



LOMA LINDA UNIVERSITY
ADVENTIST HEALTH SCIENCES CENTER

OPERATING POLICY

CATEGORY:	HUMAN RESOURCE MANAGEMENT	CODE:	I-24
SUBJECT:	PARTICIPATION IN SOCIAL MEDIA AND OTHER PUBLIC FORUMS	EFFECTIVE:	8/31/2010
		IMPLEMENTED:	8/31/2010
		REPLACES:	
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Introduction:

LLUAHSC encourages its employees, medical staff, faculty, and students ("Individuals") to post responsibly and exchange opinions and ideas in public media forums in a way that is professional, constructive and in compliance with all LLUAHSC policies and codes of conduct. Accordingly, this policy is intended to set forth the terms of LLUAHSC policy regarding use of various public media forums, e.g. radio/TV appearances, newspaper editorials, conference presentations, as well as blogs, discussion forums and other interactive websites.

NOTE: LLUAHSC employees (including faculty, physicians, employees and officers) are required to work through the Office of the Vice President for Development and Public Affairs or his/her designee in all dealing with the press media; i.e. newspapers, on-line publications, magazines, television, radio and filmmakers regardless of whether the press initiates the contact or the LLUAHSC employee, etc. initiates the contact.

This policy includes provisions for Individuals creating, posting, commenting, or uploading to any Internet website such as media sites, chat rooms, bulletin boards, newsgroups, discussion groups, email groups, personal websites, video sharing sites, picture sharing sites, dating sites, and social networking sites, e.g., My Space, Facebook, Twitter, etc., whether or not such sites are set to private.

All LLUAHSC core entities shall adopt a public forums policy that incorporates the general principles outlined in this policy.

Definition:

Public Forums: Any communication forum which broadcasts the thoughts, opinions, and views of an individual for mass consumption. This includes, but is not limited to radio/TV appearances, newspaper editorials, conference presentations, as well as participation in Online Public Forums.

Online Public Forums: Public forums which are generally available digitally or via the internet. This includes but is not limited to chats, blogs, podcasts, discussion forums, as well as social networking sites, e.g. My Space, Facebook, Twitter, You Tube, blogs, etc.

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LLUAHSC Online Forums: Public Forums that relate to LLUAHSC business, marketing, or operations and have been approved by the Office of the Vice President for Development and Public Affairs or his/her designee.

LLUAHSC Confidential Online Forums: LLUAHSC Online Forums which are confidential and intended for internal use only. Its focus is on topics related to LLUAHSC business and its employees and students in general.

A. GENERAL PROVISIONS

1. Individuals shall be free to participate in all forms of public media, provided that such participation does not violate any LLUAHSC policies, is not detrimental to LLUAHSC best interests, and does not interfere with Individual work duties.
2. Individuals shall participate in said forums at their own risk, and shall be personally and legally responsible for their comments and postings, including compliance with all applicable laws, LLUAHSC policies, and LLUAHSC codes of conduct.
 - 2.1 LLUAHSC shall not assume any liability or risk for Individual's comments, or posting.

NOTE: Types of relevant laws implicated by such activities include, but are not limited to: privacy, libel, defamation, harassment, copyright, data theft, disclosure of material non-public information, and disclosure of confidential or trade secret information.
 - 2.2 Individuals shall be particularly careful when traveling internationally to avoid making public comments that are openly critical of or hostile toward the countries in which they plan future travel, including the countries' governments, ruling parties, officials, and religious values.

NOTE: Some governments have criminal penalties for such public statements, including imprisonment.
3. When participating in a public forum, the Individual shall, when identifying LLUAHSC or when discussing LLUAHSC business:
 - 3.1 identify him- or herself with regard to his or her relationship to LLUAHSC.
 - 3.2 speak in the first person (I, me) not in the third person (we, us).
 - 3.3 make it clear that what is being said is representative of the Individual's personal views and opinions and does not necessarily reflect the views and opinions of LLUAHSC.
 - 3.4 at minimum, include the following standard disclaimer language: "I am an employee/volunteer/student of a LLUAHSC entity. The views expressed are mine alone and do not necessarily reflect the positions, strategies, or opinions of LLUAHSC."

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3.5 in no way represent or suggest that their opinions or positions are endorsed by LLUAHSC or any of its executives, managers, or employees.

3.6 not re-publish postings or statements of other LLUAHSC Individuals without making the same disclaimer that the views expressed are of an employee/medical staff/faculty/volunteer/student of a LLUAHSC entity and do not reflect the positions, strategies, or opinions of LLUAHSC.

4. Managers and Directors shall exercise particular care when participating in public forums to ensure that their published personal thoughts are not mistaken as expressions of official LLUAHSC positions. Managers shall also act on the assumption that their direct reports will view their comments.

5. Managers and Directors shall not use non-official forums for communicating LLUAHSC policy or instructions to LLUAHSC Employees.

6. Executives and Officers shall assume that all published thoughts will be viewed by the public as official LLUAHSC positions, and shall guard their comments accordingly. So called “off-the-record” or “background” comments “not-for-attribution” should not be made.

7. Individuals shall remain in compliance with LLUAHSC policies regarding non-disclosure of proprietary, confidential, and personal information and shall therefore refrain from revealing or making any reference to any information covered by those policies. (Reference Section B.)

NOTE: Even vague or disguised references to such information could violate LLUAHSC policies and applicable laws.

8. Because comments made in public forums may generate media interest or coverage, Individuals shall contact the Office of the Vice President for Development and Public Affairs if a member of the media contacts him or her about a LLUAHSC-related public comment published by the Individual or requests LLUAHSC information of any kind.

B. SPECIFIC PROHIBITIONS

1. Individuals shall use caution to not allow the informality of online public forums to lapse into rash postings, careless behavior, or improper comments, and shall be expected to comment with respect.

1.1 Individuals shall assume that all comments made in Public Forums will be made widely available at some point and attributed back to them.

1.2 Individuals shall not engage in postings or comments that may harm or tarnish the image, reputation, and/or goodwill of LLUAHSC or any of its student, employees, patients, or clients.

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1.3 Individuals shall be prohibited from making any discriminatory, harassing, disparaging, libelous, defamatory, obscene, profane, indecent, threatening, or otherwise illegal or injurious comments, e.g., sexually explicit or racial messages, jokes, or cartoons, or otherwise engaging in any such conduct prohibited by LLUAHSC policies.

2. Individuals shall not post information that in any way discloses private or confidential information about employees, students or patients of LLUAHSC.

2.1 Individuals shall not publish or comment on information about patients that is protected by HIPAA laws.

NOTE: This provision can only be waived by LLUAHSC administration, NEVER by the patient alone.

2.2 Individuals shall not publish or comment on information about students that is generally protected by FERPA laws.

2.3 Individuals shall not publish or comment on any information that would be considered confidential employee information. This includes, but is not limited to employee addresses, social security numbers, employment status, pay, evaluation or job performance. It is understood that the HRM and Payroll Department may release appropriate employee information as authorized or required by law. .

3. Individuals shall not post information that in any way discloses private, confidential, or proprietary information, or trade secrets of LLUAHSC, its employees, or any third party that has disclosed information to LLUAHSC, or any other information of LLUAHSC protected by its policies.

3.1 When relying on the intellectual work of others or quoting them, Individuals should always credit and/or link to the copyrighted work.

3.2 Individuals shall be prohibited from sharing any confidential information with anyone outside of LLUAHSC unless given express written permission to do so by LLUAHSC.

3.3 Individuals shall be prohibited from discussing or publishing confidential information of any LLUAHSC entity patient, medical staff member, faculty member, employee, partner, vendor, supplier, or affiliate.

3.4 Individuals shall not use any LLUAHSC confidential information in public forums for their own benefit or for the benefit of any person or entity other than LLUAHSC.

4. Individuals shall be prohibited from using LLUAHSC logos, trademarks, or other intellectual property without LLUAHSC written permission.

C. ONLINE PUBLIC FORUMS – GENERAL

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LLUAHSC encourages Individuals to post responsibly and exchange opinions and ideas in Online Public Forums in a way that is professional, constructive and in compliance with all LLUAHSC policies and codes of conduct including those specifically stated in this policy.

1. Individuals shall be prohibited from using any LLUAHSC logo or from adding a link from an external webpage into a LLUAHSC website in such a way which would imply endorsement by LLUAHSC.
2. Individuals shall not use Online Public Forums for LLUAHSC related communications without the permission of the Office of the Vice President for Development and Public Affairs.

D. LLUAHSC ONLINE FORUMS – GENERAL

1. Each LLUAHSC Online Forum shall have a designated Online Editor. Each LLUAHSC entity shall establish processes for the designation of Online Editors. These processes must be approved by the Office of the Vice President for Development and Public Affairs or his/her designee.

NOTE: LLUAHSC does not expect or require employees to work on work-related tasks, including the LLUAHSC Online Forums, during meal periods or after scheduled working times. Any and all use of the LLUAHSC Online Forums will be in compliance with LLUAHSC policies on hours of work, overtime, and pay day policies.

2. Individuals may not publish information or comments about a competitor or make endorsements or criticisms of any other organization, service, or product without the prior express written approval of the Office of the Vice President for Development and Public Affairs.
3. Individuals shall not use the LLUAHSC Online Forums to promote or solicit participation in any activity that is unrelated to their work at LLUAHSC.
4. Individuals shall not use the LLUAHSC Online Forums for any illegal purpose, violation of any LLUAHSC policy, or in any manner contrary to the best interests of LLUAHSC, or for personal or pecuniary gain.
5. Access to the LLUAHSC Online Forums shall be within the sole discretion of LLUAHSC.
 - 5.1 Individuals shall have no free speech right to post content in the LLUAHSC Online Forums, and anonymous posting shall be prohibited.
 - 5.2 Individuals shall be prohibited from using exaggeration, colorful language, guesswork, legal conclusions, and derogatory remarks or characterizations.
 - 5.3 Posting shall be considered a privilege that may be revoked if abused, and LLUAHSC shall, at its sole discretion, retain the absolute right to delete or modify any content it deems inappropriate.

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5.4 LLUAHSC shall retain the right to require any employee or student involved in posting inappropriate content to stop posting immediately.

5.5 While LLUAHSC reserves the right to remove inaccurate, offensive, or inappropriate content from the LLUAHSC Online Forums, it shall not be obligated to do so, and shall assume no liability for failing to take such action.

a) LLUAHSC encourages each participating employee, volunteer, or student to monitor the LLUAHSC Online Forums by correcting inaccurate information and by reporting any offensive or inappropriate content immediately to HRM, or the appropriate Online Editor.

E. LLUAHSC ONLINE FORUMS – CONFIDENTIAL

1. Unless otherwise noted, any LLUAHSC Online Forum that is accessed from the intranet, the portal, requires a login or is generally NOT available to the public shall be considered a LLUAHSC Confidential Online Forum.
2. LLUAHSC Confidential Online Forums shall not be used for issues that are unrelated to the mission of LLUAHSC.
3. Emailing, reposting, or otherwise disclosing information from a LLUAHSC Online Forum could violate LLUAHSC policies regarding the nondisclosure of proprietary, confidential, and personal information.
4. Individuals shall not use the LLUAHSC Confidential Online Forums as a means of notifying LLUAHSC of compliance matters or concerns, but instead follow the process outlined in LLUAHSC policy, or report such concerns to the employee's supervisor, manager, and/or HRM.
5. While postings in the LLUAHSC Confidential Online Forums may be critical of LLUAHSC policies or decisions, Individuals shall be respectful and constructive, and refrain from lapsing into personal attacks.

F. RESPONSIBILITY TO REPORT

1. Any inappropriate blogs and/or postings that violate the provisions of this policy shall be reported to LLUAHSC management/administration immediately. Questions and concerns shall be directed to the employee's supervisor, manager, and/or Human Resources Management Department (HRM).

G. REMEDIES

1. Failure to comply with LLUAHSC policies regarding blogging and online posting shall be considered grounds for disciplinary action, including immediate termination.

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APPROVED: LLUAHSC Board of Trustees – August 31, 2010

Vice President, Development & Public Affairs

Date

President/CEO

Date

Corporate Secretary

Date

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All LLUAHSC Online Forums shall have this confidentiality disclaimer explaining LLUAHSC's right to edit or delete any comments or content deemed inappropriate

Please read the following disclaimer for critical information prior to posting to this page.

The opinions expressed on the _____ (*site name*) represent the thoughts of the **[site name]** community and not necessarily those of *LLUAHSC or its affiliates*. The views expressed here do not in any way reflect the views of the site they are posted on, other sites affiliated with this site, the staff involved with the site, or any other members of this site.

LLUAHSC reserves the right to edit or delete any comments deemed inappropriate for this site and its readers. The following types of comments may be deleted or edited by moderators:

- Comments that violate the privacy of our patients and their families
- Abusive or hurtful comments about the commenter
- Off-topic and redundant comments (this includes promotion of events, groups, pages, websites, organizations, and programs not related to or affiliated with LLUAHSC)
- Comments which use foul language or derogatory language (racial, ethnic or gender bashing language)
- Personal attacks or defamatory comments (i.e., making negative personal comments about a fellow commenter), instead of just criticizing his/her posting, opinion, or comments

Information posted here by participants or any third party (e.g. commenter) should not be considered medical advice, nor is it intended to replace consultation with a qualified physician or other health care provider. Participants will not evaluate, endorse, or recommend any particular health care providers, medications or treatments.

All links to other websites found linked from this blog are provided as a service to readers, but such linkage does not constitute endorsement of those sites by *LLUAHSC*, and as such we are not responsible for the content of external websites.

By submitting content to this page (wall posts, photos, links, etc.), you understand that this information is publicly available; and that *LLUAHSC* may use this information internally and on closed-circuit television displays. If you do not wish to have your information published, please do not post on this page.

We encourage open discussions and look forward to any comments, stories and experiences you want to share.