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## What are the responsibilities of Human Resources Leaders?

- 1. Assist Supervisors and/or Administration with investigations of inappropriate use of Social Media related to Tenet business.
- 2. Review Intranet reports provided by Information Systems.
- 3. Assist Supervisors with corrective action pertaining to the inappropriate use of Social Media.

## What are the responsibilities of Supervisor/Leaders?

Report any violations or potential problems to Administration, the Information Privacy Security Office, and Human Resources for appropriate corrective action with employees.

# What are the responsibilities of Information Systems?

- 1. Monitor Tenet Intranet social postings for possible violations of this policy and provide related reports to Human Resources.
- 2. Assist with promptly removing inappropriate content in violation of this policy from Tenet Intranet sites.

# **Employee Guidelines and Restrictions**

#### Can employees post content related to patients and patient care?

On all sites (public or the Tenet Intranet), employees may NOT publish any content related to patients and patient care, even if the patient is not identified, and must maintain strict adherence to all laws and policies related to a patient's personal health information. This personal health information includes any information collected, created or maintained by Tenet or on behalf of Tenet, to facilitate treatment, payment and/or healthcare operations. This personal health information may include, but is not limited to, patient name, demographic information, photos, diagnostic testing results, images, and case information.

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# How can an employee request permission to establish a public, work-related Social Media site?

Employees wishing to establish an official, public, work-related Social Media site must first gain approval from Tenet Entity administration. Tenet Entity administration must then obtain approval for such proposed social media site from the Home Office Corporate Communications department ("Corporate Communications"). Use of the Tenet or Tenet Entity name, logo or photographs to establish official Social Media sites is not permitted without Communications Center's prior written approval (see Administrative Policy AD 1.20 Requirements for Social Media Community Managers).

### Can an employee provide medical or health advice on Tenet's Intranet or a public site?

Employees must not provide medical or health advice on any public Social Media site or Tenet's Intranets.

#### What can an employee communicate about Tenet on public Social Media sites?

Employees should strive to be accurate and honest in all communications related to Tenet, and will comply with all applicable laws, including the Health Insurance Portability and Accountability Act (HIPAA).

#### Can Tenet employees comment on major business or financial developments at Tenet?

If based upon material, non-public information, Tenet employees must not comment under any circumstance on major business or financial developments at Tenet or rumors about such developments, including developments or speculation about Tenet's earnings or financial prospects, purchases or sales of hospitals and other assets, management changes or other important business matters. In addition, employees must not post any other Confidential or non-Public Information about Tenet or any companies with which Tenet does business (for example, vendors), nor may employees post Tenet's Proprietary Information. Employees are reminded that, under Tenet's Administrative Policy AD 1.17 Fair Disclosure, only authorized Home Office spokespersons are authorized to speak on behalf of Tenet to the investing public with respect to these matters. Unauthorized disclosure of material non-Public or Confidential Information also constitutes a violation of Tenet's Standards of Conduct and Tenet's Information Privacy and Security Program. It should be noted that the prohibition against disclosing material non-Public Information on Social Media sites applies even to "anonymous" postings. Under applicable law,

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internet service providers may be compelled to disclose the identity of "anonymous" posters under certain circumstances

# Can Tenet employees "friend" patients on Social Media sites?

Tenet strongly discourages "friending" of patients on Social Media sites. Staff in patient care roles generally should not initiate or accept friend requests except in unusual circumstances such as the situation where an in-person friendship pre-dates the treatment relationship.

# Can Tenet staff in management/supervisory roles initiate "friend" requests with employees they manage?

Tenet discourages staff in management/supervisory roles from initiating "friend" requests with employees they manage. Managers/supervisors may accept friend requests if initiated by the employee, only if the manager/supervisor does not believe it will negatively impact the work relationship.

#### Which Tenet policies apply to employee comments or conduct on Social Media?

Tenet's policies regarding harassment, non-discrimination, retaliation and Internet use apply; therefore, libelous, defamatory, maliciously false, obscene, indecent, lewd, violent, abusive, threatening, sexually harassing, discriminatory, and/or similar comments or conduct is strictly prohibited.

#### Can Tenet employees update or monitor Social Media during work time?

Employees should not use work time to update or monitor Social Media sites unless that activity is specifically part of the employee's work duties. Employees are expected to perform their work duties when on working time.