

**THE HOSPITAL FOR SICK CHILDREN FOUNDATION
POLICY & PROCEDURE**

SUBJECT:	Social Media Policy
NUMBER:	3.1.7
CATEGORY:	External Communications
ISSUED BY:	Senior Management Team
APPROVED BY:	Board of Directors
DATE:	June 16, 2022

1.0 Background

The Hospital for Sick Children Foundation (the “**Foundation**”) is a charitable organization whose members of the Board of Directors (“**Directors**”), non-Director Board Committee members, officers, employees and volunteers (the “**Representatives**”) serve the charitable purposes to which the Foundation is dedicated. Representatives occupy a position of trust in dealing with others outside the Foundation.

Whatever the area of activity or degree of responsibility, the Foundation expects its Representatives to act in a manner that will enhance the Foundation's reputation for ethical performance including activities on “**Social Media**” (defined below). Regardless of intent, Social Media content posted by Representatives may be viewed in light of their employment relationship with the Foundation.

The Foundation respects the free speech rights of all of its Representatives, but Representatives must remember that donors, families, patients, colleagues and supervisors often have access to a Representative’s posted online content and that taking public positions online that are counter to the Foundation’s interests or posting inappropriate material might cause conflict and/or damage to the Foundation’s reputation.

The overall intent of this policy is to outline the expectations of Representatives when it comes to Social Media, to establish guidelines for appropriate behaviour online, and to remind Representatives that anything they say or post on Social Media can be interpreted to be a reflection of the Foundation. The overall objective is to protect the reputation and perception of both the Foundation and its Representatives and to avoid any undue harm or negative attention.

2.0 Purpose and Application

This policy applies to the professional use of official Social Media accounts by Representatives on behalf of the Foundation, the personal use of Social Media encouraged by the Foundation, as well as the personal use of Social Media by Representatives in the context of their role as a Representative of the Foundation by virtue of their employment.

Social Media should be broadly understood for purposes of this policy to include, blogs, wikis, microblogs, message boards, chat rooms, electronic newsletters, online forums, social networking sites (e.g. Facebook, Instagram, LinkedIn, Reddit, TikTok, Twitter, etc.) and other sites and services that permit users to share information with others in a contemporaneous manner (“**Social Media**”).

3.0 Policy

3.1 Social Media Core Values

When engaging with Social Media, officially on behalf of the Foundation, encouraged to amplify Foundation content on personal Social Media or general personal use of Social Media, Representatives must adhere to the Foundation's *Core Values #1.1.2* (Collaboration, Excellence, Inclusion, Innovation and Integrity) as well as the Foundation's commitment to the highest standards of conduct, ethical practice and honest, transparent communication, in addition to all other applicable guidelines and policies governing the Foundation, such as the *Respect in the Workplace Policy #4.2.1*, *Conflict of Interest and Code of Conduct Policy #1.1.7* and *Privacy Policy #2.5.3*.

Set out below are some parameters as to what is appropriate behaviour on Social Media, including, but not limited to:

- Only meaningful, polite and respectful comments should be posted. Remarks that are offensive or derogatory should not be posted.
- Staged disagreement in an attempt to drive online traffic should not be used. When necessary, respond honestly and respectfully when there is disagreement. Social Media should be used to engage and encourage.
- Online content should not reflect poorly on, disparage or compromise the reputation of the Foundation or its donor community.

3.2 Official Social Media Accounts

Representatives may be asked to participate in Social Media on behalf of the Foundation, using official Foundation Social Media accounts as part of their employment duties.

The Foundation's Brand Strategy and Communications Department (**BSCD**) determines how official Foundation Social Media accounts are to be created and managed. Only Representatives authorized by BSCD may post online content through an official Foundation Social Media account or create an official online presence on Social Media.

3.3 Approved Foundation Content Amplified on Personal Social Media

Representatives may be encouraged to amplify specific online content of the Foundation on their personal Social Media account(s) (e.g., liking, sharing or reposting Foundation content on Social Media). As a Representative, the Foundation's Core Values should be always adhered to in addition to the following:

- Representatives should not "break" any major Foundation announcements. Major announcements or news that affect the Foundation should always be shared first by Foundation official communications channels, including Social Media. This also applies when Representatives engage in general personal use of Social Media.
- No additional compensation will be provided to a Representative from the Foundation for using personal Social Media to promote or benefit the Foundation in any way.

- If a Representative comes across negative or disparaging content or posts about the Foundation or becomes aware of a third party trying to spark negative online dialogue about the Foundation, unless they are a designated spokesperson or Social Media community manager for the Foundation, the Representative should not engage and immediately share such online content with the BSCD, which may request a copy of the communications and may engage the Legal Department if and as needed.
- Representatives are also encouraged to notify the BSCD if they become aware of positive and supportive content that may be worthwhile sharing.

3.4 Personal Social Media

The Foundation expects Representatives to take great care when using personal Social Media, whether open to the public or private. Representatives shall ensure the Foundation's brand, reputation, donor information and other Foundation information is protected and that the standards of professionalism, honesty and integrity are upheld, whether during or outside work hours, in the online space. Representatives have an obligation to uphold and align with the Foundation's values as per their employee contract and as per the *Respect in the Workplace Policy #4.2.1, Conflict of Interest and Code of Conduct Policy #1.1.7 and the Privacy Policy #2.5.3*.

The Foundation encourages Representatives to participate in the Social Media space, but urges Representatives to do so properly, exercising sound judgement and common sense when mixing their business and personal lives. Online, personal and business personas are likely to intersect, and it is important for Representatives to remember that anything they post can be interpreted to be a reflection of the Foundation regardless of whether it's posted during work hours or in personal time.

This policy, in addition to all other applicable guidelines and policies governing the Foundation, apply to a Representatives' personal activities online. Below are additional guidelines when using personal Social Media accounts:

- Representatives are encouraged to engage in conversation that promotes and celebrates the Foundation if they so desire. Participation and engagement is the Representative's choice.
- Consistent with the *Acceptable Use Policy #4.4.2*, Representatives may make incidental use of computers, mobile devices and of the Internet, including accessing Social Media, for personal reasons, providing that such use does not contravene any part of this policy and any relevant Foundation policies and guidelines.
- Representatives must consider and maintain appropriate boundaries with patients, donors and families when using personal Social Media accounts. Consistent with the *Confidential Information and Data Policy #4.4.5*, Representatives should not publicly share any personal or private information of any Foundation stakeholders (e.g. donors, prospective donors, volunteers, etc.) or patient families, nor should they inquire about or disclose any patient health information on Social Media.
- Representatives are permitted to identify themselves as a Foundation employee on their personal Social Media accounts but when personal opinions are expressed, it is strongly encouraged to include a disclaimer that opinions are their own and not those of their employer. Representatives are reminded that even with a disclaimer the lines of interpretation are blurred and thus Representative should not post opinions that are contrary to the Foundation's Core Values, are inappropriate, or are likely to cause damage to the Foundation's reputation.

- When reposting and in other situations where use is expressly permitted, Representatives may use the Foundation brand name and trademarks on personal Social Media accounts. Representatives may not use the Foundation brand name and trademarks on personal Social Media accounts otherwise, including, without limitation, to conduct any lobbying or advocacy activities.
- No form of compensation should be accepted by a Representative from a third party for using personal Social Media to promote or benefit the Foundation.

3.5 Personal Information and Social Media

Patient or donor personal information, including their name, a photo or video showing the individual, patient health condition or medical information is never to be posted or referred to on any public forum, including Social Media, without the individual's express and documented consent.

4.0 Failure to Comply

A Representative who fails to comply with this policy is subject to disciplinary measures. Disciplinary measures may include, without limitation, verbal or written warnings, suspension or termination of employment or other positions as applicable. Depending on the situation and the Representative's actions, the appropriate policy and process therein will apply.

5.0 Relationship to Other Policies

The following policies may contain provisions that affect the creation, sufficiency and management of activity on Social Media:

Core Values #1.1.2

Conflict of Interest and Code of Conduct #1.1.7

Privacy Policy #2.5.3

Release of Information to Media and General Public #3.1.3

Issues and Crisis Management #3.1.4

Respect in the Workplace Policy #4.2.1

Acceptable Use Policy #4.4.2

Confidential Information and Data Policy #4.4.5

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