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Approval Date	<i>July 8, 2021</i>
Revision Date	<i>March 4, 2021</i>
Approved by	<i>Andree Robichaud, CEO</i>
Approver Signature	
Scheduled Review Date	<i>July 2024</i>
Cross- Reference	<i>This policy replaces: Social Media 5-10, Social Media 5-20, Social Media 5-30, and Social Media 5-40</i> <i>APPENDIX A: Guidelines for Acceptable Use of Social Media</i>

PURPOSE

The purpose of this policy is to provide direction to Central Health employees and affiliated individuals when using social media in a personal, professional or corporate capacity.


SCOPE

This policy covers the appropriate uses of social media within Central Health and provides guidance for employees and affiliated individuals who engage in social media for personal, professional, or corporate purposes.

All Central Health employees and affiliated individuals are accountable for following the direction in this policy when using social media for personal, profession or corporate purposes.

This policy does not apply to general and personal use of social media by individuals involving information, opinions, views or otherwise obtained outside their employment or affiliation with Central Health.


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DEFINITIONS


Affiliated Individuals	<p>Individuals who are not employed by Central Health, but perform specific tasks at or for the organization, including, but not limited to, trustees, students, volunteers, pastoral care, researchers, contractors, vendors and individuals working at the organization.</p>
Business Information	<p>Information with respect to Central Health’s business that is not publicly disclosed by the organization. Employees / affiliates may encounter such information that is not generally known to the public as they perform their duties. Examples include, but are not limited to:</p> <ul style="list-style-type: none"> • legal matters involving the organization that are not public knowledge; • financial information that is not available in Central Health’s annual report; • contractual agreements with vendors, consultants, contractors, and third parties (the confidentiality of this information may be written into the contract, e.g. non-disclosure of the cost of the service); • information about intellectual property such as development of new technology and treatments or unpublished reports; and • information pertaining to Central Health’s information and technology access and security systems.
Client	<p>A person who avails of the services of an authority, and includes a client, patient and/or resident.</p>
Defamatory Libel	<p>A matter published, without lawful justification or excuse, that is likely to injure the reputation of any person by exposing him to hatred, contempt or ridicule, or that is designed to insult the person of or concerning whom it is published.</p>
Department	<p>Means any department, division, business unit, clinic, program, portfolio, sector, section, or service within the Central Health organizational structure.</p>

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Disclose	To make the information available or to release it but does not include a use of the information and "disclosure" has a corresponding meaning.
Health Care Professional	<p>A person, including a corporation, that is licensed or registered to provide health care by a body authorized to regulate a health care professional under one of the following enumerated Acts but does not include an employee of a health care professional when acting in the course of his or her employment:</p> <ul style="list-style-type: none"> • Chiropractors Act, 2009 • Dental Act, 2008 • Denturists Act, 2005, • Dietitians Act, • Dispensing Opticians Act, 2005, • Hearing Aid Practitioners Act, • Licensed Practical Nurses Act, 2005, • Massage Therapy Act, 2005, • Medical Act, 2011, • Occupational Therapists Act, 2005, • Optometry Act, 2012, • Pharmacy Act, 2012 • Physiotherapy Act, 2006, • Psychologists Act, 2005, • Registered Nurses Act, 2008, and • Social Workers Act. <p>The following health professions are subject to the <i>Health Professions Act</i>:</p> <ul style="list-style-type: none"> • Acupuncturists • Audiologists • Dental Hygienists • Medical Laboratory Technologists • Medical Imaging Technologists • Midwives • Respiratory Therapists • Speech Language Pathologists

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Health Care Provider	A person, other than a health care professional, who is paid by MCP, another insurer or person, whether directly or indirectly or in whole or in part, to provide health care services to an individual.
Personal Health Information	Identifying information in oral or recorded form about an individual that relates to: <ol style="list-style-type: none"> i. the physical or mental health of the individual, including information respecting the individual’s health care status and history and the health history of the individual’s family; ii. the provision of health care to the individual, including information respecting the person providing the health care; iii. the donation by an individual of a body part or any bodily substance, including information derived from the testing or examination of a body part or bodily substance; iv. registration information; v. payments or eligibility for a health care program or service in respect of the individual, including eligibility for coverage under an insurance or payment arrangement with respect to health care; vi. an individual’s entitlement to benefits under or participation in a health care program or service; vii. information about the individual that is collected in the course of, and is incidental to, the provision of a health care program or service or payment for a health care program or service; viii. a drug as defined in the Pharmacy Act, 2012, a health care aid, device, product, equipment or other item provided to an individual under a prescription or other authorization issued by a health care professional; or ix. the identity of a person’s representative as defined in Section 7 of the Personal Health Information Act.

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Personal Information	Recorded information about an identifiable individual including: <ul style="list-style-type: none"> i. the individual's name, address, or telephone number; ii. the individual's race, national or ethnic origin, color, or religious or political beliefs or associations; iii. the individual's age, sex, sexual orientation, marital status or family status; iv. an identifying number, symbol or other particular assigned to the individual; v. the individual's fingerprints, blood type or inheritable characteristics; vi. information about the individual's health care status or history, including a physical or mental disability; vii. information about the individual's educational, financial, criminal, or employment status or history; viii. the opinions of a person about the individual; and ix. the individual's personal views or opinions.
Professional Boundaries	Professional boundaries are the spaces between a health professional's power and the client's vulnerability. Professional boundaries support key elements of the health practitioner-patient relationship including trust, compassion, mutual respect, and empathy and serve to keep lines of communication open.
Professionalism	Qualities or typical features of a profession or professional including: knowledge, spirit of inquiry, autonomy, collegiality and collaboration, accountability, advocacy, innovation and visionary, ethics and values. A collection of attitudes and actions; it suggests knowledge and technical skill.
Social Media	Social media is a term used to describe on-line technologies, applications and practices used to share information, knowledge and opinions (e.g. social networking sites, social media groups, messenger, blogs, wikis, content sharing sites, photo sharing sites, and video sharing sites). Well-known platforms include Facebook, Twitter, Instagram, YouTube, Reddit, Pinterest and LinkedIn.

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Social Media Account Administrators	Social media account administrators are employees who have been authorized by Central Health to manage (e.g. monitor, post content, respond to queries, etc.) social media platforms on behalf of the organization (i.e. CH social media accounts).
Social Networking	Includes all types of postings and/or interactions on the internet including, but not limited to, social networking sites blogs and other online journals and diaries, discussion boards and chat rooms, microblogs, third party rating sites and smartphone applications. Multimedia host sites and similar media. Social networking activities may also include the permission or refusal of posts by others where an individual can control the content of the postings.

POLICY STATEMENTS

Disclosure or sharing of personal, personal health or confidential business information [herein referred to as *Information*] of Central Health through social media platforms for personal, professional, or corporate purposes must adhere to applicable laws, professional practice standards and Central Health policy direction.


Unauthorized disclosure of Information by Central Health employees or affiliated individuals is strictly prohibited in accordance with the Central Health Confidentiality Policy (IPR-0003) and Oath of Confidentiality.

Social media platforms are publicly available social networking sites or accounts that offer no expectation of privacy and are not authorized for disclosure or sharing of any Information obtained through employment or affiliation with Central Health, except as authorized by the individual to whom the information relates or as approved through Central Health processes.

Acceptable Use of Social Media by Central Health Employees and Affiliated Individuals

In order to protect the privacy of Central Health employees, affiliated individuals and clients, all Information posted to social media which has been gained through

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employment or affiliation with Central Health must be approved by the individual's manager and the Corporate Communications and Government Relations Department, prior to any posting to any social media platform or account.

Employees and affiliated individuals may use their personal social media accounts to engage with authorized content posted by approved individuals on Central Health social media accounts and to promote Central Health programs and services by sharing, liking, commenting, following, etc.

Unless authorized, employees and affiliated individuals must clearly indicate that their online comments and/or social media activity are of a personal and/or professional nature, and not on behalf of Central Health. As a private citizen, a Central Health employee must make every reasonable effort to make it clear that they are contributing to social media sites as a private individual, and not as a representative of Central Health.


Personal social media accounts must not use Central Health email addresses. Unless authorized by the Central Health Corporate Communications and Government Relations Department, social media content must not include the Central Health name or logo.

Personal use of social media in the workplace is limited to breaks and must not occur in the presence of clients or visitors. Personal use of social media must not interfere or cause a delay with the provision of care and service delivery, or with one's ability to safely perform work-related responsibilities.

Work-related concerns or issues must be addressed at work through the appropriate channels and not publicly via personal use of social media. Concerns or issues must be reported through the employee's respective manager, Medical Services and/or the People and Culture Department.

Unless authorized by the Corporate Communications and Government Relations Department, Central Health services, initiatives, or events, including live tweeting must be communicated on Central Health social media accounts and not on personal social media accounts.

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Use of Social Media for Professional Purposes

Professional practice standards regarding confidentiality, therapeutic boundaries and professional image must be adhered to when health care professionals use social media in connection with their professional activities.

Health care professionals must:


- Abide by professional standards of practices, codes of ethics, other and regulatory standards when using social media;
- Maintain professional boundaries when using social media (e.g. when accepting “friend requests” from clients on Facebook, searching for clients or making comments on client’s posts or blogs for whom you have no other personal relationship);
- Avoid offering professional advice on social media as such advice could lead to professional liability;
- Only accept compensation for contributions to an online forum regarding work-related matters with approval of Central Health or the applicable regulatory body; and
- Avoid the collection of a client’s information via social media as it may impact critical thinking and professional judgement.

Corporate Use of Social Media by Central Health

Corporate use of social media within Central Health may be used by authorized administrators for the purposes of:

- Increased access to audiences and timely communication and engagement of the public;
- To increase engagement partners, and stakeholders;
- Increase brand awareness;
- Increase the speed of public feedback and input;
- Reach targeted audiences on specific issues; and/or
- Reduce dependence on traditional media channels and support accurate communication of information.

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Employees and affiliated individuals must be authorized by the Corporate Communications and Government Relations Department to comment, represent and/or speak on behalf of the organization (e.g. to present themselves, or to be perceived to present themselves, as official Central Health spokespeople online).

Where authorized, Central Health social media accounts must be attached to a general Central Health email address, and not to an employee’s personal or work email address. The social media accounts must not use the name or title of an employee or affiliated individual as the administrator unless the purpose of the social media account is to feature a specific individual on behalf of Central Health (e.g. President and Chief Executive Officer).

The Corporate Communications and Government Relations Department is responsible for developing the governing processes for the use of social media by Central Health for corporate purposes.

The Corporate Communications and Government Relations Department oversees the online presence of Central Health, including Central Health social media accounts, as well as online and social media advertising and information sharing on behalf of Central Health.


Employees and affiliated individuals seeking work-related information (e.g. storm closures) must use internal communication processes such as the Central Health Intranet and must not use Central Health social media accounts for this purpose.

Where any risks are posed to Central Health by the use of social media, authorized administrators may disable access to any social media platform where there is reason to believe Central Health networks, information, technology infrastructure or systems are at risk or there has been a violation or perceived violation of any applicable Central Health policies, guidelines or procedures. See [Internet Acceptable Use Policy \(1-50\)](#).

Management of Central Health Social Media Accounts

Corporate Communications and Government Relations manages the corporate social media accounts for Central Health (e.g. Facebook, Twitter, etc.). Corporate

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Communications and Government Relations may accept requests for posting content on these platforms from departments and program areas across the organization.

Corporate Communications and Government Relations retains sole discretion to authorize new and/or deactivate Central Health social media accounts, including open or private (member-only) platforms intended for internal or external audiences, based on demonstrated communication needs, benefits and risks. Central Health shall not support short-term Central Health social media accounts for the purposes of campaigns, events, or similar initiatives.

Social media account administrators are approved by and must receive training from Corporate Communications and Government Relations on how to represent Central Health in the online domain prior to engaging in communication on any Central Health social media account. Central Health social media accounts must be registered with Corporate Communications and Government Relations.


Social Media Content Management

Content posted on authorized Central Health social media platforms must align with Central Health vision, values, strategic priorities, and be authorized through a corporate and departmental approval processes, including obtaining signed consents of identifiable individuals prior to the posting of photos, videos, etc.

Corporate Communications and Government Relations reserves the right to remove or request removal of content where it is determined to be harmful, non-factual, and/or have a negative impact on the reputation of the organization.

Approved social media account administrators may respond to public comments and legitimate queries on behalf of Central Health in accordance with corporate policies, guidelines and in a respectful and timely manner. Public feedback provided in good faith shall not be deleted or edited by Central Health administrators; unless if it is determined by Central Health to have a safety impact or does not adhere to acceptable standards of communication of the organization.

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Central Health social media account administrators may remove comments from a Central Health social media platform or account where they:

- Contain inappropriate or vulgar language;
- Are not relevant to Central Health or the subject matter;
- Are spam or another form of advertising;
- Are in violation of federal or provincial law;
- Contain confidential information;
- Are disrespectful towards Central Health employees or affiliated individuals; or
- In case of other violations of generally accepted communication standards.

Social media administrators are authorized to block users who repeatedly use abusive, profane, derogatory or offensive content on Central Health social media platforms.

Intellectual Property

Central Health’s logos, photos, graphics, and videos used to brand authorized Central Health social media accounts must follow Central Health Graphic Standards.


Copyrighted or trademarked materials posted to Central Health social media accounts must comply with applicable laws and Central Health policies, procedures and guidelines.

Collecting Human Resource Information via Social Media

Central Health employees and affiliated individuals must exercise caution when collecting information from social media platforms. Central Health must collect personal information directly from individuals unless indirect collection is authorized by the individual or permitted by law. The collection of personal information must directly relate to and must be necessary for activities of Central Health.

Where collection of information is authorized by law or consent of the individual, personal information must only be used by Central Health to make a decision that directly affects the individual, where every reasonable effort is made to ensure that the

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information is accurate, complete and limited to the minimum amount of information necessary for the purpose of the use.

Central Health may indirectly collect information via social media to identify potential instances of non-compliance with Central Health policy direction or professional practice standards. Central Health employees and health care professionals may authorize the indirect collection of information by accepting employment according to its terms and conditions, including social media policies where notified at the time of hire.

Compliance


Unauthorized collection, use or disclosure of Information on social media constitutes a privacy breach. Where a potential privacy breach is identified, Privacy Breach Policy must be followed.

Central Health employees and affiliated individuals who believe on reasonable grounds that their personal information has been collected, used, or disclosed by Central Health in contravention of privacy laws must enter a CSRS occurrence and consult their respective manager and/or the Central Health privacy representative. Individuals may make a complaint to the Office of the Information and Privacy Commissioner if they are not satisfied with the response of Central Health.

Any confirmed misuse, unauthorized disclosure, failure to safeguard Information or unprofessional conduct by employees or health care professional is subject to disciplinary action, up to and including termination, as per Central Health's People and Culture policy/Medical Staff Bylaws and may be reportable to the individual's regulatory body, if applicable.

Where it is determined that there was unauthorized use or disclosure of Information through social media by an individual other than an employee of Central Health, the resulting investigation will include the review of their services/contract provisions and will be acted on accordingly. This may result in the termination of engagement or contract for services with Central Health.

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Employees and affiliated individuals have the legal right to pursue civil action under the Newfoundland and Labrador *Privacy Act* if they believe their privacy has been violated by any individual through unauthorized use of social media.

Where an employee or affiliated individual of Central Health is the subject of social media harassment or bullying as a direct result of their work or affiliation to Central Health, the individual may report the abusive post to the social media channel, e.g. Facebook and consult their respective manager or director and the Central Health privacy representative.

REFERENCES

Criminal Code, Revised Statutes of Canada (1985) c C-46.

Government of Newfoundland and Labrador. Social Media Policy and Guidelines.

Retrieved on March 4, 2021 from:

https://www.gov.nl.ca/wp-content/uploads/social_media_guidelines.pdf

Healthcare Insurance Reciprocal of Canada. (2017, August). Communicating through Social Media. Toronto, Ontario: Author. Retrieved on February 2021 from:

<https://www.hiroc.com/resources/risk-notes/communicating-through-social-media>

Office of the Information and Privacy Commissioner. (2018). Collecting Information via Social Media (Employee and Background Checks). Retrieved on March 4, 2021 from:

<https://www.oipc.nl.ca/pdfs/CollectingInformationViaSocialMedia.pdf>

Personal Health Information Act, Statutes of Newfoundland and Labrador (2008, c. P-7.01). Retrieved from House of Assembly website:

<https://assembly.nl.ca/legislation/sr/statutes/p07-01.htm>


Privacy Act, Revised Statutes of Newfoundland and Labrador (1990, c.P-22).

Retrieved from House of Assembly website:

<https://assembly.nl.ca/legislation/sr/statutes/p22.htm>

The Canadian Medical Protective Association. (2014). Social media: The opportunities, the realities. Retrieved on October 5, 2020 from:

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<https://www.cmpa-acpm.ca/en/advice-publications/browse-articles/2014/social-media-the-opportunities-the-realities>


The Canadian Medical Protective Association. (2014). Top 10 tips for using social media in professional practice. Retrieved on October 5, 2020 from: <https://www.cmpa-acpm.ca/en/advice-publications/browse-articles/2014/top-10-tips-for-using-social-media-in-professional-practice>

RELATED RESOURCES

[CMPA Position Statement: Top 10 tips for using social media in professional practice](#)

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APPENDIX A: Guidelines for Use of Social Media

Protect Client Information

- Never post, share, or discuss client information on any social media platform.
- Do not take, post, or share photographs or videos of clients, visitors, employees, physicians, or other affiliated individual's without appropriate consent.
- While some sites appear to facilitate private conversations through direct messages, content communicated via social media is unprotected and publicly accessible and can place the confidentiality of patient information at risk.

Be Professional

- Avoid using social media to vent or discuss work-related events or to comment on similar postings by others.
- Avoid posting negative comments about your colleagues, supervisors, and other health care professionals; disclosing information obtained at work could be considered unprofessional and, if erroneous, could lead to a defamation claim.
- Respect and enforce professional boundaries: becoming a patient's electronic "friend" or communicating with them through social media sites may extend the scope of professional responsibility.
- Be aware that it is difficult to ascertain whether individuals providing or seeking information through a social media account are who they say they are.
- Avoid offering health-related advice in response to comments or questions posted on social media sites; if relied upon, such advice could lead to professional liability.

Respect sensitive information

- Do not share organizational business information online. If that information is not readily available on the Central Health website, consider whether it is confidential and not intended for distribution.

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