

Policy and Procedure

Title:	Social Media	
Policy Number:	01.100	Section: Communications
Effective Date:	February 14, 2014	
Revised Date:	September 27, 2023	
Approving Body:	President and Chief Executive Officer of CancerCare Manitoba (CCMB)	
Authority:	<i>The Health System Governance and Accountability Act (Manitoba)</i>	
Policy Contact:	Communications and Public Affairs	
Applicable to:	CCMB Community	

1.0 BACKGROUND:
1.1 Rationale

CancerCare Manitoba's (CCMB) reputation in the community is critical to ensuring that it can effectively carry out its Mission and Vision.

Employees and Independent Contractors who Post on Social Media may inadvertently harm CCMB as a result of posting identifying information, stating aspects such as CCMB's name, their name and relationship with CCMB or where a relationship with CCMB may be inferred, or the general content of the Post.

Such Posts can cause harm and other unwanted effects to CCMB, including, but not limited to:

- 1.1.1 Damage to CCMB's reputation and goodwill;
- 1.1.2 Damage to CCMB's relationship with patients and their families;
- 1.1.3 Unauthorized release of confidential and proprietary information, including information about CCMB, CCMB's personnel and CCMB's patients and their families;
- 1.1.4 Loss of privacy and non-compliance with privacy laws in keeping with *The Personal Health Information Act* (Manitoba) legislation;
- 1.1.5 Civil liability for defamation; and
- 1.1.6 Regulatory offences, including non-compliance with rules established by the Canadian Radio-television Telecommunications Commission and the Competition Bureau of Canada and non-compliance with *The Freedom of Information and the Protection of Privacy Act* (Manitoba) legislation.

1.2 Application

This Policy applies to all uses of Social Media undertaken by, or on behalf of, Employees and Independent Contractors, including, but not limited to, a Post that occurs:

- 1.2.1 While Employees are performing their employment duties;

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- 1.2.2 By Independent Contractors in the course of their engagement by CCMB;
- 1.2.3 Outside work hours on personal time, but only as expressly stated herein;
- 1.2.4 By using CCMB's technology or the Employees' or Independent Contractors' personal technology.

2.0 **PURPOSE:**

The purpose of this Policy is to mitigate risk of harm to CCMB as an organization and to CCMB staff through the improper use of Social Media, to outline acceptable and unacceptable use of Social Media by CCMB Employees and Independent Contractors, and to ensure that effective and clear processes regarding the use of Social Media are in place and used by staff at all CCMB sites and facilities.

3.0 **DEFINITIONS:**

- 3.1 **CCMB:** CancerCare Manitoba.
- 3.2 **Communications:** CCMB's Communications & Public Affairs department and staff.
- 3.3 **Employees:** all persons employed or contracted by CCMB as well as members of the medical staff, board members, volunteers, and students/trainees in direct-care and indirect care areas.
- 3.4 **Independent Contractors:** all persons engaged by CCMB to provide services on an independent, contractual basis to CCMB.
- 3.5 **Post or Posting:** the act of communicating information on Social Media that directly or indirectly relates to CCMB.
- 3.6 **Social Media:** any Internet media that involves user participation or user-generated content and ensures rapid sharing of information and resources, including, but not limited to Facebook, Instagram, X (formerly Twitter), LinkedIn, YouTube, Snapchat, Flickr, blogs and wikis.

4.0 **POLICY:**

4.1 **General Conduct Standards**

- 4.1.1 Use of Social Media on CCMB's computers or laptops is prohibited except for individuals who have been authorized to represent CCMB using official CCMB social media accounts.

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- 4.1.2** Personal use of Social Media on an employee's personal device is permitted in the workplace only during legitimate breaks (i.e. coffee or lunch breaks) from employment, contractual or volunteer duties.
- 4.1.3** Social Media posting of any photos taken in the workplace, including "selfies," is strictly prohibited at all times, recognizing that CCMB is a professional workplace with very strict privacy legislation that must be followed. Exceptions to this shall be authorized by the CCMB CEO and shall be made in support of campaigns or events that have had prior authorization. All photos taken must adhere to CCMB policies related to privacy.
- 4.1.4** Employees and Independent Contractors who Post must do so in a manner which is respectful of others and must refrain from Posts that harm CCMB's interests. For examples of Posts which may harm CCMB's interests please refer to Section 4.2 of this Policy.
- 4.1.5** Employees and Independent Contractors must be mindful of CCMB's reputation when using Social Media. For example, no references shall be made to patients of CCMB and/or their families and there shall be no disclosure of patients' personal information. Maintaining the trust of our patients is critical to ensuring we can effectively carry out our mandate in the community and therefore, all applicable privacy legislation and regulations must be strictly adhered to at all times by Employees and Independent Contractors using Social Media.
- 4.1.6** Social Media usage must be professional and consistent with all other CCMB policies and procedures. If an Employee, for example, chooses to identify themselves as a CCMB employee on Social Media that Employee must act in accordance with CCMB's Employee Code of Conduct when using Social Media. A copy of the Employee Code of Conduct is available for review in the CCMB Policy Library. Partner websites are encouraged to manage online information as does CCMB, in order to ensure professionalism, quality of information and privacy.
- 4.1.7** Authorized users only shall access Social Media during work hours to conduct work-related business. Only employees who are authorized to make statements to the public may communicate on behalf of the Employer (see CCMB Policy 01.102 - Media Relations Policy).

4.2 Prohibited Activities

- 4.2.1** Examples of prohibited activities include, but are not limited to, the following:

- (a)** Posting confidential and proprietary information about, or related to, CCMB, CCMB's personnel and CCMB's patients and their families;
- (b)** Posting information about other Employees or Independent Contractors which, in the view of a reasonable person, those Employees or Independent Contractors would expect to be private;
- (c)** Purporting to Post on behalf of CCMB, unless expressly authorized or

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required by the Employee's employment duties or the Independent Contractor's engagement with CCMB;

- (d) Posting information that would be materially misleading because the Employee's or Independent Contractor's affiliation with CCMB is unknown;
- (e) Posting information or material where CCMB is not explicitly named, but where a relationship with CCMB by the person Posting may be inferred.
- (f) Any use of Social Media that has a negative impact on Employees' and Independent Contractors' productivity or efficiency;
- (g) Posts that constitute real or reasonably perceived harassment and/or discrimination of an Employee, Independent Contractor, patient or any third party;
- (h) Use of the TikTok app on CCMB-issued mobile devices is prohibited. The Manitoba government banned the use of the TikTok app on all government-issued mobile devices as of March 6, 2023 <https://news.gov.mb.ca/news/?archive=&item=58350>; and
- (i) Violating any other CCMB policy or procedure, or any other applicable legislation, including, without limitation, *The Freedom of Information and the Protection of Privacy Act* (Manitoba) and *The Personal Health Information Act* (Manitoba).

4.2.2 Examples of the content of Posts which would violate this Policy include, but are not limited to:

- (a) Personally identifying patients or families by name;
- (b) Disclosing personal health information of a patient, even if the name of the patient is not disclosed;
- (c) Posting confidential information about CCMB operations or personnel;
- (d) Making defamatory comments about CCMB patients, their families, or employees (co-workers, supervisors, leadership), or volunteers; and
- (e) Making defamatory or discriminatory comments relating to race, religion, ethnicity, sexual orientation, gender or on any other grounds prohibited under *The Human Rights Code* (Manitoba).

4.3 Fundraising

CCMB acknowledges that Employees and Independent Contractors use Social Media to fundraise on behalf of CCMB. All fundraising activities on Social Media are governed by this Policy and any other applicable CCMB policies regarding fundraising.

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4.4 Responsibility for Material

Employees and Independent Contractors acknowledge legal responsibility for their Posts. Where reasonably appropriate, Posts must be accompanied by a disclaimer that indicates the views expressed in the Posts are solely the views of the particular Employee or Independent Contractor and are not representative of the views held by CCMB.

4.5 Terms of Service

Employees and Independent Contractors who Post in the course of their employment or contractual duties must read and familiarize themselves with the Social Media provider's terms of service and privacy policy before using that provider's service. Employees and Independent Contractors who Post outside work hours on personal time should read and familiarize themselves with the Social Media provider's terms of service and privacy policy before using that provider's service.

4.6 Media Inquiries

Any media inquiries related to a Post relating to CCMB shall be immediately referred to Communications. Employees and Independent Contractors shall not speak to the media about Posts related to CCMB on Social Media without the express permission of Communications.

4.7 Employee/Independent Contractor Monitoring

Employees and Independent Contractors who Post on Social Media should monitor subsequent related Posts generated by other individuals in response to their initial Post. Employees and Independent Contractors must take all action reasonably within their power to immediately remove all Posts generated by other individuals on their Social Media pages which may cause harm to CCMB. Such Posts must also be reported to Communications.

4.8 CCMB Monitoring

CCMB reserves the right to monitor public Posts of Employees and Independent Contractors. The term "public", as used herein, shall be interpreted by reference to, among other things, the number of individuals who are able to access the Post and the identity of the individuals who are able to access the Post. Questions regarding whether a Post is "public" should be directed to the Director of Communications and Public Affairs, who shall make those decisions at their sole discretion. There is a presumption in favour of a finding that such Posts are public.

4.9 Compliance

Managers and supervisors are responsible for monitoring their staff and ensuring that the Social Media policy is being followed in the workplace. Staff should address questions or concerns with their supervisor. Consultation should occur with Communications or Human Resources as appropriate.

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4.10 Reporting Offences

Any Employee or Independent Contractor that observes a breach of this Policy shall immediately notify Communications. In the case of a reported offence, the Chief Executive Officer and Human Resources will also be notified by Communications, as well as the staff member's/volunteer's or contractor's manager.

4.11 Enforcement

This Policy will be enforced and interpreted by the Director of Communications at CCMB. Employees and Independent Contractors should direct any questions about a Post, this Policy or the use of Social Media to Communications. The Director of Communications may delegate aspects of the administration and enforcement of this Policy as is appropriate at their sole discretion.

4.12 Non-Compliance

Employees who violate this Policy may be subject to disciplinary measures, up to and including dismissal. Independent Contractors who violate this Policy may be subject to cancellation of their engagement.

5.0 PROCEDURE: Not Applicable.

6.0 REFERENCES:

- 6.1** CCMB Policy 01.102 - Media Relations [Media Relations](#)
- 6.2** *The Freedom of Information and the Protection of Privacy Act* (Manitoba)
<http://www.gov.mb.ca/chc/fippa/index.html>
- 6.3** *The Personal Health Information Act* (Manitoba) <http://www.gov.mb.ca/health/phia/>
- 6.4** *The Human Rights Code* (Manitoba)
<https://web2.gov.mb.ca/laws/statutes/ccsm/h175.php?lang=en>

Documentation:

1.	The original signed and approved document is on file in the Policy Office, CCMB.
2.	The e-copy is on file in the CCMB Governing Documents Library on SharePoint.

Revision History:

Date	Version	Status	Author	Summary of Changes
14/02/2014	1	Initial	Communications & Partner Relations Board Committee, CCMB Senior Leadership	New CCMB Policy.

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10/07/2014	2	Minor Revision	Policy Committee Sr Leadership	Minor revisions made.
06/04/2018	2	Minor revision	S.Friedenberger	Reformatted to new template
09/11/2019	3	Revision	P Penner, CCO	Reviewed with minor revisions made.
09/27/2023	4	Revision	Communications	Reviewed with minor revisions.

Executive Sponsor: This Policy was approved/endorsed by:

Date	Name / Title
	Not Applicable

Approved by:

Date	Name / Title	Signature
September 27, 2023	Dr. Sri Navaratnam, President and Chief Executive Officer, CancerCare Manitoba	"Original signed by Dr. Sri Navaratnam"