

Guidance: 303.G1 Social Media Guidance

Index

- I. Definition
- II. Summary of Relevant UW and UW Medicine Policies
 - A. Workforce Member Responsibilities
 - B. Confidential Information
 - C. Patient Privacy
 - D. Intellectual Property Rights
 - E. Institutional Time and Property
- III. Social Media - Best Practice Guidelines

I. Definition

Social media are interactive technologies that facilitate the creation and sharing of content, ideas, interests, and other forms of expression through virtual communities and networks. While challenges to the definition of social media arise due to the variety of stand-alone and built-in social media services currently available, there are some common features:

1. Social media are interactive Web 2.0 Internet-based applications.
2. User-generated content—such as text posts or comments, digital photos or videos, and data generated through all online interactions—is the lifeblood of social media.
3. Users create service-specific profiles for the website or app that are designed and maintained by the social media organization.
4. Social media helps the development of online social networks by connecting a user's profile with those of other individuals or groups.

The term social in regard to media suggests that platforms are user-centric and enable communal activity. As such, social media can be viewed as online facilitators or enhancers of human networks—webs of individuals who enhance social connectivity. (Wikipedia, Social Media, https://en.wikipedia.org/wiki/Social_media (as of October 23, 2023).

Social media websites and applications such as Facebook, TikTok, YouTube, WhatsApp, Instagram, X (formerly called Twitter), Reddit and LinkedIn allow users to post and share content with virtually anyone and can be an effective way to keep in touch with colleagues. Organizations, including healthcare institutions, have rapidly integrated the use of social media into their education, outreach and marketing strategies.

While this creates new opportunities for communication and collaboration, it also creates vulnerabilities for individuals and institutions, especially those involved in the healthcare environment. Depending on your privacy settings, anyone with access to the internet can see and share your social media profiles, photos and posted opinions. The potential impact on one's image and the institution's image is an important consideration.

Social media includes text, images, audio and video communicated via such tools as:

- Blogs and micro-blogs,

- Social networks;
- Interactive media;
- Professional and profession-based networking sites
- Video, audio and photo sharing;
- Social bookmarking;
- Public comment sections on webpages (such as those for online news sites);
- User created web pages; *and*
- Any other internet-based social media application similar in purpose or function to those applications described above.

You may want to visit the following website for a comprehensive and current list of social networking platforms and sites. This policy still applies even if a site is not included on this list.
https://en.wikipedia.org/wiki/List_of_social_networking_services (as of October 23, 2023).

II. Summary of Relevant UW and UW Medicine Policies

A. Workforce Member Responsibilities

Confidential, proprietary and trade-secret information about UW Medicine or its affiliates, students, employees or alumni may not be posted on social media. It is your responsibility to adhere to UW Medicine policies related to professionalism, integrity, confidentiality and security.

Relevant UW and UW Medicine policies include, but are not limited to, the following:

- UW Medicine Policy on Professional Conduct:
<https://www.uwmedicine.org/about/policy-professional-conduct>
- UW Medicine Codes of Conduct:
https://depts.washington.edu/comply/docs/UWM_CodeofConduct.pdf
- UW Medicine Patient Information Privacy Policies:
http://depts.washington.edu/comply/patient_privacy/
- UW Privacy Policies: <https://privacy.uw.edu/policies/>
- Family Educational Rights and Privacy Act (FERPA) for Students:
<https://registrar.washington.edu/students/ferpa/>
- UW Online Privacy Statement: <http://www.washington.edu/online/privacy/>
- Access and Use Agreement for UW Data and Information Systems:
<https://uwnetid.washington.edu/agree/>
- UW Data Governance Policies, Standards, and Guidelines:
<https://datagov.uw.edu/topics-initiatives/policies/>
- UW Electronic Discovery: <https://www.washington.edu/ago/electronic-discovery/>

B. Patient Privacy

Patient privacy must be maintained in all use of social media. Do not post information that may be used to identify patients or their health conditions unless posting the content is related to your job duties, you have received management approval to post the content onto social media and you have obtained the patient's signed HIPAA authorization giving you their express permission to undertake this activity. Remember that even seemingly de-identified information may be recognized by coworkers, patients, their families or their employers.

Relevant UW Medicine Compliance policies include COMP.103 Use and Disclosure of Protected Health Information.¹

C. Intellectual Property Rights

Intellectual property rights are to be preserved. If you have any questions regarding UW Medicine and UW's intellectual property rights please contact the appropriate department prior to any use: http://depts.washington.edu/uwcopy/UW_Policies/UW_Contacts/.²

D. Institutional Time and Property

Respect institutional time and property. In general, do not use social media sites for personal, non-work related purposes when you are supposed to be doing your job. Be aware there may be more limitations or specific policies governing the use of social media depending on where you work. UW Medicine entities or departments may also set more restrictive or specific policies regarding access to social media sites. When in doubt, check with your supervisor. The use of institutional computers, internet access, networks and time on the job is subject to a number of specific rules and policies, including but not limited to the following:

- a. UW workforce members are subject to state law and UW policies³ that prohibit the use of computers and networks for most personal use except under certain circumstances.⁴ State resources may not be used to: support, promote, or solicit for an outside organization or group unless otherwise provided by law and University policy; assist an election campaign, promote or oppose a ballot proposition or initiative, or lobby the state legislature; advertise or sell for commercial purposes; conduct an outside business or private employment or other activities for private financial gain. Supervisors are responsible for: monitoring the use of state resources; determining whether frequency or volume of use complies with the law; counseling workforce members as needed; and revoking access privileges, if necessary.⁵

¹ See all UW Medicine Patient Information Privacy Policies at <https://depts.washington.edu/comply/privacy-policies/>. Unauthorized or inappropriate disclosure of confidential patient information is a violation of UW Medicine policy and the Health Insurance Portability and Accountability Act (HIPAA). UW Medicine takes violations of patient privacy very seriously. Suspected noncompliance with UW Medicine's patient information privacy policies is handled in accordance with COMP.005 Compliance Investigations. Violations of the privacy rules may result in corrective actions in accordance with COMP.006 Corrective Actions.

² For comprehensive guidance on relevant laws and UW Medicine policies, consult the UW Copyright Connection at http://depts.washington.edu/uwcopy/Copyright_Connection/.
UW Patent, Invention and Copyright Policy: <http://www.washington.edu/admin/rules/policies/PO/EO36.html>.
UW DCMA (Digital Millennium Copyright Act) Information: <http://www.washington.edu/itconnect/work/appropriate-use/uw-dmca-digital-millennium-copyright-act-information/>.
UW Trademarks and Licensing Policy: [Revised-Policies-May-2019-APPROVED-MG.pdf](#).

³ APS 47.2 Personal Use of University Facilities, Computers, and Equipment by University Employees.

⁴ UW Medicine entities not owned or operated by the state have policies or procedures aligned with the principles of the Washington State Ethics Act, in this regard.

⁵ Faculty and staff who violate published University policies regarding the personal use of University resources, facilities, computers and equipment, or policies regarding outside work and conflict of interest are subject to appropriate disciplinary or corrective action, including dismissal. Allegations of noncompliance with APS 47.2 are handled in accordance with APS 47.10 Policy on Financial Irregularities and Other Related Illegal Acts. In addition, the State Executive Ethics Board has the authority to investigate allegations of improper use of state resources (RCW 42.52.360) and is charged with enforcing laws and rules

- b. Student use of computers and networks is subject to UW policies.⁶

E. Outside work

If you are planning to engage in any social media activities for which you may earn any personal income, you must obtain approval in advance by following the outside work requirements based on your entity or role⁷ (e.g., professional or classified staff member, School of Medicine faculty member or other academic personnel, etc.), and ensure these activities are done without the use of institutional time and property as described in section D. above.

III. Social Media – Best Practice Guidelines

1. **Think twice before posting.** Privacy does not exist in the world of social media. Consider what could happen if a post becomes widely known and how that may reflect on both you and UW Medicine. Recognize that any post that references care provided to UW Medicine patients could make a patient identifiable when social media posts are looked at in the aggregate (e.g., multiple posts) or in conjunction with other information that is publicly available (e.g., news). Search engines can turn up posts years after they are created, and comments can be forwarded or copied. If you would not say it at a conference or to a member of the media, consider whether you should post it online. If you are unsure about posting something or responding to a comment, seek advice from your supervisor, residency or academic advisor or the department head. Additionally, there should be no expectation of privacy when using a UW Medicine and or UW-based account to visit internet websites. Email communications and internet use may be subject to disclosure under the Public Records Act or for audit purposes.⁸
2. **Use disclaimer language.** Unless you are serving as an approved, official spokesperson for UW Medicine, online communications are your personal opinions and do not reflect the opinion of UW Medicine or its affiliated entities. Each workforce member is personally responsible for his/her posts (written, audio, video or otherwise). If you acknowledge your UW Medicine affiliation or you may be otherwise known or presumed to be affiliated with UW Medicine, include disclaimers in your online communications that indicate you are not speaking officially on behalf of the organization.

For example:

- a. “The postings on this site are my own and do not represent the positions, strategies or opinions of my employer (or the University of Washington and UW Medicine)”; or
- b. “This is a personal website, produced in my own time and solely reflecting my personal opinions. Statements on this site do not represent the views or policies of my employer,

prohibiting state workers from improperly using state resources. The Executive Ethics Board's determinations and actions are independent of any disciplinary or corrective action taken by the University.

⁶ See <https://itconnect.uw.edu/it-at-the-uw/it-governance-and-policies/appropriate-use/>.

⁷ See UW Medicine Compliance Outside Work FAQs: https://depts.washington.edu/comply/docs/FAQ_OutsideWork.pdf

⁸ See [APS 47.2 Personal Use of University Facilities, Computers, and Equipment by University Employees](#).

past or present, or any other organization with which I may be affiliated. All content is copyrighted.”

3. **Even disclaimers are not failsafe.** Standard disclaimer language may not by itself exempt UW Medicine managers and executives from a special responsibility when posting to social media. By virtue of their position, managers and executives must consider whether personal thoughts they publish may be misunderstood as expressing UW Medicine positions. Managers should assume that their team may read the posts.
4. **Anonymity is a myth.** Write everything as if you are signing it with your name.
5. **Remember your audience.** A presence in the social media world is or easily can be made available to the public at large. This includes prospective and current students, current employers and colleagues, patients and their families and peers. Consider this before publishing to ensure the post will not alienate, harm or provoke any of these groups.
6. **Strive for accuracy.** Get the facts straight before posting them on social media. Review content for grammatical and spelling errors. This is especially important if posting on behalf of UW or UW Medicine in any capacity.
7. **Familiarize yourself with and use conservative privacy settings regardless of the content on your profile.** Practice restraint when disclosing personal information on social networking sites; your audience is everyone.
8. **Consider your professional image.** As a rule, post online only content that you would be comfortable having your chair or supervisor see. Employers often search social networking sites during the hiring process. Always consider the professional image you wish to present to your employer, coworkers, patients and their families. Even seemingly innocuous images and comments can diminish the respect and trust that others have for you.
9. **Do not “friend” patients or students on social networking sites unless you had a relationship with the patient or student previously.**
10. **Ask permission before posting medical-related content on social media sites.** If you are faculty or staff, ask permission from someone with appropriate authority in your chain of command. If you are a resident or student, ask permission from someone with appropriate authority in your program.
11. **Disclose your relationship.** If you make comments that could reasonably be construed as an endorsement of UW Medicine’s services, disclose your relationship with UW Medicine.
12. **Do not engage in cyberbullying. Do not harass, libel, slander or embarrass anyone.** Do not post any material that is obscene, defamatory, profane, libelous, threatening, harassing, abusive, hateful or embarrassing to another person or entity. Individuals may be held personally liable for defamatory, proprietary or libelous commentary.
13. **If in doubt, do not post!**