

 <p>Winnipeg Regional Health Authority Office régional de la santé de Winnipeg Caring for Health À l'écoute de notre santé</p> <p>POLICY</p>	<p>REGIONAL</p> <p>Applicable to programs, departments and services of the WRHA governed sites only and WRHA integrated sites, unless specifically exempt as stated within a given policy.</p>		Level: 2A
	Policy Name: Social Media, Websites and Online Communication	Policy Number: 10.30.040	Page 1 of 8
	Approval Signature: Original Signed by Scott Sime	Section: General Administration: Communications	
	Date: November 6, 2023	Supercedes:	

1.0 **PURPOSE:**

The WRHA is committed to ensuring an efficient and coordinated approach to two-way communication on digital channels as members of the public look to online channels for health information, while minimizing privacy and confidentiality risks to the Winnipeg Regional Health Authority (WRHA) and its Clients.

1.1 To provide guidance on how Staff can communicate in a professional manner that maintains the reputation of the WRHA and aligns with relevant WRHA policies and applicable legislation.

1.2 To define responsibilities and expectations for Staff using and developing various online sites, including Social Media platforms, websites, apps and intranets.

2.0 **DEFINITIONS:**

2.1 **Clients:** All individuals inclusive of patients/clients/residents receiving health care services from the WRHA.

2.2 **Confidential Information:** Personal and protected information, including but not limited to:

2.2.1 Information that is, or may be, excluded from access under the Freedom of Information and Protection of Privacy Act (FIPPA); and

2.2.2 Personal information subject to FIPPA and Personal Health Information subject to The Personal Health Information Act (PHIA); and

2.2.3 Corporate Information that is not readily available to the public, including:

2.2.3.1 the disclosure of which would expose WRHA to charges of breach of trust or confidentiality, including, but not limited to information and Personal health information (PHI) regarding Clients and Staff,

DISCLAIMER: Please be advised that printed versions of any policy or policies posted on external web pages may not be the most current version of the policy. Although we make every effort to ensure that all information is accurate and complete, policies are regularly under review and in the process of being amended and we cannot guarantee the accuracy of printed policies or policies on external web pages. At any given time the most current version of any WRHA policy will be deemed to apply. Users should verify that any policy is the most current policy before acting on it. For the most up to date version of any policy please call 204-926-7000 and ask for the Regional Policy Chair's office.

collected for the purposes of administering the business of the organization including management of personnel.

2.2.3.2 is considered proprietary to WRHA, including, but not limited to any legal, business, planning, reporting, statistical or financial information, including information subject to intellectual property rights, which has not been authorized for release by a member of the WRHA executive team.

2.2.4 Other Confidential Information that is subject to legislation or is confidential to the health care environment.

2.4 Direct Message (DM): A private mode of communication between Social Media Users.

2.5 Email: Messages distributed by electronic means from one computer or mobile phone User to one or more recipients via a network.

2.6 Handle: A public username used on Social Media or online accounts.

2.7 Identifiers: Any information, including personal information or personal health information, but is not limited to the individual's name, address, telephone or mobile phone number; race, ethnicity, ancestry, national origin, religious or political beliefs or associations; age, gender, sexual orientation, marital or family status; socio-economic status, source of income, any identifying number, symbol, or other particular assigned to the individual; the individual's fingerprints, blood type or inheritable characteristics; information about the individual's health care history, including physical or mental abilities; information about the individual's educational, financial, criminal or employment history; anyone else's opinion about the individual; the individual's personal views or opinions, except if they are about someone else.

2.8 Internet: A global computer network providing a variety of information and communication facilities, consisting of interconnected networks using standardized communication protocols. For instance, Social Media networks and Online Sites are accessible via the Internet.

2.9 Offensive Material: Includes, but is not limited to, pornography, hate literature, harassment or any material contravening the Manitoba Human Rights Code.

2.10 Personal Health Information: Recorded information about an individual, including:

2.10.1 Any identifying information about the individual collected in the course of, and is incidental to, the provision of health care or payment for health care.

2.10.2 Personal Health Identification Number (PHIN) and any other identifying number, symbol or particular assigned to an individual;

2.10.3 blood type, fingerprints or other hereditary characteristics;

2.11 Personal Information: recorded information about an individual, including:

2.11.1 Surname and given names and nicknames;

2.11.2 Home address, home telephone, facsimile number and e-mail address;

2.11.3 Age, sex, sexual orientation, marital and family status;

2.11.4 Ancestry, race, ethnicity, colour, nationality, national or ethnic origin;

2.11.5 Religion or creed, or religious belief, association or activity;

- 2.11.6 Political belief, association or activity;
- 2.11.7 Education, employment or occupation, or educational, employment or occupational history;
- 2.11.8 Source of income or financial circumstances, activities or history;
- 2.11.9 Criminal history, including regulatory offences;
- 2.11.10 Personal views or opinions, except if they are about another person;
- 2.11.11 Views or opinions expressed about the individual by another person;

2.12 Social Media and Online Sites and Mini-sites: Networks or channels hosted and accessed through the Internet where two-way and one-way communication is facilitated and could also be a digital marketing tactic that centers on creating niche pages for a specific focus, drawing attention to a product, service or event. These include, but are not limited to: internal-facing and externally accessible websites operated by the WRHA, including governed and integrated sites, programs and services; external non-WRHA operated Internet networks or channels where the Staff member's relationship to the WRHA is recognized, identified or assumed, such as websites, including but not limited to: Email, Microsoft Teams, blogs, Twitter, Facebook, Pinterest, LinkedIn, Flickr, YouTube, Google+, Instagram, Snapchat, , online forums, comments, apps (mobile applications), wikis, text messaging, RSS feeds, video sharing, podcasts and other forms of online publishing or discussion.

2.13 Staff: All persons employed by WRHA facilities or WRHA funded agencies including medical staff, volunteers, board members, students, and other individuals associated through legal contracts.

2.14 Text Message: An electronic communication sent and received by mobile phone, including but not limited to: SMS (Short Message Service) or MMS (Multimedia Messaging Service which enables Users to send photographs, audio or video over a mobile phone) or third-party services such as WhatsApp, Viber, Hangouts and Facebook Messenger.

2.15 Users: A person or account operating something, especially a computer or application, Social Media channel or online site in this particular application.

3.0 **POLICY:**

3.1 Staff who engage in Social Media should be mindful that Social Media activities, even if conducted off premises and while off-duty, could have an adverse effect on the WRHA's legitimate business interests and that readers may view Staff as a spokesperson for the WRHA. As such, Staff shall adhere to the following:

3.1.1. The WRHA's electronic networks are the property of the WRHA and these networks are normally used for business purposes in serving the interests of the WRHA.

3.1.2. All use of Social Media networks and Online Sites operated by the WRHA shall conform to WRHA policies including [Confidentiality](#), [Respectful Workplace](#), and [French Language Services – Communications in Official Languages](#), [Confidentiality of Personal Health Information](#), [Computer/Internet Usage](#), and [Use of Portable Electronic Devices and Personal Computers](#).

3.1.3 Staff using Social Media must comply with all applicable laws, including those governing copyright or trademarks owned by others and/or the WRHA.

3.1.4 Staff shall not speak on behalf of the WRHA on Social Media or Online Sites unless authorized by Communications & Public Affairs. Refer to [Media Relations](#) policy for further direction on speaking to journalists.

3.1.5 Staff shall not use Social Media or Online Sites or Mini-Sites to provide medical advice online.

3.1.6 Any personal Social Media and Online Sites belonging to Staff (website URL, or Social Media name, Handle and URL) shall not include the WRHA's name or logo, or the name or logo of any WRHA owned, operated or funded facilities or services.

3.1.7 Staff shall not use their WRHA Email address for any personal Social Media or online accounts. Refer to [Computer and Internet Usage](#) policy.

3.1.8 Staff shall not send Text Messages from personal mobile or personal desktop devices containing Confidential Information, Identifiers, Personal Health Information (PHI) or Personal Information regarding Clients, Staff or Corporate Information of the WRHA. Requests for third-party services for specific projects must be submitted to e-Health/Digital Health and Communications & Public affairs for review. Refer to [Guidelines for Texting](#) document. and [Computer and Internet Usage](#) policy.

3.2 Developing a Social Media Channel or Online Site for WRHA – all Social Media and Online Sites and Mini-Sites for WRHA, as well as governed and integrated sites, service areas and services shall create and maintain a business case to support the communication channel. Additional measures shall accompany the creation and maintenance of Social Media, Online Sites and Mini-Sites:

3.2.1 All Social Media and Online Sites and Mini-Sites shall conform to WRHA's branding or visual guidelines and [FLS Communications in Official Languages](#) policy (10.40.230). Contact WRHA Communications & Public Affairs for further information at communications@wrha.mb.ca.

3.2.2 All Online Sites and Mini-Sites for WRHA governed and integrated sites as well as its service areas and services shall be hosted by Digital Shared Services or through an external hosting provided approved by Digital Shared Services and Communications & Public Affairs.

3.3 Participating on WRHA Social Media, Online Sites or Mini-Sites -- Staff shall not post content to or contribute to any discussion that contains Offensive Materials or Confidential Information, Personal Health Information, Personal Information or Corporate Information about the WRHA. Refer to [Confidentiality](#) and [Respectful Workplace](#) policies.

3.4 Personal Use of Social Media and Online Sites -- When publicly identifying as an employee of the WRHA, Staff shall make it clear that their contribution to any non-WRHA Social Media or Online Site is as a private individual and not as a representative of the WRHA. When Staff identify their affiliation with WRHA on Social Media, they shall be consistent with WRHA's image, values and standards of professional conduct. Refer to [Respectful Workplace](#) policy.

3.5 Online Confidential Information – Staff shall not disclose Confidential Information, Personal Health Information, Personal Information or Corporate Information that could be used as Identifiers to Clients receiving care at the WRHA, as well as fellow Staff members or suppliers when posting content, contributing to a discussion or interacting

with Users via Direct Message, Text Message or Email via Social Media, Online Sites or Mini Sites. Refer to [Confidentiality](#) and [Entries into Health Records](#) policy. Additional measures shall apply, including:

3.5.1 Staff shall not, under any circumstances unless expressly authorized by the Program and/or Chief Privacy Officer to lessen a risk of serious harm, use social media to communicate with or about Clients and their families.

3.5.2 Staff shall not use Text or Direct Messaging for communicating with Clients except as provided for using the [Shared Health Texting Guideline](#)

3.5.3 Staff shall not use Email for communicating with Clients except as provided for using the [Shared Health Email Guideline](#).

3.5.4 Staff shall not refer to Clients or other Staff in a disparaging manner online, even if the individual is not identified.

3.5.5 Staff shall not take photos or videos of Clients, Staff, WRHA's locations, facilities, operations or products on personal devices, including mobile phones for posting on Social Media or Online Sites. Refer to [Audio, Video, and Photographic Recordings Policy](#)

3.7 Clinical Use of Social Media and Online Sites - Staff shall ensure any health resource information obtained from Social Media, apps or the Internet (e.g., medical websites) used for patient/client/resident care or educational purposes is from reliable and credible sources.

3.8 Communications & Public Affairs reserves the right to decommission Social Media channels and Online Sites that are not kept up to date.

3.9 Public comments and posts that do not adhere to WRHA policies shall be removed and Users who make disrespectful, obscene, libelous or threatening comments will be blocked. This policy also informs the Guidelines for Public Interactions with WRHA Social Media, which will direct and moderate public interactions with WRHA Social Media channels.

3.10 Communications & Public Affairs retains the right to remove online sites, comments, posts or Users at any time.

3.11 Staff in breach of this Policy shall be dealt with in accordance with applicable WRHA policies and procedures, and contractual provisions or standards including, but not limited to the WRHA [Discipline and Discharge](#) Policy and the Medical Staff Bylaws. Where disciplinary action is imposed, reporting to the applicable professional regulatory body shall occur if required by the professional regulatory body or by law.

3.12 Suspected privacy breaches shall be immediately reported to a Staff member's manager or Privacy Officer at the facility/site or the WRHA Chief Privacy Officer. Refer to the [Reporting and Investigating Privacy Breaches and Complaints](#) Policy.

3.13 Staff are legally responsible for their own posting and should be aware that outside parties can pursue all legal remedies against a Staff member if the posting violates the law or their rights.

4.0 **PROCEDURE:**

4.1 Personal Social Media accounts: Staff must clarify to readers that the views expressed in any social media postings that relate in any way to the WRHA are the Staff member's own personal views and that they do not reflect the views of the WRHA. Staff shall include a disclaimer in their "About Me" section or somewhere on their profile, such as: *The views and opinions expressed here are my own and do not necessarily represent those of my employer.*

4.2 Staff who create Social Media Channels or Online Sites as part of their position responsibilities, shall present a business case to WRHA's Communications and Public Affairs Department, outlining why the channel or site is being created, how it can support and enhance WRHA's brand and reputation, why existing communication channels are not effective, and what resources will be available to support ongoing updates and maintenance.

4.2.1 Communications & Public Affairs shall be informed of any major changes in the direction of content or design on existing WRHA operated Social Media channels or Online Sites.

4.2.2 Staff shall obtain appropriate media consent forms from Communications & Public Affairs before taking photos or videos of Clients for posting on Social Media or the Internet. Refer to [Audio, Video & Photographic Recordings](#) Policy.

4.2.3 Programs shall designate at least one Staff member to be responsible for maintaining the online content as well as receive training on the content management system.

4.2.4 URL addresses, if approved by Communications & Public Affairs shall follow the naming convention of <http://program.wrha.mb.ca>

4.2.5 Social Media channels, if approved by Communications & Public Affairs shall follow the naming convention of @programWRHA

4.2.6 Staff who have created Social Media channels and/or Online Sites not hosted by the WRHA but directly related to WRHA operations shall inform Digital Shared Services and Communications & Public Affairs and provide an active login profile.

4.2.7 All usernames and passwords shall be provided to Communications & Public Affairs. Only those individuals authorized by Communications & Public Affairs can access WRHA's Social Media and Online Sites.

4.3 Direct messages sent by the public to the WRHA on social media or online communication channels shall be automatically responded to with an automated reply, informing the public of the risks associated with sharing information by electronic communication and the obligations outlined to the organization under Personal Health Information Act (PHIA) and Freedom of Information and Protection of Privacy Act (FIPPA). Staff authorized to administer WRHA social media and online communication channels shall use the disclaimer below:

4.3.1 Disclaimer: *Thank you for contacting the Winnipeg Regional Health Authority. This page is not monitored 24/7 and does not provide medical advice.*

- *For medical emergencies dial 911*
- *Manitoba Suicide Line 1-877-435-7170*
- *Klinic Crisis Line 1-888-322-3019*
- *Kids Help Phone 1-800-668-6868*

For questions, complaints or concerns related to medical care you received at a WRHA facility or site, contact Client Relations at: 204-926-7825 or email: clientrelations@wrha.mb.ca

The WRHA does not warrant the quality, accuracy nor completeness of the information available on this Social Media Channel. The WRHA expressly disclaims any and all warranties and conditions of any kind whether express or implied.

The WRHA will not be liable or responsible for any claims, injury or damages sustained by any person as a result of: (1) use (including unauthorized use) of the Social Media Channel; or (2) reliance on the information available on the Social Media Channel.

The Internet is not a secure medium and privacy cannot be assured. The WRHA cannot assume any responsibility for any harm or damage you may experience by sending personal or confidential information concerning yourself or another person to the WRHA through social media or direct message communication hosted by social media networks.

Personal information that you provide will not be shared outside of our organization except as required or permitted by law.

In accordance with The Personal Health Information Act (Manitoba – PHIA) you are not permitted to share personal health information of anyone, including a family member, and social media as a channel for two-way communication with the WRHA is not exempt from this legislation.

The WRHA is committed to maintaining the confidentiality and privacy of your personal information in accordance with The Freedom of Information and Protection of Privacy Act (Manitoba) (FIPPA) and of your personal health information in accordance with The Personal Health Information Act (Manitoba) (PHIA). Any collection of information shared by a member of the public on this Social Media Channel will be subject to compliance with FIPPA should an investigation be ordered by the office of the Manitoba Ombudsman.

For more information on PHIA and FIPPA legislation in Manitoba, visit <https://bit.ly/473Ubs4>

5.0 **REFERENCES:**

- 5.1 [Access to Information under the Freedom of Information and Protection of Privacy Act \(FIPPA\)](#) policy (10.40.190)
- 5.2 [Confidentiality](#) policy (20.10.030)
- 5.3 [Confidentiality of Personal Health Information](#) (PHIA) policy (10.40.020)
- 5.4 [Computer/Internet Usage](#) policy (70.20.010)

- 5.5 [French Language Services – Communications in Official Languages](#) policy (10.40.230)
- 5.6 [Respectful Workplace](#) policy (20.10.040)
- 5.7 [Use of Portable Electronic Devices and Personal Computers](#) policy (10.20.025)
- 5.8 [Entries into Health Records](#) policy (75.00-060)
- 5.9 [Audio, Video, and Photographic Recordings Policy](#) (10.40.280)
- 5.10 [Media Relations](#) policy (10.30.020) (review –in progress)
- 5.11 [Guidelines for Texting with Individuals Receiving Health-Care Services](#) – Shared Health
- 5.12 [Guidelines for Emailing Personal Health Information](#) – Shared Health
- 5.13 Guidelines for Public Interactions with WRHA Social Media (NEW – in progress)
- 5.14 [VCH Social Media, Websites and Online Communication policy](#)
- 5.15 [Reporting and Investigating Privacy Breaches and Complaints](#) Policy.(10.14.110)

Policy Contact: *WRHA Communications and Public Affairs Lead*