

Disclosure of Corporate Information

1. Introduction

Providence Health Care (PHC) is accountable to the people of British Columbia and is committed to openness and transparency in all its activities, including managing its finances, operating its programs, patient safety and outcomes. PHC will provide the public with access to its records as set out in the *Freedom of Information and Protection of Privacy Act* (FIPPA).

1. Purpose

The purpose of this policy is to:

- ensure an effective and standardized approach to responding to requests for corporate records
- communicate our processes and identify staff responsibilities in responding to such requests

2. Scope

This policy applies to all [Staff](#) and to all records in PHC's custody or control, including administrative and business records created in the conduct of PHC business.

1.3. Exceptions

This policy does not apply to personal information or personal health information.

2. Policy

PHC will strive to meet the spirit of openness and accountability as set out in FIPPA as well as comply with its specific provisions. PHC will:

- Treat all applicants requesting information under Freedom of Information (FOI) fairly and equitably;
- Make every reasonable effort to respond to FOI requests openly, accurately and completely and without delay, in accordance with timelines set out in FIPPA;
- Disclose the identity of applicants only as set out in Appendix A;
- Receive, process and respond to FOI requests in electronic format where possible; and
- Provide records in the format requested by the applicant where appropriate and practical.

PHC will protect confidential corporate and personal information by withholding or redacting information as permitted or required by law.

2.1 Proactive and Routine Disclosure

PHC follows the spirit and intent of B.C. government policies and guidelines, including those related to proactive reporting. PHC proactively discloses reports on the

providencehealthcare.org website, including PHC's Annual Report, executive compensation and key performance indicators.

3. Responsibilities

3.1. Staff

- support and cooperate with the Information Access and Privacy Office (IAPO) in responding to FOI requests in an open, complete and timely manner;
- work with the IAPO to identify and publish records that are appropriate for proactive disclosure;
- will forward to the IAPO any request for confidential business information that has not been identified as a "Routine Release"; and
- respond directly to requests for records that may be released routinely, releasing records in an open, complete and timely manner.

3.2. Information Access and Privacy Office (IAPO)

- receive, process and respond to all FOI requests for PHC's confidential business information; and
- assist with identifying, reviewing and preparing documents for proactive release.

4. Compliance

Failure to comply with this policy may result in disciplinary action including, but not limited to, the termination of employment, loss of privileges as a student or volunteer role, prosecution and restitution for damages.

5. Supporting Documents

5.1. Related Policies

[Information Privacy and Confidentiality](#)

6. Definitions

"Confidential Business Information" means any corporate-related, financial or administrative information. This includes information stored on all forms of media including, but not limited to, paper, electronic, magnetic, optical disk and microfiche.

"FIPPA" means the *BC Freedom of Information and Protection of Privacy Act*, as amended from time to time.

"IAPO" means the Information Access & Privacy Office

"Records" means records as defined in FIPPA, but does not include personal information or personal health information.

"Routine Release" means release of information upon request, without processing through freedom of information.

“Staff” means all employees (including management and leadership), medical staff (including physicians, midwives, dentists and nurses), residents, fellows and trainees, health care professionals, students, volunteers, contractors, researchers and other service providers engaged by PHC.

7. References

1. BC Freedom of Information and Protection of Privacy Act (FIPPA)
2. Office of the Information and Privacy Commissioner for BC – Investigation Report F11-02
3. Vancouver Coastal Health Transparency and Freedom of Information Policy 2012-01-30

Questions

Contact Information Access & Privacy Office: privacy@providencehealth.bc.ca or 604-806-8894

8. Appendices

Appendix A: Key Steps in Responding to Freedom of Information Requests

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1. Receiving Written Requests for Records

Promptly upon receiving a written request for records, in any format, staff will decide whether the requested records may be provided routinely or whether the request should be processed as an FOI request, and may consult with the Information Access and Privacy Office (IAPO) for assistance.

If a request in writing is to be processed as an FOI request, staff will promptly forward the request to the IAPO for processing.

PHC does not require applicants to submit formal FOI requests. A written request in any form may be accepted as an FOI request, and need not mention "freedom of information".

2. When does a written request for information become an FOI request?

Here are some situations where staff should forward the request to the IAPO for processing:

- the request is large and it will take many hours to respond
- the records contain third party personal or business information
- the records contain advice about internal matters
- the records contain information that could compromise security
- the records contain information that may be sensitive or confidential

Upon receipt of a FOI request, the IAPO will then contact the appropriate PHC department/staff and request either:

- (a) records responsive to the request; or
- (b) an estimate of the time it will take to search for the requested records.

3. Notifying PHC Communications & Public Affairs

The IAPO will notify PHC Communications & Public Affairs about FOI requests which are likely to result in PHC staff receiving questions from the public, media, government, elected officials or union representatives. Notification is provided so that they may assist staff in responding to such questions. Communications and Public Affairs will not influence or be involved with the review or severing of records in response to such requests, except as applicable under #4 below.

4. Searching For and Providing Records

Staff will respond in a timely manner to requests from the IAPO. Upon receiving a request for records from the IAPO, staff will make every reasonable effort to conduct a thorough and complete search for such records.

Where possible, staff will provide records to the IAPO in electronic format and organized in chronological order, if reasonably practicable. All responsive records will be provided.

5. Processing FOI Requests

In processing FOI requests, the FOI office will, as necessary or upon request, consult with and provide assistance to staff/departments whose records have been requested. The IAPO will be responsible for sending for third party review where applicable and for reviewing and severing records as per FIPPA.

The IAPO will protect the confidentiality of applicants and will only disclose their identity where staff need to know to search for and provide requested records. The IAPO may provide the applicant category (e.g. media, union, individual) and may reveal the identity of FOI applicants following the completion of an FOI request, subject to compliance with privacy laws.

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