

responsibility

*respect*

trust

ETHICAL STANDARDS

act with **integrity**

A Guide to

# Ethical Standards

at Partners HealthCare System



FOUNDED BY BRIGHAM AND WOMEN'S HOSPITAL  
AND MASSACHUSETTS GENERAL HOSPITAL





## *Ethical Principles*

Partners is committed to fair and respectful treatment of all employees.

EMPLOYMENT STANDARD

Partners is committed to creating and preserving truthful and correct business records.

CREATING & PRESERVING RECORDS STANDARD

Partners recognizes the important role a safe and healthy physical environment plays in promoting human wellbeing and is committed to the practice of health care that conserves natural resources and is non-polluting.

SAFETY & THE ENVIRONMENT STANDARD

Partners is committed to acting as a responsible steward of the financial resources we receive to support our mission. We use these resources to accomplish the greatest public good.

FINANCIAL STANDARD

Ethics and integrity are essential to the advancement of scientific knowledge. Partners is committed to conducting research in accordance with the highest professional, ethical and legal standards.

RESEARCH STANDARD

Partners is committed to providing the right care, safely and skillfully delivered to all our patients.

PATIENT CARE STANDARD

Partners is committed to carefully managing relationships with outside individuals and organizations to avoid either real or perceived bias in the conduct of our patient care, research and educational activities.

MANAGING CONFLICTS STANDARD

Partners is committed to transparent, truthful, responsive and clear communications.

PUBLIC COMMUNICATIONS STANDARD

Partners is committed to protecting the privacy and security of confidential information entrusted to us by our patients, employees and other members of our community.

SAFEGUARDING CONFIDENTIAL INFORMATION STANDARD

For generations our patients, our employees and our larger community have been able to count on us as we have considered thoughtfully the implications and context of the decisions we make.



David F. Torchiana, MD  
*President and  
Chief Executive Officer  
Partners HealthCare*

Partners HealthCare is a community of talented and dedicated women and men who support our hospitals each day in order to make care better for our patients. As an organization, we regularly examine new ways to improve the care we provide, we are committed to training the next generation of caregivers and leaders, and we push the boundaries of science to find the cures and treatments of tomorrow.

Partners can also take great pride in our long history of ethical leadership. For generations our patients, our employees and our larger community have been able to count on us to make careful decisions. We hold ourselves to the highest standards because we believe transparent, ethical behavior is the core of our mission. As members of the Partners community, it is our job to build on this proud tradition. Please read this guide carefully; in it you will find the standards that will help direct your work.

Integrity is at the heart of what we do. Thank you for your commitment to the trust that is placed in us by our patients, their families and the communities we serve.

*David Torchiana*

# Why Should You Read This Booklet?

**T**his *Guide to Ethical Standards* will introduce you to principles that you are expected to follow as a member of the Partners HealthCare System community. These principles apply to you if you are a board member, officer, employee, provider, volunteer or an agent acting on behalf of our organization.

Not every ethical or policy question you may have will be answered here — but you will discover advice on finding specific answers you need as well as general principles of conduct to guide you in considering how best to handle situations where there may not be a specific rule, policy or procedure.

Partners depends on each individual to make our shared commitment to high ethical and legal standards come to life. The trust and respect of our patients and our community has been built by repeated acts of integrity by individuals within Partners and our member institutions over many years. Regardless of your role, you are responsible for protecting and adding to this long and proud tradition.

If you have questions about these principles or how to apply them to a particular situation, please contact your supervisor or the Compliance, Audit & Business Integrity Department.

respect

ETHICAL STANDARDS

responsibility

trust

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Throughout this Guide, you will find [Learn More](#) sections with suggestions of policies or people to provide you with a deeper understanding of our Ethical Standards. Partners policies can be found online on Partners Pulse or through Partners Applications. Information on how to find institution specific policies can also be found through Partners Applications or the institution intranet site.

# Your Ethical Responsibilities



The standards and expectations included in this booklet apply to all board members, officers, employees, providers, volunteers and agents acting on behalf of our organization. Each of us is responsible for understanding the ethical standards, policies and procedures related to our role.

- For employees, adherence to these standards is a condition of employment. Partners considers your actions under these standards to be a significant reflection of your judgment and competence; your knowledge of and compliance with them will constitute an important element of your annual performance evaluation.
- Individuals in non-employee roles should be aware that applying the ethical, legal and policy rules in your role is essential to your effectiveness and your continued participation in our organization.

If you are unsure about policies, legal requirements, or ethical standards applying to your work, you are expected to ask for the clarification you need. Don't guess if you are unfamiliar with standards or laws — answers and consultation are available to you. Don't ignore your own good judgment about what is right and wrong.

## Special Responsibilities of Leaders and Supervisors

If you supervise others, Partners expects that you will both model and teach high ethical standards. You represent our organization to those you lead. If your staff do not see that working with integrity is important to you, it will be difficult for them to believe that ethical standards matter to our organization as a whole. One of your key leadership responsibilities is to inspire those around you to deliver results with integrity. In order to do this you must:

- Help those who report to you understand the legal and ethical standards that apply to their work.
- Model ethical decision-making by explicitly asking: "Is this the right thing to do?" "Did you check this against our standards and policies?"
- Create an open environment to aid and support others so they can raise compliance questions without hesitation.
- Listen carefully and act on the integrity concerns raised by those who report to you.

Partners has a **firm policy prohibiting retaliation of any kind**. Any person who violates this policy will be subject to corrective action.

## Duty to Report

Any individual working for or acting on behalf of Partners is expected to notice and report any internal problem that violates our standards so it can be corrected. You may not remain silent if you see or know about a problem. This duty to report is both a right and an obligation for all members of our organization.

You may choose to report concerns to your local Compliance Department, Compliance, Audit and Business Integrity, your supervisor or the department you believe can best correct the problem. However, if you have identified a possible instance of wrongdoing that could put Partners or Partners' reputation at risk, you or your supervisor should always report the issue to your local Compliance Department or Compliance, Audit and Business Integrity.

## Non-Retaliation Standard

Partners understands that individuals sometimes may be reluctant to voice their concerns due to a fear of retaliation. Management action that would deter a reasonable individual from making a report, even if it does not cause the reporter direct economic harm, may constitute retaliation. Whether obvious or subtle, such actions taken against an individual who has raised a good faith concern or cooperated in an investigation will not be tolerated at Partners. Not only is it against Partners policy to retaliate against those who report concerns, it is also illegal under both state and federal law.

Learn More

- Policy on Reporting, Investigation, and Resolution of Compliance Issues
- Non-Retaliation Policy
- Fraud and Abuse Reporting Policy
- Human Resources Labor and Employee Relations Staff
- Local Compliance Department or Compliance, Audit & Business Integrity Department



# The Compliance, Audit & Business Integrity Department

Partners has established a Compliance, Audit & Business Integrity Department to assist all members of our organization with understanding and meeting their ethical, legal, and regulatory responsibilities. This department's responsibilities include education, investigation, and consultation with all members of the Partners community, including management and board leaders.

The Compliance, Audit & Business Integrity Department serves as an independent resource for any members of the Partners community who need to raise concerns or reports of wrongdoing to the highest levels of our organization. Partners Chief Compliance Officer regularly updates senior management and reports to the Partners Audit & Compliance Committee to insure that leaders are aware of ethical and compliance issues. Compliance Officers at each Partners institution also maintain close communication with their site leadership about these issues.

## How to Contact Compliance, Audit & Business Integrity

**1-800-856-1983** Partners Compliance HelpLine

**<http://www.partners.org/complianceline>** Partners Web-based Compliance Reporting

Reports can be made at any time, 24 hours a day, 7 days a week, from any location.

Partners offers both a toll-free telephone service and a web-based reporting option to you for raising ethical, legal or policy concerns or asking questions. The HelpLine receives many calls each year covering a wide variety of topics and locations across the Partners system.

- Reports made using either of these methods are confidential and taken by professionals who do not work at Partners.
- You may choose to make a report without giving your name using either method. If you file anonymously, you will be given a callback response date and instructions on how to pick up the response to your report. Please be sure to check back; we may need additional detail to do an effective investigation of your concern.
- All concerns reported to the Compliance HelpLine by phone or online are investigated. You will be provided with a response with as much detail as is possible.



# Employment Standards

## Equal Employment Opportunity

Partners values the diversity of our workforce. Partners supports equal employment opportunity to employees and job applicants. Our workplace must be free from discrimination based on race, color, religious creed, national origin, sex, age, gender identity, disability, sexual orientation, military service, genetic information, and/or other status protected under law.

## Harassment/Sexual Harassment

Workplace harassment, sexual harassment, comments or other conduct that creates an intimidating or offensive environment will not be tolerated. Partners has adopted specific policies with respect to workplace and sexual harassment that provide a way for you to bring such improper conduct to the attention of management.

## Wage and Hour Standards

Partners is committed to paying its employees all compensation they are entitled to receive in compliance with applicable state and federal laws. We have detailed policies about timekeeping and pay practices specifically for non-exempt employees. No Partners employee is permitted to instruct another employee to work “off the clock” (perform work that is not reported through the proper timekeeping systems and paid as working time). Every Partners employee is responsible for understanding the policy and reporting policy violations or unresolved timekeeping errors to the attention of the Compliance, Audit & Business Integrity Department.

Learn More

- Human Resources policies
- Partners Time Reporting Policy for Non-Exempt Employees
- Human Resources Business Partner



# Creating & Preserving Records

Partners is committed to creating and preserving accurate and complete business and patient medical records.

## Creating Accurate Records

Each of us plays an important role in promoting the creation of accurate business records and patient medical records. Records are present in our daily work activity which include documents and transactions such as patient medical records, financial statements, expense accounts, vouchers, invoices, time reports, payroll records, reports to government agencies, measurement and performance records...the list of records pertaining to Partners is virtually endless. All records must be prepared with care, honesty and with accuracy. You must never improperly alter or falsify entries or intentionally omit required information on any Partners record or document.

## Preserving Records

Federal and state laws and regulations require that Partners keep certain documents or data for specified periods of time. Examples include personnel records, patient medical records, government contracts, billing and other financial records. Always follow these legal requirements and the standards in the Partners Record Retention Policy, Schedule and Guidelines.

Relevant records may never be destroyed during pending or anticipated litigation, internal investigation, or audit. Destruction of records to avoid disclosing them in a legal proceeding may be a criminal offense. If you have any questions about your responsibility in retaining Partners records, contact your supervisor or the Partners Compliance, Audit & Business Integrity Department.

## Safely Destroying Records

When you determine that documents or data are permissible to be destroyed, use good judgment in preserving confidentiality. Think before you dispose of any electronic media or devices; old copiers, flash drives, cell phones and other devices could contain information capable of putting our patients or other individuals at risk if disposed of improperly. Never dispose of paper or electronic media containing patient information or other confidential information in the general trash or recycling bins. Use the special locked bins provided for paper and ensure that confidential data on tapes, flash drives and other electronic media is rendered permanently unreadable by following guidance from Partners IS security staff before discarding it.

### Learn More

- Partners Record Hold Policy
- Partners Records and Information Management Policy and Schedule
- Guidance on proper disposal methods of confidential information is available from the Partners IS Service Desk or from the Chief Information Security and Privacy Officer



# Safety & the Environment

Partners recognizes the important role a safe and healthy physical environment plays in promoting human wellbeing and is committed to the practice of health care that conserves natural resources and is non-polluting.

## Good Neighbor Practices

Partners and our member institutions value our relationship with our neighbors and have achieved a reputation of responsiveness to the interests of our community. Because of the nature of our business, we face particular challenges. Laboratories and research areas work with materials that may present problems if handled or disposed of incorrectly. Clinicians delivering medical and diagnostic care utilize substances that, while vital to successful clinical outcomes, can compromise the environment if we are not scrupulously careful in their use, monitoring, and disposal. State and national agencies have developed standards and rules of practice to protect our air, soil, and water. Each of us shares the responsibility to learn and follow these standards and to promptly report any risks we observe.

## Sustainable Initiatives

Health care today is increasingly aware of its significant environmental footprint. Hospitals are some of the most energy intensive buildings in the country, consuming large amounts of fuel and water and generating a significant waste stream.

Partners and our member institutions aspire to lead health care efforts to:

- promote a healthy environment,
- optimize the care of our patients and the well-being of our employees, and
- conserve the resources we expend.

Partners Sustainable Initiatives encourages the involvement of all members of the Partners community to achieve these goals.

## Workplace Safety

Partners is equally committed to promoting a safe working environment for our employees and physicians. Each Partners employee shares in the responsibility to keep our workplace safe. Employees are provided with information on handling and working with hazardous materials. Partners also provides employees with needed protective equipment and training in its use. It is vital that employees use equipment and materials properly and follow the appropriate procedures to ensure that everything possible is done to avoid compromising the safety of co-workers.

Learn More

- [MSDS Material Safety Data Sheets](#)
- [Partners Real Estate Intranet Sustainable Initiatives site](#)



# Financial Standards

Partners is committed to acting as a responsible steward of the financial resources we receive to support our mission. We use these resources to accomplish the greatest public good.

## Billing for Care

One of the most complex and important functions in our organization is accurate and appropriate billing for services. Partners strives to achieve full compliance with all federal and state health care program requirements, including the requirement to prepare and submit accurate claims. We are equally committed to following the claims standards of our non-government payers.

Billing is a highly complex process. Careful attention from many employees and providers is required at each step, even from individuals who may not always think of themselves as part of the billing process. Wherever you work in Partners, it is likely that something you do impacts our ability to bill correctly. It is important to do your part and to raise concerns if you notice a practice that could lead to inaccurate or inappropriate billing.

## Avoiding Fraud, Waste and Abuse

Billions of dollars intended to be spent on health care are lost to fraud, waste and abuse each year. Because Partners receives significant government funds from Medicare, Medicaid, and other federal and state programs, we have a responsibility to detect, correct and prevent fraud, waste and abuse. We are determined to avoid any practices that could cause federal or state health care funds to be misused.

Partners has multiple mechanisms in place to help prevent, detect, and respond to potential fraud, waste or abuse. Partners Finance and Partners Compliance, Audit & Business Integrity work together to develop policies designed to produce claims which accurately reflect the services performed by qualified providers. Education is available for groups with questions about the requirements. Consultation is also available from Partners and Institution billing compliance staff when new systems or processes are being developed.

## Financial Management of Donated Funds

Donors made the founding of Partners hospitals possible some 200 years ago. Today, Partners and its member institutions, as non-profit organizations, are being supported by individual, foundation and corporate donors. We have been entrusted with these funds to achieve our mission of patient care, research, teaching and service to the community. We take our duty to use these funds carefully and to meet our responsibilities to donors very seriously. We adhere to the highest standards in the solicitation, acceptance, recording, and use of donated funds. Groups within Partners who wish to engage in fundraising activities must first consult with their Development Office to ensure that all legal and policy requirements are met.

Learn More

- Finance Policies
- Fraud and Abuse Reporting Policy



# Research

## Authorship

Authorship decisions on all publications must appropriately reflect the degree of contribution of those who conducted the research.

## Data and Results Integrity

Falsifying or manipulating data or claiming the ideas of others as your own destroy the integrity of both research and researcher. Investigators are obligated to report results accurately regardless of whether the findings support or disprove their hypothesis. Results should be free from bias. This requires, at a minimum, that researchers report and account for financial interests that could impair or appear to impair their judgment and impartiality.

## Respectful Treatment of Subjects

Clinical research should be focused on the patient. It should be based on voluntary consent and trust and should include a full disclosure of relationships and interests. Clinical research must do no harm and should carefully balance the risk of potential future harm and benefits.

While research involving animals cannot involve consent, it should reflect similar ethical standards. All Partners animal research must be based on the humane treatment of animal subjects, and be conducted in accordance with well-established standards.

## Laboratory Safety

Laboratory safety is critical to the Partners research mission. Researchers must be cognizant of the institutional and regulatory requirements associated with bench research, secure the necessary approvals, and foster a culture of lab safety within their groups so that all participants fully understand the hazards and risks of advanced laboratory research.

Ethics and integrity are essential to the advancement of scientific knowledge. Partners is committed to conducting research in accordance with the highest professional, ethical and legal standards.



## Financial Management of Grants and Awards

Research grants and awards require us to use funds only for their intended purpose and to account for their use appropriately. In addition to following Partners general financial standards, those involved in research and research administration are required to follow policies and procedures established to ensure accurate reporting of time and effort as well as grant-specific costs.

Learn More

Partners Research Navigator: <http://navigator.partners.org/>



# Patient Care Standards

Partners is committed to providing the right care, safely, efficiently, and skillfully delivered to all our patients.

## Achieving Quality Requires Integrity

Partners and its member institutions are known worldwide for safe, high quality clinical care. Every member of our organization is responsible to do his or her utmost to continue and advance our leadership in this area. Quality health care is safe, effective, efficient, equitable, timely, and patient centered based upon the practice of understanding and adhering to our ethical standards. It requires that we bring a high level of ethical decision making to every action we take on behalf of Partners. To provide safe, high quality health care we must ensure that we actively engage our patients and their families in their care, while treating them with kindness, respect and without discrimination. Quality requires everyone doing his or her job thoughtfully so patients can have confidence that we will uphold the highest standards of personal and institutional conduct.

## The Right Care . . .

We must provide the right care at the right time to each patient. This means we must:

- Provide only those services which are necessary for the proper diagnosis and treatment of the patient.
- Provide services in the most appropriate setting for the patient. This requires careful assessment of outpatient vs. inpatient, primary care vs. specialty care, and institutional vs. home locations of service. It also requires sensitively considering the particular concerns of patients who may need physical, social, or cultural accommodations in their care.
- Help patients with limited financial resources receive the care they need. Patients with an emergency medical condition always have the right to receive screening and care without delay to assess their ability to pay. Beyond this, our hospital financial counseling staff actively works with patients to help them access resources to pay for their ongoing care.
- Address all of the patients needs, medical, behavioral, and social, regardless of patients personal circumstances.

## Safely and Skillfully Delivered

Patients must be able to trust that the staff they encounter are well qualified to provide their care. All Partners institutions have instituted competency assessments, credentialing requirements, and supervision practices in order to ensure that we are consistently worthy of our patients' trust. It is appropriate that we are closely scrutinized by accrediting organizations and government agencies. All staff members are encouraged to cooperate fully with these standard-assessing bodies as part of our ongoing commitment to continuous quality improvement and to promote transparency with our patients and the public.

### Learn More

- Partners HealthCare Hospital Credit & Collection Policy
- Patient Discount and Financial Assistance Policy
- Clinical policies at each Partners institution
- Partners HealthCare Quality and Safety  
<http://qualityandsafety.partners.org/>
- Population Health Management  
<http://www.partners.org/Innovation-And-Leadership/Population-Health-Management/Default.aspx>



# Managing Conflicts

Partners is committed to carefully managing relationships with outside individuals and organizations to avoid either real or perceived bias in the conduct of our patient care, research and educational activities.

## Conflicts of Interest

All of us have multiple roles, commitments and interests. When acting in our Partners role, it is important to carefully manage situations where our personal interests could conflict or reasonably appear to conflict with the best interests of Partners or our patients. A conflict of interest may exist whenever you have an opportunity to use your position at Partners for personal gain for yourself, a family member or a friend. A conflict of interest may also exist when an outside interest might inappropriately influence your work decisions. Conflicts do not always have to be eliminated but they must always be managed to protect the interests of our patients and the reputation of Partners.

## Conflicts of Commitment

Partners recognizes that many individuals who are part of our organization also maintain consulting or other relationships to other organizations. These relationships may be either paid or unpaid. A conflict of commitment exists when these outside ties may keep you from devoting appropriate amounts of time, energy, creativity or other personal resources to your Partners responsibilities. Partners has adopted policies limiting the time and other resources you may devote to outside activities.

## Disclosing Potential Conflicts

Partners Office for Interactions with Industry (OII) conducts a formal, mandatory conflict of interest disclosure process annually which includes physicians, board members and certain employees. Financial interests and outside activities reported in this process are reviewed by supervisors. Partners individuals may be required to make formal disclosures at other times throughout the year. Researchers should be particularly careful to be sure they understand their reporting obligations. Partners OII also monitors disclosures against other external and internal sources of information.

Even if you are not required to complete a formal disclosure, you should promptly disclose and discuss any potential conflict of interest or commitment with your supervisor. You may also contact OII or the Compliance, Audit & Business Integrity Department for clarifications and recommendations about how to assess and resolve a potential conflict.

## Gifts

Gifts from individuals or organizations outside Partners pose a particular risk of creating actual or apparent conflicts of interest. For this reason, Partners has adopted high standards in this area.

**Gifts from Vendors:** Partners has adopted a comprehensive ban on gifts from all vendors. This ban applies to all employees of Partners and Partners institutions, including all full-time employed physicians. It also applies to part-time employed physicians and other individuals when they are acting in a Partners capacity. Consult with your supervisor if you are not sure if this applies to you. The definition of gifts prohibited by this standard includes many things vendors are accustomed to offering to their clients or customers; it covers meals, trips, tickets to sporting events, holiday baskets and even items of minimal value such as pens and coffee mugs. In addition to this Partners standard, physicians and other prescribers are subject to particularly stringent state and federal requirements concerning acceptance of items or services from pharmaceutical or medical device vendors.

Because of the high level of scrutiny attached to relationships with industry, it is essential that you never accept anything from a vendor or a potential vendor unless you have sought and received assurances from your supervisor and/or the Partners Office for Interactions with Industry that the item or service does not constitute a gift under our policy or the law. Gifts from industry may violate anti-kickback laws as well as Partners policies.

**Gifts from Patients:** Patients sometimes wish to express gratitude for the care they have received but it is important to avoid any appearance that a different level of care and consideration will be provided to patients who give their caregivers gifts. All patients deserve the very best care that we can provide. A thoughtful word or a letter of thanks is the most appropriate expression of appreciation. However, a professional staff member or other caregiver is allowed to accept modest non-monetary gifts from his or her patients.

**Gifts to or from Referral Sources:** Partners and its member institutions may not accept or give anything of value to an individual or organization where one of the purposes of the gift may be to obtain referrals of patients. Referral sources may include providers, hospitals or other health care entities outside Partners. Gifts to or from referral sources may be considered kickbacks and may violate both our policies and federal law. Appearance matters; even if these gifts are not a violation of the law, they may carry significant risk to our reputation. Always seek guidance before offering or accepting them.

### Learn More

- Partners Policy for Interactions with Industry and Other Outside Entities
- Partners Office for Interactions with Industry
- Partners Internet Site Vendor Information pages
- Partners Code of Conduct

# Public Communications

Partners is committed to transparent, truthful, responsive and clear communications with those outside our organization.

## Official Communications

Partners official communications are designed to inform others about our goals and actions related to our mission of excellence in patient care, research, teaching and service to the community. We are careful to share only fully accurate and non-deceptive information. Departments responsible for representing Partners to the public — Marketing, Government Affairs and Communications — must meet high standards of transparency and trustworthiness. They can serve as a resource to groups and individuals within Partners and should be consulted on achieving these high standards when representing Partners in the public arena.

## Speaking for Partners

Individuals should not represent themselves as speaking for Partners or a Partners institution without express permission to do so. Communicating without authority risks misrepresenting our organization as a whole and confusing or even misleading our public community.

**Media contacts:** If you receive a request from the media to comment on a matter that involves Partners, you should contact the Vice President of Communications before responding.

**Use of logo and name:** Partners and each Partners Institution have developed guidelines on how and when their name and logo may be used; always check these guidelines to be sure any use you plan is permitted.

**Public presentations:** All presentations on topics related to your work at Partners require approval from your supervisor. They must conform to logo and name-use standards as well as to more specific policies governing outside activities.

**Endorsements:** It is generally not appropriate to endorse a company's product or service on behalf of Partners. In some circumstances, it may be permissible to recommend products or services that Partners has used and found successful or participated in developing. These exceptions always require the explicit approval of the Partners Marketing Department as well as the relevant institution's public affairs and/or marketing department.

## Political Activities and Contributions

Federal and state laws restrict the use of corporate assets and govern the activities of non-profit organizations such as Partners in connection with elections. Examples of activities that are prohibited include:

- Using employee work time for personal political fund-raising;
- Using the Partners telephone or e-mail system for political solicitations;
- Using Partners copiers to reproduce material for political campaigns.

Senior management or other designated individuals may participate in legally permitted political activities to fulfill their responsibilities as advocates for Partners and our patients, but may not use Partners resources to support any candidate, office holder or political organization. Partners advocacy activities must always be conducted in accordance with legal ethical standards regarding lobbying.

## Social Media Use

**Personal Use:** You are expected to use good judgment in your personal social media activities. Even private postings on social media sites may constitute a public communication; you should follow Partners standards regarding confidentiality, truthfulness, and respect for others. If you identify yourself as a Partners employee, post about Partners, or refer to the work of Partners or a Partners Institution, your communication is governed by all applicable Partners policies.

**Official Use:** Partners and all Partners institutions have adopted or are developing authorization processes and guidelines for official social media activities. Sites that present as official pages of Partners or a Partners program, institution, or initiative must receive approval prior to going live. Because this is an area where standards continue to evolve to meet new circumstances you are encouraged to contact the Marketing & Business Development Department or the Compliance, Audit & Business Integrity Department for assistance in identifying where to go for needed approvals.



Learn More

- Policy and Guidelines for Use of the Partners Brand and Logo
- Partners Social Media Policy
- Partners Partners Code of Conduct
- Policy and Procedures for Employee Business Expenses

# Safeguarding Confidential Information

Partners is committed to protecting the privacy and security of confidential information entrusted to us by our patients, employees and other members of our community.

## Protecting Patient Information

Our patients entrust us with their personal and medical information so that we can care for them, and provide administrative services associated with their care (e.g. process payment, and conduct internal operations to promote safe and efficient care). We act as responsible stewards of this information and use it carefully to carry out our responsibilities. Patient privacy rules and standards change frequently as new risks are identified. We are committed to protecting our patients' confidentiality in this dynamic environment. You are responsible for learning and staying current on the specific procedures related to your work, but some standards apply no matter what your role:

- Never divulge patient information to any individual who is not authorized to receive that information. This includes casual conversations with your family or friends as well as disclosures at work. Avoid talking about patients in public areas such as shuttle buses, elevators or cafeterias.
- Never share information about patients in virtual public areas such as blogs or social media sites.
- Only access patient information as required in order to perform your job duties. Only access the minimum necessary information required to accomplish your work. Access of any non-required information is strictly prohibited. You are NOT permitted to access records of friends, co-workers or family members. Contact the appropriate site Health Information Services Department if you need to request the health records of others.
- When entering into a relationship with a vendor or organization needing access to patient information to perform services on behalf of Partners, assess whether the outside organization will protect our patients' confidentiality. A potential vendor's privacy and security practices should be a key element in the vendor selection process. Always obtain an approved business associate agreement before sharing patient identifiable data with the vendor or organization.
- Use good judgment and follow Partners policies when you must mail or fax information that could be used to identify patients. Always encrypt patient information e-mailed outside of Partners.



## Protecting Personal Information

You must also protect personal information about patients, employees, vendors and others that could put any individual at risk of identity theft. Currently state law identifies an individual's name in conjunction with their Social Security number, their driver's license or state ID number, or a financial account number as the elements most likely to cause a risk of identity theft. All of us must safeguard these data elements wherever they are used or stored in our systems. You must promptly report any improper disclosure or loss of this information so we can take required steps to protect the individual at risk. Other data elements such as biometric identifiers, mother's maiden name, or other unique identifiers may also create risks for individuals. Partners expects all members of our community and all vendors with whom we contract to thoughtfully safeguard any information that could compromise an individual's identity.

## Proprietary Information

You must not share Partners proprietary information with outside persons, such as competitors, suppliers or outside contractors unless you have been specifically authorized to do so. Proprietary information includes business strategies, pricing information, financial data, research protocols and intellectual property

This requirement continues to apply even after you leave Partners employment or service. You may have similar obligations to prior employers or because of service to other institutions. Partners will honor your responsibility to protect that information as well.

## Maintaining Information Security

Partners has adopted security standards, policies, and procedures to enable us to pursue our patient care, research, teaching, and community service mission without disruption. These standards are also essential to protecting confidential information. Security rules include encryption of mobile devices and external e-mail messages, password and access management, guidance on avoiding spam and phishing attempts, and many other requirements. Because the risks are constantly changing, these standards will continue to evolve. You are responsible for knowing and following the security rules related to your job.

Learn More

- Granting Access to PHS Electronic Health Record Policy
- Safeguarding Fax, Copiers, Printers, Telephone Use and Pagers Policy
- Minimum Necessary Standard Policy
- Laptop Encryption Policy
- IT Asset Management Policy
- For advice on protecting privacy, contact the Partners Privacy Office
- For consultation on security requirements, contact your site Information Security Officer
- For information on Business Associate requirements, contact Supply Chain or your site Privacy or Compliance Officer



responsibility

respect

trust

ETHICAL STANDARDS

act with  
**integrity**

Integrity is at the core of all we do.  
If you question the appropriateness of a decision or action,  
contact us.

**CONFIDENTIAL AND ANONYMOUS REPORTING**

**<http://www.partners.org/complianceline>**

or

**Partners Compliance HelpLine**

**1-800-856-1983**

Retaliation for reporting a concern is a violation of Partners Policy and may violate federal and state laws.



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