

KINGSTON GENERAL HOSPITAL

ADMINISTRATIVE POLICY MANUAL

Subject: Social Media

Number: NEW

Prepared by/Reviewed by: Privacy Office /Operations Committee

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Introduction

Kingston General Hospital (KGH) recognizes that social media now play an increasingly essential role in communication and self-expression, including new opportunities for communicating with patients and families, persons employed, appointed, affiliated or credentialed staff at Kingston General Hospital (persons), and other community stakeholders. Social media is defined as “forms of electronic communication (as Web sites for social networking and microblogging) through, which users create online communities to share information, ideas, personal messages, and other content (as videos)”.

The purpose of this policy is to provide all persons identified above, with guidelines and an understanding of their roles and responsibilities as a representative of KGH for participating in social media, including both KGH-hosted social media and non-KGH social media in which the person’s affiliation to KGH is known. This policy complements existing hospital policies, and reiterates our duty to protect the interests of Kingston General Hospital, its patients and families, and those who work and learn here.

Policy

Social media may be used by all persons for business-related purposes subject to the restrictions set out in this policy. The use of social media for personal reasons is prohibited on work time. These restrictions are intended to ensure compliance with the law; with KGH policies including but not limited to workplace conduct, privacy and confidentiality, communications, code of behaviour and discrimination/harassment; and with KGH guiding principles.

This policy also applies to the use of social media when a person is away from work and when the person’s KGH affiliation is identified, known or presumed. While there is a distinction between professional and personal life, actions outside the workplace can affect a person’s relationship with KGH if those actions bring the hospital’s reputation and people working and learning at the hospital into disrepute or otherwise affect the employment relationship at the organization. It is important to remember that online identities and actions are visible to the public, widely accessible and available for a long time.

Consequences of deliberate violations or more serious breaches of this policy may result in disciplinary action up to and including termination of employment and/or affiliation with KGH.

Definitions

Affiliates: an individual who is not employed by the hospital but performs specific tasks at the hospital, including: learners, volunteers, contractors or employees of contractors who may be members of a third-party contract or under direct contract to the hospital, and individuals

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working on the hospital premises, but funded/employed through an external source (i.e. research and university staff on site).

Credentialed Staff: Physicians, dentists, midwives, extended class nurses.

Discrimination: The behaviour that excludes individuals or treats them unfairly because they are members of a specific group. According to the Ontario Human Rights Code, individuals cannot be discriminated against in employment based on their race, sex, sexual orientation, gender identity, same sex partner status, colour ancestry, place of origin, ethnic origin, marital status, age, disability, citizenship, family status or religion.

Persons: Includes the Board of Directors and officers of the hospital, credentialed staff, employees, management, contracted services, and people who do business at and on the premises of the hospital.

Social media: For the purposes of this policy, the term “social media” refers to any facility that allows for online publication, commentary and social networking, including but not limited to websites, online forums, blogs, wiki's, Facebook, LinkedIn, Tumblr, Twitter, Flickr, Skype and YouTube.

KGH-hosted social media: This refers to corporate social media sites, i.e., sites that are created, branded and utilized by KGH for official hospital purposes of informing, educating and communicating with patients, families, professional colleagues and the community. These sites represent KGH as an organization and are administered through the Communications and Public Affairs Department (Public Affairs).

Non KGH-hosted social media: This refers to social media sites used exclusively for personal purposes, e.g. self-hosted sites used to communicate with family, friends, etc. While use of social media sites for educational and personal/professional development is permitted, all use must comply with this policy.

Vexatious: An act done by a person in order to annoy, embarrass or otherwise aggravate another person.

Workplace: All hospital premises, work assignments that occur off hospital property, off site work-related social events and functions, work-related seminars, conferences, travel and training, and other locations where work related responsibilities are carried out. Phone calls, communications, faxes, and electronic mail that are related to workplace activity made with communication devices are considered an extension of the workplace.

Work time: a time period when you are required to work, i.e. when not on a break time.

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Procedure

KGH-hosted Social Media Sites

1. A person requires documented approval from their manager, mentor, department head or others as appropriate, and the Communications and Public Affairs Department before creating or using social media for work purposes. Standalone, business-related social media sites (e.g., a blog, Facebook page) cannot be created without consultation with Communications and Public Affairs.
2. Permission from Communications and Public Affairs is required to use the logos, trademarks and images owned by the Hospital.
3. Social media content must comply with all KGH policies including, but not limited to, those addressing privacy and confidentiality, communication and workplace conduct (see a complete list of specific policies below).
4. KGH reserves the right to monitor access and respond to the impact of social media usage on its information management systems. It will monitor system capacity as part of ensuring that its core business of patient care is unimpeded and protected at all times. KGH must also continue to perform operations as required by law for maintenance, compliance and investigation of incidents which may involve a person's use of social media sites.
5. Confidential information related to KGH, the persons who work and learn at KGH, our patients and families, or any community partners may not be released, posted or shared through social media. This includes the names or personal information of co-workers, managers or supervisors, as well as discussion of incidents that have occurred in the workplace and that are not generally known outside of the workplace.
6. A person may not publish, post or share materials that are malicious, threatening or messages that contain vexatious, discriminatory or offensive comments that are known or ought to have reasonably been known to be offensive or unwelcome, including those in violation of the Ontario Human Rights Code, or the Occupational Health and Safety Act.
7.
 - a) Photos or video recordings of identifiable KGH patients and families cannot be posted on social media without documented signed consent (Appendix A - Media Consent Form).
 - b) Photos or video recordings of identifiable KGH persons cannot be posted on social media without informed consent of those individuals. E.g. Notice that a photo will be tweeted on KGHconnect.
8. Photos or video recordings of patients for the purposes of medical education and/or research, particularly where classical or unusual disease entities are involved, cannot be

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posted on social media without signed consent from the patient or person authorized to act on his/her behalf as specified in KGH Policy 06-120, Consent for Medical Photography. This holds true even when the patient cannot be readily identified.

9. Photos or video recordings of KGH property or persons working and learning on KGH property to be used for social media purposes will be documented and approved by Communications and Public Affairs prior to the capturing of photos or video recordings.
10. Direct and indirect (e.g., through links to other sites or web domains) unauthorized use of KGH's intellectual property in social media communications is prohibited.
11. Social media users must abide by copyright laws, ensuring they have permission to use or reproduce copyrighted text, photos, graphics, video or other registered or trademark material owned by others.
12. A person who participates in social media should refer to the guidelines in Appendix B.

Non KGH-hosted Social Media Sites

1. In any personal social media site, all KGH policies including but not limited to patient privacy, confidentiality and harassment, as well as professional boundaries for health care workers apply.
2. In any personal social media site, a person should not identify individuals as KGH patients or ask them to identify themselves as patients of the Hospital.
3. In any personal social media site, if KGH staff identifies the Hospital as his/her employer or includes information that enables a reader to associate him/her with the hospital, then he/she should visibly include the disclaimer: *"The views expressed here are my own and do not reflect the views of my employer, Kingston General Hospital, Kingston, Ontario."*
4. In any personal social media site, a person must use a personal e-mail address—not a KGH e-mail address—as their means of identification and/or notification.
5. Any social media site requires the user to verify/validate the accuracy, adequacy or completeness of information obtained for educational and personal/professional development use.

Policies

KGH Policy 01-217 Workplace Conduct

KGH Policy 07-010 Media Inquiries

KGH Policy 01-146 E-mail Usage

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KGH Policy 01-145 Internet Usage

KGH Policy 02-143 Workplace Violence Prevention

KGH Policy 12-320 Code of Behaviour

KGH Policy 02-075 Use of Wireless Communication Devices

KGH Policy 09-055 Personal Health Information Protection

KGH Policy 01-219 Freedom of Information

KGH Policy 01-121 Intellectual Property: Employee

KGH Policy 01-122 Intellectual Property: Queen's Faculty Members with Hospital Appointments

KGH Policy 06-120 Consent for Medical Photography

References

Hospital Privacy Toolkit, OHA Publication #314, 2004

Children's Hospital of Eastern Ontario (CHEO), Use of Social Media by Staff & Physicians

Personal Health Information Protection Act, S.O. 2004

Freedom of Information and Protection of Privacy Act, R.S.O. 1990

College of Nurses of Ontario: Practice Standards Document 41069, Privacy

Royal Ottawa Health Care Group, Use of Social Media Policy

Authorizing Signature:

Leslee J. Thompson
President and Chief Executive Officer