PURPOSE:

RWJBarnabas Health (“RWJBH”) recognizes the integral role social media and networking plays in enhancing knowledge and promoting communication and learning. With the rise of new media and next generation communications tools and devices, the way in which individuals associated with RWJBH can communicate internally and externally continues to expand and evolve. While this creates new opportunities for communication and collaboration, it also creates new responsibilities for RWJBH and all individuals covered under this policy. RWJBH has the right and obligation to protect itself, its affiliates, patients and other customers from unauthorized disclosure of information. Information that is provided on social networking sites or exchanged through social media – even if the intended content is personal or limited to certain individuals or entities – can be circulated beyond your intended audience.

The purpose of this Social Media and Networking policy is to ensure Employees create and maintain respectful and well-informed interaction on the Internet to protect the privacy and confidentiality of RWJBH, its affiliates, patients and other customers, and any and all forms of social networking activities do not result in the disclosure of RWJBH’s confidential or non-public proprietary information, such as patient information, trade secrets, non-public financial data, and similar information. Accordingly, this Social Media and Networking Policy include important rules and guidelines applicable to all Employees. All Employees must follow this Policy.

This policy is not intended to interfere with any rights guaranteed to Employees under any applicable federal, state, or local law, including but not limited to Employees’ rights to engage in any activity protected by the National Labor Relations Act.

POLICY:

Employees who communicate using social media must do so in a responsible manner, and within the guidelines outlined in this policy. Social media activities are not permitted during working hours, including accessing social media sites through a company-owned or personal computer, smart phone or other device during a work shift unless otherwise previously approved.

RWJBH policies and procedures relating to these issues are available on the Intranet or can be obtained by contacting RWJBH’s Human Resources Department. They are also summarized in the Employee Handbook. Employees who are uncertain about the suitability of content of any Internet Postings (defined below), or need clarification with respect to any aspect of this policy, should contact their local Human Resources Department.
Internet Postings and Forms of Social Media:

Internet postings or other forms of social media or technology include but are not limited to the following:

1. Multi-media and social networking applications and websites, including but not limited to, MySpace, Facebook, Twitter, Yahoo! Groups, YouTube, Flickr, chat rooms, Instagram, Snapchat, tiktok, external blogs (defined as a website, usually maintained by an individual with regular entries of commentary, descriptions of events, or other material such as graphics or video, or other similar forms of online journals, diaries, or personal newsletters) not affiliated with RWJBH.

2. Video postings or wiki postings (e.g., Wikipedia and any other site where text can be posted).

All posting activities including multi-media, social networking sites, blogs, online forums, photo sharing, video sharing, microblogging, podcasts, and posted comments are referred to as "Internet Postings" in this policy.

General Guidelines & Rules:

RWJBH respects the right of Employees to use blogs and social networking sites as a medium of self-expression and public conversation and does not discriminate against Employees who use these venues for any lawful purpose. Employees are expected to adhere to the following General Guidelines and rules and other applicable system policies:

1. Employees are not authorized, at any time, to speak on behalf of RWJBH, or represent authority to do so, unless previously approved in writing by RWJBH. Nor should an Employee claim or imply to be posting as an authorized representative of RWJBH. An Employee who identifies himself or herself as an RWJBH Employee on any Internet Posting, refers to the work done by RWJBH or provides a link on an RWJBH website, is required to include the following or a similar disclaimer in a reasonably prominent place: “The posts on this site, including but not limited to images, links, and comments left by readers, are mine alone and do not represent the views, positions, strategies or opinions of RWJBH.”

2. Employees cannot use RWJBH-owned equipment, including computers, company-licensed software or other electronic equipment to conduct personal blogging, Internet Posting or personal social networking activities without prior written approval.
3. Postings should not disclose confidential financial data of RWJBH or other non-public proprietary company information. Do not share confidential information regarding RWJBH’s business partners, vendors, patients, or customers.

4. Employees are prohibited from posting any patient information which may include, but is not limited to, name, date of birth, photograph, Social Security number, address, diagnosis or prognosis, treatment, date of admission or discharge, or any other information which would identify a patient or any other information protected by the Health Insurance Portability and Accountability Act (“HIPAA”) and/or other federal, state, or local law. Employees are further prohibited from posting information which might disclose the identity of other patients, visitors, or vendors.

5. Employees cannot, for commercial purposes, post on a personal blog or social media website any advertisements or photographs of RWJBH’s products or services, nor sell any RWJBH products or services.

6. An Employee’s personal Internet Posting should comply with paragraph one above and should clearly reflect that the statement represents the Employee’s personal point of view, not necessarily the point of view of RWJBH. Because an Employee is legally responsible for his or her postings, the Employee may be subject to liability if his or her posts are perceived to be defamatory, libelous, obscene, harassing, discriminatory, threatening, or proprietary by any offended party, not just RWJBH. Examples of such conduct might include offensive posts meant to intentionally harm someone’s reputation or posts that could contribute to a hostile work environment on the basis of race, sex, disability, religion or any other status protected by law or RWJBH policy. Be respectful in all communications and blogs.

7. When engaging in any social networking activity, Employees must abide by all applicable codes of conduct or ethical rules associated with their profession, certification or license, as well as all the terms of this policy and all of RWJBH policies and procedures.

8. An Employee engaging in internet posting activities is not to speak on behalf or give the appearance of speaking on behalf of RWJBH in an official capacity. If an Employee communicates to the public about RWJBH or any of its affiliates, the Employee must disclose his/her connection with RWJBH and his/her role at RWJBH, and must ensure that his/her communications otherwise comply with the terms of this and other RWJBH policies, as well as with all applicable confidentiality and privacy laws, such as HIPAA.
9. In addition, the Employee acknowledges that the content posted will be visible to colleagues, patients, consumers, and the diverse communities we serve. The Employee shall ensure the information posted is the most professional reflection of the opinions and beliefs.

10. Employees must behave professional and with the utmost respect for these individuals involved in the discussion when communicating online. Ethnic slurs, personal insults, foul language, or conduct that would not be acceptable at RWJBH and must not be used.

11. Employees must comply with and respect all applicable federal, state and local laws, including but not limited to all intellectual property, trademark, copyright, fair use, privacy, HIPAA, and financial disclosure laws.

**Employer Monitoring:**

RWJBH reserves the right to monitor comments or discussions about the company, its affiliates, clients, and the industry. These guidelines apply even if the social networking activity is being conducted anonymously or under a pseudonym. If an Employee engages in such social networking, the Employee should be aware that, in appropriate circumstances, RWJBH reserves the right to take steps to determine his/her identity.

As a general rule, Employees should remember anything posted on the Internet may be public for an indefinite period of time (even if there are attempts to modify or delete it) and that Internet Postings typically can be traced back to its author one way or another. Also, the terms of service of social networking sites apply to the information posted on these sites and might allow for posted material to be used in a different manner than intended.

Employees also should be aware that they have no expectation of privacy with respect to their social networking activities and Internet Postings while using RWJBH equipment for any purpose, including authorized blogging except as consistent with applicable law.

**Reporting Violations:**

RWJBH requests Employees report any violations or possible or perceived violations of this policy to their supervisor, manager, the local Human Resources Department, or RWJBH’s Corporate Compliance Department.
Responsibilities:

1. Supervisors are to ensure each of their Employees are familiar with the contents of this policy and shall partner with their local Human Resources Department to investigate reported violations of same.

2. Employees who are contacted by a member of the news media or a blog site concerning RWJBH’s perspective about Internet Postings are not to respond to this request on behalf of RWJBH, but are required to refer that person to RWJBH’s Public Relations Department so the System can respond timely and in a professional manner through a designated spokesperson.

3. Employees’ Internet Postings shall not violate any other applicable policy of RWJBH, including, but not limited to, those set forth in the Employee Handbook, the Code of Conduct Policy and Employee Standards of Workplace Behavior Policy.

4. Employees are personally responsible and legally liable for the content they publish on blogs, websites or any other form of user-generated media.

5. RWJBH shall not be liable, under any circumstances, for any errors, omissions, loss or damages claimed or incurred due to any of its Employees’ Internet Postings.

6. This policy will not be interpreted or enforced in a manner that would interfere with Employees’ rights to discuss work-related issues with one another or to interfere in any way with Employees’ rights under any applicable federal, state or local law.

7. Additional information related to or clarification of this policy may be obtained through the local Human Resources Department.

Discipline for Violations:

RWJBH investigates and responds to all reports of violations of the Social Media and Networking policy and other related policies. Violation of this policy or other RWJBH policies will result in disciplinary action up to and including immediate termination of employment. RWJBH reserves the right to take legal action where necessary against Employees who engage in prohibited or unlawful conduct.