

TITLE COMMUNICATIONS (INTERNAL AND EXTERNAL)	POLICY # CF-01
	SUBCLASSIFICATION N/A
PARENT BOARD PRINCIPLE / POLICY SUITE Governance / Corporate Accountability and Financial Stewardship	ESTABLISHED June 24, 2009
APPROVING AUTHORITY Alberta Health Services Board	APPROVED REVISION August 26, 2010
POLICY SPONSOR Alberta Health Services Board / Senior Executive / Communications	NEXT REVIEW August 26, 2013

If you have any questions or comments regarding the information in this policy, please contact the Corporate Policy Department at corporatpolicy@albertahealthservices.ca.

PURPOSE

- To ensure Alberta Health Services' ("AHS") internal and external communications are consistent with key AHS documents, such as Strategic Direction 2009-2012 and the Code of Conduct.
- To foster and support engagement, consultation, open communication, and ensure transparency when AHS employees are speaking:
 - on behalf of AHS;
 - as an AHS employee expressing a private opinion;
 - as a patient advocate; and
 - as a member of a profession or organization expressing an opinion on behalf of that professional group or organization.

POLICY STATEMENT

AHS is committed to accessible, accountable, and transparent communication with employees, physicians, the public, the media, and other stakeholders. Communications, by or on behalf of AHS, shall be open, respectful of individual and corporate privacy and confidentiality obligations and comply with the AHS Code of Conduct, Strategic Directions, bylaws and policies, and applicable legislation.

Communication on behalf of AHS, whether internal or external, shall consistently and accurately reflect AHS' mission, goals, values, principles, mandate, strategic direction, and visual identity. A variety of means, methods, and formats shall be used to effectively meet the communication needs of diverse audiences. AHS subject-matter experts may be asked to speak in an official capacity on behalf of AHS.



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APPLICABILITY

Members of the Board, AHS employees, members of the medical and other professional staffs, students, volunteers, Health Advisory Councils, Health Foundations and/or Trusts, and other persons acting on behalf of AHS in an official capacity shall comply with this policy.

POLICY ELEMENTS

1. Responsibilities

- 1.1 AHS Communications shall develop and maintain internal and external communication strategies in consultation with executive leadership.
- 1.2 All individuals or groups shall ensure any use or distribution of copyright-protected content complies with relevant copyright legislation, regulations, and AHS policies.

2. Communications

- 2.1 AHS Communications is the primary point of contact for media requests for comments made on behalf of AHS, including requests related to AHS policies, decisions and positions. Requests for comments on behalf of AHS are directed by AHS Communications to the most appropriate department or individual. In this context and when speaking on behalf of AHS, communications shall be coordinated to provide cohesiveness and consistency within and among AHS departments, divisions, programs, and stakeholder groups.

2.2 Communicating Private Views and Opinions

Consistent with the values in the Strategic Directions document and the principles in the Code of Conduct, AHS does not regulate, restrict, or direct the private or personal views or opinions of individuals. This includes individuals speaking on behalf of a profession or organization. When making public comment, it is the responsibility of the individual to clearly indicate when the comments are being made in an official capacity on behalf of AHS, or alternatively, when the comments are personal or private views and opinions or on behalf of an organization or profession. Having made this distinction, employees and physicians can speak in either capacity.

3. Patient Advocacy

Patient advocacy is one of the most important ways in which health care can be improved. AHS stands behind physicians and other health care providers who advocate on behalf of his or her patients. Communication is expected to be fair, transparent, accountable, professional, and consistent with the Code of Conduct.

4. Speaking in an Official Capacity on Behalf of AHS

- 4.1 Individuals authorized to speak on behalf of AHS have a duty to the organization not to make public statements that would put them in a conflict of interest with AHS. Conflict of

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interest can include unauthorized disclosure of confidential information or public statements adverse to AHS. AHS individuals speaking in leadership roles or on behalf of AHS have a duty to the organization not to make public comments that are, or may be, prejudicial to AHS.

- 4.2 In addition, all individuals, whether speaking in an AHS official capacity or not shall not disclose unauthorized confidential information.

5. Duty of Fidelity

- 5.1 An employee's "duty of fidelity" is also referred to as their duty of loyalty to their employer and refers to the obligation of an employee to serve the employer honestly and faithfully. This duty is an implied term of an employment contract.
- 5.2 When speaking in their role as administrators and leaders, employees are expected to communicate the position of AHS. Speaking in this capacity, an employee is expected to act in good faith toward AHS, be loyal to AHS and to exercise discretion in communicating information, judgements and beliefs about AHS and should not make public statements adverse to the interests of AHS.
- 5.3 All employees should employ internal mechanisms designed to help them address concerns and issues. This includes communication and consultation with supervisors, senior AHS officials, Human Resources, and appropriate policy advisors including the Office of Ethics and Compliance. In addition, those who are subject to collective agreements may find mechanisms specific to their collective agreements that can help address their concerns or issues.
- 5.4 The duty of fidelity does not impose a ban or suppress an individual from making comments in the best interests of the public including, but not limited to, safety, security, or evidence of wrongdoing as guided by the AHS Safe Disclosure policy (#EC-01).
- 5.5 As noted in the Policy Statement, consistent with the AHS Code of Conduct, public comments made by AHS employees must:
- a) be reasonable, responsible, accurate, and consistent with the principles of the AHS Code of Conduct and the values of the AHS Strategic Directions document including respect, accountability, transparency, and engagement;
 - b) uphold the integrity and obligations of relationships with the individual, his/her colleagues, and AHS;
 - c) meet legal and ethical principles as well as professional standards;
 - d) respect the integrity of opposing viewpoints;
 - e) strictly protect the health and personal information of AHS patients, staff, physicians and other individuals; and
 - f) strictly protect and maintain the confidentiality of information (such as, but not limited to, financial information, personal information, statistical information, corporate or business information and the information AHS receives from its business partners,

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suppliers and other third parties) that are protected by confidentiality obligations found in contracts, legislation, professional guidelines, and elsewhere.

6. Media

- 6.1 Media inquires and requests for comment on behalf of AHS shall be directed to and coordinated through the AHS Communications department.
- 6.2 The on-call number for communications for Edmonton and the North are 780-445-3866, and for Central Alberta, Calgary and the South, 403-804-6469.
- 6.3 External communication and media requests for information and interviews shall be responded to in a timely, fair, and equitable manner and in compliance with relevant AHS bylaws and policies and any applicable legislation.

7. Corporate Visual Identity

Use of the AHS logo, name, design, and presentation shall comply with the AHS Visual Identity Standards or have the approval of AHS Communications.

8. Health-Related Education Information

- 8.1 Information shall be provided to assist the public, stakeholders, and delivery partners to understand AHS' goals, programs, services, and plans for delivery of quality patient care, in accordance with applicable legislation and AHS policies.
- 8.2 Health-related educational material, provided by or through AHS, shall be from reliable sources.

REFERENCES

- AHS Code of Conduct
- AHS Strategic Direction 2009-2012
- AHS Bylaws and Policies:
 - Conflict of Interest Bylaw
 - Medical Staff Bylaws
 - Safe Disclosure (#EC-01)
 - Information Technology Acceptable Use (#IM-06)
 - Protection and Privacy of Health and Personal Information (#IM-05)
- AHS Visual Identity Standards
- *Canadian Charter of Rights and Freedoms* (Canada)
- *Freedom of Information and Protection of Privacy Act* (Alberta)
- *Health Information Act* (Alberta)

REVISIONS

August 26, 2010