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## Faculty Media Policy

Effective Date: September 1, 2023

Supersedes: July 1, 2022

### Policy

PSOM faculty are personally responsible for the content they publish on social media sites and doing so could result in civil or criminal liability. All laws regarding copyright infringement, defamation, including libel and slander, privacy of patient and other individual's personal information, proprietary information, or obscenity apply. Faculty are responsible for monitoring their own social media site(s) and for deleting posts that do not adhere to these guidelines.

Postings within social media sites are subject to the same professionalism and behavioral standards as any other personal interactions. Postings related to the care of patients, colleagues, and Penn Medicine employees may be used in legal and/or administrative proceedings, such as by the State Board of Medicine, and may violate Federal and state privacy laws, Penn Medicine privacy and security policies, and may have regulatory compliance and legal ramifications.

### Purpose

The purpose of this policy is to

- reinforce patient, faculty, and staff confidentiality
- specify those authorized to speak on behalf of Penn Medicine and the University of Pennsylvania
- reinforce proper use of Penn associated names and logos
- provide guidelines for social media posting

### Implementation

Senior leadership, department chairs, business administrators, and faculty members share responsibility for implementing this policy consistent with its terms.

### Procedure

#### Patient, Faculty, and Staff Confidentiality

Do not post confidential or proprietary information (e.g., business practices, financial interests or similar sensitive or private information) about UPHS/Penn Medicine/University, its learners, employees, patients or alumni.

Identifiable patient information shall not be shared online or via social media except when specifically **authorized by the patient [or the patient's personal representative]**. Without such consent, faculty shall not post anything on social media that could identify, on its own or together with other available information, a Penn Medicine patient. Identifiable photos of patients or identifiable body parts (e.g. specific birthmarks or tattoos) may only be displayed online or on social media if the patient has provided specific consent for posting. Also, for patients with an FYI flag called "No Photography/Videography for Non-

Treatment Purposes” on their charts, no images may be displayed online or on social media even if de-identified. Online discussions or comments regarding specific patients are prohibited, even if all identifying information is excluded. Never offer patient-specific medical advice on a social media site. Any exceptions must be approved in writing by the patient *as well as* by the Penn Medicine Communications Office.

Review any photos you intend to post that were taken within any inpatient or ambulatory Penn Medicine facility for inadvertent capturing of patient information or other items that could potentially identify a patient (on screens or documents that are within view for example). The UPHS Photographs, Video Recording and Audio Recording policy provides further information regarding photos taken within UPHS hospitals and ambulatory care sites.

[http://uphsxnet.uphs.upenn.edu/hupadmpl/Photographing\\_2010.pdf](http://uphsxnet.uphs.upenn.edu/hupadmpl/Photographing_2010.pdf)

## Authorization to Speak on Behalf of Penn Medicine and the University of Pennsylvania

Only those officially designated have authorization to speak on behalf of the University, the Perelman School of Medicine (PSOM), UPHS, and/or UPHS entities and organizations. In general, if a PennKey or UPHS credentials log-in is required to access content or content can only be accessed while on the Penn Medicine network, it must not be shared outside the network on social media or other platforms.

[Guidelines for Penn Medicine Faculty & Staff Media and Government Relations Activity - Penn Medicine](#)

## Proper use of Penn Associated Names and Logos

Use of the University of Pennsylvania, Penn Medicine, UPHS, Perelman School of Medicine names and associated logos, or those of any hospital or other clinical entity related to any of the above is carefully regulated by University, UPHS, and PSOM policy. Individuals are not permitted to use any of the above entities’ logos without permission from the appropriate office. The names of the above entities must not be used in any way on any social media platform in connection with personal or non-official activities if such use in any way could be construed as implying endorsement of or responsibility for any project, product, service, or activity by any of the above entities.

## Guidelines for Social Media Posting

If you identify yourself as a Penn medicine employee in any social media post, it should be clear in the posting that the views expressed are not necessarily those of Penn Medicine or any part of the University of Pennsylvania or UPHS unless you have specific authorization to make the representation. A disclaimer such as, “The views expressed in this [post/blog/website] are my own and do not reflect the views of Penn Medicine or the University of Pennsylvania” may be appropriate.

Assess the implications of “friending,” “liking,” “linking,” and “following” or accepting a request from another person given the potential for misinterpretation of relationships such as doctor-physician, teacher-learner, supervisor-subordinate. “Friending,” “liking,” and “linking,” and “following” or accepting a request from patients and/or their families is strongly discouraged.

“Untag” yourself from any inappropriate photos, as all content posted or published on social media sites and other online locations becomes immediately searchable and can be immediately shared.

Online relationships between faculty and other learners a faculty member may supervise (including medical students) are covered by GME and UPHS policies, as well as other policies on consensual relations and sexual harassment. Cyber stalking, requests to those you supervise to engage in activities outside of work, and inappropriate postings to social media sites while supervising trainees can all be considered forms of sexual harassment.

If an individual, group, institution, or entity offers to pay faculty or staff for participating in an online forum in their University role, offers advertising for pay and/or for endorsement, this could constitute conflict of interest and University policies and guidelines apply.

The use of social media is prohibited while performing direct patient care activities, or when its use could compromise patient confidentiality. Other use during work hours must not create distractions from your work or that of others. Photographs of others should not be posted without their permission to do so.

Faculty and staff should not publish statements that could reasonably be deemed obscene, discriminatory, threatening, or harassing to an individual or group on the basis of sex, race, national origin, sexual orientation, or other characteristics protected by civil rights laws and University policy. This includes personally developed and “retweeted” content.

## Reporting Requirements and Handling of Related Complaints

Faculty are responsible for their social media presence, which is subject to the same behavioral and professionalism standards as other forms of personal interactions. Failure to abide by this policy may result in disciplinary action, including referral to departmental professionalism committees, entity-specific medical boards, or licensing boards, as well as sanctions under the University faculty handbook where appropriate. Disclosure of patient information that violates HIPAA may result in civil and criminal penalties.

If a faculty member believes that another member of the University or Penn Medicine community has used social media or institutional resources in violation of this policy, that concern must be reported to a division chief, department chair or a member of a professionalism committee.

## Additional Relevant Policies

The UPHS Acceptable Use of Information Resources Policy provides further information regarding appropriate and inappropriate use of UPHS information technology resources and systems.

[https://uphsxnet.uphs.upenn.edu/healthispl/pdf/ISD-SEC-03 Acceptable Use of Information Resources Policy.pdf](https://uphsxnet.uphs.upenn.edu/healthispl/pdf/ISD-SEC-03%20Acceptable%20Use%20of%20Information%20Resources%20Policy.pdf)

The UPHS Telecommunication Devices Policy provides further information regarding use of UPHS issued mobile devices: [TEL-1-003 \(upenn.edu\)](#)

UPHS GME has issued social media guidelines for house staff:  
[149152 uphs\\_gme\\_social\\_media\\_guidel\[2\].pdf \(upenn.edu\)](#)

Additional UPHS/Penn Medicine policies regarding information security policies and standards is available at this link: [Information Security - Policies \(upenn.edu\)](#)