



# Social Media Policy Statement

## Introduction

At VillageCare, we recognize and encourage our employees' active participation in social media and online communications.

This Policy is designed to guide you in making responsible decisions when creating, posting or otherwise contributing to blogs, social networks, wikis, virtual worlds or other social media. Whether you use external sites such as Facebook, LinkedIn, Twitter, YouTube, Google+, Instagram, Pinterest or Wikipedia or internal sites or comment on blogs or any form of digital media. The Policy covers three main areas:

1. Basic principles for all types of social media
2. Special guidelines for official use of social media on behalf of the company
3. Special guidelines for personal use of social media

## Basic Principles

These principles apply to official use of social media on behalf of our company as well as personal use.

1. **Adhere to the Code of Conduct.** The Workforce is expected to adhere to all existing VillageCare rules and policies when using or participating in social media. All the rules that apply to other VillageCare communications apply here, specifically: respecting employees, patients, customers, members, clients, residents and one another; protecting confidentiality, privacy, and security of patient, client, resident identifiable information, PHI, employee identifiable information, and VillageCare information; and safeguarding and proper use of VillageCare assets.
2. **Be respectful.** When representing VillageCare in any official capacity, the workforce may not post any material that is obscene, defamatory, profane, libelous, threatening, harassing, abusive, hateful, or embarrassing to another.
3. **Abide by the law and respect copyright laws.** The Workforce may not post content or conduct any activity that fails to conform to any and all applicable state and federal laws. For the protection of both VillageCare and the workforce, it is critical that all the Workforce abide by the copyright laws by ensuring that they have permission to use or reproduce any copyrighted text, photos, graphics, video, or other material owned by others.
4. **Obtain approval before setting up VillageCare hosted site.** The Workforce may not set up a VillageCare-hosted blog or other social media sites without getting approval from the Corporate Communications department.

5. **Proprietary information.** The Workforce may not disclose any confidential or proprietary information of or about VillageCare, its affiliates, vendors, or suppliers, including but not limited to business and financial information, represent that they are communicating the views of VillageCare or do anything that might reasonably create the impression that they are communicating on behalf of or as a representative of VillageCare.
6. **Patient/Client/Resident/Member confidentiality.** The Workforce may not disclose any patient/client/resident/member identifiable information of any kind on any social media without the express written permission of the patient and/or the VillageCare Privacy Officer. Identifiable information includes but is not limited to photographs, neighborhoods, birthdates, etc. Even if an individual is not identified by name within the information you consider to use or disclose, if there is a reasonable basis to believe that the person could still be identified from that information, then its use or disclosure could constitute a violation of the Health Insurance Portability and Accountability Act (HIPAA) and VillageCare confidentiality policy.
7. **Fraternalizing.** Avoid "friending" or "linking" or connecting with patients/clients/members/residents and their families.
8. **The Workforce confidentiality.** The Workforce may not disclose any personal information obtained through records or documents viewed or obtained through the normal course of business at VillageCare.
9. **Photography.** Avoid taking photographs of patients/residents/clients/members without written approval from the individual or their parent/guardian, unless it is for medical purposes as required or authorized by facility or program policy to be maintained as part of the individual's record with VillageCare. Any photos taken on behalf of VillageCare shall be taken on VillageCare provided phones and/or cameras.
10. **Self-hosted sites.** The Workforce must not say or suggest that the views and opinions they express related to VillageCare and healthcare topics represent the official views of VillageCare.
11. **Press Inquiries.** All media requests and press inquiries should be referred to the Corporate Communications Department.
12. **Reporting Violations.** Suspected violations of this policy should be immediately reported to your supervisor and/or the Privacy Officer.

## Violations

Violations of this policy may subject the violator to disciplinary action up to and including termination or dismissal from VillageCare. VillageCare reserves the right to demand that a post or statement that violates this policy be corrected, edited or removed.