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<b>Title:</b>	Partners HealthCare Social Media Policy
<b>Department:</b>	Information Systems
<b>Policy Type:</b>	<input type="checkbox"/> Partners System-wide <input checked="" type="checkbox"/> Partners System-wide Template <input type="checkbox"/> Partners Corporate <input type="checkbox"/> Partners Corporate Departmental <input type="checkbox"/> Entity
<b>Applies to:</b>	All Partners HealthCare Employees and Agents
<b>Approved by:</b>	Mary Finlay, Acting CIO Dennis Colling, Vice President, Human Resources Lynne J. Eickholt, Vice President, Business Planning and Marketing Development Brent Henry, Vice President and General Counsel
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<b>Contact Person:</b>	Partners Chief Information Security Officer; Partners Corporate Compliance Manager; Partners Market & Business Development; Partners Human Resources

**PURPOSE:**

The way in which Partners HealthCare Employees and Agents can communicate internally and externally continues to evolve due to the rise of internet-based communications tools. Partners HealthCare recognizes the exciting new opportunities for communication and collaboration created by these tools, and encourages their responsible use. However, use of these tools also creates new responsibilities for Partners Employees and Agents.

This Social Media Policy describes requirements and guidelines for Partners Employees and Agents when using social media as defined below either for private purposes, or on behalf of Partners HealthCare (Partners) for authorized workplace duties.

**APPLICABILITY:**

This Social Media Policy applies to anyone who represents themselves as a Partners Employee or Agent and either makes reference to Partners, or who represents Partners, or any of its entities, on the following types of internet sites. Due to the emerging nature of social media, this policy cannot cover every platform of the future, but applies to those listed and any other online platform available, regardless of the mode of access (e.g., PC, mobile device, etc.)

- Any Partners HealthCare related Domain Website

- Social networking websites (e.g., MySpace, Facebook, Yahoo! Groups, Gather.com and Twitter)
- Multimedia Sharing Websites (e.g., Flickr, YouTube, Vimeo, Picassa)
- Blogs (e.g., WordPress, Blogger, TypePad, Moveable Type)
- Forums and discussion board (e.g., Yahoo! Groups, Google Groups)
- Wikis (e.g., Wikipedia, PBwiki, Wikispaces)
- Online polls and surveys (e.g., Survey Monkey, Doodle)
- Personally-managed websites, blogs, etc.
- Any other internet-accessible site on which individual users can post text, media, etc.

This policy applies even if your use of social media is anonymous or under a pseudonym.

This policy also applies to any Partners official sites on social media platforms maintained by departments, divisions or programs at Partners. Partners reserves the right to suspend, modify, or withdraw this Social Media Policy, and you are responsible for regularly reviewing the terms of this Social Media Policy.

**DEFINITIONS:**

**Social Media:** All of the activities referenced in the Applicability section are referred to as social media in this policy.

**Partners Confidential Information:** Includes but is not limited to, electronic protected health information, personal information, intellectual property, and employee information. Partners Confidential Data also includes any other non-public information that would subject Partners, the data owner, or the data subjects, to harm if the data was lost, stolen, or accessed by unauthorized individuals.

**Partners Agent:** Any individual or entity acting on behalf of Partners.

**POLICY STATEMENT:**

1. General Requirements

1.1 Partners has spent substantial time and resources building its reputation and good will. These are valuable and important assets. Before you make any posting that identifies yourself as an employee or agent of Partners, or that refers to Partners or a Partners entity, consider whether you risk damaging Partners reputation, or the reputation of any Partners entity.

1.2 If you do engage in anonymous or pseudonymous social media activity, you should be aware that in appropriate circumstances Partners will take steps to determine your identity.

1.3 Your social media activity must not disclose any information that is confidential or proprietary to Partners or to any third party that has disclosed information to Partners. Any use of social media by Partners Employee and Agents is subject to all Partners policies and procedures, copyright, privacy, fair use, financial disclosure, and other applicable laws.

1.4 You are more likely to resolve complaints about work by speaking directly with your co-workers, supervisor or other management-level personnel than by posting complaints on

the internet. If you, nonetheless, decide to post complaints or criticism, you must avoid doing so in a way that is defamatory or damaging to Partners or any Partners Employee or Agent.

1.5 Partners may request in its sole and absolute discretion that you temporarily confine your social media activity to matters unrelated to Partners if Partners determines it is necessary or advisable to ensure compliance with applicable laws.

## 2. Official Usage of Social Media

2.1 Representation of Partners or any Partners program or initiative on social media platforms may only be initiated or authorized by the Director of Partners Marketing or the Vice President of Public Affairs. Any uses related to fund-raising must be approved by the Chief Development Officer.

2.2 Sites or pages on You Tube, Facebook, Twitter, Gather, Blogger, WordPress, etc. that present as official pages of Partners or a Partners corporate program or initiative, including use of name and logo, are prohibited unless these are developed and/or approved by Partners Marketing, Public Affairs or Development Office.

2.3 No site use of the Partners name and logo is permitted without approval by Partners Marketing, Public Affairs or Development Office. Content owners of approved sites must follow all Partners Policies including any guidelines and are responsible for monitoring and maintaining web content.

2.4 Any use where an employee speaks in a professional capacity, either representing Partners HealthCare or their own view, but as an official spokesperson of Partners, on a site not managed by Partners, must be approved by the Vice President of Partners Public Affairs. That is, just as you must receive permission from Partners Public Affairs before supplying information to, commenting or submitting an editorial opinion to "the press" (i.e., any printed newspaper or other printed media) in an official capacity, you must do the same when posting your viewpoints or commentary on a non-Partners internet site if you are doing so in an official capacity or as a spokesperson of Partners.

2.5 If a member of the news media or a blogger contacts you about social media activity that concerns the business of Partners, please refer that person to Partners Public Affairs.

2.6 Partners posts that constitute endorsements under Federal Trade Commission Guidelines must disclose material connections the poster shares with the seller of products or services mentioned.

## 3. Personal Usage of Social Media

3.1 Common sense is the best guide if you decide to post information on your own time to social media in any way relating to Partners. If you are unsure about any particular posting, please contact your supervisor or any of the listed contacts in this policy for guidance.

- 3.2 Your private social media activity should reflect your personal point of view, not the point of view of Partners.
- 3.3 In your private social media activity if you identify yourself as a Partners Employee or Agent, refer to the work done by Partners or provide a link to a Partners website, the following disclaimer must appear in a prominent place: “the views expressed on this post are mine and do not necessarily reflect the views of Partners HealthCare.”
- 3.4 You must follow the General Requirements above if you post any personal or confidential information about yourself or co-workers or any work related activities. Do not post Partners Confidential Information or any photography or videos taken on hospital/entity premises.
- 3.5 Your social media activity must not include Partners logos or trademarks, unless such use is approved by the Director of Partners Marketing or the Vice President of Public Affairs.
- 3.6 Use your personal email address, not your partners.org address when participating in personal social media activities.

**SANCTIONS:**

Failure to comply with this policy may lead to corrective action up to and including termination.

**PROCEDURES:**

Official Usage of Social Media Guideline TBD by Partners Marketing.

**OTHER APPLICABLE PARTNERS HEALTHCARE POLICIES:**

- [Partners Acceptable Use Policy \(PH-502\)](#)
- [Partners Electronic Communication Policy](#)
- [Partners Corrective Action Policy](#)
- [Partners Sexual Harassment Policy](#)
- [Partners Termination of Employment Policy](#)
- [Partners Workplace Harassment Policy](#)

**REFERENCE:**

[Federal Trade Commission Guides Concerning the Use of Endorsements and Testimonials in Advertising Governing Endorsements \(2009 Revision\)](#)

**DEVELOPMENT AND CONSULTATION**

Reviewed by:	Original Review Date:	Revision Approval Dates:
Partners Business & Market Development	June 2010	
Partners Human Resources	June 2010	
Partners Compliance & Business Integrity	June 2010	
Partners Chief Information Security Officer	June 2010	
Partners Compliance Operating Committee	August 2010	