



## Standards of Conduct, Privacy and Data Security Information For Volunteers



### THE DIGNITY HEALTH INTEGRITY PROGRAM

Dignity Health is committed to the highest standards of business ethics and integrity. Employees, **volunteers**, medical staff members, and contractors are expected to always conduct themselves in a manner that reflects integrity, and shows respect and concern for others. Dignity Health also expects employees, supervisors, vendors, volunteers, and medical staff members will treat one another with dignity, respect and courtesy. All of us as citizens, employees or volunteer caregivers have a duty to adhere to rules and laws each day. At Dignity Health we require that our **volunteers**, employees and physicians understand and comply with all state/federal laws aimed at preventing fraud and abuse. Dignity Health's unique heritage and values demand higher Standards of Conduct, which are provided in our Integrity Program.

#### Personal Responsibilities

As a **volunteer** in a Dignity Health facility, you will be expected to know and follow our Standards of Conduct:

**Ethical Conduct** - You must represent Dignity Health accurately and honestly, deal fairly with its competitors, customers, and vendors.

**Honest Communication** - Dignity Health staff are expected to communicate with candor and honesty in performing their job assignment responsibilities.

**Misappropriation of Proprietary Information** - Dignity Health workers must not steal or misappropriate confidential or proprietary information belong to another person or entity.

**Confidential Information – Volunteers** must not disclose confidential patient or business related information to unauthorized persons.

**Report Violations** - It is the responsibility of every member of the workforce to report suspected violations of the Standards of Conduct, a breach of privacy or data security, applicable regulations or Dignity Health policy.

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#### Compliance and Ethics

We sincerely appreciate your contribution to Dignity Health. Dignity Health has a long and proud history of living our values. Maintaining an ethical culture is an obligation that each one of us shares.

Each day, as you go about your work, we ask that you:

- Take responsibility for your own actions;
- Know and comply with applicable laws and rules, including applicable Federal health care program requirements, the Dignity Health Standards of Conduct and Dignity Health policies and procedures as they apply to your particular **volunteer** assignment responsibilities;
- Seek guidance provided in the Dignity Health “Integrity Program: Standards of Conduct” booklet and/or policies when in doubt about your responsibilities;
- Refrain from involvement in illegal, unethical or other improper acts or any activity intended to defraud anyone of money, property or services;
- Promptly report any potential or suspected violation of the Dignity Health Standards of Conduct, Dignity Health policy or applicable laws or regulations;
- When requested, assist Dignity Health personnel and authorized outside personnel in investigating all allegations of violations.



In accordance with the Health Insurance Portability and Accountability Act (HIPAA) and other federal and state privacy and data security regulations, Dignity Health maintains a high level of privacy and data security in all aspects of our facilities. Protecting our patients' privacy and the security of their personal information is an essential part of the care we provide, and is the responsibility of all Dignity Health employees, **volunteers**, physicians, business associates, and vendors.

**Privacy & Confidentiality**

Our patients have both legal and ethical rights concerning the privacy and confidentiality of their Protected Health Information (PHI). As a volunteer at our facility, you may encounter PHI or other confidential information.

PHI includes any private information that may identify the patient, including a patient's name, medical record number, phone number, address, date of birth, financial records, social security number, insurance card, X-ray, test results, facility patient directory, identification bracelet, prescription label, etc. All PHI must be safeguarded whether it is written on paper, spoken, heard, or stored electronically.

PHI can not be accessed by any employee, **volunteer**, or physician unless they have a legitimate business purpose and require the information to do their job (e.g. treatment, payment or healthcare operations). Under no circumstances, discuss any patient PHI you have accessed with other staff members, unless the information is necessary for their jobs. If it is necessary to discuss PHI, do so in a private setting and not in public places such as hallways, elevators, or the cafeteria.

You cannot access your own PHI or that of any member of your family without completing the proper authorization procedures. Inappropriate access to PHI will result in disciplinary action according to Dignity Health policies.

**Data Security**

Dignity Health computer network access is a privilege granted to users to facilitate the performance of Dignity Health business. Computer network users should have no expectation of privacy when using Dignity Health resources. The contents and history of all user computer network activity is the property of Dignity Health. User responsibilities are covered in the Network Usage Policy (NUP) that every network user must read and sign. Dignity Health regularly monitors user activity. Any content that a user creates or receives via the Dignity Health network is not private or personal. This includes E-mail, web browsing, Instant Messages (IM), or any computer network program activity.

Never post confidential information nor use a cell phone to take a photo of a patient and post it on a Social Media site (Facebook, MySpace, Twitter, etc.) or anywhere else on the Internet. Even if no name is attached, it is inappropriate and violates our policies to reveal patient images or confidential information in public or on the Internet.

Dignity Health policies address what information may be shared with authorized individuals and how permission is obtained from the patient or guardian. If you need additional information on Dignity Health policies and procedures contact your supervisor or **volunteer** coordinator.

**Penalties for Privacy or Data Security Violations**

A violation of federal or state regulations or Dignity Health policy can result in discipline, fines or imprisonment. Both federal and state privacy laws carry criminal penalties, including fines and possible prison time for violations. Dignity Health would consider a willful breach of privacy or data security as being outside the scope of your volunteer assignment duties and would not defend you.

It is the responsibility of every member of the workforce to report suspected violations of the Standards of Conduct, a breach of privacy or data security, applicable regulations, or Dignity Health policy. Reporting these concerns helps Dignity Health promptly determine whether conduct is proper and to correct problems quickly.

Dignity Health has established the Dignity Health Hotline at **1-800-938-0031** for use by staff members to ask questions or report potential or suspected violations. The Hotline is accessible 24 hours per day, seven days a week. All reports will be taken seriously, reviewed, and investigated promptly and, to the extent possible, be treated in a confidential manner.

Any Dignity Health staff member or **volunteer** may make a Hotline report anonymously. You should also understand that in a follow-up review of the report, the reporter's identity may be learned as a natural consequence of an investigation.

If you have questions or want to report a potential or suspected violation, you are encouraged to first speak with your immediate supervisor. If you do not feel you can candidly discuss an issue with your supervisor, you may contact the Volunteer Services Department staff for matters relating to your assignment or the Facility Compliance Liaison for other concerns. If you are not comfortable speaking to the Volunteer Services Department staff or Facility Compliance Liaison, you may call the Dignity Health Hotline at **1-800-938-0031**.

Retaliation against any person who, in good faith, reports potential or suspected violations is unlawful and will not be tolerated.

