PURPOSE
Children’s Hospital Los Angeles (henceforth referred to as “CHLA” or “the hospital”) is committed to conducting business in compliance with all applicable laws, regulations and CHLA policies and in a manner consistent with our organization’s mission, values and guiding behaviors. CHLA has adopted this Policy to indicate that social media participation by hospital employees is subject, at any time, to scrutiny by hospital representatives to ensure adherence to hospital policies, consistency with its mission and alignment with the hospital’s policies and governmental requirements.

DEFINITION
An exhaustive list of online communication and social computing channels, media, networking and platforms cannot be compiled, but is broadly defined as being websites where content is generated or submitted by users. Examples include but are not limited to blogs, forums, video sharing and social networking sites like Facebook, Google+, HealthGrades, Instagram, Pinterest, Twitter, Yelp and YouTube.

SCOPE
This Policy applies to all CHLA employees, agents, contractors, volunteers, vendors or other individuals or entities retained to fulfill the organization’s mission. For simplicity, this group shall be referred to throughout as “employees,” “user” or “users.”

POLICY
The institution prohibits employees from engaging in social media and online interactions when those activities threaten the privacy and HIPAA rights of our patients, employees, the hospital, its vendors, community partners or constituents, expose confidential or sensitive information to compromise by others, place the institution’s reputation or brand at risk or increase the institution’s exposure to liability.

HOSPITAL ONLINE PRESENCES
Employees should not create social media channels or identities that could be interpreted to represent the hospital or a division, program or professional reputation within it without authorization by the Chief Marketing Officer (CMO) and ongoing oversight and guidance from the Marketing Communications Department. Creation and management of any social media account or identity that could have an impact on the hospital’s brand or reputation in any way is the responsibility of the Marketing Communications Department.

SOCIAL COMPUTING GUIDELINES FOR EMPLOYEES
Employees will be held personally, professionally and legally responsible for any content that they publish. Whenever their online interactions impact or implicate CHLA, the guidelines below must be
followed.

Compliance with Hospital Policies
Employees must not violate any of the hospital’s policies, procedures or guidelines, online or offline.

Protection of Patient Privacy
Under no circumstances may employees post or publish patient health information online unless they are functioning at the direction of the Marketing Communications department and a valid CHLA Authorization To Use And Disclose Health Information for Communications or Media Activity Form is on file.

Use of Institutional Email Address is Prohibited
Employees should refrain from using their institutional email address as the login for a personal social media presence. This is designed to draw a clear line between the thoughts and opinions of an individual and the official stance of the institution on any health care or health-related topic. Exceptions to this policy will be made in cases where the user must use their institutional email address for the professional management of an institutionally owned and operated social media presence.

Social Media Interaction with Patients and Families is Prohibited
Employees must recognize that their relationships with CHLA patients (and their family members) of the hospital are professional relationships and that social pleasantries shared at the bedside do not extend into online social networking. Because social networking blurs the lines of patient-clinician relationships, CHLA prohibits employees from knowingly engaging in the following social networking activities:

- Posting updates about a patient on their own or other social media channels (with or without personal identifiers).
- Friending patients and their family members.
- Accepting friend requests from patients and their family members.
- Tagging photos or videos of patients and family members.
- Blogging, microblogging or tweeting about patients or family members (or commenting on blogs maintained by patients and their family members).
- Following online profiles of patients and their family members.

Exception
An exception to the policy regarding social media interaction with patients and families is permitted in instances when an employee has a pre-existing relationship with a family prior to their child becoming a
CHLA patient (in these instances, employees must be extremely careful to prevent their online engagement from straying into discussion of anything related to the patient’s medical care or health status as doing so would represent a HIPAA breach).

Responding to Comments or Ratings from Patients and Families
As it pertains to ratings of providers or their care, clinicians must not respond to any online comment left by a patient or family member of a patient online. Doing so would represent a breach of HIPAA and result in disciplinary action. Instead, clinicians and CHLA employees should:

1. Alert the Patient Relations department at 323-361-4682 or 323-361-4198.
2. Alert the Marketing Communications department at 323-361-7691.

Maintain Confidentiality about Hospital News or Business
Employees may not disclose patient, employee, or hospital confidential or sensitive information including trade secrets and private or confidential information related to hospital business. Employees are not permitted to share news about any official hospital business online until it has been officially shared by the hospital through a news story, press release or placement on the hospital’s website or social media channels (this extends to strategic plans or operational developments, and visits from celebrities or political figures). In cases where celebrities visit the hospital to cheer up patients and their family members, these visits should be considered official hospital business.

Celebrity or VIP Visits
Employees must NEVER take a photo of a celebrity or VIP without express permission being granted by hospital staff. Staff members should consult with the CHLA team members coordinating the celebrity’s visit to determine whether personal photos may be taken and must delay posting photos or other details about the visit to social media until released to do so. Because celebrities and VIP’s may be visiting the hospital for personal or private reasons, it is paramount that these visits be handled with the utmost sensitivity. For questions regarding the timing of the release of personal photos, please check with your supervisor or the Entertainment Communications office at 323-361-4121. In all cases, employees are advised to work with their managers and hospital leadership before sharing CHLA news so that proper steps can be taken to release news through the most appropriate channels.

Legal Compliance
Employees must comply with all copyright, fair use and financial disclosure laws when posting online. Employees should quote only short excerpts of others’ work and, when doing so, should reference original works with a link.
Advertising
Advertising for any part of the hospital is the role of the Marketing Communications Department. Employees should not engage in these activities without the direct oversight of this Department.

Impact on Employees Responsibilities
Social media engagement must not alter employees’ ability to perform their job duties or responsibilities. Employees should refrain from using social media while on work time or on equipment provided or owned by CHLA (including smartphones, tablet devices or laptops), unless it is work-related, authorized by the user’s manager and consistent with the parameters of this Policy. Personal social media use should be confined to break periods and personal computing equipment.

Online Conduct
Employees should be mindful that all of their engagement online should be reflective of CHLA’s high standards of professional conduct, especially if they link or tie themselves to CHLA in any way.

Managers and executives, by virtue of their positions, must assume that team members and direct reports will read their social media content and bear in mind that their personal thoughts may be construed as representative of hospital policy, opinion and strategy and that public forums are not the place to communicate hospital policies to employees.
Blogging, Reviewing or Rating the Hospital
If an employee rates, reviews or gives an online opinion about the hospital (e.g. on Yelp), its employees, its policies, programs, units, departments or divisions, it is mandatory that the user indicate their role, and incorporate the following statement:

The postings I make on this site are my own personal opinions and do not necessarily reflect the opinions or views of Children’s Hospital Los Angeles.

Employees should not imply official endorsement, approval or sanction for an individual, organization, program, association, vendor or entity online on behalf of the hospital in compliance with hospital policy, ADM 30.0 [Hospital Name Use to Imply Sponsorship of Product or Individual Views].

Social Media Interaction with Other Employees
Employees must recognize that their relationships with fellow colleagues are professional relationships. Social media interaction between employees (for example, accepting or rejecting “friend” requests) must align with all of the hospital’s policies, procedures and guidelines and not result in or be used for disruptive behavior, harassment, bullying, intimidation or other discriminatory behaviors).

MONITORING AND TRACKING
The hospital may monitor the usage of its computing assets at any time (for additional information, refer to CHLA Policy MHR #35.0 [Privacy, Searches and Investigations] and MIS #33.0 [Workspace Acceptable Use]). Social media posts are often readily accessible to the public and, as a result, hospital representatives will often be able to secure access to employees’ online interactions, even if they have been made from personal devices or on employees’ own time.

Monitoring and Tracking for Employees Productivity
Though neither the Information Services Department nor the Marketing Communications Department makes any commitment to monitor social computing activities of employees, if managers or supervisors believe that social media use is interfering with completion of job duties or functions, they may elect to monitor employees on an individual basis and incorporate this information into performance reviews. These requests can be made through the I.S. Service Desk at ext. 14444.

NON-COMPLIANCE (Violations of Policy)
Any failure to abide by this Policy may result in disciplinary action involving revoking or restricting any right to system access and may lead to more serious disciplinary action in accordance with CHLA disciplinary policies up to and including termination of employment and legal liability for hospital employees. For non-employed, credentialed and privileged practitioners, breaches will be forwarded to the Medical Staff Services Department for management through the Medical Staff process.
RESOURCES

CHLA Social Media Intranet Page

This resource provides access to a social media guide for employees, a link to this policy, social media FAQs, Do’s and Don’ts for employees and presentations which can be used in employees meetings to clarify institutional expectations.

REVIEWED BY:
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