PURPOSE:

Social media provides opportunities for members of the Pennington Biomedical Research Center community to share information and knowledge and to foster learning, innovation, collaboration, and research. It is the policy of Pennington Biomedical that the use of social media is consistent with the center’s commitment to academic freedom and that it promotes thoughtful discourse on appropriate matters.

- This policy provides information and instruction for faculty, staff, student workers, trainees, and any other affiliated person of Pennington Biomedical using social media and applies to:
  - All social media use on behalf of the center;
  - Social media content created or posted on center-sponsored websites and social media accounts; and
  - Social media content created or posted by staff members of Pennington Biomedical in a personal capacity only if that content incorrectly creates an appearance of an endorsement or suggests a particular opinion by the center or violates applicable law, center or university policies.

- This policy does not apply to online posts made by faculty, staff, student workers, trainees, and any other affiliated person on a non-Pennington Biomedical social media site and/or group list (i.e. posts to professional membership listservs and/or related social media sites not directly sponsored by Pennington Biomedical).

Please note: Research conducted through social media is governed by a Human Research Protections policy, not this policy. Please see the IRB for more details.

POLICY MANAGEMENT:

The center recognizes that social media content has the potential to affect the reputation of the center and members of its community. Use of social media is a growing means of communication which takes a number of forms including, but not limited to, social networking websites (e.g., LinkedIn, Facebook), microblogging websites (e.g., Twitter), blogs (center as well as personal), online encyclopedias (e.g., Wikipedia), and video and photo sharing websites (e.g., YouTube, Flickr, and Instagram). Preexisting and future social media sites and content are covered by this policy.
POLICY:

All data and files, including social media content, stored on computers owned or operated by the center or transmitted using center computer systems are subject to applicable center computing usage policies. Social media content not created or posted using computers owned or operated by the center, or transmitted using center computer systems may nonetheless be subject to appropriate action by the center under applicable institutional, local, state or federal laws and policies.

The center is committed to promoting, regulating, and protecting the integrity of its identity and its trademarked names and identifying marks. The center may pursue all available recourse to block, remove, or delete a social media communication that incorrectly creates an appearance of an endorsement by the center or makes an inappropriate or unauthorized use of any intellectual property held by the center.

Rules for Social Media Users & Content

Social media users and any content created or posted on behalf of the center must adhere to the following:

- **It must add value to the conversation.** Pennington Biomedical believes our employees are our best subject matter experts on the work underway here. As such they should utilize social media to lend unique and valuable expertise and commentary.
- **It must be considerate of the center’s reputation.** Stay aware of your identity online as a Pennington Biomedical employee. Social media can be a very powerful tool, and if you identify yourself as an employee, people may form an opinion about Pennington Biomedical based on your social media presence.
- **It must be clear and in good judgment.** Take ownership of your social media content. Pennington Biomedical employees are personally responsible for all content they publish online. Keep in mind the internet is a public forum for all to see, and nothing is easily erased. Use your best judgment—when in doubt, don’t post.
- **It must give credit where credit is due.** Respect all fair use and copyright laws. For more on fair use see LSU PM-17.
- **It must be honest and transparent.** Be the first to correct any of your mistakes.
- **It must be professional.** Stick to professional topics that relate to Pennington Biomedical if you are a user of an official Pennington Biomedical social media account. This means official users should focus on subjects that further Pennington Biomedical’s mission and should avoid engaging in issues that do not impact Pennington Biomedical.
- **It should comply with all applicable laws, regulations, and center policies.** This includes, but is not limited to laws addressing harassment, privacy of student and health records, confidentiality, copyright, trademark, computer usage, and information security.
- **It should comply with the terms of use for the social media platform used.**
- **It must not disclose any confidential, restricted, sensitive, proprietary, or otherwise non-public information.** If in doubt, contact the communications department for clarification.
- It must not be abusive, threatening, defamatory, harassing, or create a hostile environment.
- You may not pose as a spokesperson for Pennington Biomedical unless authorized.
- You may not create or post personal social media content (either on personal or Pennington Biomedical sites) that implies that the content is on behalf of or is endorsed by the center.
- You may not provide an endorsement on any site or in any post where your center affiliation is identified. In any potential creation of an appearance of an endorsement by the center or members of the center community, the content must include a disclaimer that the views expressed are personal and are not necessarily those of the center.
- You may not use the center name, marks, symbols, and logos to promote a product, service, cause, political party, or candidate on a personal social media account or platform.
- You may not post information protected by applicable laws or center/university policies or non-public information about the center, the university, its students, faculty, staff, or alumni.

Alert the Pennington Biomedical communications department if you spot any controversial issues online that pertain to the center so that they may respond swiftly and appropriately.

Creating and Registering Social Media Accounts at Pennington Biomedical

Faculty, staff, and related individuals creating or registering a social media account on behalf of the center must provide information to the Pennington Biomedical communications department via IRB Manager xForm Social Media Site Registry or via email if no IRB Manager account is in use.

- Register your social media account by logging into IRBManager via https://pbrc.my.irbmanager.com/Login.aspx and searching “Social Media Site Registry.” Please contact the IRB for help in locating the form.
- If you do not have access to IRBManager, please provide the following information to the communications department via email at news@pbrc.edu:
  - Name of principal investigator
  - Project associated with social media site
  - Social media site platform (i.e. Facebook, Twitter, etc.)
  - Social media site web address
  - Name/contact information of person managing the social media site
  - Names of other individuals authorized to post to this social media site
  - A brief justification for the creation and use of the social media site
  - Confirmation that a member of the communications department has been listed an administrator with full access rights on the social media site
- A supervisor must be identified for each registered social media account used on behalf of the center or one of its authorized affiliates/entities. That supervisor should familiarize their faculty, staff, and student workers who are creating or posting social media content on that account with applicable policies and procedures. That supervisor should also have
a succession plan in place so that the social media account can be maintained through changes in supervision.

- For accounts created prior to the adoption of this policy and for accounts created in the future, account supervisors must also submit the account information via IRB Manager xForm Social Media Site Registry within 30 days of adoption of this policy.

- The communications department will review the request and respond to the requestor with an approval or denial.

- **Please note:** A communications department staff member must be made an “administrator” with full access rights to any social media account created on behalf of the center or one of the center’s sponsored programs.

- The communications department will maintain a list of Pennington Biomedical direct and affiliated social media accounts.

### User-Generated Content on Pennington Biomedical Sponsored Websites and Social Media Accounts

The center reserves the right to delete content posted to center-affiliated websites and social media accounts that, in its sole discretion, it deems is in potentially bad taste, is defamatory, obscene, threatening, or harassing; targets or disparages any ethnic, racial, religious, or gender group; advocates illegal activity; infringes copyrights or trademarks; contains spam, junk mail, or unauthorized solicitations; or violates any applicable local, state, or federal law, or center policies. Pennington Biomedical websites and social media accounts - and all affiliated websites and social media accounts - must contain a disclaimer stating that any such user-generated content does not reflect the opinions or views of the center, its trustees, foundations, officers, or employees. The disclaimer should read: *The views and opinions expressed on this site do not necessarily represent those of the Pennington Biomedical. Therefore, we are not attesting to the accuracy or reliability of information posted by external parties.*

### Clinical Trial Participant/Campus Visitor Guidelines

The center recognizes the opportunity to build lasting relationships with clinical trial participants. Social media can be an extremely powerful tool for communicating general healthcare information to the public, creating professional connections, and sharing experiences. However, sharing too much information on social media platforms could impact participant confidentiality.

To ensure the privacy of others participating in research studies, we ask that all visitors and clinical trial participants refrain from taking photos and videos of other patients, Pennington Biomedical staff, and any procedures one may participate in or view during their visits to Pennington Biomedical.

- Pennington Biomedical is not required to obtain consent from the patient when the patient is the subject of the photography/audio recording and such recording is performed by the patient or the patient’s family members or the patient’s visitors.

- Patients, family members, and/or visitors are not permitted to take photographs of, or audio record, other patients or workforce members without consent.
• To the extent the workforce member is aware of any inappropriate attempt to photograph a patient and/or workforce member, the workforce member must take reasonable steps to ensure that patients and/or workforce members are not photographed within Pennington Biomedical’s campus by a patient or the patient’s family members or visitors.

To adhere to HIPAA regulations, it is necessary to educate all employees and clinical trial participants about the do’s and don’ts of social media while on the Pennington Biomedical campus:

DO NOT:
• Take photos or videos of any kind of clinical trial participants, clinical trial procedures, or in any environment on the Pennington Biomedical campus that clinical trial participants may frequent.
• Share or post photographs, or any form of an image, of a participant without written HIPAA authorization from that participant.
• Share or post photographs, or any form of an image, showing participant medical files.
• Share or post participant information with unauthorized individuals, even if the participant’s name is not disclosed.

DO
• Educate employees and research participants on the importance of adhering to HIPAA regulations.
• Avoid “friending” or following participants on social media.
• Understand that even a deleted social media post can still exist in cyberspace.

Understand that HIPPA is composed of 18 personal identifiers including but not limited to photos, zip codes, birth dates, and vehicle identifiers. All of these must stay private. See Pennington Biomedical Policy 412.14 for more information on HIPAA identifiers.

Violations and Enforcement

Violations of center policies may result in discipline, up to and including termination in accordance with applicable center policies.

Contacts:

Pennington Biomedical Communications Department – x32750, news@pbrc.edu
Pennington Biomedical Legal and Regulatory Affairs – x32515

Definitions:
**Social media account** means an identifiable profile or online identity that is attributed to a particular individual or organization on a social media platform, which often permits a certain amount of control to the individual or organization over the account.

**Social media content** means user-generated content or communications, including but not limited to text, photographs, or video. Examples of social media content include commentary, blog posts, and events.

**Social media platform** means the mobile or web-based application that allows the creation and exchange of social media content, such as a blog, wiki, social network, and other interactive websites. Examples of social media platforms include, but are not limited to, Facebook, Twitter, Flickr, YouTube, LinkedIn, Foursquare, Myspace, and Instagram.

**Social media content on behalf of the center** means social media content that is created or posted by faculty, staff, or student workers in the center’s name within the scope of the individual’s responsibilities or position at the center. Examples include department Facebook pages or Flickr accounts. Social media content created or posted by individuals with academic appointments is not included if the content is published in their own names and is not attributed to the center, even if created as part of their academic activities.

**Supervisor** means a faculty or staff member who is responsible for overseeing and monitoring a social media account that is registered with the center.
Policy Committee Secretary's Attestation

Date of Policy Committee Meeting: 7/25/2016 (email review)

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Anne Duke, Policy Committee Secretary

8/1/16

Date

Approval by the Executive Director

William T. Cefalu, MD

Executive Director

8/4/16

Date