

TORRANCE MEMORIAL MEDICAL CENTER

Department: **ADMINISTRATION**

Policy/Procedure: **SOCIAL MEDIA**

Torrance Memorial Medical Center (hereinafter “Torrance Memorial”) recognizes that many physicians or privilege holders, independent contractors, volunteers and students (collectively “Personnel”) engage in social media activity. For purpose of this policy “Social Media Activity” includes all types of posts and other communications on the Internet, including but not limited to, posts on social journals and diaries; bulletin boards and chat rooms; micro blogging, such as Twitter; and posts of video or audio on media sharing sites, such as YouTube or Flickr. “Social Media Activity” also includes permitting, or failing to remove, posts by others where the Personnel can control the content of posts, such as on a personal page or blog.

1. Torrance Memorial respects the legal rights of its Personnel and understands that Personnel’s time outside of work is their own. However, Personnel who engage in social media activity should be mindful that their social media activity, even if done off premises and while off-duty, could affect Torrance Memorial’s legitimate business interests. For example, the information posted could be Torrance Memorial’s confidential business information or the information discussed could contain Protected Health Information (hereinafter “PHI”) which could result in a privacy violation.
2. This Social Media Policy applies to all Personnel as described above. This policy applies to social media activity that relates in any way to Torrance Memorial’s business, patients, Personnel, customers, vendors, or competitors or that identifies Personnel’s affiliation with Torrance Memorial (other than as an incidental mention of place of employment in personal social media activity unrelated to Torrance Memorial).
3. This policy applies to social media activity when on or off duty, while using Torrance Memorial’s or personal electronic devices, and whether or not Personnel posts anonymously or using a pseudonym.
4. Torrance Memorial values its established brand reputation and good will relationships. These are important assets which Personnel should be aware of before Personnel engages in social media activity that in any way relates to Torrance Memorial. This policy does not and cannot cover every possible social media activity. For this reason, Torrance Memorial relies on the professionalism and judgment of its Personnel to ensure that social medical activity is undertaken responsibly.
5. Torrance Memorial has established social media including Facebook, YouTube, Twitter and others. Departments and individuals may wish to use these channels to promote programs, services, events and other Torrance Memorial related information. Please contact Public Relations.

6. Torrance Memorial respects its Personnel's right to express opinions when using social media and does not retaliate or discriminate against Personnel who use social media for personal, political, organizing, or other lawful purposes. Nothing in this policy is intended or should be construed to infringe upon our Personnel's Section 7 Rights under the NLRA.
7. Torrance Memorial prohibits the use of its electronic communications systems and devices for personal social media purposes during regular work time. Personnel can only use their own personal electronic communications equipment and devices at the workplace during non-work time for this purpose. Personnel are to ensure that social media activity does not interfere with work commitments.
8. Torrance Memorial communications systems and devices should be used for business related purposes, and Personnel should not expect any privacy when using such systems and devices.
9. Personnel should not post content about Torrance Memorial, management, co-workers or patients that is vulgar, obscene, threatening, intimidating, defamatory, harassing, or a violation of Torrance Memorial's policies against discrimination, harassment on account of age, race, religion, gender, ethnicity, nationality, disability, or other protected class, status, or characteristic.
10. Personnel should not disclose personally identifying information (such as dates of birth, social security numbers, credit or debit card numbers or financial account numbers) of Torrance Memorial's Personnel, patients, customers, vendors or competitors.
11. Personnel engaging in the use of social networking are individually responsible for their commentary and can be held personally liable for commentary that is considered a breach of confidentiality or privacy, harassing, defamatory, obscene, proprietary or libelous by any offended party.

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