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<b>COMMUNICATIONS POLICY</b> <b>SUBJECT: Social Media</b>	<b>FUNCTION/OWNER:</b> UMMS Marketing & Communications	

**KEYWORDS:**

**Social Media; Facebook; Twitter; Instagram; Snapchat; YouTube; LinkedIn; TikTok; Pinterest; Nextdoor; Clubhouse; Bigo; Reddit; Blog; journal; chatroom; webpage**

**I. BACKGROUND:**

Social media allows the University of Maryland Medical System (UMMS) to expand and deepen interactions with patients and their families, team members, and stakeholders. This policy builds upon the policies of Employee Code of Conduct, Behavioral Standards, Equal Employment Opportunity/Fair Treatment, Harassment, Sexual Harassment, Workplace Violence, and Workplace Language, HIPAA and all policies and procedures concerning confidentiality and release of patient information.

**II. OBJECTIVE**


1. To define “social media” for team members.
2. To provide guidelines to team members on how to participate on social media and other online platforms while staying compliant with organizational policies.

**III. DEFINITIONS:**

**Social Media Participation** – We define social media participation as all forms of public communication and expression on platforms such as blogs, social network sites (e.g., Facebook; Twitter; Instagram; Snapchat; YouTube; LinkedIn; TikTok; Pinterest; Nextdoor; Clubhouse; Bigo; Reddit, etc.), wikis, content sharing sites (e.g., photo, video, image, or document), forums, mailing lists, discussion groups, and chatrooms. This includes both creating a new and individual conversation or commenting in a pre-existing public or private conversation, regardless if the conversation is associated or affiliated with UMMS. This policy applies regardless of where the access occurs or who owns the device.

**University of Maryland Medical System includes:**

UM Baltimore Washington Medical Center	UM Capital Region Health
UM Charles Regional Medical Center	UM Rehabilitation & Orthopaedic Institute
University of Maryland Medical Center (downtown & midtown)	UM St. Joseph Medical Center
UM Shore Regional Health	UM Upper Chesapeake Health
UM Physician Network	UMMS Corporate Shared Services
Mt. Washington Pediatric Hospital	UM Urgent Care

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**IV. SCOPE AND APPLICABILITY:**

This policy applies to all team members, supplemental team members, students, volunteers, vendors and contractors of the University of Maryland Medical System and any of its member organizations.

When applying this policy to your social media participation it’s important to be mindful of the “persona” you are portraying, especially when commenting on topics related to UMMS. Ask yourself if you are portraying a “professional persona” of a UMMS team member or your “personal persona,” as a member of the general public as you consider the content you wish to share.

You are acting in your professional persona as a team member when:

You identify yourself on social media as an UMMS team member, or you occupy a role at UMMS responsible for commenting on a topic related to your role within the organization.

While acting in your “professional persona” on social media, consider approaching each subject thoughtfully and professionally and consider every post you make a representation of the UMMS brand and as you as an individual.

You are acting in your personal persona when:


You don’t mention yourself as an UMMS team member on your personal social media profiles and you use your account to engage in activities such as networking or posting content of life outside of work.

**V. RESPONSIBILITY FOR FOLLOWING THE POLICY**

It is your responsibility to know and understand the Social Media Policy. If you have any questions about the policy or whether it is appropriate for you to post something, refer to the UMMS annual training social media module.

Report any potential misuse of social media by contacting the UMMS Compliance Hotline at 1-833-5-TELL-US. For any questions regarding the content or application of this policy please contact UMMS Marketing and Communications.

**Things to Consider When Engaging on Social Media**

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**1. All UMMS policies and procedures apply to social media.** Never use social media in a way that breaches any UMMS policies. This includes HIPAA.

- a. This policy does not prohibit employees from discussing wages and other terms and conditions of employment.

**2. Protect confidential information.**

HIPAA applies everywhere, including social media, even if the patient’s information has been disclosed in the news media or by the patient or a family member. Disclosing confidential patient information is a federal offense under HIPAA.

Team members should not release electronic recordings, including photos, videos, or audio of patients or families without UMMS Marketing and Communications' prior written permission in the form of a signed and documented consent release form from the patient or family.


**3. Protect and enhance the value of the UMMS brand.**

We encourage all team members to present UMMS and its member organizations positively and avoid inaccurate comments about our services, systems, patients and family members, or other team members. Please refer to the Employee Code of Conduct for further information on expectations.

Team members should not release confidential information such as the development of systems, processes, services, or technology and UMMS equipment, facilities or property.

Please note that any recommendations or endorsements provided by you to a current or former team member on LinkedIn or a similar online platform are from you and do not represent UMMS.

Only authorized team members of UMMS leadership, UMMS Marketing and Communications, and UMMS Talent Acquisition are permitted to speak on behalf of the organization and create external or internal social media accounts, blogs or websites. Team members are not allowed to create UMMS branded social media profiles in public or private domains that lead followers to believe that the profile represents UMMS. When using UMMS logos and names, team members must abide by copyright/trademark laws. If you have questions, please reach out to your marketing and communications lead. There is a higher risk to the organization to have accounts branded as “UMMS” with no documented or assigned control, governance, standards, or ongoing management. We

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want our patients and family members, stakeholders, and team members to be able to identify and follow our corporate social profiles easily.

**4. Think before you post.**

Use sound judgment and think about reactions to your post before publishing it. Remember, all social media posts and conversations may be discoverable even if you delete them immediately after posting. Avoid posting in the heat of the moment. Ask yourself if this issue is better handled by another part of UMMS, such as Compliance, Risk, Legal, Marketing and Communications, etc. If the answer is yes or maybe, do not post your content.

**5. Respect your audience.**

Your online communication should not adversely affect your job performance, the performance of other team members, or otherwise adversely affect patients, suppliers, or vendors' interests. Avoid personal attacks or insults, obscenities, name-calling, ethnic or racial slurs, profanity, comments around gender, sexual orientation, politics, and other protected classes when posting on social media.

**6. Identifying Yourself on Social Media**


Always adhere to the UMMS Social Media Policy.

Team members should use their personal email addresses for personal social media activities, not their UMMS email address. [This does not apply to staff authorized to represent the organization and use social media as part of their role.]

*By platform:*

LinkedIn is primarily a professional social media network where you speak in your professional persona and shape your personal brand. Your profile should align with your role/title at UMMS without providing misleading information to external users.

Team members engaging with followers in this context can assume that it is primarily an environment where their professional persona matches the topics that will likely dominate the discussion. The use of UMMS assets poses little risk if team members stay in their professional persona and adhere to the Social Media Policy. Consider identifying yourself in your LinkedIn profile as a UMMS team member and add a line that states, "These thoughts and views are my own and do not represent those of my employer." Adding "these thoughts and views are my own and do not represent those of my employer," does not relieve team members from being compliant with UMMS policies.

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Twitter is a social media network that can also be used for personal branding. Developing a presence on Twitter is a great way to increase your knowledge of social media and your industry. Many people have found an open, professional community on Twitter that is easy to be a part of. It is important to treat Twitter as a professional community and build up connections with consistent use over time when using the platform in this way.

While Twitter is often used as a social media platform for personal branding, it can be easily misconstrued that you're speaking on behalf of the organization. It's important to note that while you are building your personal brand you are still operating on a professional level if you have identified your role at UMMS in your account. When using UMMS logos and names, team members must abide by copyright/trademark laws.

Facebook, Instagram and other social media platforms are typically personal social media networks where the topic of discourse is wide-ranging, including, at times, some professional content. If you choose to identify where you work on these social networks, consider adding this statement: "These thoughts and views are my own and do not represent those of my employer." Adding "these thoughts and views are my own and do not represent those of my employer," does not relieve team members from being compliant with UMMS policies.

**7. Have productive conversations.**

When acting in your professional persona as a UMMS team member, remember that the primary benefit of social media participation is for others to learn about you and UMMS and for UMMS to learn about others. While it is OK to offer your point of view, it should be delivered in good faith. If UMMS has relevant and approved information on a topic, link to it to add value.


**8. Engage responsibly and have fun.**

Social media participation is about enjoying personal interaction, not delivering corporate communications. A big part of the social media experience is being authentic. Humor may be appropriate if it stimulates positive discussion. Because content on social media can be taken out of context, please be mindful of statements that could detract from the UMMS brand and your personal brand.

**9. Publicity.**

If a social media post generates a request for a briefing or an expert for an interview, please contact the UMMS Media Relations team at [media@umm.edu](mailto:media@umm.edu).

**10. Monitoring.**

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UMMS reserves the right to monitor all social media accounts and conversations our team members participate in on UMMS-owned platforms to ensure compliance with this Policy. There is no right to privacy for publicly posted social media content, and UMMS may monitor for such postings for compliance with our Employee Code of Conduct and other policies. Violations of this Policy may result in disciplinary action, up to, and including, termination of employment.

## VI. REFERENCES

- Communications Policy: Photography/Video/Filming of Patients Policy
- HIPAA – Uses, Authorizations and Disclosures policy
- IS&T policy No. CIS-1301 Acceptable Use
- HR Policy: Employee Code of Conduct
- HR Policy: Equal Employment Opportunity/Fair Treatment
- HR Policy: Harassment
- HR Policy: Sexual Harassment
- HR Policy: Workplace Violence
- HR Policy: Behavioral Standards
- Glossary of IS&T Policy Terms

This policy will be maintained by UMMS Marketing and Communications. For questions, submit to the UMMS Social Media Team here: [umms.org/socialrequest](http://umms.org/socialrequest)