



# Saskatchewan Cancer Agency

**DIVISION:** Corporate Services **POLICY #:** IM 0021  
**DEPARTMENT:** Information Management Services **ISSUE DATE:** June 1, 2015  
**CATEGORY:** Security and Confidentiality **REVISED DATE:**  
**POLICY TITLE:** **Social Media Policy**

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**Policy Statement** In order to protect the interests and the operations of the Agency, and to protect the privacy of patients, employees, clients, and individuals, the Agency maintains a social media policy.

**Purpose** The purpose of this policy is to delineate guidelines regarding use of social media by the Agency and Agency employees.

**Application** This policy and standards apply to all employees, contractors, consultants, volunteers, committee members including the board of directors, temporary workers and other workers at the Agency, including all personnel affiliated with third parties that utilize Agency infrastructure to use social media, refer to the Agency or implicate their work or role within the organization in their social media postings.

For purposes of this policy, social media includes but is not limited to all social networking sites (e.g., Facebook, LinkedIn, Twitter), blogs, discussion forums, collaborative information and publishing systems (Wikis), RSS feeds, video and photo sharing websites (e.g., YouTube, Picasa) and other websites with user-generated content.

**Authority** ELT

**Information** CIO  
VP – Corporate Affairs  
CFO - reimbursement  
Information Management Services  
Human Resources – enforcement

Approved by: \_\_\_\_\_

Signature

Date: \_\_\_\_\_

June 29, 2015

## Definitions

Personal Use: Not related to an employee's performance of his/her duties with the Agency and/or related to employment at the Agency.

Publicly Available Information: Information available via regular internet browser search. Publicly available information is not information that is only visible, available, or accessible to an individual's approved or private "friends" (as in the case of Facebook), contacts, or members.

Work Related: An activity that is:

- Related to the performance of duties at the Agency; and/or
- Related to employment at the Agency.

## Guidelines

### 1.0 Employee Personal Use of Social Media

When employees use social media for personal use, they are required to comply with this section.

#### 1.1 Identification

When an employee uses social media for personal use, the employee is responsible for his/her conduct and the content of postings. The Agency does not endorse any content that is posted by the employee. Employees are prohibited from indicating that the Agency endorses activities and content posted for personal use. Use of an Agency logo or trademark is prohibited. Employees shall not state or imply that they are authorized to speak on behalf of or represent the Agency. If an employee chooses to identify themselves as an employee of the Agency, the employee should use a disclaimer such as "My posts reflect my personal opinions and are not approved or authorized by the Saskatchewan Cancer Agency.

Employees should make every effort to separate their personal social media use in their private lives from their professional role and related work.

#### 1.2 Content

Employees must follow the policy on Code of Conduct (HR-509) and are prohibited from posting or disseminating information that would create a conflict of interest such that their personal activities, interests or dealings may actually, potentially or be perceived to:

- Impair the employee's ability to function and perform their duties;
- Have a negative impact on the Agency's reputation; or
- Result in personal gain or advantage due to their position in the Agency.

Employees are also bound by the Agency's confidentiality agreement, and required to comply with the *Health Information Protection Act* and the *Local Authority Freedom of Information and Protection of Privacy Act*. Employees are prohibited from posting or disseminating the following on personal accounts:

- Work-related personal health information or personal information (information security classes 4 and 5);

- Agency business information (information security classes 2 - 4);
- Unlawful information; or
- Defamatory, discriminatory, profane, obscene or threatening information about the Agency, an Agency employee, an Agency patient/client, or an Agency service provider or partner.

When expressing personal opinions employees are encouraged to maintain the highest standards use common sense and discretion. While employees are not asked to publicly support campaigns or initiatives of the Agency on personal social media sites they must abide by the code of conduct and the values of the organization. Any potential or perceived conflict of interest that arises from their personal use of social media or activities must be reported to their vice president.

### **1.3 Non-Compliance**

If the Agency becomes aware of non-compliance with this policy, the Agency may take the following action:

- a) Requesting an employee to remove unauthorized content;
- b) Referral to HR for disciplinary action; and/or
- c) Requesting a social media service provider to remove unauthorized content.

### **1.4 Use of Network**

Employees may use the Agency's network for personal social media use provided that the use meets 1.1 and 1.2, and that use does not interfere with work-related duties.

### **2.0 Agency Use of Social Media**

When employees use social media for work-related purposes, they are required to comply with this section.

### **2.1 Approval by Public Affairs**

The Public Affairs department is solely responsible for developing any official Cancer Agency social media presence. Any use of social media by Agency employees for work-related purposes must be approved by the Agency's Public Affairs Department.

### **2.3 Identification**

Any social media content for work-related purposes must identify the author's relationship with the Agency and must include the author's actual name and not a pseudonym or alias.

### **2.4 Content**

Social media content shall:

- Not include unethical, obscene, profane, discriminatory, threatening, defamatory or unlawful information.
- Not contain personal information or personal health information unless as allowed by the *Local Authority Freedom of Information and Protection of*

*Privacy Act or the Health Information Protection Act, and in consultation with Public Affairs and the Privacy Officer.*

- Be accurate.
- Contain relevant disclaimers.
- Not infringe on copyright.
- Follow the Agency's code of conduct and values

### **3.0 Agency Monitoring of Personal Accounts**

The Agency may review and observe an employee's personal social media accounts where information is public and in cases where it becomes necessary to ensure compliance with this policy, other policies or by law.

### **4.0 Use and Disclosure of Personal Information or Personal Health Information**

The Agency shall not disclose personal information and personal health information on social media unless as required or allowed by law. Posting de-identified patient information such as posting statistics on wait times is permitted provided that the information has been sufficiently de-identified and has been approved by Public Affairs. Statistical information must be aggregated and de-identified to point that a person cannot be identified in the information. Simply removing the name of a patient or using initials may not sufficiently de-identify a person.

The laws and policies in place to protect privacy and information access apply to social media. This means that information on social media sites are subject to freedom of information requests.

### **5.0 Selection of Social Media Provider**

The Agency shall use reputable social media providers.

## **Enforcement**

Any employee, agent, consultant, or contractor found to have violated these policies and standards may have their access to Saskatchewan Cancer Agency network and data disabled. They may also be subject to disciplinary action, up to and including termination of employment. Any violation of the policy by an agent, temporary worker, contractor or vendor may result in the termination of their contract or assignment with Saskatchewan Cancer Agency.