I. PURPOSE

The purpose of this policy is to establish clear expectations for the use of online networking or “social media” (see definition on page 4) and staff behavior in the social media environment.

This policy applies whenever you reference or allude to Regions Hospital (or a related organization), its people, patients, services, customers or business in the Social Media environment, regardless of whether you are doing so as part of your work or for personal reasons. This policy also applies when you are using Social Media via a company-owned computer or other device (such as a smart phone), when you are using a personally-owned computer or device in a facility owned or operated by Regions Hospital or a related organization and when you are using a company-owned or personally-owned computer or device during working hours, as well as during “off hours” and/or when using your own computer, device or system.

II. POLICY

In general, Regions Hospital does not prohibit you from using Social Media at work and as part of your work. But in order to protect the privacy of the people we serve, preserve the reputation of the organization and promote a respectful and productive work environment, there are important rules that you must follow when using Social Media for personal or work-related reasons. These rules are described in this policy.

A. Using Social Media as Part of Your Work

Social Media can be an important tool in the work we do. It can help us communicate with our patients, customers and each other. It can help us improve service, respond to concerns and identify care and business opportunities. But like all tools, Social Media must be used properly.
1. **When Is It Appropriate to Use Social Media as Part of Your Work?**

There are so many possible ways we could use Social Media to help with our work, but that doesn’t mean that we should be using it for everything. In general, you may use Social Media as part of your work if:

- The activity fills legitimate need related to marketing, patient care, employee engagement or community benefit;
- The activity is consistent with the Mission, Vision and Values of the organization; and
- The organization will have the ability to regularly monitor the proposed site and content, and to edit or remove content in its discretion.

If employees have an idea for using social media to help achieve the work of the organization -- for example, a work-related blog, Facebook page, a virtual meeting or other online content sharing -- the employee must first work with his/her leader to gain their initial approval. After the leader's approval, you must follow the instructions on the [Social Media Approval Process Form](#) on Brand Central then work with Brand Team to determine appropriate use, content and administration. **All requests must be reviewed and approved by Brand Team PRIOR to implementation.**

2. **How Should Staff Behave when Using Social Media for Work-Related Reasons?**

It might seem a little strange to talk about “behavior” in the online world, but just as we behave in the “real” world, we also behave in the “virtual” world. In general, all organizational policies that govern your “real world” behavior also govern your behavior in the Social Media world. This means, for example, that when using Social Media you must follow the organization’s:

- Code of Conduct
- Privacy Policy, Standards and Guidelines
- Security Policy and Standards
- Internet Use and Email Use Policies
- Human Resources Policies

But there are some unique aspects of the “virtual” world that are in fact different from the “real” world. For example, it can be difficult to determine the true identity of an online user. Also, online postings are generally considered public, can be disseminated easily and rapidly, and often cannot be deleted – ever. For these reasons, Regions Hospital requires you to follow some additional rules when using Social Media:

a. **Represent Yourself and Regions Hospital Honestly.**

When using Social Media for work-related reasons, you must:

- Use your real name and disclose that you are a Regions Hospital employee (or consultant, resident, volunteer, Medical Staff member, etc.); be clear about which part of the organization you work for and what your general role and responsibilities are.
- Disclose only information that is already available to the public. You may not post or comment on confidential Regions Hospital information, such as patient information, financial information, business performance, business plans, legally protected information or employee or staffing information. **If you have any question about what is considered confidential Regions Hospital information, or what is or is not already available to the public, you must get guidance from your supervisor; supervisors, in turn, are responsible for consulting with Corporate Communications, Legal, Human Resources, Corporate Integrity and Finance,** as

Regions Hospital management retains the right to interpret and/or change current policies as necessary. These policies and procedures are not an employment contract and should not be interpreted as creating an employment contract or contractual rights.
appropriate.

- When you post any content, make sure that you do not claim or imply that you speak for Regions Hospital or any of its related organizations unless you have been expressly authorized by your leader to do so.

b. **Be Responsible.**

When using Social Media for work-related reasons, you must:

- Make sure that anything you post or publish is factually accurate and complies with all related organizational policies, such as Code of Conduct and privacy-related policies.
- Not make any announcements or statements about Regions Hospital or a related organization unless you have received the specific authorization of the Corporate Communications Department to do so.
- Only offer opinions, support or guidance about matters that fall within your area of responsibility at Regions Hospital. If you become aware of an opportunity to engage in a Social Media interaction related to the work of Regions Hospital or a related organization that falls outside your area of responsibility, bring this to the attention of a leader in the relevant area so that they can evaluate the matter and follow up as appropriate.
- Not disclose other people’s personal information in Social Media (or any other format) and that you comply with the organization’s privacy-related policies, guidelines and standards and expectations related to caregiver professionalism. This includes (but is not limited to) not discussing specific patients or discussing, displaying or posting their information or images on Social Media, even if you do not refer to the patient by name or other details.
- Obey copyright, privacy and other applicable laws when using Social Media. Seek advice from the Law Department if you are not certain about what you are permitted to post or publish on a Social Media platform.
- Observe standards of professionalism and professional boundaries.

c. **Be Respectful.**

When using Social Media for work-related reasons, you must:

- Be respectful of all individuals and communities with which you interact.
- Be polite and respectful of others’ opinions, even if you disagree in the midst of heated debate and discussion.
- Obey the Terms of Use and the cultural and behavioral norms of the Social Media platform being used.
- Make sure that you do not post any material that is obscene, defamatory, threatening, harassing, discriminatory or hateful to another person or organization, including Regions Hospital, its staff, its competitors or its customers, or patients.

B. **Using Social Media for Personal Purposes**

When you choose to use Social Media for non-work-related reasons, the requirements described above continue to apply. In addition, you must follow several additional rules:

1. If using Social Media while at work, on work time or using a device or system that belongs to Regions Hospital, you must:
   - You may only access social media while on a defined break and must limit your use to occasional & incidental use
   - Your use MUST not interfere with the organization’s business activities or your job performance or productivity
   - You may not use computers or devices located in a direct patient care area to access social media. This includes inpatient, outpatients, ED, Surgical Services and other
diagnostic or procedural areas. You may use computers located in break rooms, offices, the Health Resource Center and the cafeteria

- Not pursue or promote any outside job or business activity not associated with the organization
- Not make any statements, post any material or act in any way that could embarrass or potentially embarrass Regions Hospital including its staff, patients or visitors, or its related organizations
- Make sure that your use does not violate the Code of Conduct, this Policy or any other organizational policy.

2. In addition, whether using the organization’s or your own devices or systems, and whether you are using Social Media on work time or your own personal time, you must also follow these rules:

- If you refer to Regions Hospital, a related organization, our people, services, business partners or competitors, identify yourself as an employee (or consultant, resident, volunteer, Medical Staff member, etc.).
- Do not imply in any way that you are authorized to speak for or on behalf of Regions Hospital or a related organization.
- Do not use or co-opt the identity of any patient or member or any other employee (or consultant, resident, volunteer, etc.) of Regions Hospital, a related organization, a business partner or a competitor.
- Do not use any logos, signage or trademarks of Regions Hospital or a related organization in your personal Social Media interactions, unless Regions Hospital has specifically authorized that use.
- Make it clear that any opinions you express are your personal opinions. If you are commenting or offering your personal opinion about a work-related matter, make sure that your comments and opinions do not cause damage to Regions Hospital, its related organizations, our people, services, business partners or competitors.
- If you regularly refer to your work or the activities of Regions Hospital or a related organization (for example, if you maintain a personal blog about your profession), include a permanent disclaimer that your comments and opinions are your own and not those of Regions Hospital or its related organizations.
- Refrain from commenting about our patients, members or other customers, even if you do not identify them by name. All of the people we serve deserve to be treated with dignity and respect; negative or disrespectful comments about them will not be tolerated.

III. **PROCEDURE(S)**

Regions Hospital reserves the right to monitor and review Staff's use of Social Media in a Regions Hospital facility or through a Regions Hospital owned or issued device or system. In the event Regions Hospital identifies any content posted by or at the request of a person subject to this policy that it deems inappropriate under this policy, Regions Hospital may demand the removal of such content.

Business unit leaders may adopt more restrictive policies and procedures relating to Staff's use of Social Media in order to protect the organization or its patients, members or customers.

IV. **DEFINITIONS**

Regions Hospital management retains the right to interpret and/or change current policies as necessary. These policies and procedures are not an employment contract and should not be interpreted as creating an employment contract or contractual rights.
“Social Media” means the use of web-based or other electronic technology for the purpose of interacting and communicating with people, companies and communities. Examples of Social Media include, but are not limited to:

- Social networking sites, such as Facebook, LinkedIn and MySpace
- Video, photo and audio sharing sites, such as YouTube and Flickr
- Blogs and blogging tools, such as Blogger and WordPress
- Micro-blogging tools, such as Twitter and Yammer
- Collaborative forums (open or closed), such as Yahoo!Groups, SharePoint and SecondLife
- Interactive encyclopedias, such as Wikipedia
- Comment-enabled online tools on webzines, online news sites and listserves
- Personal web mail accounts, such as Yahoo or gmail
- And any other web sites or electronic media that allow individual users or companies to publish or post content

“Staff” means any person who works for or represents Regions Hospital, or who works in a facility owned or operated by Regions Hospital or a related organization. This includes, but is not limited to, employees, privileged medical staff, residents, students, volunteers, temporary employees, consultants, board members.

V. COMPLIANCE

If you do not comply with this policy you may be disciplined, which could include suspension or removal of internet or email privileges, and other disciplinary action, up to and including termination. If your violation of this policy results in Regions Hospital or a related organization incurring any cost, we can recover those costs from you. If you break the law, you may also be personally liable.

VI. ATTACHMENTS

None

VII. OTHER RESOURCES

- Code of Conduct, other policies (privacy, security, internet, email, etc.)
- Privacy Policy, Standards and Guidelines
- E-mail and Internet Use policy #RH-HR-HR 60-10-25
- Social media tips for appropriate and effective use.

VIII. APPROVAL(S)

Beth L. Heinz
Vice President

IX. ENDORSEMENT

People Council
Corporate Integrity
Human Resources Leadership Team