



# UCF /HCA GME Consortium Use of Internet and Social Networking Sites Policy

**<u>Purpose/Intent</u>**: This policy provides guidance regarding the appropriate use using the internet and social networking websites for communication.

<u>Summary</u>: Inappropriate internet and social networking communication is unprofessional and may be a source of liability and embarrassment for individuals and institutions. Trainees includes both residents and fellows.

The Consortium supports the proper use of social media and recognizes the need to manage the use of social media in the workplace to protect the reputation of UCF COM, all participating hospitals and clinical sites as well as to ensure the privacy of their staff, faculty and patients. This policy establishes the standards to ensure that use of social media by all trainees is appropriate and consistent, and that personal use of social media does not interfere with work responsibilities.

## **Definition of Social Media:**

Social Media includes but is not limited to blogs, online discussion boards, online communities, social networks, microblogs, photo and video sharing sites. Examples include, but are not limited to Facebook, LinkedIn, Twitter, Flickr, YouTube and online comments sections.

## **General Information:**

Trainees need to be cognizant that when posting content online, they may be viewed as representing the university, HCA and participating hospitals, the clinical sites and the medical community. If you identify yourself as employed or affiliated with UCF, HCA, or an affiliate, you must make it clear that you are not a spokesperson of that organization. Trainees are subject to the University Use of Information Technology and Resource Policy 4-002.1. Trainees should be aware that:

- All material published on the internet should be considered public and permanent.
- Any information posted on a social networking site may be disseminated (whether intended on not) to a larger audience, and that the post may be taken out of context or remain available online in perpetuity.
- There is no expectation of privacy when using institutional computers and electronic devices.
- Trainees should carefully take into consideration and adopt privacy best practices for social media to include but not limited to enhancing the privacy settings on all social media sites.
- Limit Internet use for social networking to your personal time only. If using a device owned by HCA (or UCF), you must abide by HCA (or UCF) device policies as applicable.

## **Professionalism**

The tone and content of all electronic conversations should remain professional and respectful. To use social media and social networking sites professionally trainees should:

- Refrain from posting unprofessional images or behavior that may tarnish their professional image and impair their ability to practice medicine effectively, become licensed, and/or participate in positions of trust and responsibility within an institution or within the community.
- Never post any material that is obscene, defamatory, profane, libelous, threatening, harassing, abusive, hateful, or embarrassing to another person or any other entity.
- Never use social media to discriminate or harass any individual based on race, color, gender, religion, national origin, disability, age, veteran status, genetic information or any other characteristic protected by state or federal law.
- Never use social medial to impersonate another user or mislead a recipient about one's identity.

## Protecting Privacy/Confidentiality

Just as in the hospital or ambulatory setting, patient privacy and confidentiality must be protected at all times, especially on social media and social networking websites. Online communications are held to the same laws and policies as offline communications.

- Privacy and confidentiality between physician and patient are of the utmost importance. All health care providers have an obligation to maintain the privacy of health information as outlined by the Health Insurance Portability and Accountability Act (HIPAA).
- Identifiable protected health information (PHI) should never be published/posted on the
  internet. This applies even if no one other than the patient is able to identify him/herself from
  the posted information. Patient images should be only obtained with written consent, and then
  only using institutional hardware, and never using trainees' personal equipment. Patient images
  must be stored and/or transmitted only using institutional hardware, and never on personal
  equipment or posted online.
- Each individual is responsible for the content of his/her own posts and blogs, including any legal liability incurred (HIPAA or other).
- Trainees should never mention patients' room numbers, refer to them by code names, post pictures of them, or post any identifiable information of patients.
- Transitions of care/sign-out of patients must not be done by routine email or unapproved data file sharing sites.
- Personal phones, personal cameras and other personal devices shall not be used to photograph, film or record patients or to receive, store or transmit individually identifiable information about patients.

## **Respecting Copyright laws, Advertisements and Endorsements**

• Trainees must avoid discussing any sensitive, proprietary, confidential, or financial information about any institution. Any material posted by a trainee that identifies an institution in which the trainee has worked or is working should have prior written authorization by the appropriate official of that institution.

- Branding: your social media name, handle, or URL should not include UCF, HCA or affiliated hospital. Unauthorized use of institutional information or logos is prohibited, including but not limited to UCF, HCA hospitals, and affiliates.
- No institutional phone numbers, e-mail addresses, or web addresses may be posted to a website without written permission from an authorized institutional official.
- Endorsements: never imply that you are endorsing a person or product on behalf of UCF, HCA or affiliate in social media site such as LinkedIn.
- Do not post any advertisements of HCA or affiliate products and services unless you receive official authorization

## Interacting with Patients

To maintain appropriate professional boundaries and compliance with HIPAA:

- Trainees should not "friend", "connect with", or "follow" patients on any social networking site or review patient profiles on these sites.
- It is never appropriate to provide specific medical advice to a patient on a social networking site.

## Posting with Caution

Postings within social networking sites are subject to the same professionalism standards as any other personal interaction. Remember that online activities, even those that seem private, can become public if content is copied, forwarded or printed. Text, images and video can remain on the internet even after efforts have been made to remove them. Trainees should routinely monitor their own "internet presence" to ensure that their personal and professional information posted by them or others is accurate and professional. This includes making an effort that they are not "tagged" in images posted by others that might be seen as portraying them in an unprofessional manner. Trainees should ensure that they have implemented appropriate privacy settings to avoid inadvertent dissemination of personal information to others outside of their control.

Trainees are strongly encouraged to take a moment to reflect before every posting to a social media site to consider if the posting could potentially violate any patient privacy laws and/or the content of this policy. If there is any doubt, trainee should not continue with the posting.

## **Policy Violations**

Failure to comply with the provisions of this policy will result in corrective action up to and including termination from the Residency program. Trainees, faculty, and other GME staff are encouraged to report violations to UCF GME office and program leadership. Violations involving protected health information should be reported according to hospital/clinical site policies, and should include privacy and information security officers for both the hospital and UCF COM.

This policy governs all GME programs sponsored by UCF/HCA GME consortium. However, hospitals and clinical teaching sites may have additional policies related to the use of social media that are more

restrictive and trainees are subject to the policies of their respective teaching sites. Individual programs may provide additional policies.

## **References:**

Federation of State Medical Boards. Model Policy Guidelines for the Appropriate Use of Social Media and Social Networking in Medical Practice. Available at

http://www.fsmb.org/policy/advocacy-policy/policy-documents

Use of Information Technologies and Resources UCF policy 4.002 found at:

http://policies.ucf.edu/