

**TITLE****SOCIAL MEDIA****DOCUMENT #**  
1139**INITIAL APPROVAL DATE**  
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Alberta Health Services Executive Committee**INITIAL EFFECTIVE DATE**  
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Communications**REVISION EFFECTIVE DATE**  
N/A**CATEGORY**  
Corporate Accountability**NEXT REVIEW**  
October 11, 2014

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If you have any questions or comments regarding the information in this policy, please contact the Corporate Policy Department at [corporatepolicy@albertahealthservices.ca](mailto:corporatepolicy@albertahealthservices.ca). The Corporate Policy website is the official source of current approved corporate policies, procedures, and directives.

**PURPOSE**

- To provide direction on the management of Social Media by Alberta Health Services (“AHS”).

**POLICY STATEMENT**

AHS is committed to transparent internal and external communication through the use of reputable Social Media platforms. The AHS Communications Division (“Communications”) supports Departments using Social Media to ensure that Social Media platforms are used effectively.

Approved AHS Social Media platforms comply with the Code of Conduct, the Conflict of Interest Bylaw, and applicable AHS policies and procedures (see References section).

Consistent with the values in the Strategic Directions document and the principles in the Code of Conduct, AHS does not regulate, restrict, or direct the private or personal views or opinions of individuals. This includes individuals speaking on behalf of a profession or organization. When making public comment, it is the responsibility of the individual to clearly indicate when the comments are being made in an official capacity on behalf of AHS, or alternatively, when the comments are personal or private views and opinions or on behalf of an organization or profession. Having made this distinction, employees and physicians can speak in either capacity.

**APPLICABILITY**

Compliance with this policy is required by all AHS employees, members of the medical and midwifery staffs, students, volunteers, and other persons acting on behalf of AHS (including contracted services providers as necessary). This policy is subject to all applicable laws.

## POLICY ELEMENTS

### 1. Use of Social Media Accounts

- 1.1 Individuals using Social Media in any capacity will not disclose any business, Health, and/or Personal Information of other AHS employees, contractors, patients/clients, or another aspect of their position within AHS that they are not specifically authorized to disclose.
- 1.2 Individuals are to use their personal non-AHS email address when using a personal Social Media account, and make a reasonable effort to indicate that their Social Media use is in a personal capacity rather than as a representative of AHS.
- 1.3 Personal use of Social Media is only permitted on AHS IT Resources in accordance with the Information Technology Acceptable Use policy (#1109).

### 2. Establishing Social Media Accounts

- 2.1 Communications is responsible for developing the processes for the use of Social Media by AHS. Departments interested in obtaining an AHS Social Media account are to submit requests to the Department's Communications advisor, via the requesting Department's leadership, to enable evaluation, approval, and, where appropriate, participation in Social Media conversations pertaining to AHS.
- 2.2 Communications works with the requesting Department to determine the most appropriate Social Media platform. Requests for a Social Media account are approved based on the demonstrated need for the account and the potential benefits and risks associated with the account and Communications retains the sole discretion to authorize AHS Social Media accounts.
- 2.3 Approved Social Media accounts are registered with Communications.

### 3. Management of Social Media Accounts

- 3.1 Communications oversees Social Media accounts for media relations or AHS as an organization.
- 3.2 Social Media accounts are managed by the respective Department. The Department using a Social Media account consults with Communications and designates account managers to oversee their Social Media accounts.
- 3.3 An account manager is an AHS spokesperson, appropriate to their employee role and area of expertise, when contributing to Social Media discussions. Account managers receive training from Communications on how to represent AHS in the online domain prior to engaging in communication on an AHS Social Media account.

- 3.4 Account managers must comply with the AHS Social Media Best Practice Guidelines on the appropriate use of Social Media on behalf of AHS before setting up a Social Media account.
- 3.5 Account managers, or their designates, are the only individuals with administrative access to the Social Media accounts and the account's corresponding email addresses, and are responsible for managing the content on the Social Media accounts.

#### 4. Privacy and Security

- 4.1 Collection, access, use, and disclosure of Personal, Health, and business Information on an AHS Social Media account is done in accordance with applicable legislation and AHS policies and procedures.
- 4.2 Departments requesting a Social Media account must consult with, and follow the direction of, the Information & Privacy Department to determine whether there are any privacy risks associated with the account and/or whether a Privacy Impact Assessment is required to comply with the Privacy Impact Assessments policy (#1145).
- 4.3 The account manager must obtain written consent from individuals for any information, including photos, video, and audio recordings, posted on a Social Media page by AHS, unless disclosure without consent is authorized under the *Health Information Act (Alberta)* or *Freedom of Information and Protection of Privacy Act (Alberta)*.
- 4.4 AHS Social Media accounts are attached to a general AHS email address and not an employee's personal or work email address.
- 4.5 AHS Social Media accounts will not use the name or title of an employee as the administrator unless the purpose of the Social Media account is to feature a specific individual on behalf of AHS (e.g. the President and Chief Executive Officer).
- 4.6 IT Security and Compliance monitors and assesses any risks posed to AHS by the use of Social Media platforms and can disable access to any Social Media platform where there is reason to believe AHS' IT systems or data are at substantial risk or it is considered a violation of any applicable AHS policies or procedures.

#### 5. Content Management

- 5.1 Content posted on an AHS Social Media account must comply with the AHS Code of Conduct, Strategic Direction, Conflict of Interest Bylaw, Communications (Internal and External) policy (#1106), and other applicable policies and procedures.

- 5.2 Account managers responding to any public comments on behalf of AHS must do so in accordance with AHS' Social Media Best Practice Guidelines and in an honest and respectful manner. Legitimate public feedback shall not be deleted or edited.
- 5.3 Records related to Social Media accounts are retained in accordance with the Records Management policy (#1133) and the Records Retention Schedule (#1133-01).
- 5.4 Comments are removed by the account manager from an AHS Social Media account as soon as they are discovered if they:
- contain inappropriate or vulgar language;
  - are not relevant to AHS or the subject matter;
  - are spam or another form of advertising;
  - are in violation of federal or provincial law; and/or
  - contain Personal or Health Information or confidential business information unless otherwise authorized by the Information and Privacy Department or with written consent of the individual.

## 6. Intellectual Property

Copyrighted or trademarked materials posted to an AHS Social Media account must comply with applicable law and AHS policies. AHS' logos and trademarks are only to be used on approved AHS Social Media accounts and in accordance with the AHS Visual Identity Standards.

## 7. Compliance

Non-compliance with this policy may result in disciplinary action up to and including termination of employment or appointment in accordance with applicable AHS bylaws, policies, procedures, collective agreements, terms and conditions of employment, and/or employment contract.

## DEFINITIONS

**Department** means any division, unit, clinic, program, portfolio, sector, section, or service within the AHS organizational structure.

**Health Information** means information that identifies an individual and is stored in any format that relates to:

- diagnosis, treatment and care; and
- registration information (e.g. demographics, residency, health services eligibility, or billing).

**Personal Information** means recorded information of any kind, excluding Health Information, stored in any format that identifies an individual including, but not limited to:

- a) address and contact information (including an identifying number or symbol assigned to an individual);
- b) race, ethnic origin, gender, or marital status;
- c) educational, financial, employment, or criminal history;
- d) opinions of others about the person; and
- e) personal views and opinions of a person (except if these are about another person).

**Social Media** means an internet website or internal or external platform which allows for the creation and exchange of user-generated content. Social Media includes, but is not limited to, social networking, blogging, microblogging, video hosting, wikis, and social bookmarking.

## REFERENCES

- AHS Code of Conduct
- AHS Strategic Direction 2012-2015
- AHS Visual Identity Standards
- AHS Social Media Best Practice Guidelines
- AHS Bylaws, Policies, & Procedures:
  - Collection, Access, Use, and Disclosure of Information (#1112)
  - Communications (Internal and External) (#1106)
  - Conflict of Interest Bylaw
  - Information Classification (#1142)
  - Intellectual Property (#1137)
  - Information Technology Acceptable Use (#1109)
  - Privacy Impact Assessments (#1145)
  - Records Management (#1133)
  - Records Retention Schedule (#1133-01)
- *Freedom of Information and Protection of Privacy Act (Alberta)*
- *Health Information Act (Alberta)*

## REVISIONS

None.