

Social Media, Websites and Online Communication

1. Introduction

Description

This policy describes responsibilities and expectations for Staff using and developing various Online Sites, including Social Media platforms, websites, apps and intranets. The purpose of the policy is to ensure an efficient and coordinated approach to online communication as members of the public look to online channels for health information, while minimizing privacy and confidentiality risks to Vancouver Coastal Health (VCH) and its Clients. It also offers guidance on how Staff can communicate in a professional manner that upholds the reputation of the organization.

Scope

This policy applies to all persons associated with VCH, including employees, medical staff with privileges at any VCH facility, contractors and service providers engaged with VCH, students and volunteers. These groups are collectively referred to as “Staff” in this policy.

2. Policy

2.1. Developing and Participating on VCH Sites

2.1.1. Developing a Social Media Channel or Online Site for VCH

Approval Process

Staff interested in creating and managing a Social Media channel or website on behalf of VCH must first present a business case to VCH’s Communications and Public Affairs Department (C&PA). The business case must outline why the channel or site is being created, how it can support and enhance VCH’s brand and reputation, why existing communication channels are not effective, and what resources will be available to support ongoing site maintenance.

C&PA must be informed of any major changes in the direction of content or design on existing sites.

Branding

All sites must conform to VCH’s branding guidelines available at: brand.vch.ca. A minisite template and graphics for Social Media accounts are provided by C&PA.

Website Hosting

All VCH websites must be hosted by Information Management Information Technology Services (IMITS) in the provincial data centre or through an external hosting provided approved by IMITS and C&PA. Staff who have created websites

(minisites) and Social Media channels not hosted by VCH but directly related to VCH operations must inform C&PA. A representative of C&PA will advise on how the sites can appropriately represent VCH.

URL addresses, if approved by C&PA, should follow the convention of <http://program.vch.ca>.

Maintenance

Programs must designate at least two Staff members to receive training on the content management system. C&PA will also provide links to online courses they must complete before launch to help them understand best practices for the channel and its content. These Staff will be responsible for maintaining the online content. If the content is not kept up to date, C&PA has the right to decommission the site.

Emails, postings and comments should be replied to when appropriate.

Governance

Public comments and posts that do not adhere with VCH policies must be removed and users who make disrespectful, obscene, libelous or threatening comments will be blocked.

Site managers must ensure that appropriate photo and video waivers are signed.

C&PA retains the right to remove sites, comments, posts or users at any time.

All usernames and passwords must be provided to C&PA. Only those individuals authorized by C&PA can access VCH's Social Media and Online Sites.

2.1.2. Participating on VCH Sites

When participating on VCH Social Media or contributing to websites, Staff must not post content that contains offensive materials or Confidential or Personal Information about VCH, Clients or third parties.

All use of VCH Social Media and Online Sites must conform to VCH policies including [Standards of Conduct](#) and [Acceptable Use of Technology](#).

2.2. *Personal Use of Non-VCH Social Media and Online Sites*

2.2.1. Identifying as a VCH Staff Member

When publicly identifying as an employee of VCH, Staff must make it clear that their contribution to any non-VCH Social Media or Online Site is as a private individual and not as a representative of VCH. In this case, Staff must include a disclaimer in their "About Me" section or somewhere on their profile, such as:

The views and opinions expressed here are my own and do not necessarily represent those of my employer.

When Staff identify their affiliation with VCH on Social Media, they must be consistent with VCH's image, values and standards of professional conduct.

Staff must not speak on behalf of VCH unless authorized by C&PA.

Staff must not use Social Media or Online Sites to provide medical advice online.

Any personal Social Media and Online Sites belonging to Staff (website URL, or Social Media name, handle and URL) must not include VCH's name or logo, or the name or logo of any VCH owned and/or operated facilities or services.

Staff must not use their VCH email address for any personal Social Media or Online accounts.

2.2.2. Using Mobile Devices at Work

This policy is also subject to any ensuing Bring Your Own Device policy which governs the use of personal devices for work-related purposes. Staff must also follow VCH policies including [Standards of Conduct](#) and [Acceptable Use of Technology](#).

2.2.3. Online Privacy and Confidentiality

When sharing information online, Staff must not disclose confidential Client- or business-related information or reference any Identifiers or information that could be used to identify individual Clients receiving care at VCH, as well as fellow Staff members or suppliers.

Staff must not collect Personal Information from Social Media sites or other Online Sites, even if they receive consent to do so.

Staff must not refer to Clients or other Staff in a disparaging manner online, even if the individual is not identified.

Staff must not disclose the name of or other information about other Staff online without their consent.

Staff must not take photos or videos of Clients on personal devices, including mobile phones for posting on Social Media or Online Sites unless it is for business purposes and the appropriate photography consents have been obtained. Refer to the [Cellular Phone and Blackberry Devices](#) policy and [Media Consent Form](#). This policy is also subject to any ensuing Bring Your Own Device policy which governs the use of personal devices for work-related purposes.

2.2.4. Maintaining Professional Relationships

Staff must not engage in any sort of personal relationship with Clients online. This includes initiating or accepting friend requests on various Social Media channels.

2.2.5. Clinical Use of Social Media and Online Sites

Staff must ensure any health resource information obtained from Social Media, apps or the Internet (e.g. medical websites) used for Client care/education is from reliable and credible sources.

2.2.6. Privacy Breaches

Any suspected privacy breach should be immediately reported to your Supervisor or Manager and to the Information Privacy Office who will then initiate an investigation.

2.3. **Responsibilities**

2.3.1. Staff

Staff must:

- Know and comply with VCH's existing related policies concerning the use of technology for work purposes.
- Comply with professional and ethical obligations as outlined by the respective Professional College or Associations' commonly accepted standards and best practices.
- Provide information about VCH that is informed and factual. Activities on Social Media and Online Sites must not jeopardize the trust and reputation of VCH, the health care profession, Clients or Staff.
- Contact the Information Privacy Office immediately for any privacy and confidentiality breaches.
- Report suspected privacy breaches to management as directed in this policy (see 2.2.6 Privacy Breaches)

2.3.2. Management

Management will:

- Allow Staff in their area to use/manage Social Media and Online Sites on behalf of the department, program, service or organization.
- Must not take disciplinary action against Staff members for opinions and disagreements expressed on VCH Social Media and Online Sites when those contributions align with existing VCH policies such as [Standards of Conduct](#), [Acceptable Use of Technology](#) and [Information Privacy & Confidentiality](#).
- Ensure Staff in their area abide by this policy and all relevant codes of conduct.

- Ensure Staff receive appropriate training and support, as well as regular reminders of privacy and security requirements when using Social Media and Online Sites.
- Refer questions, concerns or issues to C&PA when appropriate. Report suspected privacy breaches as directed in this policy (see 2.2.6 Privacy Breaches)

2.3.3. Communications and Public Affairs

C&PA will:

- Review all requests for developing VCH Social Media channels, websites and other Online Sites and approve requests if appropriate.
- Ensure all Social Media accounts and Online Sites align with VCH's brand, reputation and existing policies.
- Maintain up-to-date records of all approved Social Media and Online Site usernames, passwords and site managers.
- Remove inappropriate sites, comments, posts or users.
- Provide guidance, education and, if necessary, training on the proper use of Social Media and Online Sites.
- Ensure appropriate Staff education and communication processes are provided to promote and increase awareness of policy and guidelines.

2.3.4. Information Privacy Office

The Information Privacy Office will:

- Investigate any reported breach of privacy or confidentiality resulting from improper use of Social Media and Online Sites.
- Ensure that privacy compliance controls are defined for monitoring and auditing Social Media and Online Site usage.

2.4. Compliance

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

3. References

Tools, Forms and Guidelines

- [VCH Brand Guidelines](#)
- [VCH Connect: Communications & Public Affairs Web & Social Media Guidelines](#)
- [Media Consent Form for Photo and Video](#)

Related Policies

- [Acceptable Use of Information Technology](#)
- [Cellular Phone and Blackberry Devices](#)
- [Corporate Identity and Branding](#)
- [Emailing](#)
- [Information Privacy & Confidentiality](#)
- [Internet Access](#)
- [Media Policy and Procedures](#)
- [Respectful Workplace and Human Rights](#)
- [Standards of Conduct](#)
- [Texting](#)

Keywords

blogs, Facebook, Flickr, LinkedIn, social media, Twitter, website, YouTube

Definitions

“Clients” means all people receiving services from VCH and includes patients and residents.

“Confidential Information” means all information, other than personal information, that is specifically identified as confidential or is reasonably understood to be of a confidential nature, that staff receive or have access to through VCH or through other Lower Mainland Consolidation parties, including vendor contracts and other proprietary information that a Lower Mainland Consolidation party may have received from a third party.

“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.

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“Personal Information” means any information about an identifiable individual including, but not limited to: patients, clients, residents, volunteers, students, staff, physicians, or members of the public. Personal information does not include business contact information, such as a person's title, business telephone number, business address, email or facsimile number.

“Social Media and Online Sites” mean all types of social networks of communication, including both internal VCH-affiliated and external non-VCH affiliated social media, where the staff member's relationship to VCH is recognized, identified or assumed. These include, but are not limited to, websites, email, blogs, Twitter, Facebook, Pinterest, LinkedIn, Flickr, YouTube, Google+, Instagram, Snapchat, LinkedIn, online forums, comments, apps (mobile applications), 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 nurse practitioners), residents, fellows and trainees, health care professionals, students, volunteers, contractors, researchers and other service providers engaged by VCH.

Questions

Contact: [Communications and Public Affairs Team](#)

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