



## AF0100 – TRANSPARENCY AND FREEDOM OF INFORMATION

### 1.0 PURPOSE

To guide and direct Interior Health in meeting its legal obligations and in maintaining an open, transparent and accountable culture.

### 2.0 DEFINITIONS

Client Personal Health Records:	means recorded information about an identifiable individual that is related to the individual's health or the provision of health services to the individual.
Corporate Records:	means records as defined in Freedom of Information and Protection of Privacy Act, but does not include personal health records.
Freedom of Information Request:	a written request received for access to Interior Health Corporate Records.

### 3.0 POLICY

#### 3.1 Scope

This policy applies to all Interior Health staff and to all records in Interior Health's custody or control, including all administrative and business records created in the conduct of Interior Health business.

This policy does not apply to personal health information.

#### 3.2 Proactive/Routine Disclosure

The Interior Health Freedom of Information Office may develop and manage a proactive/routine disclosure program; the intent of the program is to:

- establish categories of records appropriate for proactive/routine disclosure,
- create a system for publishing such records, and
- ensure consistency across the organization in publishing such records.

Interior Health Departments and the Freedom of Information Office work collectively to identify and publish records that are appropriate for proactive/routine disclosure.

#### 3.3 Freedom of Information

Interior Health strives to meet the spirit of openness and accountability as set out in Freedom of Information and Protection of Privacy Act as well as comply with its specific provisions.

Interior Health:

- treats all freedom of information applicants fairly and equitably;

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- makes every reasonable effort to respond to freedom of information requests openly; accurately and completely and without delay, in accordance with timelines set out in the Freedom of Information and Protection of Privacy Act;
- discloses the identity of applicants only as set out in section 4.2.5;
- receives, processes and responds to freedom of information requests in electronic format where possible; and
- provides records in the format requested by the applicant where appropriate and practical

Interior Health protects confidential corporate and personal information by withholding or redacting information as permitted or required by law.

Interior Health staff:

- supports and cooperates with the Freedom of Information Office in responding to freedom of information requests in an open, complete and timely manner, and
- responds directly to requests for records that may be released routinely, releasing records in an open, complete and timely manner.

### **3.4 Transparency and Access to Information Website**

The Interior Health Freedom of Information Office will develop and manage an Information Requests webpage on the Interior Health public website.

## **4.0 PROCEDURES**

### **4.1 All Staff**

1. promptly upon receiving a written request for records, in any format, consult with the Freedom of Information Office for assistance in determining whether the requested records may be provided routinely or whether the request should be processed as an freedom of information request,
2. promptly forward freedom of information requests to the Freedom of Information Office,
3. conduct a thorough and complete search for the requested records or provide an estimate of time to search for the records as requested by the Freedom of Information Office,
4. respond in a timely manner to requests from the Freedom of Information Office for records or estimates of time to search for records. (where possible provide the requested records in an electronic format).

### **4.2 Freedom of Information Office**

1. upon receipt of a freedom of information request, send to the appropriate department/staff for either:
  - a request for the requested records; and/or
  - a request for a time estimate to search for the requested records.

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2. notify the Interior Health Communications and Public Affairs Office and the appropriate VP about freedom of information requests which are likely to result in Interior Health staff receiving questions from the public, media, government, elected officials or union representatives.

**NOTE:** Notification is provided to the Communications and Public Affairs and the appropriate VP so that they may assist staff in responding to such questions. Communications & Public Affairs will not influence or be involved with the review or severing of records in response to such requests, except as applicable under section 4.2.5.

3. consult with and provide assistance to staff/departments whose records have been requested.
4. compile the records and redact any information as permitted under the Freedom of Information and Protection of Privacy Act, before releasing the records to the applicant
5. protect the confidentiality of applicants and will disclose their identity only where staff need to know to perform their duties. The Freedom of Information Office may reveal the identity of applicants if legally required to do so.
6. advise the appropriate Vice Present and/or Senior Executive member of the release prior to release to the applicant.

## 5.0 REFERENCES

1. BC Freedom of Information and Protection of Privacy Act [RSBC 1996] CHAPTER 165
2. Vancouver Coastal Health Transparency and Freedom of Information Policy (2011)

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