



Conseil Cri de la santé et des services sociaux de la Baie James  
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Cree Board of Health and Social Services of James Bay

# SOCIAL MEDIA POLICY OF THE CREE BOARD OF HEALTH AND SOCIAL SERVICES OF JAMES BAY

**SUBMITTED TO THE MOSES-PETAWABANO ADVISORY COMMITTEE JUNE 3, 2016  
PRESENTED FOR ADOPTION AT THE CBHSSJB BOARD MEETING JUNE 14, 2016**

## **SOCIAL MEDIA POLICY OF THE CREE BOARD OF HEALTH AND SOCIAL SERVICES OF JAMES BAY**

### **1. REGULATORY FRAMEWORK**

1.1 This policy is consistent with, among others, the following laws and policies:

- Articles 3, 4, 5, 6 and 9 of the *Charter of Human Rights and Freedoms*, CQLR c C-12;
- *An Act Respecting Health Services and Social Services for Cree Native Persons*, CQLR c S-5;
- The *Archives Act*, CQLR c A-21.1;
- Articles 3, 35, 36, 1463, 2085 and 2088 of the *Civil Code of Québec*, CQLR c C-1991;
- The *Professional Code*, CQLR c C-26 and codes of conduct of professionals working within the Institution;
- The Code of Ethics of the CBHSSJB (Guide for Interveners and Users of the Pathways to 'Miyupimaatisiun');
- The Institution's Information Technology Policy;
- The Institution's Media Relations Policy.

### **2. POLICY STATEMENT**

2.1 This policy recognizes that Social Media are an established part of the communication landscape of the Cree communities of Eeyou Istchee, that Social Media have an important role to play in the communication strategy of all health and social services organizations, and that it is desirable that the Institution use Social Media wisely and well.

2.2 It is the aim of this policy to establish a fair balance between fundamental freedoms and rights on one hand, and obligations on the other hand, of those covered by this policy with respect to the use of Social Media inside and outside the Institution. Under the law, individuals have freedom of expression as well as a right to privacy. Furthermore, all those covered by this policy have rights as private citizens and, generally, as Users of the Cree Board of Health and Social Services of James Bay, while they also are bound by applicable laws and regulations, the Code of Ethics of the Institution, their respective professional codes and, in the case of employees, their duty of loyalty towards their employer.

2.3 The Institution has a duty to uphold Cree values and to promote Miyupimaatisiun in everything it does, including in its communications. Social Media communications must reflect the principles of respect, sincerity and accountability. Such communications must also be meaningful and thoughtful, and emphasize the importance of social well-being.

2.4 The Corporate Services Department is responsible for monitoring and regulating the use of Social Media for Professional Purposes by all those covered by this policy. Specific procedures and

guidelines are outlined in a separate document entitled “Guidelines for the Use of Social Media within the CBHSSJB”.

2.5 This policy does not attempt to regulate every aspect of social media use since existing laws, regulations, professional codes and policies that apply to other modes of expression and types of conduct also apply to Social Media use.

### **3. OBJECTIVES**

3.1 To reinforce awareness of applicable laws and codes of conduct governing the use of social media inside and outside the Institution by any person covered by this policy.

3.2 To establish principles for access to and appropriate use of Social Media for Professional Purposes by the Institution’s Authorized Persons.

### **4. APPLICATION**

4.1 This policy applies to all employees of the Institution. It also applies to members of the Board of Directors, consultants under professional service contracts, partners in research projects funded by the Institution, student interns, and volunteers.

4.2 The policy remains in force for six months following cessation of employment or the cessation of any other relationship with the Institution.

4.3 This policy does not address employees’ use of personal communication devices to access Social Media platforms for personal reasons during working hours, which is governed by human resources policies and applicable laws and regulations.

### **5. DEFINITIONS**

5.1 “Authorized Person” refers to a person who has been given permission by his/her supervisor or the Institution to use Social Media within the Institution for Professional Purposes.

5.2 “CPDP” refers to the Institution’s Council of Physicians, Dentists and Pharmacists.

5.3 “Confidential Information” refers to data or information to which only designated and Authorized Persons or entities have access. It also refers to strategic, financial and commercial information rightfully belonging to the Institution. In addition, it includes any information whose disclosure might harm a User, the Institution, a person covered by this policy or a member of the CPDP. It includes information that relates to a person and allows that person to be identified. It excludes all information that is public in nature in as much as it was legally and lawfully made public.

5.4 “Guidelines for the Use of Social Media within the CBHSSJB” refers to a document maintained by the Corporate Services Department that contains specific procedures and content guidelines governing the use of Social Media on behalf of the CBHSSJB by Authorized Persons.

5.5 “Institution” refers to the Cree Board of Health and Social Services of James Bay (CBHSSJB).

5.6 “Litigious Content” refers to:

- content that infringes on a person’s fundamental rights, particularly rights to privacy, dignity and reputation, and the confidentiality of personal information;
- content that discriminates based on race, colour, gender, pregnancy, sexual orientation, marital status, age, religion, political convictions, language, ethnic or national origin, social status, disability or use of any means to palliate a disability;
- content that is defamatory or that constitutes propaganda or hate speech (including but not limited to attacks, insults, threatening or obscene language, harassment, blackmail, degrading images);
- content that is rude, upsetting, insulting, hurtful, denigrating, disrespectful;
- unauthorized commercial or advertising content or spam designed to promote an idea, a service or a tangible or intangible good unrelated to the Institution’s mandate;
- anonymous or repetitive content;
- illegal content;
- misleading content; and
- content that includes Confidential Information.

5.7 “Media” refers to commercial or public print, broadcast and online Media in which the majority of content is created by professional journalists.

5.8 “Professional Purposes” refers to the use of Social Media by a person in connection with his/her employment, contract or other, being distinct from personal use of Social Media.

5.9 “Social Media” refers to websites, platforms and applications, including those of Media, that enable Users to create and share content or to participate in social networking.

5.10 “Institution’s Social Media Account” refers to an account, page, group or newsfeed created or administered by an Authorized Person on behalf of the CBHSSJB, as well as to blogs, User profiles, pages or groups associated with specific regional or local initiatives and programs carried out by other departments (e.g., public health campaigns, support groups, communities of practice and local activity pages).

5.11 “User” refers to any person receiving or having received health or social services from the Institution.

## **6. ROLES AND RESPONSIBILITIES**

6.1 The Institution's Board of Directors is responsible for

- i) approving this policy and all subsequent modifications and updates; and
- ii) ensuring compliance by board members.

6.2 The Coordinator of Communications within the Corporate Services Department

- i) maintains the present policy and the associated document Guidelines for the Use of Social Media within the CBHSSJB;
- ii) monitors Social Media use within the Institution to ensure compliance with the present policy;
- iii) assists the Director of Human Resources, managers and supervisors to correct any policy breaches that occur within their departments; and
- iv) conducts, in collaboration with the Director of Information Technology Resources, an annual review of Authorized Persons' permissions to use the Institution's Social Media accounts.

6.3 Director of Information Technology Resources:

- i) conducts, in collaboration with the Coordinator of Communications, an annual review of Authorized Persons' permissions to use the Institution's Social Media accounts.
- ii) restricts or authorizes access to Social Media accounts to those persons covered by this policy who use the Institution's equipment, software and network on behalf of the Institution; and
- iii) ensures that Authorized Persons have the tools and support required to carry out Social Media-related tasks.

6.4 Director of Human Resources:

- i) ensures that the orientation of new employees includes information about the appropriate use of Social Media, including the Code of Ethics of the CBHSSJB, this policy and the Media Relations Policy; and
- ii) applies, as necessary, administrative or disciplinary measures and supports managers in the application of these measures.

6.5 Managers:

- i) ensure that Social Media initiatives within their teams are managed appropriately;
- ii) designates those persons authorized to use Social Media in the Institution;

- iii) notify Corporate Services of new Social Media initiatives and changes to existing social media initiatives within their teams; and
- iv) apply, as necessary, disciplinary or administrative measures in coordination with the Director of Human Resources.

#### 6.6 Persons Authorized to Access the Institution's Social Media Accounts:

- i) adhere to the present policy and associated guidelines and ensure that content guidelines are followed by all Users within any Social Media accounts that they use on behalf of the Institution; and
- ii) intervene to remove problematic content or block Users who violate content guidelines.

### **7. PERSONAL USE OF SOCIAL MEDIA**

7.1 Persons covered by this policy have freedom of expression. They have the right to express opinions about their work and the Institution on Social Media.

7.2 Even in their personal use of Social Media, however, they must follow the provisions of this section and of this policy.

7.3 Persons covered by this policy must respect the User's confidentiality at all times. It is forbidden to share information on Social Media concerning any User, or information that may permit a User to be identified directly or indirectly, without the User's prior explicit or implicit consent.

7.4 Persons covered by this policy are not permitted to communicate or disseminate Litigious Content about or directed towards the Institution or its mission, those persons covered by this policy or members of the CPDP.

7.5 Persons covered by this policy are not permitted to communicate or disseminate information on behalf of the Institution without authorization. If in doubt, the person must ask for clarification from his/her supervisor or obtain proper authorizations as the case may be.

7.6 When persons covered by this policy make statements on Social Media platforms about subjects related to the Institution's mission, they are encouraged to specify that their opinions are their own and that they do not speak for the Institution.

7.7 Persons covered by this policy should be mindful of the Institution's duty of care and should refrain from using Social Media to perpetuate misinformation about health matters or promote practices that are contrary to the Institution's mission.

7.8 Persons covered by this policy must use the appropriate internal processes for any issues regarding the Institution or its mission, a person covered by this policy or a member of the CPDP.

## **8. PROFESSIONAL USE OF SOCIAL MEDIA**

8.1 Social Media are increasingly used within the Institution as a strategic tool to support local and regional awareness efforts, and to facilitate communication among Users in public or private groups. Both public and private communication using Social Media are covered by this policy.

8.2 In general, Social Media platforms are not accessible from the Institution's information technology network. However, Authorized Persons may have access to a designated terminal and/or they may be provided with a mobile device in order to perform tasks such as posting content and moderating comments.

8.4 Authorized Persons must:

- a. be authorized according to this policy;
- b. follow the Guidelines for the Use of Social Media within the CBHSSJB; and
- c. agree to respect the Terms of Use of the Social Media platforms.

## **9. PAID ADVERTISING**

9.1 The Corporate Services Department must approve any use of the Institution's funds to promote or increase the visibility of content on Social Media.

9.2 As the use of CBHSSJB funds to promote or increase the visibility of content on Social Media platforms is considered paid advertising, such use must respect the guidelines established by the Media Relations Policy for paid advertising, including the requirement that the content be reviewed by the Corporate Services Department before publication.

9.3 Personal credit cards and debit cards may not be used for the purpose of promoting or increasing the visibility of content created in the context of professional use of Social Media.

## **10. SANCTIONS FOR BREACH OF POLICY**

10.1 Any person covered by this policy who then breaches any of its provisions is subject to administrative or disciplinary measures up to and including dismissal, depending on the context of the breach, without limiting any other recourse that could be available to the Institution.

**11. MISCELLANEOUS**

11.1 The Corporate Services Department, in collaboration with the Coordinator of Communications, will prepare an annual report on the application of this policy to be presented to the Institution's Board.

11.2 This policy shall be subject to review by the Board every three years.