication is not limited to the workplace environment or equipment, employees are able participate in global communications on a 24/7 platform from any public or private locale.

In spite of the risks, Inova understands the benefits of employee as well as company-sponsored participation in social media. The line that the System must walk involves protecting the organization and its employees from risky online behavior and commentary while not attempting to limit employees' rights to engage in social networking activity.

The solution is a standalone social networking policy that clearly states Inova's expectations around employee activities in this area, coupled with frequent reminders to employees about what they may or may not say about their work, their colleagues or their employer. This proposal is not intended to minimize Inova's current communication or behavior standards and policies; rather, it is designed to augment such policies with specific social networking elements, to underscore Inova's attention to the importance and risks associated with such a global communication venue.

A social networking policy should include several basic aspects:

1) It should require that the employee make clear that his or her statements and opinions are his or hers alone – not that of Inova or supervisors.
2) The policy should require that employees respect the privacy of others in what they choose to publish, and abide by all existing Inova behavioral and communication policies. This means prohibiting the posting of any patient-related information, strategic considerations, financial information, any trade secrets and other proprietary information of value to Inova.
3) Though employers cannot control their employees' online conduct away from the office, the legal risks presented by an employee engaging in social networking can be mitigated by developing and emphasizing a specific policy to govern online statements that might affect Inova regardless of official or unofficial commentary.
OBJECTIVE

Professional Use of Social Media:
The objective of this policy is to ensure employee, students and volunteer use of social networking during work is in compliance with administrative policies, as well as legal, regulatory, privacy regulations in order to prevent harm to Inova Health System and the patients it serves.

The policy extends to specific organizationally sanctioned social networking activity as well as individual activity when representing – directly or indirectly – the organization. The absence of or lack of explicit reference to a specific tool, site or venue does not limit the extent of the application of this policy. Where no policy or guideline exists, employees should use their professional judgment in accordance with existing policies regarding behavioral standards and Inova’s Code of Conduct, and take the most prudent action possible. Employees should consult their immediate manager or supervisor if they have any questions about the appropriateness of their online activities.

Personal Use of Social Media:
Inova Health System’s social media policy is not intended for internet activities that do not associate or identify a faculty or staff member with Inova Health System, do not use an Inova email addresses, do not discuss Inova Health System and are purely about personal matters.

Personal social media activity and/or professional activity that is not part of official Inova Health System communication, and where you identify yourself as an Inova employee, either through a bio, comments, or by using your Inova email address. The following disclaimer should be added whenever you identify yourself as part of Inova while not officially acting on behalf of the medical center:

The views and opinions expressed here are not necessarily those of Inova Health System, and they may not be used for advertising or product endorsement purposes.

For example, if you list Inova Health System as your employer on your Facebook info tab, you'll need to add the disclaimer on the tab as well.
PURPOSE

Inova Health System employees, students and volunteers should at all times use **social networking** in a manner consistent with the organization’s mission and values, as well as administrative policies, laws, confidentiality standards, and privacy regulations in order to prevent harm to Inova Health System, its affiliates or the patients they serve.

DEFINITIONS

**Social Networking** is the term used to describe the use of a variety of Internet Web sites that allow users to post materials, comment, reply, rank, rate and/or link themselves to other users. Collectively, these types of services are called “social media” or “Web 2.0.” Social networking includes any usage of Web 2.0 technologies and sites, such as blogging or microblogging (Twitter, Plurk), photosharing (Flickr, Twitpic), video sharing (YouTube, Vimeo), lifecasting (BlogTV, Qik), status sharing or discussion (Facebook, MySpace), networking (LinkedIn, Plaxo) and so forth.

**Blogs** are Web sites designed to allow users to post written content, photos, videos and hyperlinks of interest for others to view. Entries appear in reverse chronological order. Other users may often reply or comment on these posts, which are also generally indexed and available through search engines. Posting content on these sites is called blogging.

**Podcasts** are audio or video programs that are created by individuals or organizations and distributed via the Internet. These programs are often produced on a regular schedule, available through a distribution channel (i.e., RSS feeds, iTunes and so forth), and have many similarities to blogs.

POLICY:

When engaging in social networking, all Inova employees should:

1) **Abide by Inova Health System policies and procedures** while participating in online settings. In addition, online actions should not violate any local, state, federal or international laws, or infringe on copyrights or intellectual property rights.

2) **Follow Inova Health System’s Codes of Conduct** intended to provide a safe and encouraging workplace. Specifically, actions online should not be discourteous, abusive, threatening or abrasive to patients, fellow employees, physicians, volunteers, or other members of the public. Postings, including pictures or comments should not infringe on another individual’s privacy, or hold them up to ridicule. Likewise, online actions should not include defamatory, racial or other offensive material. Disparaging Inova Health System or its affiliates through online comments will be considered a violation of Inova Health System’s Codes of Conduct.
Employees must realize that their online presence can reflect upon Inova. Whether in the actual world or a virtual one, employees' interactions and discourse must be respectful to themselves and others. For example, patients lose faith in Inova's ability to provide professional, world-class healthcare if they see online examples of employees behaving unprofessionally, even on "personal" sites.

3) **Protect patient privacy** through compliance with all regulations and policies regarding patient information. Employees/students/volunteers should not post patient photographs, films, x-rays or diagnostic information. In addition, employees/students/staff should at no time disclose any of the following patient identifiers:
   
i) Name
   ii) Geographical subdivisions smaller than a state, including street address, city, county, precinct, or zip code
   iii) Dates related to the individual, e.g., date of birth, admission date, discharge date, date of death, any age elements that can be aggregated into a category, i.e., over 70 years of age.
   iv) Telephone numbers
   v) Fax numbers
   vi) Electronic mail address
   vii) Social Security number
   viii) Medical record number
   ix) Health plan beneficiary numbers
   x) Account numbers
   xi) Certificate/license number
   xii) Vehicle identifiers and serial numbers, license plate numbers
   xiii) Device identifiers and serial numbers
   xiv) Personal or professional Web addresses, also referred to as Universal Resource Locators (URLs)
   xv) Internet Protocol (IP) address numbers
   xvi) Biometric identifiers, including finger prints and voice prints
   xvii) Full face photographic images and comparable images
   xviii) Any other unique identifier (number, characteristic, code, or data)

4) **Protect confidential or proprietary Inova Health System information.** Confidential or proprietary information should not be posted online. Sharing other details of Inova Health System plans, reports or internal operations should only be done after consulting with the employee's/student's/volunteer's supervisor.

Employees may not reference or cite company clients, partners, vendors, consultants or customers online without their express consent. Other people's information (be it intellectual property or personal information) belongs to them. It's their choice whether to share their material with the world. Before posting someone else's material, check with the owner.
5) **Respect scheduled work time and resources.** Internet access is a privilege and must be used in a manner consistent with Inova Health System’s Code of Conduct. Inova Health System recognizes that social networking has become a common method of professional and personal communication, much like the telephone or e-mail. However, social networking which is excessive, or interferes with job responsibilities is subject to disciplinary action. Therefore, because of the amount of time and resources required, blogging is not allowed during work hours or with Inova Health System computers unless acting in an approved, official capacity as an Inova Health System spokesperson. Refer to IT resource usage policies for more information.

6) **Never comment on pending legal matters** related to Inova Health System unless acting in an approved, official capacity as a Inova Health System’s spokesperson.

7) **Regarding media contact,** if someone from the media or press contacts faculty, staff, or students about posts made in online forums that relate to Inova Health System in any way, faculty/staff/students alert their manager/leadership and contact Inova Public Relations department before responding.

8) **Be open, honest, respectful and transparent** when discussing professional topics online. Employees/students/volunteers should not create a false identity; write about competitors in a negative way; “pick fights;” or engage in impolite online dialogue, no matter how rude or provocative others may be. Employees/students/volunteers should be professional and use good judgment in things that are said and done online. In addition, employees/students/volunteers should seek to add value to online conversations in ways that support the health of communities that Inova Health System serves, and in line with Inova Health System’s mission, vision and values. Employees/students/volunteers are not authorized to use and may not use “Inova Health System” or “Inova” in their online user names or personas unless approved by the Communications & Marketing division.

Though some sites have a restricted-content feature, employees must assume that all online content is viewable by anyone on the Internet, especially because digital information can be easily shared and altered. Remember - all content contributed on all platforms becomes immediately searchable and can be immediately shared. This content immediately leaves the author’s control forever. Consequently, employees are responsible for ensuring the appropriateness of all Inova-related content posted by them, regardless of where it’s posted.

9) **Authorization and Monitoring protocols** - content Owners are responsible for gaining the expressed consent of all involved parties for the right to distribution or publication of recordings, photos, images, video, text, slideshow presentations, artwork and advertisements whether those rights are purchased or obtained without compensation.
Content Owners are responsible for constantly monitoring postings and comments to social media sites, and for deleting postings that do not adhere to our policies.

10) **Obtain pre-approval before setting up** any social networking groups, fan pages, Web sites, or other accounts that use “Inova Health System,” the Inova brand name, or the brand name of any Inova Health System affiliate or joint venture. Inova Health System has a presence on most of the major social networks and the Marketing Communications department reviews and approves additions and expansions to our official presence on social media sites. Specifically, employees/students/volunteers should not create Inova Health System-related LinkedIn business listings, Facebook groups or pages, blogs, or Twitter accounts without prior approval. Inova Health System’s logo, or the logo of its affiliates or joint ventures, may not be used online by employees/students/volunteers without permission. In addition, a member of the Marketing Communications department will be assigned to be a member with administrative rights to any Inova-sanctioned Facebook groups or sites with similar group features.

11) **Personal blogs should have clear disclaimers** underscoring that the views expressed by the author in the blog are those of the author alone and do not represent the views of the Inova. Communication should be clear, written in the first person and speaking for one’s self, rather than on behalf of Inova Health System or any of Inova’s services or operating units.

If an employee comments publicly about any issue in which they are engaged in their capacity as an Inova employee, even loosely, they must make their status as an Inova employee clear. They should also be clear about whether, in such commentary, they are speaking for themselves (presumably the normal case) or for Inova. If they are speaking on behalf of Inova, they must do so only in consultation with the Inova Public Relations team.

12) **Employees must observe and respect copyright laws**, and reference or cite sources appropriately. Rules about plagiarism apply online as well as offline. Community sites containing material written by Inova employees on behalf of Inova are governed by System policies. When employees leave Inova, material written during their employment is still considered Inova property and is subject to the same policies.

13) **Inova logos and trademarks cannot be used** without express, written consent.

14) **Consider the rules of media engagement** – the ability to comment via the Internet through channels known as social media is simply another means of media engagement, and is therefore governed by the same rules surrounding engagement with the traditional media. Do not comment upon Inova-related issues online unless you work with Inova’s Public Relations team.
15) **Understand** that Inova Health System reserves the right to monitor Internet communications to the extent necessary to protect its rights or property. In addition, breach of confidential patient health information may also be subject to legal proceedings and/or criminal charges.

16) **Everyone is responsible for their actions online** whether constructed as entries, comments or replies, and whether posting as an individual or anonymously. Use common sense and act in the best interests of Inova Health System and its affiliates at all times while online.

17) **Conflicts of interest should be avoided.** If someone or some group offers to pay faculty/staff/students for participating in an online forum in their Inova Health System role, offers advertising for pay and/or for endorsement, this could constitute conflict of interest and Inova Health System Codes of Conduct apply.

**ENFORCEMENT:**

All officers, agents, employees, students, volunteers, of Inova Health System and its affiliates must adhere to this policy. Violations of this policy are grounds for disciplinary action, up to and including termination of employment and criminal or professional sanctions in accordance with Inova Health System and its affiliates’ policies and personnel rules and regulations.

Reviewed by:  

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Geoffrey Brown, Senior Vice President and CIO  

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