

### **DIGITAL MEDIA POLICY**

3.05

Effective Date: 07/18

**Purpose:** The following are guidelines for Barren River District Health Department (BRDHD) employees who participate in any type of digital media communication; this includes personal blogs and other websites such as Facebook, LinkedIn, Twitter, YouTube, Pinterest, or any others not specified in this policy. Policies and guidelines for digital media are not intended to limit access to social and digital media tools that may help employees be engaged and could promote the activities and services provided by BRDHD to our communities. Rather, these guidelines are intended to help employees ensure the effective and efficient operation of the BRDHD by abiding by agency policies while completing the work we are paid to complete. Social and digital media does not create a new world of communication and responsibilities but only creates new tools. These guidelines will apply whether employees are posting to their own sites, a BRDHD site, or commenting on other sites while on or off duty.

**Failure to Comply:** This policy applies to all full time, part time, variable hour and contract employees. It also applies to students, interns, Board members and volunteers of BRDHD. As custodians of the personal health information of our clients, BRDHD takes very seriously the intentional, inappropriate violation of these guidelines as the result could mean a deterioration of the trust our clients place in us and could negatively impact on the reputation of the agency. Intentional violation of these guidelines may result in a sanction and/or disciplinary action up to and including dismissal per KRS 18A.

**Policy:** Follow all applicable BRDHD policies. Among the policies most pertinent to this discussion are those concerning patient confidentiality, HIPAA privacy and security policies, computer, internet and email use, standards of conduct, and harassment. Specifically, you must not share confidential or proprietary information about BRDHD, its clients, patients or staff whether in person or in an online venue. Do not disclose anything to do with a legal issue, legal case or attorneys. You must never discuss patients, clients, information pertaining to particular cases or divulge any information that could potentially lead someone reading your comments to deduce a patient's identity. You must also never discuss your co-workers in the same manner described above. The Internet is not the appropriate place

to work out interpersonal problems with a co-worker. If you ever find yourself wondering if you can talk about something you learned at work... don't.

#### **Announce Yourself**

Always write in the first person. Where your connection to BRDHD is apparent, make it clear that you are speaking for yourself and not on behalf of BRDHD. In those particular circumstances you should include the following or a similar disclaimer: "The views expressed on this [blog, website, profile] are my own and do not reflect the views of my employer." Consider adding this language in an "About Me" section of your social media profile.

#### **Professionalism**

If you identify your affiliation with BRDHD, your social media activities should be consistent with BRDHD's standards of professional conduct; including photographs you might publish of yourself for online public viewing. You are responsible for protecting our patients, clients and yourself every day. You may ask the Marketing and Communications Coordinator, Director of Information Systems, or the Barren River District Public Information Officer if you have any questions about what is appropriate to include in your social/digital media profile(s). Act responsibly and ethically. When participating in online communities do not misrepresent yourself or your role with BRDHD. If you are a healthcare provider, it is not prudent to advise on medical treatment in online discussions except in the most broad terms. If you are not a healthcare provider, it is especially not prudent to misrepresent yourself and offer medical advice. Do not participate in this activity. If you choose to advertise that you work for the BRDHD you should represent yourself honestly and present a professional image.

# Reciprocity

Use good judgment, be professional, and be accurate and honest in your communications; errors, omissions, and unprofessional language or behavior reflect poorly on yourself and on BRDHD and may result in liability for you and the agency. Be respectful and civil to fellow employees, business partners, competitors and patients in particular. Be honest and treat others as you would like to be treated.

#### **Work Ethic**

Ensure that your digital media activities do not interfere with your work commitments. Use of employee Internet/email access should be in the support of education, communication, research and be consistent with BRDHD objectives. Supervisors should work with employees to determine the suitability of using the Internet and electronic communication for professional or personal activities during working hours while insuring employees do not violate the general provisions listed in <a href="Policy 3.11">Policy 3.11</a> – Internet / <a href="Internet Internet Internet Internation Technology Acceptable Use Policy">Internation Technology Acceptable Use Policy</a> or other documented agency guidelines or policies.

### **Professional Conflicts**

BRDHD strongly discourages "friending" or communicating with patients or clients on social media websites unless you have a defined, assigned role in the BRDHD marketing plan. Staff in patient/client care roles generally should not initiate or accept online friend requests except in unusual circumstances

such as the situation in which an in-person friendship predates the treatment relationship. If you were not friends with a client before they were a client, don't "friend" them online.

### **Work Relationships**

BRDHD discourages staff in management/supervisory roles from initiating online "friend" requests with employees they manage. Managers/supervisors may accept friend requests from employees if initiated by the employee and if the supervisor does not believe it will negatively impact the work relationship.

### **Endorsements**

BRDHD staff does not endorse people or political parties or solicit money for the same. Staff assigned to promote BRDHD and its interests may endorse products, services or organizations with a relationship with BRDHD or its programs. Unless specifically authorized to do so, on digital media sites where your work affiliation is known, personal recommendations should not be given or requested.

### Marketing

BRDHD may assign specific employees to promote BRDHD and its interests via digital media. Unless approved by the public health director of BRDHD or his/her designee, your social or digital media name, handle, URL or other naming mechanism must not include BRDHD's name or logos. BRDHD management may, at its discretion, disallow or stop the use of its name or logos for a previously sanctioned online promotion.

#### Discrimination

BRDHD will not tolerate discrimination including discrimination because of age, gender, race, color, creed, religion, ethnicity, sexual orientation, national origin, citizenship, disability, marital status or any other legally recognized protected status under state, local or federal laws, regulations or ordinances. Do not post biased remarks about anyone.

### **Online Identity**

You may not use an alias or any other means of disguising your online identity to make posts or comments about patients, BRDHD or its staff.

### Copyright

If posting on behalf of BRDHD in an official capacity you must abide by any copyright, fair use, financial disclosure or other applicable laws.

#### **Synopsis**

In case you forget or choose to ignore the above guidelines, below is a summary of what could possibly happen:

- 1. You could cause yourself to be fined by the federal government for violating HIPAA.
- 2. You could cause the BRDHD to be fined for your violation of HIPAA.
- 3. You could get into legal trouble for your violation of HIPAA.
- 4. You could get BRDHD into legal trouble for your violation of HIPAA.

- 5. You could cost BRDHD the ability to get and keep clients.
- 6. You could be fired.

Forms: None

References: KRS 18A; Policy 3.11 – Internet / Information Technology Acceptable Use Policy; HIPAA

Privacy Manual; Policy 1.13 - Employee Behavior Standards; Policy 1.05 - Harassment and Discrimination

Policy; Policy 4.01 - Employee Conduct and Performance Procedure

**Contact Persons:** Director of Information Sciences; Director of Finance; Human Resources Manager; Public Health Director, Marketing and Communications Coordinator

## **Date Adopted:**

## Policy Origination, Revision, and Review Tracking

Policy Version Number	Origination Date	Description of Revision
		or Reviewer Name
3.05	12.14.2017	HR Manager – Policy
		Creation