

Sutter Health and Affiliates Administrative Policies and Procedures	
POLICY FOR SOCIAL NETWORKING AND OTHER WEB-BASED COMMUNICATIONS	
Communications & Marketing Policy Number: 12-745	Origination Date: August 4, 2009 Revised Date: Next Review Date: August 4, 2010
Approved by: Peter Anderson, Sr. VP Strategy & Business Development	

POLICY

The Sutter Health network believes that participation in online communities can promote better communication with the Sutter Health system's colleagues and customers, the general public, traditional and non-traditional media, and other community stakeholders. Such participation may include, but is not limited to, postings in online forums, blogs, microblogs, wikis or vlogs (e.g., Facebook, LinkedIn, MySpace, YouTube, Twitter, health pages and blogs, media sites or similar types of online forums). Communications produced by Sutter Health or affiliate employees, physicians, volunteers or associates on behalf of Sutter Health or its affiliates in the online community must be consistent with Sutter Health and its affiliates' *Employee Handbooks* and *Standards for Business Conduct*, policies and applicable laws, including laws concerning protected health information, privacy, confidentiality, copyright and trademarks.

Sutter Health and/or its affiliated entities may require that an employee, physician, volunteer or other associate temporarily discontinue use of Sutter Health- or affiliate-sponsored online communities or stop acting on behalf of Sutter Health/affiliate if it believes their communications are in violation of organizational policies, values or local, state or federal laws, including state and federal patient privacy laws.

PURPOSE

The purpose of this policy is to assure i) communications in online communities made on behalf of Sutter Health or its affiliates are consistent with the organizations' *Employee Handbooks* and *Standards for Business Conduct*, policies and applicable laws, including laws concerning privacy, confidentiality, copyright and trademarks; ii) that employees' personal opinions in online communities express the fact that they are not representatives of Sutter Health and/or its affiliates; and iii) uses of Sutter Health- or affiliate-sponsored online communities are appropriate and that communications are accurate.

PROCEDURES

A. General Guidelines

1. Communications should be consistent with Sutter Health or affiliates' *Employee Handbooks* and *Standards for Business Conduct*, values, policies and applicable laws.
2. Communications in online communities should never contain information that identifies a patient's identity or health condition in any way.

3. Communications must not contain Sutter Health or affiliate confidential, proprietary or trade-secret information.
4. Individuals may be held personally liable for defamatory, proprietary or libelous commentary.
5. E-mail and Internet access is provided to support Sutter Health or affiliate business purposes. While users who are given access to these tools may make incidental personal use of them, they may not make extensive personal use of them either during work or non-work time. Each user's manager has the right and responsibility to determine what is "extensive use," counsel their staff and revoke access privileges for abuse of the system, if necessary.

B. Unofficial Participation in Online Forums

1. Unless an individual is serving as an approved, official spokesperson for Sutter Health or an affiliated entity in online communications, such communications are the individual's personal opinions and do not reflect the opinion of Sutter Health or its affiliated entities. Each individual employee, physician, volunteer or other associate of Sutter Health or its affiliates is personally responsible for his/her posts (written, audio, video or otherwise).
2. If employees, physicians, volunteers or other associates of Sutter Health and its affiliated entities acknowledge their relationship with Sutter Health and/or its affiliates in an online community, they shall include disclaimers in their online communications advising that they are not speaking officially on behalf of the organization.

C. Official Spokesperson or Other Job-specific Participation in Online Forums

1. As outlined in the organization's media relations policies, if a member of the media or non-traditional online media (can include bloggers) contacts an employee, physician, volunteer or other associate of Sutter Health or its affiliated entities about the business of the organization (e.g., Sutter Health or affiliate news, network operations, policies, practices, strategic commitments or additional business information of any kind), prior to responding, the individual must contact the Sutter Health Communications Department at (916) 286-6770 or his/her affiliate communications department. These communications departments, which will coordinate with other appropriate departments, may give an individual permission to serve as an official spokesperson. Once an individual has approval to serve as an official spokesperson for Sutter Health or an affiliated entity, the individual must clearly identify himself/herself as spokesperson for the organization or affiliate, and clearly identify his/her level of expertise.
2. In some instances, an individual's department or another department of the Sutter Health network may ask the individual to participate in particular online forums in other functional, job-specific capacities. Examples might include medical posts on Sutter's MyLifeStages.com, collaboration with Sutter Health colleagues within MySutter blogs and forums, as a recruitment officer on LinkedIn, or to share best practices on certain trade sites related to health care quality or the participant's profession. Prior to participation, the individual should discuss involvement with his/her supervisor, receive approval, and agree on parameters for the project as well as the length of participation. As appropriate, guidance from the Sutter Health or region Legal counsel should be sought.

3. Employees and others associated with the Sutter Health network may not post any material that includes confidential/proprietary information or trade secrets; or information that is obscene, defamatory, profane, libelous, threatening, harassing, abusive, hateful or humiliating to another person or entity. This includes, but is not limited to, comments regarding Sutter Health, its affiliates, Sutter Health employees, customers, partners or patients. An individual may respectfully disagree with company actions, policies or management. Individuals should ask their managers and/or refer to the Sutter Health and affiliates' *Employee Handbooks* and *Standards for Business Conduct* if they have any questions about what is appropriate to include in Web-based communications.

D. Use of Sutter Health- or Affiliate-Sponsored Sites

Individuals using Sutter Health- or affiliate-sponsored online communities should refrain from using copyrighted materials (written, audio, video and all other electronic forms), as well as, language that is obscene, defamatory, derogatory, profane, libelous, threatening, harassing, abusive, hateful, or humiliating to another person or entity.

Individuals who have concerns regarding workplace conduct or inappropriate behavior are encouraged to contact their immediate supervisor, local Human Resources representative or the Sutter Health Confidential Message Line at (800) 500-1950. Online forums are not the most effective way to resolve such issues.