

## Social Media Policy

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### Washington/Montana Regional Services (“ministry”)

**Department:** Human Resources

**Approved by:** Chief Human Resources Officer

**Date Last Reviewed:** 9/25/2025

**Date Last Revised:** 9/25/2025

**Date Adopted:** 7/1/2021

**Policy Name:** Social Media

**Scope:** All workforce members

**Purpose:** In keeping with our mission and values, the ministry strives to ensure that workforce members comply with ethical and legal obligations concerning social media, and utilize approved media processes and platforms. This policy aims to clarify what constitutes official use of social media, to establish guidelines for the official use of electronic social networking, and to clarify the personal responsibilities and legal implications of personal use of electronic social networking while at work or while posting information about the ministry.

**Terms:**

*Workforce member* means caregivers, volunteers, trainees, interns, medical staff, students, independent contractors, vendors and other individuals working at the ministry, whether or not they are paid by or under the direct control of the ministry.

*Official use of social media:* The ministry maintains a series of official social networking websites for various regions, departments, key spokespeople, and events that are organized and coordinated by the ministry. These official social media pages are managed by designated workforce members.

*Branded content sharing sites:* The ministry maintains a series of official storytelling and content capture websites that are organized and coordinated by the ministry. These official content sharing sites are managed by designated workforce members.

*Personal use of social media:* The sharing by any workforce member of their own personal opinions or content via any social networking website, personal blog or website, or by posting on someone else's social networking website.

*Review sites:* Web-based media designed to enable consumers to post reviews about people, businesses, products, or services. Examples include Yelp, Healthgrades, Vitals, Wellness, RateMDs, Doctor.com, etc.

*Social media (or social networking websites):* Web-based media designed to be disseminated through social interaction, using highly accessible and scalable publishing techniques. Social media are characterized by open two-way communications between the host and the audience. Example platforms include Facebook, LinkedIn, YouTube, X (formerly known as Twitter), Snapchat, Instagram, Pinterest and blogs.

*Web-based communications:* Electronic communication technologies, including but not limited to electronic mail (email), text messaging, instant messaging, social and mobile applications and web-based technologies (internet, intranet and extranet).

### **Policy:**

Social media may be used by the ministry for business-related purposes and by its workforce members for business and other purposes subject to the restrictions set forth in this policy. This policy is established to assure compliance with legal and regulatory restrictions and privacy and confidentiality agreements.

Workforce members using social media for personal use must follow policies regarding meal and break times for use occurring during the workday.

In addition, anyone using branded content sharing sites are required to use the approved tools and social account/ad account set up to activate social media.

This policy is not intended to restrict workforce members from discussion, transmission or disclosure of wages, hours, working conditions, or other terms of employment in accordance with applicable federal and state laws.

### **Procedures:**

1. **Official use of social media requirements:** Official use of the ministry's social media shall be subject to prior written approval by Communications and shall adhere to this policy.

- A. **Approval:** Any program or entity must obtain written approval from Communications prior to any site being launched or materially changed from its original purpose.
- B. **Obtaining approval:** To obtain written approval for an official use of social media, the proposer shall present a business case and maintenance plan. The proposer shall provide a brief statement of:
  - 1. The business plan or objectives
  - 2. The brand management of ministry logos, colors, styles, and naming conventions
  - 3. The maintenance plan to ensure effectiveness
  - 4. The monitoring and response plan to ensure material and content is appropriate
  - 5. The cost to implement and maintain over time
- C. **Reporting concerns:** Workforce members should report social media concerns to Communications.
- D. **Respect copyright laws and obtain necessary releases:** All official use of social media must comply with applicable copyright laws and any photos/videos requiring subject release forms are the responsibility of the designated site owner to obtain.
- E. **Standards/Codes of Conduct:** Apply to workforce member's use of web-based communications and social media
- F. **Ethical and Religious Directives:** The Ethical and Religious Directives apply to workforce member's use of web-based communications and social media.

## 2. Personal use of social media

- A. **Code of Conduct:** The Code of Conduct applies to workforce members' use of web-based communications and social media. Accordingly, social media posts that would be considered malicious, discriminatory, harassing, threatening, obscene, bullying, defamatory, or otherwise unlawful are strictly prohibited. This policy is not intended to restrict workforce members from

discussion, transmission or disclosure of wages, hours, working conditions, or other terms of employment in accordance with applicable federal and state laws.

- B. **Legal liability:** It is important for workforce members to remember that individuals can be held personally and legally responsible for their publicly made opinions and comments, even on personally maintained sites and pages. This means workforce members cannot share confidential or proprietary information, photographs, or videos about the ministry that may include confidential or proprietary information on personal sites.
- C. **Protected health information/patient images:** All information contained in the ministry's systems are owned by the ministry. Workforce members (including medical staff) are prohibited from taking photos, videos or otherwise using any PHI on social media pages or otherwise, **including but not limited to images or pictures that the workforce member believes to be de-identified**, without obtaining prior written approval from the communications department and the appropriate prior written authorization from the patient. Workforce members are required to maintain patient privacy by following confidentiality, privacy, and security policies and standards and Health Information Portability and Accountability Act (HIPAA) rules at all times. Examples of such confidential or proprietary information that cannot be shared include: protected health information (PHI), personally identifiable information (PII) including photographs, business plans, and other information or data whether conveyed in writing or orally, that is known to be confidential or proprietary. An exception to this rule is that workforce members are allowed to post or share information found on an official ministry public site (for example, ministry webpages, Facebook or Instagram account). Confidential or proprietary information does not include information relating to wages, hours, or working conditions.
- D. **Privileged and confidential information:** Any confidential or proprietary information workforce members may be privy to is not to be included in any external electronic communications.
- E. **Logos and trademarks:** Use of the ministry's logos or trademarks for any commercial purpose, or in any way that reasonably would mislead others into thinking that the communication is an official ministry communication, is strictly prohibited.

- F. **Sharing as a workforce member:** When creating a personal site or commenting on other sites, if workforce members include their relationship to the ministry, they should make it clear that they are speaking for themselves and not on behalf of the ministry. In order to ensure that anyone reading a blog, posting or other online activities understands that the workforce member is not speaking on behalf of the ministry, workforce members must use a personal email address (not a ministry email address) as their primary means of identification on personal sites.
- G. **Reputation:** If a workforce member's blog, posting or other online activities would disparage the ministry's reputation or brand and/or its sponsors, leadership, caregivers, or services, workforce members should not refer to or identify their connection to the ministry or should make clear that they are not speaking on behalf of the ministry.
- H. **Respecting the ministry's partners:** Be respectful and professional to business partners, competitors and patients. Workforce members should not post anything about our partners, competitors, or patients that would be considered malicious, discriminatory, harassing, threatening, obscene, bullying, defamatory, or otherwise unlawful. Those who identify themselves as connected to the ministry in their postings and comment can be liable for the statements that are made. Workforce members are asked to think about how their comments may affect fellow team members (core leaders, physicians, co-workers, etc.).
- I. **Endorsing candidates for public office:** Workforce members who endorse or oppose a candidate for public office in web-based communications must do so as private individuals and without reference to the ministry.
- J. **Ethical and Religious Directives:** The Ethical and Religious Directives apply to workforce member's use of web-based communications and social media.

**References:**

- Providence Code of Conduct
- Confidentiality Policy
- Standards of Conduct Policy
- COMM-602: Use of Names and Logos Policy on PolicyStat

- GOV-211: Lobbying and Political Activities Policy on PolicyStat
- PSJH-DLA-1801: Copyright Compliance Policy on PolicyStat
- [Ethical and Religious Directives for Catholic Health Care Services](#), Sixth Edition, issued June 2018

**Help:** For questions about this policy, or assistance with understanding your obligations under this policy, please contact the [HR Service Center](#).

The statements of this policy document are not to be construed as a contract or covenant of employment. They are not promises of specific treatment in specific situations and are subject to change at the sole discretion of the ministry.