

Ram Raju, MD, MBA, FACS, FACHE
President and CEO

May 27, 2014

Operating Procedure No. 20-61

SOCIAL MEDIA USE

TO: Distribution D
FROM: Dr. Ram Raju, President



I. PURPOSE

The Corporation recognizes that its employees use social media such as Facebook, Tumblr, Twitter, LinkedIn, and other forms of user-generated media, such as wikis, blogs and other on-line journals and diaries, as well as chat rooms and bulletin boards. This policy was developed to help employees identify and avoid potential issues and provide guidance to them in the use of social media.

II. SCOPE/COVERAGE

This policy applies to all HHC employees using social media as indicated below.

III. POLICY

- A. Use of HHC's office and technology resources to access social media for personal use is subject to Operating Procedure 20-60, Limited Personal Use of HHC Office and Technology Resources. Employees must, at all times, comply with NYCHHC Internet access policy and usage guidelines, and any and all computer usage policies, as well as all laws, rules, regulations, policies, orders and/or HHC operating procedures.
- B. HHC employees have no right to privacy with respect to any information they transmit, receive, create, access, obtain, view, or store on HHC's computers and computer systems.
- C. Employees are advised that HHC monitors social media activity.
- D. Employees must ensure that social media use does not interfere with work duties and responsibilities.

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- E. Employees must comply with the laws governing the use of copyrighted material, icons, logos, trademarks, brands, and other intellectual property owned by HHC and by others.
- F. Employees are prohibited from posting or disclosing private or confidential information, including but not limited to patient information as well as proprietary information of or about HHC, its affiliates, vendors, and/or suppliers. HHC employees must comply with the Health Insurance Portability and Accountability Act of 1996 ("HIPAA") and other patient confidentiality laws at all times, even when not at work. Do not post internal reports, policies, procedures, or other confidential communications.
- G. Employees are prohibited from making postings that include discriminatory remarks, harassment, and threats of violence or similar inappropriate or unlawful conduct. Examples of such conduct include posts that could contribute to a hostile work environment on the basis of race, gender, disability, religion, or any other status protected by law or HHC policy.
- H. When not communicating in an official capacity, employees who identify themselves as HHC employees or whose position within HHC is generally known must include a disclaimer on each page, entry, and posting to make it clear that the views expressed are the employee's alone.

EXAMPLE: "The postings on this site are my own and do not represent the positions, strategies, or opinions of my employer."

This disclaimer does not free the employee from the obligations set forth in this operating procedure or the code of conduct in the employee handbook or from disciplinary action.

- I. Employees may not use their HHC email addresses to register on social networks, blogs, or other online tools when participating in social media for non-business use.
- J. Employees' use of social media is subject to all applicable laws including, without limitation, Chapter 68 of the New York City Charter. For example, pursuant to Section 2604(b)(4) of Chapter 68, HHC employees shall not post or otherwise disclose any information unavailable to the general public that they have learned as an HHC employee.