REDEEMERS HEALTH VILLAGE

Human Resources Department

SOCIAL MEDIA & DIGITAL COMMUNICATION POLICY

Policy Code: HR-POL-032

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Date Approved:	—		

Relevant Standards

- Nigeria Data Protection Act (NDPA) 2023
- Cybercrimes (Prohibition, Prevention, Etc.) Act 2015 (Nigeria)
- Labour Act of Nigeria (Cap L1 LFN 2004)
- MDCN Ethical Guidelines on Social Media
- RHV Data Protection & Privacy Policy (HR-POL-024)
- RHV Code of Professional Conduct (HR-POL-023)
- RHV Disciplinary Action Policy (HR-POL-003)
- RHV External Communications & Escalation Policy (HR-POL-015)

Amendment History

Issue	Status	Date	Reason for Change	Authorised
1	Draft	April 28, 2026	New Policy — Board Submission	CHRO
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3				

1. Purpose

Social media and digital communication tools have transformed how healthcare professionals connect, learn, and communicate. Used responsibly, they are powerful tools for professional development, community health education, and institutional visibility. Used carelessly or irresponsibly in a healthcare context, they can destroy patient trust, violate legally protected privacy, damage professional reputations, and expose both individual employees and RHV to serious legal and regulatory consequences.

This policy establishes clear, practical guidelines for the use of social media and digital communication channels by all persons associated with RHV — both in their official institutional capacity and in their personal lives where their conduct intersects with their role at RHV. It is built on a simple principle: the same professional standards that govern your conduct in the hospital govern your conduct online.

2. Scope

This policy applies to all employees (full-time, part-time, temporary, locum, and contract), volunteers, students, and contractors associated with RHV. It covers all social media and digital communication platforms and channels, including but not limited to:

- Social networks: Facebook, Instagram, LinkedIn, X (formerly Twitter), TikTok, Snapchat, YouTube, and any emerging platforms
- Messaging applications: WhatsApp, Telegram, Signal, iMessage, and all group messaging platforms
- Blogs, vlogs, podcasts, and personal websites
- Online forums, discussion groups, and professional networks
- Email — both official RHV accounts and personal email used for work-related communication
- Any other digital channel through which communication occurs in a professional or semi-professional context

This policy applies both to communications made using RHV systems and devices and to communications made using personal devices and accounts, where those communications relate to or have the potential to affect RHV, its patients, its staff, or its reputation.

3. Official RHV Social Media

3.1 Authorised Accounts Only

RHV's official presence on social media is managed exclusively by designated, authorised personnel approved by the CEO. No employee may create a social media account, page, group, channel, or profile that purports to represent RHV — in whole or in part — without prior written approval from the CEO and HR. Unauthorised accounts that appear to represent RHV will be required to be deactivated immediately.

3.2 Approved Content

All content posted on RHV's official social media channels must be: accurate and factual; professionally presented and consistent with RHV's brand identity and values; approved through RHV's content review process before publication; free of any patient-identifiable information; and compliant with all applicable laws, including copyright and data protection.

3.3 Media Enquiries

Enquiries from journalists, media organisations, or influencers received through RHV's official social media accounts must be referred immediately to the CEO or designated spokesperson. Authorised social media managers must not respond substantively to media enquiries without CEO approval. This is governed by the RHV External Communications and Escalation Policy (HR-POL-015).

4. Personal Social Media Use — Absolute Prohibitions

The following are strictly prohibited for all persons covered by this policy, at all times and on all platforms, regardless of privacy settings. These prohibitions apply during and outside of working hours:

4.1 Patient Information

- Sharing, discussing, referencing, or alluding to any patient including their identity, diagnosis, treatment, appearance, behaviour, or outcome on any social media platform or digital channel, whether or not the patient is identified by name.
- Posting photographs, videos, audio recordings, or screenshots of patients, patient care areas, patient records, or any clinical scenario involving a real patient, with or without the patient's apparent consent. Consent given by a patient does not override RHV's institutional prohibition or Nigerian data protection law.
- Sharing any clinical case detail even anonymised where there is a reasonable possibility that the patient could be identified from the combination of details provided.

4.2 Confidential RHV Information

- Sharing internal RHV communications, meeting notes, financial information, strategic plans, HR matters, or disciplinary proceedings on any social media or messaging platform.
- Posting photographs of internal areas of RHV (wards, theatres, clinical areas, administrative offices) that reveal identifiable patient, staff, or operational information.
- Discussing ongoing investigations, complaints, litigation, or regulatory matters involving RHV in any public or semi-public digital forum.

4.3 Conduct Damaging to RHV

- Posting, sharing, or endorsing content that is defamatory, disparaging, misleading, or false about RHV, its management, its services, its staff, or its patients.
- Sharing content including by resharing or reposting that misrepresents RHV's position on any clinical, ethical, or institutional matter.

4.4 Conduct Damaging to Colleagues

- Posting, sharing, or endorsing content that harasses, bullies, defames, ridicules, or discriminates against any current or former RHV employee, student, volunteer, or contractor.
- Recording or sharing recordings of colleagues — video, audio, or photographic without their express consent, in any professional or work-related context.

4.5 Medical Misinformation

- Publishing or sharing medical or health information in a personal capacity that contradicts established clinical evidence, promotes unproven treatments, or could endanger the health of the public — particularly where the employee's RHV affiliation, explicitly or implicitly, lends the content professional credibility it does not merit.

5. Personal Social Media Use — Standards and Guidance

5.1 You Remain a Professional Online

RHV does not seek to control employees' personal social media expression beyond what is necessary to protect patients, colleagues, and the institution. However, employees are healthcare professionals, and the public holds them to a higher standard — online and offline. Employees should conduct themselves on social media as they would in a professional setting, even when posting in a personal capacity. A post made at 11pm on a personal account is not meaningfully different, in terms of its potential consequences, from a statement made in a clinical corridor.

5.2 Identifying Your RHV Affiliation

Where an employee identifies themselves as a healthcare professional or mentions their employment at RHV on a personal social media account, they must ensure that their personal views are clearly distinguished from any institutional position. Where relevant, employees should include a clear disclaimer such as: 'Views expressed here are my own and do not represent the views of Redeemers Health Village.' This disclaimer does not, however, provide protection for content that otherwise violates this policy.

5.3 Professional Development Use

RHV actively supports the use of professional social media networks (particularly LinkedIn) for legitimate professional development, networking, and continuing education. Employees are encouraged to participate in professional online communities, share published clinical literature, and engage constructively in evidence-based health discussions — provided this is done in a manner consistent with this policy and their professional code of ethics.

5.4 Messaging Applications in Clinical Settings

The use of informal messaging applications (including WhatsApp) for clinical communication — including handover, clinical decision-making, sharing of investigation results, or discussion of patient care — is permitted at RHV only where: the communication occurs within a specifically designated, access-controlled clinical group managed by the Head of Department; no patient-identifiable information beyond what is operationally necessary is shared; and the communication is not used as a substitute for formal clinical documentation in the patient's record. Clinical decisions made or communicated via messaging apps must be recorded in the patient's formal clinical record without delay. Personal messaging groups must not be used for any clinical communication.

6. During Working Hours

- Personal social media use on personal devices during working hours is restricted to designated break periods. Use of social media during active clinical duties — including at the nursing station, in consultation rooms, in theatre, or at the bedside — is prohibited.
- Use of RHV-owned devices for personal social media browsing or posting is prohibited at all times.
- RHV reserves the right to monitor use of RHV-owned systems and devices, including email and internet access, for legitimate security and compliance purposes, in accordance with the NDPA 2023.

7. Reporting Concerns

All employees are expected to take responsibility for the digital culture at RHV. If you become aware that a colleague has posted content that violates this policy — particularly involving patient information — you must report it immediately to HR or through the RHV Whistleblowing channel (HR-POL-021). Do not engage with, share, or comment on the content. HR will assess the report and determine the appropriate response, which may include requesting immediate removal of the content, regulatory notification, and disciplinary action. Employees who report concerns in good faith are fully protected from retaliation.

8. Content Removal

Where an employee becomes aware that they have posted content that violates this policy, they must: remove the content immediately; notify HR within 24 hours; and provide HR with a full account of what was posted, where, for how long, and whether it was shared or engaged with by others. Voluntary and prompt disclosure will be considered as a mitigating factor in any disciplinary assessment. Delay or concealment will be treated as an aggravating factor.

9. Consequences of Violation

Violations of this policy will be assessed under the RHV Disciplinary Action Policy (HR-POL-003). The severity of the sanction will reflect the nature of the breach, the harm caused or risked, the employee's seniority and the expectations attaching to it, and whether the employee disclosed promptly or sought to conceal.

- Minor violation (e.g., posting an RHV image without sensitive content, isolated use of personal phone during working hours): verbal warning and mandatory refresher training on this policy.
- Moderate violation (e.g., sharing internal RHV information, making disparaging comments about a colleague): formal written warning, mandatory training, and restriction of access to institutional systems where warranted.
- Serious violation (e.g., sharing patient-identifiable information, posting content that brings RHV into disrepute, medical misinformation with RHV affiliation): disciplinary action up to dismissal, notification to the relevant professional regulatory body, and — where applicable — notification to the Nigeria Data Protection Commission and/or law enforcement.

Under the Nigerian Cybercrimes Act 2015, certain forms of harmful online communication are criminal offences. RHV will cooperate fully with law enforcement in any investigation arising from an employee's digital conduct.

10. Training and Awareness

This policy is communicated to all new employees during induction. Annual awareness training — covering patient confidentiality online, professional digital conduct, and the specific risks of clinical social media use — is mandatory for all staff. Clinical staff receive additional guidance relevant to their professional regulatory obligations in respect of online conduct (MDCN, NMCN, PCN ethical guidelines). Training completion is recorded in the HR system.

11. Monitoring and Review

HR reserves the right to review publicly accessible social media content where a complaint or concern has been received relating to an employee's digital conduct. HR does not conduct routine monitoring of employees' personal social media. This policy is reviewed annually by the CHRO and updated to reflect changes in platforms, Nigerian law, professional regulatory guidance, and institutional experience.