

HENRY COUNTY HOSPITAL HUMAN RESOURCES MANUAL

SECTION V: MISCELLANEOUS

SUBSECTION 8: SOCIAL MEDIA

(a) PURPOSE:

The purpose of this policy is to assist employees of Henry County Hospital (the "Hospital") with the appropriate use of Social Media both inside and outside of the workplace as it relates to their employment with the Hospital.

(b) DEFINITIONS:

"Employee" shall mean any employee of Hospital, its subsidiary organizations, and any other related entities.

"HIPAA" shall mean the Health Insurance Portability and Accountability Act of 1996, the Health Information Technology for Economic and Clinical Health Act, and any regulations interpreting those laws, all as amended from time to time.

"Protected Health Information" (or "PHI") shall mean the information of another person that (i) relates to the past, present, or future physical or mental health or condition of an individual; the provision of health care to an individual; or the past, present or future payment for the provision of health care; and (ii) identifies the person or with respect to which there is a reasonable basis to believe the information can be used to identify the person; or as otherwise defined by HIPAA. Examples of Protected Health Information include (but are not limited to) information about a patient's physical or mental health; the receipt or payment of health care, patient records and enrollment and disenrollment information; name, address, Social Security Number, patient account number, security code, driver's license number, financial or credit account numbers, phone numbers, ISP and Internet domain addresses, and other information that could be used to personally identify the patient. PHI applies to information in any form, including paper, electronic, and oral.

"Social Media" shall include blogs, podcasts, discussion forums, Facebook (including the Hospital's Facebook page), Instagram, YouTube, LinkedIn, Snapchat, X (formerly Twitter), TikTok, location-based platforms and other online platforms permitting the creation or sharing of content.

(c) POLICY AND GUIDELINES:

The Hospital values our employees' ability to express themselves freely and openly and recognizes that Social Media can be a highly effective tool for sharing ideas and exchanging information. A healthy workplace culture encourages engaged employees, and we believe that Social Media tools help our employees be engaged. We must also ensure that use of such communications helps maintain the Hospital's brand identity, integrity, and reputation while minimizing actual or potential legal risks. Therefore, the following rules and guidelines have

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been established relating to Employee use of Social Media as it relates to their employment with the Hospital.

1. When using Social Media, whether at or outside of work, Employees must be honest and respectful of the rights of other Employees, patients, guests, visitors, and Hospital business partners. Any use of Social Media that references Hospital-related matters, patients, Employees or management personnel must be consistent with the Hospital's core values, while exhibiting a level of professionalism that our patients and community expect and deserve. Use of Social Media must not violate any of the Hospital's policies and procedures.
2. When using Social Media, Employees must comply with all applicable laws that protect patient privacy, including HIPAA. Employees may never post information to a Social Media site, in written, video, or photographic form, that contains PHI without first obtaining the patient, or the patient's legal representative's, permission to disclose his or her PHI. Even stating that a patient is receiving care at the Hospital without the patient's permission is an improper disclosure of PHI. In addition, disclosing information about an episode of care without specifically identifying a patient also could result in an improper disclosure of PHI.
3. When using Social Media, Employees may not discuss confidential Hospital matters and must protect the confidentiality of Hospital trade secrets, strategic business plans, competitor intelligence, financial information, business contracts, patient information, and any other nonpublic Hospital information that Employees can access. Employees also have a duty to protect other Employees' personal information, including home addresses, telephone numbers, email addresses, and other contact information.
4. Employees may not use Social Media to unlawfully harass, bully, defame, threaten, or discriminate against co-workers, managers, patients, visitors, any organizations or businesses associated or doing business with the Hospital, or any member of the public, including visitors to a Social Media site who may post comments about the contents of the site. Racial or ethnic slurs, insults, obscenities, defamatory statements, or other unlawful posts are also prohibited. If an Employee feels he or she or someone else has been a victim of harassment from another Employee's use of Social Media, he or she should report the harassment, as set forth in the Hospital's policy on harassment.

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5. Employees who maintain Blogs or other Social Media accounts or websites and choose to identify themselves as Employees of the Hospital must state explicitly, clearly, and in a prominent place on the site that views expressed in their Blogs or other Social Media accounts or websites are their own and not those of the Hospital or of any person or organization affiliated or doing business with the Hospital. To that end, the following disclaimer is recommended: "The postings on this site are my own and should not be construed as representing the positions of Henry County Hospital or its affiliates. Neither Henry County Hospital nor its affiliates are responsible for the material posted on this site." The Hospital reserves the right to prohibit an employee from identifying themselves as an employee on their Blogs or other Social Media accounts or websites.
6. Employees may not use the Hospital's logo or trademarks or the name, logo, or trademarks of any business partner, affiliate, or subsidiary on any Social Media site unless such use is sponsored or otherwise approved by the Hospital or business partner, affiliate, or subsidiary, as applicable. Similarly, Employees may not post on Social Media sites the Hospital's copyrighted information or hospital-issued documents bearing the Hospital's name, trademark, or logo. Employees also must not tortuously defame, misappropriate the likeness of, invade the privacy of, or interfere with the business relationship of another party.
7. Employees may not post on Social Media sites photographs of Hospital events, co-workers, or Hospital representatives engaged in Hospital business, unless the Employee has received explicit permission from the Hospital and, if applicable, the individual(s) depicted in the photographs.
8. The Hospital respects employees' right to express personal opinions on Social Media and does not retaliate or discriminate against employees who responsibly use Social Media for political, organizing, or other lawful activity. However, an employee may be asked to remove or modify material not of a public concern that is deemed offensive (such as sexually explicit material, foul language, crude jokes, etc.) and, therefore, reflects poorly on the Hospital. Employees also should not disclose anything to do with a Hospital legal issue or court case.
9. Personal use of Social Media, like the personal use of cell phones, the Internet, and email, should be reserved for non-work time except for emergencies.
10. Social Media communications are not private or secure. Even if you believe you are just communicating with one individual, there is a possibility that the information will be spread or made publicly available. You are responsible for your own words and actions, even if you do not intend for them to be made public. The Hospital further cautions that

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employees should have no expectation of privacy while using Hospital equipment and facilities for any purpose.

11. The Hospital reserves the right to use software and internet-search tools to monitor comments or discussions about Hospital representatives, patients, Employees and other Hospital related matters that employees (and nonemployees) post anywhere on the Internet, including Social Media sites.
12. Employees should not respond to any negative Social Media comments about the Hospital and/or its affiliates. They should, however, immediately notify their supervisor/director of the negative comments. The supervisor/director is then responsible for notifying their administrative representative who will determine and take appropriate next steps.
13. Employees are encouraged to report violations of this policy, and they will not be subject to retaliation for doing so.
14. The Hospital will investigate and respond to reports of violations of this policy and/or HIPAA. In the event a violation is found, the Hospital reserves the right to discharge or otherwise discipline Employees or take other appropriate action, including legal action, against Employees who engage in prohibited or unlawful conduct.

Effective Date: August 26, 2011, updated November 24, 2025