

MMC VII-18 Social Media Policy 4/1/26

👤 Revised by Kaltrina Rugova

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HUMAN RESOURCES POLICY AND PROCEDURE MANUAL	SUBJECT: Social Media Policy
APPROVED:  SHEILA McGRATH	POLICY NUMBER: VII-18
	DATE ISSUED: 03/31/10
	DATE REVIEWED/REVISED: 4/1/26

GENERAL POLICY:

Social media is a positive manner of communicating with current and prospective Associates, physicians, patients and our partners in the healthcare community through new online channels.

Montefiore's Marketing Department is responsible for developing and managing all official Montefiore social networking sites, groups, fan pages or other tools representing the organization at large. Associates wanting to develop additional subgroups/sites representing specific staff or departments at Montefiore must notify and receive approval from the Marketing Department prior to development. Montefiore reserves the right to request that such sites link to officially-sanctioned institutional sites or to request removal or changes to such subgroups/sites.

The purpose of this policy is to ensure that Associates exercise good judgment before posting any information about Montefiore, its services and/or staff on the web. Montefiore's legitimate interests can, in certain circumstances, be harmed by inappropriate uses of media. Accordingly, this policy is intended to respect employees' rights to personal expression while limiting Montefiore's legal liability and protecting Montefiore's proprietary information and business interests.

For purposes of this policy, social media includes all aspects of internal and external social media and social networking tools and channels, such as blogs, "Wiki" pages, Facebook, LinkedIn, Twitter, Instagram, TikTok, YouTube, and/or photography sharing sites (such as Flickr), etc.

POLICY APPLICABLE TO:

All Associates, including temporary or agency staff. This policy pertains to Associates' use of social media:

- whether on or off Montefiore time;
- whether on or off Montefiore's premises; and
- whether using on Montefiore's equipment/systems (computers, smart phones, etc.) or on the Associate's own equipment/systems.

PROCEDURE:

Before Associates make any posting that identifies them as an Associate of Montefiore or that refers to Montefiore, Associates must consider the following;

- Associates must exercise sound discretion when engaging in social networking with current or former patients of Montefiore. Engaging in any discussion or posting any information concerning patients including patients' medical condition(s), could constitute a HIPAA violation. Blogs/posts containing photographs or information revealing any protected health information, including the identity of any Montefiore patient, is strictly prohibited.
- When engaging in any social networking with former or current patients, Associates must abide by all applicable codes of conduct and/or ethics associated with their profession, certification or license, and with any restrictions concerning Associate-patient relationships and/or communications.
- Blogs/posts may not contain any content that:
 - violates any laws pertaining to the privacy of patients or Associates;
 - violates any other applicable laws, including laws pertaining to intellectual property rights;
 - is defamatory or libelous or might be construed as harassment or discrimination on the basis of race; color; religion; creed; national

origin; alienage or citizenship status; citizenship or immigration status; age; sex; gender; actual or presumed disability; history of disability; sexual orientation; gender identity or expression; sexual and other reproductive health decisions; genetic predisposition or carrier status; pregnancy; military status or service; familial status; marital or partnership status; arrest or conviction record; caregiver status; credit history; unemployment status; salary history; height or weight; status as victim of domestic violence, sexual violence, or stalking; or any other characteristic protected by law;

- impersonates other Associates;
 - infringes upon any third party rights (including intellectual property rights);
 - discloses any trade secrets, copy right material, or other sensitive or confidential or proprietary information; or
 - violates Montefiore's workplace policies, including policies against discrimination, harassment, workplace violence, or HIPAA violations.
- The following are permitted only with the express, prior written permission of Montefiore's Legal Department and or Marketing:
 - Blogs/posts that imply sponsorship, endorsement, or support by Montefiore;
 - Blogs/posts that hold the Associate out as a spokesperson on behalf of Montefiore; and
 - Blogs/posts that use any Montefiore logo, trademark, or copyright material in violation of laws protecting such trademarks and copyrights.
 - Social media networks can link an Associate to Montefiore and other professional organizations. Additionally, people may connect an Associate's own private account with the fact that they work for Montefiore. Posts made under an Associate's own private account may, in certain circumstances, harm Montefiore and violate Montefiore's Social Media Policy and Non-Discrimination and Anti-Harassment Policy. This includes, but is not limited to, posts that disclose confidential or HIPAA-protected information; posts that constitute unlawful discrimination, harassment, or retaliation; and/or posts that may be falsely attributed to Montefiore. In such cases, the Associate may be subject to discipline, up to and including termination.
 - Montefiore also reserves the right to take any legal action that may be necessary to protect patient privacy and Montefiore's registered trademarks, service marks, and proprietary or confidential information.
 - Improper personal use of Montefiore computers is prohibited. Montefiore may access or monitor communications stored on its property or in its systems, with or without advance notice, to ensure proper use of its equipment and detect security violations.

If there is any uncertainty concerning the content of the posting, or if an Associate needs clarification of any aspect of this policy, the Associate should consult their supervisor or the Human Resources Department before posting.

Nothing herein is intended to limit an Associate's right to engage in protected activity, including under Section 7 of the National Labor Relations Act, nor to prevent an Associate from assisting coworkers or former coworkers with workplace issues concerning Montefiore, and from communicating with others, including about the terms and conditions of employment. Further, this policy shall be applied consistently with New York Labor Law § 201-i.

Failure to comply with this policy may lead to discipline up to and including termination.

All Medical Center Human Resources Policies and practices are guidelines and may be changed, modified or discounted at any time any time by the Medical Center's Senior Vice President of Human Resources, or designee, with or without notice. Exceptions do not invalidate the basic policy.