



Labrador-Grenfell
Health

SUBJECT: MEDIA RELATIONS
APPROVED BY: Chief Executive Officer _____
EFFECTIVE DATE: 2019 04
REVIEW/REVISED DATE:

Purpose:

To ensure that the organization meets the media's need for and right to information in a consistent and timely manner, while protecting the privacy and confidentiality for all Labrador-Grenfell Health (L-GH) clients, employees and/or other affiliates.

To provide direction for employees and other affiliates in responding to media inquiries.

Policy/Standard:

Recognizing that the media are critical partners in L-GH's mission to inform the public and disseminate a variety of messages, the Authority will make every effort to work with the media by being open and responsive with timely and accurate information. Standards for communication with the media must first and foremost protect the privacy of our clients and employees.

The Communications Department is the designated single point of entry to L-GH for all media requests. This practice helps ensure that information is obtained through the appropriate authoritative sources, while minimizing delays, diminishing possible misunderstandings and maintaining confidentiality.

All media requests, inquiries, news releases, advisories, public service announcements and social media promotion concerning L-GH must be directed to the Communications Department, with the exception of *Access to Information and Protection of Privacy Act (ATIPPA)* requests which must be directed to the authorized ATIPPA Coordinator.

Upon receiving a media request, the employee/affiliate must provide the Communications Department with all details concerning the nature of the request, where known.

All interviews with L-GH must be coordinated through the Communications Department who, in consultation with the program or area in question, will determine the most appropriate spokesperson. Interview requests must not be agreed upon prior to such consultation.



The President and CEO is the official spokesperson for the organization. However, he/she may defer to a Vice President (VP) or other appropriate media spokesperson.

Materials Required:

- Consent for Photography, Audio-Visual Recording and/or Release of Selected Personal Employee Information CO-2-30-1
- Access to Information Request Form
- Authorization for Release of Personal Health Information Form #330

Related Policies:

- Privacy and Confidentiality P&A-9-010
- Requests for Photography / Videography / Audio Recording CO-2-30

Definitions:

Access to Information Requests: With limited exceptions, the *Access to Information and Protection of Privacy Act (ATIPPA)* gives individuals a right of access to records held by public bodies.

Affiliate: For purposes of this policy, refers to fee-for-service physicians, agents, volunteers, students, members of the Board of Trustees, contractors, vendors or any other individual or group engaged with L-GH.

Authorized Representative: A right or power of an individual under the *Personal Health Information Act (PHIA)* or the regulations may be exercised:

- by a person with written authorization from the individual to act on the individual's behalf;
- where the individual lacks the competency to exercise the right or power or is unable to communicate, and where the collection, use or disclosure of his or her personal health information is necessary for or ancillary to a "health care decision", as defined in the *Advance Health Care Directives Act* by a substitute decision maker appointed by the individual in accordance with that Act or, where a substitute decision maker has not been appointed, a substitute decision maker determined in accordance with section 10 of that Act;



- by a court appointed guardian of a mentally disabled person, where the exercise of the right or power relates to the powers and duties of the guardian;
- by the parent or guardian of a minor where, in the opinion of the custodian, the minor does not understand the nature of the right or power and the consequences of exercising the right or power;
- where the individual is deceased, by the individual's personal representative or, where there is no personal representative, by the deceased's nearest relative, and for this purpose, the identity of the nearest relative may be determined by reference to section 10 of the *Advance Health Care Directives Act*;
- where the individual is a neglected adult within the meaning of the *Neglected Adults Welfare Act* , by the Director of Neglected Adults appointed under that Act; or where an individual has been certified as an involuntary patient under the *Mental Health Care and Treatment Act*, by a representative as defined in that Act, except as otherwise provided in this Act.
(Source – Personal Health Information Act)

Procedure:

Media Requests (General)

- All media inquiries must be directed to the Communications Department. This includes requests for interviews with clients, employees or other affiliates of L-GH (contact information can be located on L-GH's Intranet).
- If a client gives authorization for an interview, the proper consent form (CO-2-30-1) must be signed and placed in his/her health record. A designated L-GH representative must be present to escort the media to and from the arranged interview setting and remain present during the interview.
- The health care provider/professional will ensure that there are no medical reasons to defer a requested interview. If for some reason, the client becomes clinically unstable during an interview process, the health care provider/professional may request termination of the interview.
- Employees or other affiliates of L-GH who would like to use the media to promote an event, achievement, program, etc., must coordinate through the Communications Department.



Release of client information

- L-GH is responsible for protecting the privacy and confidentiality of its clients and staff, while adhering to *ATIPPA* and *PHIA*. Therefore, neither the Communications Department nor any other employee/affiliate of L-GH are authorized to release information about a client to the media.
- L-GH may release basic information about the condition of an acute care patient to the media only when provided with the name of the individual in care. Once a name has been provided, consent must be obtained from the client or an authorized representative before any information is released, including any acknowledgement that the client has been admitted to a facility of L-GH.
- Form #330, *Authorization for Release of Personal Health Information* must be used for documentation of consent and placed on the client's health record.

Emergency and crisis situations

- The media will require timely and accurate information. The Communications Department will make every effort to react quickly by providing up-to-date information to local, provincial and national media outlets, as required.
- All media requests for a corporate spokesperson will be directed to the Communications Department.
- The Communications Department will coordinate media requests, verify appointed spokespersons, establish and build credibility for spokespersons and provide crisis communications and media training for relevant employees as needed.
- Only those designated will act as media spokespersons for the organization in an effort to establish a consistent, identifiable and credible representation to reduce public anxiety and panic.
- The Communications Department will coordinate essential information with other agencies and organizations involved with the emergency situation.
- The key spokesperson requirements and roles will be reviewed and evaluated. Knowledgeable and articulate subject matter experts outside the L-GH may be recruited as required.
- Media briefing sites will be established and identified in each region as part of L-GH's Emergency Management Plan. In some cases, access to facilities may be restricted or denied, depending on the crisis situation.



Site visits

- All visits by news media to a facility of L-GH must be authorized by the Communications Department.
- An authorized representative of L-GH must accompany all news media personnel while on site. An authorized representative will also be present during all interviews and/or filming or photography sessions.
- Media interviews will not be permitted in critical care areas or areas where clients may be receiving care. Any requests for media interviews must be directed to the Communications Department, which will make the necessary arrangements and determine an appropriate location for an interview to take place.
- If a member of the media is observed unaccompanied, L-GH staff must report their observation to Senior Executive or the Communications Department. Any unauthorized visit by the media must be reported as an occurrence using the Clinical Safety Reporting System (CSRS).

Media Requests for Photography and Videography

- All photographs and filming requests, medical or non-medical, to be released to the media or other agencies must be approved by the Communications Department.
- A consent form (Form CO-2-30-1) must be signed by the applicable client, his/her authorized representative or staff member as this is a requirement for all photography and filming requests involving clients and staff.
- Upon approval from the Communications Department or designate, and once the appropriate consent forms have been signed, media may photograph and/or videotape at L-GH facilities.
- Any “hidden” device to audiotape, videotape, video-image and/or photograph inside a L-GH facility is not permitted. Such devices would include digital cameras and cell phones with digital capabilities.
- A representative of the Authority must be present for all photography and videography.
- Designated L-GH representatives must make every effort to ensure that clients, employees or other authorized affiliates not be photographed or videotaped in such a way as to be recognized unless the appropriate consent form has been completed.



Access to Information Requests

- Under the Access to Information and Protection of Privacy Act (ATIPPA), members of the public, including media representatives, may request information in the custody and control of Labrador-Grenfell Health. Such requests for information must be accompanied by a completed ATIPP form, which is accessible at lghealth.ca, and forwarded to the designated ATIPPA Coordinator.

References:

Province of Newfoundland and Labrador (2002). *Access to Information and Protection of Privacy Act*, SNL 2002, CHAPTER A-1.1. Retrieved from <http://assembly.nl.ca/Legislation/sr/statutes/a01-1.htm>

Province of Newfoundland and Labrador (2008). *Personal Health Information Act*, SNL 2008, c. P-7.01. Retrieved from <http://assembly.nl.ca/Legislation/sr/statutes/p07-01.htm>