

University of Mississippi Medical Center

Policy and Guidelines for Personal Use of Social Media*

I. Scope:

This policy applies to all employees, students, contractors and volunteers as it relates to their employment, academic, or business relationship with the University of Mississippi Medical Center (UMMC).

For the purpose of this policy, “personal use” is defined as social media activity using your own personal or professional social media accounts.

UMMC-affiliated entities, including schools, clinics, departments, practices, groups, etc., use of social media is not regulated by this document. For questions regarding social media accounts run by UMMC-affiliated entities, please contact the Division of Public Affairs.

II. Purpose:

The University of Mississippi Medical Center recognizes that social media is an important and timely means of communication. However, those who use social media must be aware that posting certain information is illegal and use of social media during working hours as well as related to job functions should be self moderated. Offenders may be subject to criminal and civil liability, and adverse institutional actions. The purpose of this policy is:

1. To provide guidelines outlining how University of Mississippi Medical Center employees, students, contractors and volunteers can engage in the appropriate use of social media platforms;
2. To minimize the business, legal, and personal risks that may arise from an individual’s use of social media; and
3. To protect the privacy and safety of UMMC patients, students, employees, and contractors.

III. Policy:

It is the policy of UMMC that the use of social media will be done in conjunction with the principles of the UMMC Code of Conduct, the UMMC Information Policy and compliance with all federal and state rules and regulations as well as the following delineated prohibited uses and best practices.

IV. Definitions:

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- A. **Social Media** – The term ‘social media’ refers to various types of interactive communities typically accessed through the World Wide Web or mobile device and computer applications (apps). The communities are usually characterized by user-generated content, user-shared content or areas designed for free and open discussion, or can be a mix of all three.

Social media outlets, including discussions boards, may or may not be monitored or regulated. It is up to each user of a social media outlet or participant in a virtual discussion to regulate his or her content that is added or shared with the community.

Social media includes, but is not limited to, blogs (Blogger, Blogspot, Wordpress, etc.), photo and/or video-sharing sites and apps (YouTube, Flickr, Instagram, SnapChat, Vine, etc.), e-zines (digital magazines), wikis (Wikipedia), social networks (Facebook, Twitter, LinkedIn, Pinterest, etc.), video and audio podcasts (posted to the web or hosted by applications (ex.: iTunes)), ratings sites and apps (Urbanspoon, Yelp, Rate My Professor, etc.), and discussion sections of web pages or applications (comment section under articles on news or information websites).

V. **Prohibited Uses:**

- A. You may not post the personal information or photograph of any patient at UMMC. Removal of an individual’s name does not constitute proper de-identification of protected health information. Inclusion of data such as age, gender, race, diagnosis, date of evaluation, types of treatment, or the use of a highly specific medical photograph (such as a before/after photograph of a patient having surgery or a photograph of a patient from one of the medical outreach trips) may still allow the reader to recognize the identity of a specific individual. Posting of patient information could violate state or federal laws such as the Health Insurance Portability and Accountability Act (HIPAA).
- B. You may not post private (protected) academic information of a student or trainee. You may not post the personal information or photograph of any student/trainee at UMMC. Posting of inappropriate student/trainee information could violate federal laws such as the Family Educational Rights and Privacy Act (FERPA). However, this

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policy does not prohibit a student/trainee from posting his or her own information. Additionally, the policy does not prohibit posting information or photographs related to non-UMMC interactions and activities.

- C. You may not post vulgar, false, obscene, harassing statements, or statements disparaging the race, religion, age, sex, sexual orientation or disability of any individual with whom you come into contact as a result of your role at UMMC.
- D. You may not disclose any financial, proprietary, or other confidential information of UMMC.
- E. You may not present yourself as an official representative of, or spokesperson for, UMMC.
- F. You may not utilize UMMC's trademarks or logos.
- G. You may not represent yourself as another person, real or fictitious, or otherwise attempt to obscure your identity as a means to circumvent the prohibitions included herein.
- H. You may not utilize websites and/or applications in a manner that interferes with your work responsibilities. That is, do not tie up UMMC computers or phone lines with personal business when others need access.
- I. You may not utilize your official UMMC email address for social media purposes unless specifically authorized to do so by the Division of Public Affairs.
- J. Staff in patient care roles may not initiate requests to connect with patients through social media.
- K. Supervisors may not initiate requests to connect through social media to their employees.
- L. Faculty should employ the highest professional and ethical standards in any social media interactions with students enrolled at UMMC.

VI. Social Media Best Practices/Permitted Uses:

Individuals must make every effort to present themselves in a mature, responsible, and professional manner when utilizing social media. Communications must always be civil and respectful. Please be aware that no privatization measure is perfect and undesignated persons may still gain access to your networking site. Further, litigation involving such issues is complex, as the content on social media sites is easily misconstrued, permanent, discoverable by courts,

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and utilized in these adversarial proceedings. Any digital exposure can “live on” beyond its removal from the original website and continue to circulate in other venues.

Therefore, **think** carefully before you post any information on a website or application, and consider your goals in participating. Make sure you are choosing the most relevant platform and **adding value** to the discussion. **Listen** before you engage and always be modest, respectful, and professional in your actions. To help facilitate these goals, the following best practices are encouraged:

- A. Make sure your posts are relevant and accurate.
- B. Make it clear that you are speaking for yourself and not on behalf of UMMC. You may consider adding a disclaimer such as "The views expressed on this (blog, website, etc.) are my own and do not reflect the views of my employer, UMMC."
- C. You may also include a disclaimer as to medical advice when posting education information.
- D. Seek permission from co-workers prior to posting any personal information or photographs related to UMMC interactions or activities.
- E. UMMC discourages clinicians from having social media relationships with patients.
- F. Utilize citations whenever possible to prevent copyright and intellectual property issues.

VII. Violations/Enforcements:

Disciplinary actions will be undertaken in accordance with Attachment 2 of the Compliance Plan. The disciplinary procedure is also described in the UMMC Faculty and Staff Handbook. Student disciplinary actions will be undertaken according to established policies and procedures within the school in which a student is enrolled, as outlined in the Bulletin. Failure to comply with the policy requirements may result in sanctions ranging from counseling to suspension pending termination. Violations of federal and state laws may also result in criminal or civil action undertaken by the government.

VIII. Employee Affirmation/Acknowledgement:

This policy will be disseminated during annual compliance training. Each employee, student, and contractor will acknowledge the adherence to the policy at this time.

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*This policy shall not be construed to impair any constitutionally protected activity, including speech, protest, or assembly.