

## Washington University Department of Pediatrics - Social Media Guidelines

*Serves as an addendum to the [Washington University in St. Louis \(University\) social media policies](#) (issued 12/09) and the [Washington University School of Medicine Social Media Guidelines](#).*

The following policy is intended to be a guide to assist our faculty and staff in their Social Media experience to provide them a framework for what acceptable social media behavior is, provide guidance on how to represent themselves, and where to go for assistance. The social media landscape is continually changing and the expectations should be that this policy will be amended from time to time to adapt to changes in technologies and attitudes towards social media.

We expect all Department of Pediatrics faculty and staff who participate in social media to understand and follow the above policies, in addition to those outlined below.

1. Contact the Marketing Coordinator for the Department of Pediatrics prior to launching any social media or online initiatives. Marketing Coordinator will help strategize best approach. Marketing Coordinator also will act as liaison between the Department of Pediatrics efforts and the Office of Medical Public Affairs.
2. All official Department of Pediatrics social media pages will be created and maintained by Marketing Coordinator.
3. Naming Conventions - Must include WUSTLPeds or Washington University Department of Pediatrics (i.e. WUSTLPedsID) for ALL Department of Pediatrics pages.
  - 3a. All Washington University Department of Pediatrics pages must adhere to all applicable branding standards as set by Washington University Medical School Public Affairs and Department of Pediatrics Marketing Coordinator. The branding must be applied for search engine optimization as well as consistency of the Department of Pediatrics brand. Logo guidelines can be found here: <http://brand.wustl.edu>

- 3b. All Washington University Department of Pediatrics must include inline text or graphic representation of the Washington University School of Medicine Website Privacy Policy with a link to the entire policy found here:  
[http://medicine.wustl.edu/policies/website\\_privacy](http://medicine.wustl.edu/policies/website_privacy) (see example i)

4. How do I determine if this is a personal page or a WUSM page?

Personal self-hosted social media sites unrelated to WUSM business or activities must clearly and prominently state that they do not represent the opinions or views of WUSM or the University and that they convey the personal views of the creator. The University does not monitor these personal pages and is not responsible for their content. Such personal content, if using the wustl.edu domain, must comply with local, state and federal law — and must not involve copyright infringement, constitute libel or harassment, contain illegal materials, or consume inappropriate amounts of bandwidth.

**Shared Administrative Access to Social Media Platforms**

The Department of Pediatrics recognizes that responsibility for some social media initiatives may be shared among affiliated institutions/hospital partners such as St. Louis Children’s Hospital, Barnes-Jewish West County Hospital, and Shriner’s Hospital for Children in St. Louis and their employees. In such instances, the social media policies and guidelines of all participating institutions apply.

The site administrator will provide the names, titles and contact information for any individuals who share administrative access to a given social media page or site with the Marketing Coordinator. The Marketing Coordinator will share this information with the Office of Medical Public Affairs. Sharing primary site administrative responsibilities with individual patients, families, donors or students is generally not recommended.

### **Patient Privacy, Security and HIPAA**

Patient privacy is of utmost importance. The site administrator (Marketing Coordinator) and all participants representing WUSM must follow all existing WUSM policies and guidelines including HIPAA, Release of Information, Conflict of Interest, Intellectual Property, the site's User Terms and Conditions and routine approvals through the appropriate department, division or program.

Social media sites like Facebook, Twitter, Doximity and others are considered open systems and may not be used to receive, discuss or transmit electronic patient identifiable health information.

Sending email messages to outside mailboxes and systems (e.g. Facebook, Yahoo, and Gmail) is considered unprotected. The only approved methods for sending patient information via the Internet are: 1) Use of an encryption method to render the patient information unreadable while in transit or 2) Written consent in which a patient agrees to transmission of patient information via email.

If these methods are not followed, any emails or communications sent across the public Internet would constitute a breach of patient privacy.

### **Social Media for Clinical Trial (Study) Recruitment**

Use of social media platforms (Facebook, Patients Like Me, Army of Women, etc.) for clinical trial recruitment must be reviewed by the **WUSM Institutional Review Board (IRB)**. Proposals for use of social media platforms for this purpose should be submitted to the WUSM IRB by the principal investigator during the normal protocol submission process. In addition, the principal investigator or their designee will also need to notify the site administrator (Marketing Coordinator) for review and monitoring.

### **Institutional Endorsements Not Permitted**

The Department of Pediatrics does not permit explicit or implied use of the University's or School of Medicine's names, trademarks, logos or images – including pictures of campus buildings – to endorse any product or service without approval by the Marketing Coordinator. All requests must be made to the Marketing Coordinator to be coordinated with the Office of Medical Public Affairs for review and consent.

### **Disclosure of Conflict of Interest**

All Department of Pediatrics official social media initiatives related to clinical or health care topics, clinical study recruitment, and/or involving representatives from the clinical practices of WUSM shall include in-line text links to the [Conflict of Interest in Clinical Care – Policy and Consulting Agreements Guidelines](#).

### **Expected Behavior on Department of Pediatrics-Affiliated Sites or Media (Adapted from WUSM Social Media Guidelines)**

1. Follow all existing Department of Pediatrics, WUSM policies and guidelines, including HIPAA, Conflict of Interest Policy, Intellectual Property and general civil behavior guidelines.
2. Respect copyrights, trademarks and intellectual property of the University, WUSM and others.
3. Protect others' privacy and their proprietary financial, patient care or similar sensitive or private content.
4. Be professional and respectful in all postings. Be mindful that all communications in the online environment are visible to patients, co-workers, managers, competitors and others. Remember that nearly all content contributed on all social media platforms becomes immediately searchable and can be immediately shared.

5. When representing the Department of Pediatrics, identify yourself and your role with the organization in all posts. Use good judgment and strive for accuracy. Errors and omissions could result in liability for you or for WUSM.
6. When expressing personal opinions, make it clear that you are speaking for yourself and not behalf of Washington University School of Medicine, Department of Pediatrics. You also must include the Washington University School of Medicine, Dept. of Pediatrics disclaimer graphics on your personal online forum.

**Expected Behavior on Sites Not Associated with WUSM or WUSTL (From WUSM Social Media Guidelines)**

1. When you are expressing personal views, and when your association with WUSM is shared, implied or apparent, make it clear that your opinions are personal and do not represent the views or opinion of WUSM/WUSTL. Washington University is committed to a work environment free of harassment and disruptive behavior, and to providing an equal opportunity work environment where every member of the University community is treated with fairness, dignity and respect. No one shall discriminate against any individual on the grounds of race, color, religion, sex, age, disability, sexual orientation, national origin, or any other factor prohibited by law.
2. Your personal online social networking activities should be kept separate from your professional online activities to help maintain appropriate boundaries when interacting with patients online and to ensure patient privacy and confidentiality. Use privacy settings to safeguard personal information on non-work related activities as appropriate. The practice of accepting patients as friends on personal, non-WUSM or WUSTL accounts should be thoughtfully considered. Many professional societies and associations already have guidelines in place concerning this policy. Monitor your Internet presence to ensure accuracy and appropriateness of content posted about you. (Adapted from the [AMA](#)

Guidelines for Social Media.)

3. Be thoughtful about how you present yourself as a WUSM faculty or staff member in online networks. By virtue of identifying yourself as part of WUSM in such a network, you are now connecting yourself to your colleagues, managers and even WUSM patients and donors.
4. Always adhere to the site's user terms and conditions.
5. Make sure your online activities do not interfere with the completion of your job responsibilities.
6. If someone or some group offers to pay you for participating in an online forum in your WUSM role, this could constitute conflict of interest and WUSM policies and guidelines apply.
7. If someone from the media or press contacts you about posts you have made in online forums that relate to WUSM in any way, you must alert your manager and contact the Office of Medical Public Affairs before responding. Medical Public Affairs will provide assistance, including preparation of official information that can be appended to the social media site, and work with you to resolve the situation.
8. If you wish to write about other Universities or healthcare providers, information should be respectful and factually accurate.
9. Never comment on anything related to legal matters or litigation involving WUSM. Contact the Office of Medical Public Affairs if you require further assistance.
10. In order to provide the utmost care for our patients, employees and students, and the community at large, refer all social media activity around crisis topics to the Office of Medical Public Affairs. Never comment on social media sites on topics related to crisis situations involving WUSM, the University or its affiliated institutions. Be mindful that anonymous comments may be traced to any WUSM or BJC IP address.

11. When identifying yourself and your role with the WUSM in a personal online forum, use good judgment and strive for accuracy. Errors and omissions could result in personal liability.
12. Social Media postings must respect copyright, privacy, fair use, financial disclosure, and any other applicable laws.
13. Remember to include the Washington University School of Medicine, Dept. of Pediatrics disclaimer graphics on your personal online forum.

**Other Items:**

- Branding Standards - Faculty and staff should use every opportunity to include WUSTL, WUSM, and SLCH text branding for search engine optimization.
- Medical Malpractice – WUSM physicians should have a contract in place with the organization they are engaging with or providing social media for. The contract shall include a “hold harmless” agreement to indemnify the University. The contract should be reviewed by the WUSM Legal Counsel and executed by a duly authorized representative for the Department of Pediatrics.
- Thoughtful communications - Social Media posts should be meaningful and respectful comments. No SPAM or remarks that are off-topic and/or offensive. When expressing opinions that are not in agreement with other people’s opinions remember to keep your comments appropriate and polite.
- Disclaimer graphics – PCF will create a disclaimer graphic element to be appended to all personal on-line forums.

**Disclaimer Example:**

The Washington University Department of Pediatrics does not provide medical advice, diagnosis or treatment via this site. [See additional information.](#)

- Response in the event of negative posts – Faculty and staff will invariably encounter negative posts in their social media activities. Contact the Marketing Coordinator for the Department of Pediatrics as a resource to assist with negative posts. Marketing Coordinator will help strategize best approach to respond to negative posts. Marketing Coordinator also will act as liaison between the Department of Pediatrics efforts and the Office of Medical Public Affairs to manage and mitigate the response to negative posts.
- Use of photos – the use of photos embedded in social media for educational presentations should be in accordance with all WUSM HIPAA Privacy policies. Any photos used on social media sites should be de-identified. If the photo cannot be de-identified, written authorization for the use of that photo must be obtained from the patient, parent, and/or legal guardian. The WUSM HIPAA Privacy Officer can assist with the navigating the HIPAA polices while the Marketing Coordinator for the Department of Pediatrics can assist with de-identifying the photo.