

UW MEDICINE
SOCIAL NETWORKING POLICY AND GUIDELINES

May 24, 2011

BACKGROUND

Social networking sites can be an effective way to keep in touch with colleagues; in medical education, wikis and discussion boards are already heavily utilized. Social media such as Facebook, MySpace, LinkedIn, Twitter, Wikipedia, and Flickr have grown in popularity and application, allowing users to post content and share with virtually anyone. Organizations, including healthcare institutions, are rapidly integrating 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 our privacy settings, literally anyone with access to the internet can see our profiles, photos, and posted opinions, and can share them anywhere. The potential impact on professional careers and professions is an important consideration.

PURPOSE

This document summarizes existing University and UW Medicine policies that apply to the use of social media, adopts a new UW Medicine policy limiting the use of social media in hospital and clinic space, and outlines best practice guidelines for UW Medicine faculty, staff, trainees, students and volunteers (hereafter referred to as workforce members) who participate in social networking sites and share social media in other areas where use of social media is permitted. Social media includes text, images, audio and video communicated via such tools as:

- Blogs, and micro-blogs such as Twitter
- Social networks, such as Facebook
- Professional networks, such as LinkedIn
- Video sharing, such as You Tube and vlogs (video weblogs)
- Audio sharing, such as podcasts
- Photo sharing, such as Flickr and Photobucket, and
- Social bookmarking, such as Digg and Redditt
- Public comment sections on webpages (such as those for online news sites)
- User created web pages such as Wikis and Wikipedia, and
- Any other internet-based social media application similar in purpose or function to those applications described above.

SECTION I: UW MEDICINE POLICY LIMITING USE OF SOCIAL MEDIA IN HOSPITAL AND CLINIC SPACE

Use of Social Media is prohibited while performing direct patient care activities or in the unit work areas, unless Social Media use in these areas has been previously approved by a supervisor. Workforce members should limit their use of Social Media in hospital or clinic space to rest or meal breaks, unless Social Media use for business purposes has been previously approved by a supervisor.

SECTION II: SUMMARY OF OTHER RELEVANT UW AND UW MEDICINE POLICIES

1. Confidential, proprietary and trade-secret information about UW Medicine or its affiliates, students, employees, or alumni may not be posted.¹
2. Patient privacy must be maintained in all communications. Do not disclose information that may be used to identify patients or their health condition² and remember that even de-identified information may be recognized by patients, their families, or their employers. Relevant UW Medicine Privacy Policies include:
 - a. PP-07: Use and Disclosure of Protected Health Information to Carry Out Treatment, Payment, and Health Care Operations [http://depts.washington.edu/comply/docs/PP_07.pdf]
 - b. PP-08: Use & Disclosure of Protected Health Information Requiring Authorization [http://depts.washington.edu/comply/docs/PP_08.pdf].
3. Copyright and intellectual property rights must be preserved. For comprehensive guidance, consult the UW Copyright Connection at http://depts.washington.edu/uwcopy/Copyright_Connection/. This useful site contains links to relevant laws and university policies including the UW Patent, Invention and Copyright Policy at <http://www.washington.edu/faculty/facsenate/handbook/04-05-07.html> and the Digital Millennium Copyright Act information at <http://www.washington.edu/itconnect/policy/dmca.html>. Violations may result in lawsuits, fines, and imprisonment. Copyright content can be very valuable; owners may routinely search to see if their material is being used without permission and may take steps to enforce their rights.
4. The UW owns and controls its name(s) and other marks, logos, insignias, seal, designs and symbols. Unauthorized use of these trademarks is prohibited by UW trademark and licensing policies (see <http://depts.washington.edu/uwlogos/uw-resources/policies-procedures>), and is subject to civil and criminal penalties. The UW reserves the right to assess financial penalties, issue cease and desist orders, or take other legal action.
5. Respect university time and property. The use of university 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. *As employees of Washington state agencies, faculty and staff* are subject to State law and UW policy³ that prohibits the use of computers and networks for most personal use except under certain circumstances. State resources may not be used to support, promote, or solicit for an outside organization or group unless otherwise provided by law and University

¹ Disclosing student educational records or personally identifiable student information violates the Family Educational Rights and Privacy Act (FERPA). See <http://www.washington.edu/students/reg/ferpa.html>.

² Disclosing confidential patient information in an inappropriate manner is a federal offense under the Health Insurance Portability and Accountability Act (HIPAA). The sanctions include significant fines and/or criminal penalties. UW Medicine takes violations of patient privacy very seriously. Suspected noncompliance with the privacy rules is handled in accordance with PP-05: Complaints Related to UW Medicine Privacy Practices [http://depts.washington.edu/comply/docs/PP_05.pdf]. Violations of the privacy rules will result in corrective action in accordance with PP-06: Corrective Actions for Noncompliance with Privacy and Information Security Policies [http://depts.washington.edu/comply/docs/PP_06.pdf].

³ APS 47.2: Personal Use of University Facilities, Computers, and Equipment by University Employees [<http://www.washington.edu/admin/rules/APS/47.02.html>].

policy, to assist an election campaign, promote or oppose a ballot proposition or initiative, or lobby the state legislature. Supervisors are responsible for monitoring the use of state resources, determining whether frequency or volume of use complies with the law, counseling staff as needed, and revoking access privileges, if necessary.⁴

- b. *Student* use of computers and networks is subject to UW policies, including, but not limited to the following:
 - i. Using Your Computer in Residence Halls
[\[http://www.washington.edu/itconnect/connecting/reshall.html#rules\]](http://www.washington.edu/itconnect/connecting/reshall.html#rules)
 - ii. Chapter 478-120 WAC: UW Student Conduct Code
[\[http://apps.leg.wa.gov/WAC/default.aspx?cite=478\]](http://apps.leg.wa.gov/WAC/default.aspx?cite=478).
6. In general, do not use social media sites for personal, non-work related purposes when you are supposed to be doing your job. Recognize that UW Medicine has set a more restrictive policy limiting the use of social media in hospital and clinic spaces (see Section I, above). Recognize that other 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 unit head.
7. 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).
8. There should be no expectation of privacy when using a University account to visit internet websites. Email communications and internet use may be subject to disclosure under the Public Records Act or for audit purposes⁵.
9. Adhere to the rules that apply to all other aspects of your responsibilities as a UW Medicine workforce member, including professionalism, integrity, confidentiality, and security. Relevant university and UW Medicine policies include but are not limited to the following:
 - a. UW Medicine Policy on Professional Conduct:
<http://uwmedicine.washington.edu/Global/policies/Pages/Professional-Conduct.aspx>
 - b. UWMC Integrity at Work:
[http://uwmedicine.washington.edu/Global/policies/Documents/IAW_Broc_web%20\(5\).pdf](http://uwmedicine.washington.edu/Global/policies/Documents/IAW_Broc_web%20(5).pdf)
 - c. HMC Integrity at Work:
<http://uwmedicine.washington.edu/Global/policies/Documents/IntegrityAtWorkBooklowres031309.pdf>

⁴ 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 [\[http://www.washington.edu/admin/rules//APS/47.10.html\]](http://www.washington.edu/admin/rules//APS/47.10.html). In addition, the state Executive Ethics Board has the authority to investigate allegations of improper use of state resources (per [RCW 42.52.360](#)), and is charged with enforcing laws and rules 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.

⁵ See APS 47.2.2 (<http://www.washington.edu/admin/rules/policies/APS/47.02.html>)

- d. UW Medicine Information Security Policies: http://security.uwmedicine.org/policies/sec_policies.asp
- e. UW Electronic Information Privacy Policy on Personally Identifiable Information: <http://www.washington.edu/itconnect/policy/privacypolicy.html>
- f. The UW Access and Use Agreement: <http://uwnetid.washington.edu/agree/>
- g. UW Information Security policies: <http://www.washington.edu/admin/rules/APS/02.01TOC.html>
- h. UW Minimum Data Security Standards: [UW APS 2.10, UW Minimum Data Security Standards](#)
- i. UW Data Management Policy: <http://www.washington.edu/uwit/im/dmc/docs/UWDataManagementPolicyV19.pdf>
- j. UW Guidelines for Electronic Discovery: <http://www.washington.edu/admin/ago/ediscovery.pdf>

SECTION III: SOCIAL NETWORKING 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. Search engines can turn up posts years after they are created, and comments can be forwarded or copied. If you wouldn't 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.
2. **Anonymity is a myth.** Write everything as if you are signing it with your name.
3. **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 students, 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.
4. **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 the university in any capacity.
5. **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.
6. **Consider the professional image you would like to portray.** As a rule, only post online what you would want your chair or supervisor to see. Employers are beginning to search social networking sites as part of their background checks for new employees. While we all view our lives outside of work personal, consider the professional image you would like to portray to your patients and their families. Even seemingly innocuous pictures and comments can impact the respect and trust your patients have for you, now and in the future.
7. **Don't 'friend' patients on social networking sites. Managers should not engage in social media interaction with their subordinates (such as becoming "friends" on Facebook), even if a subordinate initiates the contact.**

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8. **Ask permission before posting medically-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.
 9. **If in doubt, don't post!**
 10. **Use disclaimer language.** 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 my university], or
 - b. This is a personal web site, 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, past or present, or any other organization with which I may be affiliated. All content is copyrighted.
 10. **Even disclaimers aren't failsafe.** Standard disclaimer language may not by itself exempt UW Medicine managers and executives from a special responsibility when blogging. 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 blog.
 11. **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.
 12. **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.

ADDITIONAL READING

The American Medical Association Policy (2010): Professionalism in the Use of Social Media (<http://www.ama-assn.org/ama/pub/meeting/professionalism-social-media.shtml>)