

Policy/Procedure: ENT - Social Media Policy (E-COMM-001)

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Origination Date: 03/01/2013		Effective Date: 06/30/2025

SCOPE:

- ☒ **Medical University Hospital Authority (MUHA)**
- ☒ **MUSC Community Physicians (MCP)**
- ☒ **MUSC Affiliate Physicians (MAP)**
- ☒ **MUSC Physicians (MUSCP), Carolina Family Care, Inc. (CFC), MUSC Health Partners (MHP)**
- ☒ **Medical University of South Carolina (University)**

- ☒ **Charleston Division**
- ☒ **Pee Dee Division**

- ☒ **Catawba Division**
- ☒ **Midlands Division**

Visit Type (mark all that apply)

- ☒ Ambulatory
- ☒ Ambulatory Surgical Center(s)
- ☒ Inpatient

Patient Population (mark all that apply)

- ☒ Adult
- ☒ Pediatrics
- ☒ Psychiatry/Behavioral Unit
- ☒ Rehabilitation
- ☒ Women's Health

Health Care Facilities

- ☒ Correction Unit
- ☒ Freestanding Emergency Department
- ☒ Main Campus
- ☒ Nursing Center(s)
- ☒ Outpatient Clinic(s)
- ☒ Outpatient Surgical Center
- ☒ Remote Campus
- ☒ Rural Health Clinic(s)
- ☒ Telehealth

ADDITIONAL SCOPE CLARIFICATION OR APPLICABILITY: ☒ **None** ☐ **Yes, see below:**

Printed copies are for reference only. Please refer to the electronic copy for the official version.

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Section 1: Statement of Policy

1.0 MUSC and MUSC Health (referred to collectively as “MUSC”) recognizes that social media can be an enjoyable and rewarding way to share your personal and professional life and opinions with people near and far. MUSC also recognizes the business benefits of using social media. Social media also presents certain risks and liabilities and therefore, carries certain responsibilities. To assist in making responsible decisions about personal use of social media, and to provide guidance for those MUSC staff expressly authorized to use MUSC social media (“Authorized Users”) for business purposes, MUSC has established this Social Media Policy and is providing clarification of MUSC roles/responsibilities for the posting of specific MUSC information.

Definitions:

1.1 For purposes of this policy, social media includes but is not limited to all social networking sites, blogs, discussion forums, collaborative information and publishing systems. These are hereinafter referred to as “social media.”

1.2. All employees, staff, faculty, students, trainees, care team members, volunteers, contract personnel, agents, vendors or other representatives of the MUSC enterprise are hereinafter referred to as “MUSC Community.”

Section 2: Purpose of this Policy

2.0 This Policy establishes standards for the use of MUSC-affiliated social media accounts and provides guidelines for Authorized Users who post on behalf of MUSC.

Additionally, this policy provides guidance on communicating in a professional and civil manner related to personal social media accounts to the extent that such activities are covered by existing MUSC policies.

Section 3: Policy Owner

3.0 If you have any questions about this Policy or specific MUSC Content on Social Media, please get in touch with the Office of Communications and Marketing (OCM)

Section 4: Policy/Procedures:

4.0 This policy applies to all members of the MUSC Community.

This policy applies to using social media when managing accounts affiliated with MUSC (“MUSC-affiliated Accounts”), as defined below, when the person’s affiliation with MUSC is identified, and may apply to members of the MUSC Community outside of work/class hours.

4.1 - Social media accounts representing or affiliated with MUSC

Any MUSC-affiliated account within the scope of an employee’s duties using an MUSC logo, links to a MUSC website, has MUSC in the name or is associated with any MUSC college,

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department, location, clinic, specialty, research initiative, clinical trial, laboratory, or affinity group must adhere to the following:

- i. Be created for a legitimate work-related reason,
 - ii. Obtain approval from the Chief of OCM (or a delegate socialmedia@musc.edu), and may consult with Legal BEFORE creating an account, when necessary. Once a request is submitted, reviews will endeavor to be completed within 30 days of submission. To request the creation of a new account, contact the Enterprise Social Media Manager at socialmedia@musc.edu.
 - iii. Provide OCM management of the account and passwords through existing social media management designated platforms.
- a) New MUSC-affiliated Accounts may not use the MUSC name or brand in any way without prior approval by OCM. Pre-existing accounts identified that have not been requested and approved may be required to close immediately at the discretion of OCM leaders.
 - b) It is preferred that MUSC-affiliated Accounts have a full-time MUSC employee (rather than a part-time employee, intern, graduate assistant, or student) who is identified as being primarily responsible for the content and management of the account ("Account Manager"). Interns, contractors or students may serve as co-Account Managers of approved accounts. For new accounts, once approved for access, log in and password information will be provided to the appropriate Authorized Users. Authorized Users are not to modify or change any login credentials without the express, prior approval from OCM. If an Authorized User leaves MUSC or no longer needs to access MUSC-owned social media channel(s), the account password(s) will be changed immediately upon their departure by OCM. For existing accounts, contact information for the Account Manager(s) and Authorized Users of the account must be provided to OCM along with log-in information. A member of OCM or the social media team must also be added as an Account Manager of all MUSC-affiliated accounts.
 - c) All Account Managers and users of approved MUSC-affiliated Accounts must complete MUSC's social media training found in OurDay. Email socialmedia@musc.edu to be registered for this training.
 - d) All approved MUSC-affiliated Accounts must adhere to the MUSC Brand Policy and its associated standards/guidelines, which are available on the MUSC Brand Center.
 - e) OCM will maintain a master list of MUSC-affiliated Accounts, including access, log in and password information. Social media channel access is given to Authorized Users on an as-needed basis.
 - f) Authorized Users are responsible for monitoring their MUSC-affiliated Accounts on a daily basis and for working with OCM to create escalation and risk-mitigation processes before launching your channel or posting. Authorized Users should ask OCM for risk mitigation best practices.
 - g) Authorized Users are those MUSC Community members expressly authorized to administer, post, and share on behalf of MUSC on MUSC-owned or MUSC-affiliated Accounts and monitor the commentary.

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- h) In order to publish commentary from a subject matter expert, you must secure approval of their quote prior to posting in the channel.
- i) Content may only be posted that is consistent with the subject matter or topical purposes for that specific account and/or aligned with strategic MUSC communications.
- j) MUSC-affiliated Accounts must respect intellectual property rights, federal Copyright law and MUSC policies. All content shared to an MUSC-affiliated Account must be owned, licensed, or otherwise authorized by the MUSC or the Authorized User(s) sharing the content.
- k) Anytime an individual is identifiable in an image, photo, video, prior consent is needed to post it. Therefore, Authorized Users are expected to obtain prior consent to use materials where the individual(s) is shown and is identifiable and one of the following two other conditions are met:
 - i. The image may be used for promotional or marketing purposes, or
 - ii. The individual(s) had a reasonable expectation of privacy at the time the photo or video is taken. **Note:** Typically, outdoor public areas and events do not require consent.
- l) Image-use permission (i.e., consent from the person in the photo) may be obtained by using the applicable MUSC consent forms maintained by OCM. Authorized Users should consult with OCM for guidance on any required permissions prior to posting.
- m) MUSC reserves the right to monitor, prohibit, restrict, suspend, or delete any branded social media site at any time, without notice and for any reason, and in its sole discretion.
- n) Where applicable, Institutional Review Board (IRB) approval must be obtained prior to posting or disseminating content.
- o) MUSC -MUSC-affiliated accounts may not be used to solicit minors, either explicitly or implicitly, for participation in research or clinical trials without parental consent and in accordance with policy.
- p) When posting on an MUSC-affiliated Account, content that is related to any confidential or proprietary information may not be published unless express, written permission has been granted by OCM.
- q) All paid advertising must be placed through OCM.
- r) Effective August 24, 2023, MUSC has blocked access to TikTok from any device utilizing MUSC's network. This includes the internal, MUSC Secure and Guest networks.

Violations of this policy may result in revocation of privileges as an Account Manager and Authorized User.

Section 5: MUSC Authorized Users and Social Media Engagement

5.0 MUSC respects First Amendment rights but will address online conduct that constitutes unprotected speech.

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5.1 MUSC Authorized users can be held responsible for posts on their personal sites and on the sites of others. In instances involving unprotected speech, such commentary that violates the Standards of Professional Behavior, Code of Conduct and/or MUSC policies may result in corrective and/or disciplinary action.

This policy is subject to change without notice. Each time a user accesses a social media networking site, this policy will govern usage, effective upon posting. By continuing to post any content after new terms are posted, members of the MUSC Community accept and agree to all such modifications to this policy.

5.2 Please be aware that this policy is not intended to replace other applicable MUSC policies. You should familiarize yourself with those policies that may have applicability to your activities online, including, but not limited to those listed in section 7.

5.3 MUSC Authorized users are expected to approach online interactions in the same way they approach interpersonal interactions – by using good judgment and common sense, by adhering to our values and by complying with our policies, procedures, and applicable laws and regulations.

5.4 Note that only Authorized Users (*see section 6*) may engage in social media on behalf of MUSC, subject to review and approval of such social media engagements by the appropriate MUSC stakeholders, as necessary. Any communication that appears to be made on behalf of MUSC by any MUSC Community member who is not an Authorized User should be reported immediately to OCM.

5.5 Each MUSC Authorized user is responsible for knowing and complying with these MUSC policies and must ensure that their respective personal social media activities are consistent with these policies.

Section 6: MUSC Community engaging in social media for personal use

6.0 MUSC Community members may not publish any content that is related to any confidential or proprietary information of MUSC. No protected health information content related to any MUSC patient or other confidential information may be published on a personal account. Please refer to the Patient Confidentiality Handbook for additional information.

6.1 MUSC Community members are encouraged to repost or share publicly available information, preferably from the original source, but should not announce official news about MUSC if not otherwise announced publicly.

6.2 In compliance with applicable state and federal laws, MUSC employees may not use the MUSC brand in their personal social media posts, including, but not limited to, referrals, lobbying and advertising/endorsements, without prior approval from OCM. This excludes all public events, if an event is open to the public and MUSC branding is visible, posts are acceptable.

6.3. Consider including a disclaimer in your profile, such as "Opinions are my own."

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Section 7. Resources/Related Policies

7.0 When engaging in any social media activity, MUSC Community members are governed by the same policies and laws that govern all other electronic communication, professionalism, workforce behavior, and conduct, including but not limited to:

- [ENT - Acceptable Use Policy \(E-IS-015\)](#)
 - [MUHA-HR #46 - Anti-Harassment \(Including Sexual Harassment\)](#)
 - [ENT - HIPAA Patient Confidentiality Handbook \(Compliance\)](#)
 - [Copyright](#)
 - [H.R.2281 - 105th Congress \(1997-1998\): **Digital Millennium Copyright Act** | Congress.gov | Library of Congress](#)
 - [Family Educational Rights and Privacy Act](#)
 - [ENT - Intellectual Property: Policies and Procedures \(E-FRD-002\)](#)
 - [MUSC Enterprise Brand \(E-COMM-002\)](#)
 - [ENT - Enterprise Conflict of Interest \(E-COI-001\)](#)
 - [ENT - Standards of Ethical Conduct \(E-COMP-001a\)](#)
 - [MUHA HR #12 - Standards of Professional Behavior - MUHA](#)
 - [U-HR-003 - Standards of Professional Behavior - University](#)
 - [ENT - Website Policy \(E-WP-002\)](#)
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Appendix A**Medical University of South Carolina (MUSC)/MUSC Health****Photography/Video Recording/Audio Recording Non-Patient Consent and Waiver**

THIS CONSENT FORM IS NOT AN AUTHORIZATION FOR THE RELEASE OF PROTECTED HEALTH INFORMATION (PHI). TO DISCLOSE PHI, A HIPAA COMPLIANT CONSENT FORM MUST BE USED. IF YOU HAVE A QUESTION ABOUT WHEN THIS FORM SHOULD BE USED OR NEED A PRINTED VERSION PLEASE REVIEW THE DOCUMENT POSTED AT <https://horseshoe.musc.edu/everyone/communications/resources> UNDER CONSENT FORM.

Date: _____

Program/event or college, department, or division name: _____

Dates _____ of _____ photo _____ shoot _____ or _____ recording: _____

MUSC _____ contact: _____

Participant _____ name: _____

Participant is: MUSC Student _____ Employee _____ Other: _____

Participant DOB if under 18: _____ / _____ / _____

Participant contact information:

Email: _____ Phone: _____

PLEASE READ THIS DOCUMENT CAREFULLY. It affects the rights you may have concerning MUSC/MUSC Health's use of any photographs, videos, images, voice recordings or recorded lectures or associated written content featuring you during the program identified above, and any prepared materials you provided to MUSC/MUSC Health for use related to the program identified above.

I, _____, hereby grant permission to MUSC/MUSC Health and its representatives and employees to take photographs or videos of me, to make recordings of my voice, and to obtain a transcript of my spoken or written words. I give MUSC/MUSC Health permission to use these images, recordings, and spoken or written comments, as well as my name, likeness, voice and biographical information (herein "Images") as follows:

1. To copy, reproduce, distribute, modify, display and perform the Images.

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2. To use the Images in composite or modified forms in any media, now known or later developed, including but not limited to publications, newspapers, television, radio, soundtrack recording, motion picture, filmstrip, still photograph, the Internet, social media or any transcript.
3. To use the Images for all purposes including but not limited to education, scientific research, treatment, informational, trade, advertising and promotion, without limitation, throughout the world and in perpetuity.

I authorize the use of these Images indefinitely without compensation to me and agree that MUSC/MUSC Health owns all rights to the Images. I waive the right to inspect or approve uses of the Images.

I hereby release MUSC/MUSC Health, its representatives, agents, employees, affiliates and assigns from any claims that may arise from the use of the Images, including claims of defamation, invasion of privacy, or rights of publicity or copyright. This release is binding on me, my heirs, assigns and estate, and represents the entire agreement between me and MUSC/MUSC Health regarding the matters herein.

I agree that MUSC/MUSC Health is not obligated to use any of the rights granted under this Agreement.

I (check one) _____ DO grant permission / _____ DO NOT grant permission for the use of my information and/or likeness as stated above by the Medical University of South Carolina / MUSC Health.

_____/_____/_____
Participant's signature Date

_____/_____/_____
Signature of parent/guardian if participant Date
is younger than 18 years old or unable to sign

If you do not consent to usage of your likeness, in addition to completing this form, please email photoconsent@muscd.edu.

If you opt out of signing the consent form, it is your responsibility to inform faculty or staff at the time of video-recordings or photography that you do not consent to be recorded or photographed.

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GUIDELINES FOR OBTAINING AND MAINTAINING PHOTO/VIDEO/AUDIO CONSENT

This document outlines how and when signed consent must be obtained when still images, videos, or audio are produced by faculty or staff of MUSC/MUSC Health for education, promotional, marketing, or other purposes.

When a signed consent form is not necessary

1. Consent is implied for faculty and employees of the Medical University. If faculty and staff wish not to appear in photos/videos/audio, it is that person's responsibility to inform the appropriate faculty or staff member at the time of the recording or photography that they wish not to appear.
2. Any event to which the public is welcome (i.e., graduation, most fundraisers).
3. Anyone appearing in any outdoor spaces on campus or places in which permission is not needed to enter.
4. Non-subjects appearing unintentionally in the background or any person whose identity is unclear or obscured.

When a signed consent form is necessary

MUSC Patients and Students

In general, signed consent forms are required if a student can be identified in publicly accessible photos/videos/audio, including photos/videos/audio shown or displayed in educational settings in which the student did not participate. The consent form for patients can be found above.

In most cases, students will sign an image consent form during matriculation, however, students may choose to opt out of signing the form during matriculation or at any time while a student at MUSC by emailing photoconsent@muscd.edu. If a student opts out of signing the consent form, it is the student's responsibility to inform faculty or staff at the time of video-recordings or photography that they do not consent to be recorded or photographed. In the event a student opts out of signing the form, alternate seating should be made available if feasible.

If a student has signed a consent form and later opts to withhold the public release of directory information as defined by FERPA (Family Educational Rights and Privacy Act), it is the student's responsibility to inform the appropriate faculty or staff member at the time of the recording or photography that they wish not to appear.

Digital or hard copies of signed consent forms or a record of the student's opting out of signing the consent form are held in the student's file and retained according to the program needs/ processes. All student and employee forms will be kept on file for three years or for as long as the Image is in use.

Non-affiliate of MUSC

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Written consents are required of any non-MUSC-affiliated subject appearing in any photos/video/audio, except in instances mentioned above. Consents for subjects who are minors must be signed by a parent or legal guardian.

In general, the person responsible for the project should store signed consents. Consent forms should be stored in either hardcopy or electronic format for as long as the media is used. A signed form should be on file before the photo/video/audio file is published.

If the photos/videos/audio produced can be used for multiple purposes within the college (i.e., promotional and educational purposes), the signed consent forms should be available and accessible to other faculty and staff within the college. In these cases, it is recommended that the photos/videos/audio files and signed consent forms be stored in digital form together in a college-restricted shared space.

Exterior and Interior Videotaping/Photography

Videotaping/photographing exteriors and interiors cannot disrupt MUSC activities.

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