



Policy Title: Social Networking and Blogging Policy

Category:

Policy Number:

Sponsor: Vice President Academic Affairs

Effective Date: November 19, 2014

INTRODUCTION AND PURPOSE.

Social networking sites have become a popular method of sharing information among groups of individuals with similar interests. These tools provide the university community a convenient method of promoting the university's goals and values to a world-wide audience. The proper use of these tools can help strengthen our core value of communication, and assist with executing some of our strategic plan initiatives. Social networks may help us with everything from finding the most qualified and diverse prospective students to helping researchers identify potential collaborations with other institutions. Because of the great potential benefits of social networking, the university would like to encourage the free flow of information to the external community using these tools.

However, we should also recognize that there are great risks associated with the inappropriate use of social networks. Confusion about whether a belief or opinion is expressed in a personal capacity or in an official capacity on behalf of the University, or the posting of inaccurate information on University-sponsored sites are examples of actions that can seriously damage the reputation of the University. Posting information that is protected by federal regulations such as FERPA and HIPAA is an example of an illegal activity that subjects the individual and the university to substantial penalties.

While there are existing university policies that could be applied to the social networking environment, it is important to develop a policy that addresses the unique nature of social networking. No other medium has the ability to distribute information in a manner that is instantly available, viewable by a large audience, searchable using publicly available tools, and nearly permanent in nature. We do not view this policy as a restriction of freedom to utilize social networks, but as an educational tool that explains how utilization guidelines and existing policies apply to social networking to protect the university community.

Each member of the university community must think about the impact of their actions on social networking sites. Individuals associated with the university are viewed as professionals in the area of health care education services and experts within their own career disciplines. Employees should remember that any activity on social networking sites will reflect upon their personal professionalism as well as the reputation of Rosalind Franklin University of Medicine and Science.

Furthermore, the university must actively monitor information that is posted to social networking sites to ensure that it is appropriate for consumption by the public. The university is required to protect the confidentiality, integrity, and availability of information that it maintains. Rosalind Franklin University of Medicine and Science will implement appropriate security standards and

controls such as this policy to protect private information and maintain compliance with applicable regulations.

Despite the risks involved, there is clearly a great benefit to social networks if they are used properly. This policy will help guide the university community on the appropriate use of social networking tools for institutional as well as personal purposes.

CANCELLATION.

Social Networking Policy, approved August 27, 2014.

SCOPE AND APPLICABILITY.

This policy applies to all employees, faculty, staff, students, contractors, vendors and volunteers of the university who store and share information on a category of Internet communication tools known as social networking sites.

POLICY STATEMENTS.

Institutional Use

Institutional use of social networking sites must be authorized by and executed in collaboration with the Department of Digital Marketing. There can be no university sites or pages on any social networking site unless they are developed or authorized by OMC. All sites are subject to continuous content review and OMC reserves the right to modify or eliminate sites at any time. OMC will take reasonable steps to notify the site owner of any issues and work together with the site owner to develop appropriate content modifications.

Any department authorized by the Department of Digital Marketing to maintain their own social networking site will:

- furnish DDM staff members with site credentials sufficient to maintain complete control of the site content;
- maintain web site content that is current, accurate, consistent with University policies, and represents the spirit and values of Rosalind Franklin University of Medicine and Science;
- make corrections to discussion postings using appropriate methods and notations that preserve original content in order to maintain integrity;
- avoid inappropriate use of copyrighted materials, and maintain appropriate bibliographic references to source materials;
- respond to e-mails and comments when appropriate, and forward issues to the university department that is best suited to respond to those issues;
- read the terms and conditions for site use and maintain the site in accordance with the rules of the social networking site (i.e. delete comments that contain profanity, are selling or promoting a product, are spam, or contain material that is unlawful, hateful, threatening, harassing, abusive or slanderous);
- notify DDM when there may be a conflict between site rules and university policies or values.

Any official university statements on news media sites or directly to news media officials must be made in collaboration with the Department of Digital Marketing.

The university may use public information discovered on a social networking site to support any actions related to a university community member.

Non-Disclosure

Faculty, staff, students, contractors, vendors and volunteers of the university are required to take reasonable steps to protect the confidentiality, integrity, and availability of information that they handle at the university. The precautions required to protect information are determined by the sensitivity of the information; additionally, some types of information are subject to specific regulatory requirements. Information designated as internal or legal/regulated may not be disclosed on social networking sites. However nothing in this policy precludes employees from discussing terms and conditions of employment about themselves or their fellow employees, such as, for example, wages and working conditions.

Personal Use

If you choose to participate in social networking sites for personal purposes, you should observe the following rules:

- use of the university logo or trademarks is prohibited;
- do not reference the clients, customers, or partners of the university;
- if you have identified your relationship with Rosalind Franklin University of Medicine and Science in any social network setting, you must make it clear that any views expressed by you are not the views of the university;
- supervisors and Human Resources Department employees are restricted from providing online references/recommendations for current or former employees unless they have clarified that it is a personal endorsement and not a university endorsement.

To the fullest extent authorized by law, the University prohibits the posting of comments or materials (including photographs, videos or audio) that is obscene, defamatory, libelous, threatening, abusive or violates our policy against sexual or other unlawful harassment. This includes, but is not limited to, prohibited material (as described above) regarding the University, our administrative staff, faculty, students and the families of students. Such actions constitute legitimate grounds for dismissal. It is important to note that such actions are prohibited, whether done during work hours or outside of work. Also, participation in social networking activities that can be characterized as non-work related carried out during a time that you are scheduled to be working can certainly interfere with your work duties and/or responsibilities and can be cause for appropriate disciplinary action.

Personal use of social networks, like personal use of other communication methods, should not interfere with the efficient use of or waste University time and resources.

Governing Law & Policy

When using social networking sites for any purpose, your actions are subject to all university policies as well as federal, state, and local regulations. See the References and Related Policies section for

examples of some other regulations and policies that may apply to your use of social networking tools.

Note that postings on university social networking sites can be considered official records and may be subject to discovery processes related to federal, state, and local regulations.

Enforcement

Any person found to have violated this policy may be subject to disciplinary action, up to and including dismissal from the university.

PROCEDURES.

Site Creation

Anyone wishing to create a university social networking site should complete a site request form and submit it to the Department of Digital Marketing for review. DDM staff members will review the request and work with the requestor on the details of implementation if approved. Sites that were in existence prior to this policy will be required to register their information with DDM using the same request form.

Maintaining Site Content

In addition to the requirements shown in the policy section for updating social networking site content, anyone posting content on behalf of the university should also consider the following suggestions:

- understand that your actions reflect upon your professional reputation and, by association, the reputation of Rosalind Franklin University of Medicine and Science – you should be responsible for protecting your reputation and the reputation of your employer;
- respect the opinions of others and their right to freely express themselves;
- respond to inquiries or comments in a timely fashion to keep the community engaged;
- post updates on a regular basis to keep the site fresh;
- follow-up on any issues that are deferred to other departments for resolution – be an advocate to make sure potential customers are satisfied;
- keep control of your posting activity, and therefore the site – listen to posted concerns, try to fully understand the issues, do not participate in heated/emotional conversations by posting equally emotional responses;
- gain the trust of your audience by always identifying yourself, your role with the university, and being as honest as possible when posting;
- always remember that regulations such as HIPAA and FERPA may restrict what information can be posted;
- protect the information of others – as the moderator of the site, you can edit postings (with appropriate notification) to make sure community members cannot abuse each other's information;
- protect your own information – giving away too much personal detail may allow others to harm you or your family;
- do not discuss internal university business such as management changes, partnerships, or legal issues – the university issues official press releases to discuss major issues.

However, nothing in this policy precludes employees from discussing the terms and conditions of their employment on social media sites that are not sponsored by the University.

Monitoring

When inaccurate or inappropriate information is discovered, the Department of Digital Marketing will make every attempt to contact the person who posted the information to see if they can make the necessary corrections. If modifications to a university site are required immediately, or if there is a problem getting a timely response from the department who maintains a site, then Digital Marketing staff members will make the necessary corrections and notify the department of the changes that were made.

Investigations

The Department of Digital Marketing may identify inappropriate postings that require further investigation to see if any laws or university policies were violated. DDM staff members will forward concerns and gathered evidence to the appropriate person or governing body to conduct a more thorough investigation.

Any potential, known, or suspected violation of this policy or law must be promptly reported to your supervisor, the Division of Student Affairs, or to the Office of Compliance, which may be accomplished directly or through EthicsPoint, Inc. (which allows anonymity) by navigating to <http://rosalindfranklin.ethicspoint.com>.

DEFINITIONS

Social Networking Sites are web sites with built-in tools that facilitate communication between groups of individuals. This would include comprehensive sites such as Facebook as well as more narrowly defined services such as blogs, wikis, and micro-blogging sites. Examples of social networks include, but are not limited to: Blogger, Facebook, LinkedIn, Reddit, Twitter, Wikipedia, WordPress, YouTube, Instagram, Pinterest, SnapChat, WhatsApp, and Yik Yak.

POINTS OF CONTACT.

Department of Digital Marketing
Student Affairs and Inclusion Office of Compliance
Chief Information Officer
Human Resources Department

REFERENCES AND RELATED POLICIES.

Code of Conduct
Employee Handbook
Student Handbook
Equal Employment Opportunity Policy
Information Sensitivity Policy
University-Wide Reporting Systems Policy Investigations Policy
Lobbying Policy

Policy Title:

Health Insurance Portability and Accountability Act (HIPAA) Family
Educational Rights and Privacy Act (FERPA)

Site Creation Request Form
Photograph Release Form