

		Page 1 of 6
<b><u>POLICY TITLE</u></b> <b>TRANSPARENCY AND ACCESS TO FRASER HEALTH RECORDS</b>		<b><u>Number</u></b> 6210
<b><u>AUTHORIZATION</u></b> President and Chief Executive Officer	<b><u>DATE APPROVED</u></b> April 30, 2013 ( <i>Executive Team</i> ) May 11, 2013 ( <i>Board</i> )	<b><u>CURRENT VERSION DATE</u></b> December 15, 2020

**DATE(S) REVISED / REVIEWED SUMMARY**

<b>Version</b>	<b>Date</b>	<b>Comments / Changes</b>
1.0	April, May 2013	Initial Policy Released
2.0	July 2016	Changed Health Shared Services BB (HSSBC) to their new name of BC Clinical and Support Services (BCCSS) Society.
3.0	November 2020	General updating and reorganization of policy, including Schedule A (categories of proactive disclosure records)
4.0	December 2020	Minor Revisions

**INTENT / PURPOSE**

- To communicate the transparency and access to records policy at Fraser Health, including the categories of records that will be proactively disclosed by Fraser Health.
- To link the transparency and access to records policy with the Freedom of Information (FOI) practice within Fraser Health.
- To document the application of the transparency and access to records policy and give direction to all staff.

This policy applies to all Fraser Health staff, being all employees (including management and leadership), physicians and medical staff, health care professionals, students, volunteers, researchers and service providers engaged by Fraser Health. This policy applies to all records in Fraser Health's custody or control, including all administrative and business records created or received in the conduct of Fraser Health business.

This policy does not apply to health records which are covered under the [Health Record Policy](#).

**POLICY**
**Transparency**

Fraser Health is accountable to the Government of British Columbia and through the Government to the people of British Columbia. Fraser Health is committed to open and transparent administration in all its activities, including the management of its finances, stewardship of its resources and operation of its programs in accordance with expected standards of care, safety and professional practice.

As a public organization committed to the principles of transparency, Fraser Health will anticipate the need for public accountability and will proactively publish material information including records and reports on its own performance. To accomplish this objective, Fraser Health will:

	Page 2 of 6
<p><b><u>POLICY TITLE</u></b> <b>TRANSPARENCY AND ACCESS TO FRASER HEALTH RECORDS</b></p>	<p><b><u>Number</u></b> 6210</p>

- Produce and publish a listing of the categories of records that Fraser Health will proactively disclose without a formal FOI request under the *Freedom of Information and Protection of Privacy Act* (FIPPA)
- Proactively publish records as appropriate
- Strive to improve the utility of its published records in terms of searchable information.

Where possible and appropriate, Fraser Health will facilitate access to information without requiring the submission of a formal FOI request.

Fraser Health will provide the public with access to its records consistent with the obligations and rights as set out in FIPPA. Fraser Health will comply with its disclosure obligations under FIPPA in a way that recognizes the public's right to access the records of a public body and reflects Fraser Health's commitment to openness, transparency and accountability.

Fraser Health will protect the privacy of its patients, residents, clients and staff and any third-parties in meeting its transparency commitments and FIPPA obligations. Depending upon the nature of the records requested, it may be necessary for Fraser Health to exercise appropriate diligence to sever information from the records disclosed in accordance with FIPPA or to refer a requestor to an existing report which may meet the requestor's information needs.

Fraser Health will manage the access to information process in a cost effective and sustainable manner.

**Proactive Disclosure**

Fraser Health has developed a proactive disclosure regime that identifies the categories of records and documents appropriate for proactive disclosure and has created a system for publishing the records. The overarching purpose of the regime is to identify records and information which may be made public without the need for a formal FOI request under FIPPA. The regime is not intended to create an obligation for Fraser Health to produce new records or documents for the sole purpose of responding to an information request other than as may be required by FIPPA.

Categories of records to be made available under the proactive disclosure regime are listed in Schedule A to this policy. Fraser Health programs and departments are custodians of their records and information and must be prepared to provide retrieval of documents in accordance with Schedule A. Any additional records to be added to Schedule A will require the approval of the Fraser Health Executive Team.

Proactive disclosure will be through the Fraser Health website. Releases may be periodic, quarterly or annual depending upon the availability of records. Some records may be available in arrears as it can only be made public after formal reports to the Executive, the Board, Ministry of Health including consolidation into government accounts or require auditor sign-off. Draft

		Page 3 of 6
<b><u>POLICY TITLE</u></b>	<b><u>Number</u></b>	
<b>TRANSPARENCY AND ACCESS TO FRASER HEALTH RECORDS</b>	6210	

reports and draft documents will not be provided as they are considered incomplete and unapproved documents. If records are not available, Fraser Health will identify on its website when the documents are expected to be available and provide the latest approved record. Communications and Public Affairs will be responsible for publishing all records to be proactively disclosed on the Fraser Health website and for coordinating documents that will be disclosed on a routine basis through that website.

Disclosure of procurement/supply contract information is through the Provincial Health Services Authority (Supply Chain) who contract on behalf of Fraser Health (and other BC Health Authorities) in respect of all provincial procurements/supply contracts.

This policy and Schedule A will be published on the Fraser Health website.

**FOI Requests Under FIPPA**

Fraser Health will strive to meet the spirit of openness and accountability as set out in FIPPA while balancing Fraser Health’s legitimate interests and obligations to third-parties, including all individuals in respect of their personal information.

All FOI requests under FIPPA will be made through the Freedom of Information Coordinator who will liaise with the necessary internal Fraser Health departments and/or programs to retrieve records responsive to the request and will coordinate the release of such records. Documents will be released so as to be useful and meaningful to the requestor without obligating Fraser Health to create new reports, documents or summaries. Fraser Health will protect confidential corporate and personal information by withholding or redacting reasonable information as permitted or required by law and may withhold certain records as permitted under FIPPA.

Fraser Health will:

- Treat all FIPPA applicants fairly and equitably and provide assistance where required
- Make every reasonable effort to respond to FIPPA requests openly, accurately, completely and without delay in accordance with the timelines set out in FIPPA
- Disclose the identity of applicants only insofar as may be necessary to enable Fraser Health staff to perform their duties in connection with processing a FIPPA request
- Receive, process and respond to FIPPA requests in electronic format where possible
- Provide records in the format requested by the applicant where available, appropriate and practical.

	Page 4 of 6
<b><u>POLICY TITLE</u></b> <b>TRANSPARENCY AND ACCESS TO FRASER HEALTH RECORDS</b>	<b><u>Number</u></b> 6210

**Schedule A**  
**Categories of Records for Proactive Disclosure**

Category of Record	Disclosure Timeframe	Location Details & Other Notes
<b>Health Authority Mandate Letters</b>	Annual	Posted to the Fraser Health Website on the Accountability (Taxpayer Accountability) page.
<b>Service Plan</b>	Annual	Posted to the Fraser Health Website on the Accountability page after approval of the Board of Directors and accepted by the Ministry of Health and other ministries of Government when/where required.
<b>Fraser Health's Health Care Report Cards</b>	Quarterly	Posted to the Fraser Health Website on the Accountability page.
<b>Accreditation Reports Executive Summaries</b>	Quarterly	Posted to the Fraser Health Website on the Accountability (Accreditation) page.
<b>Consolidated Financial Statements</b>	Annual	Posted to the Fraser Health Website on the Accountability (Financial Reporting) page after approval of the Board of Directors and accepted by the Ministry of Health and other ministries of Government when / where required.
<b>Schedule of Remuneration and Expenses Over \$75,000</b>	Annual	Posted to the Fraser Health Website on the Accountability (Financial Reporting) page after approval of the Board of Directors and accepted by the Ministry of Health and other ministries of Government when / where required.
<b>Schedule of Payments to Suppliers of Services Over \$25,000</b>	Annual	Posted to the Fraser Health Website on the Accountability (Financial Reporting) page after approval of the Board of Directors and accepted by the Ministry of Health and other ministries of Government when / where required.
<b>Board Remuneration And Board Remuneration and Expenses</b>	Annual	Posted to the Fraser Health Website on the Accountability (Financial Reporting) page after approval of the Board of Directors and accepted by the Ministry of Health and other ministries of Government when / where required.

	Page 5 of 6
<b><u>POLICY TITLE</u></b> <b>TRANSPARENCY AND ACCESS TO FRASER HEALTH RECORDS</b>	<b><u>Number</u></b> 6210

Category of Record	Disclosure Timeframe	Location Details & Other Notes
<b>Executive Compensation</b>	Annual	Posted to the Fraser Health Website on the Accountability (Financial Reporting) page after approval of the Board of Directors and accepted by the Ministry of Health and other ministries of Government when / where required.
<b>Expense Reports of the President &amp; CEO</b>	Annual	Posted to the Fraser Health Website on the Accountability (Financial Reporting) page after approval of the Board of Directors and accepted by the Ministry of Health and other ministries of Government when / where required.
<b>Public Board Meeting Minutes and Presentations</b>	After the Public Board meeting. (During the meeting if a Webcast is available).	Posted to the Fraser Health Website on the Leadership page. Minutes are posted after approval by the Board at the next formal meeting of the Board.
<b>COVID-19 related outbreak and exposure information</b>	As updated	Posted to the Fraser Health Website on the Health Topics (COVID-19) page. As released by the Medical Health Officer.
<b>Current Active Infection Outbreak Information</b>	As updated	Posted to the Fraser Health Website on the Patients and Visitors (Current Outbreaks) page. As released by the Medical Health Officer.
<b>Drinking water advisories, complaints, inspection reports, permits etc.</b>	Periodic	Posted to the Fraser Health Website on the Health Topics (Drinking Water) page.
<b>Recreational water advisories, complaints, inspection reports, permits etc.</b>	Periodic	Posted to the Fraser Health Website on the Health Topics (Recreational Water) page.
<b>Air quality advisories</b>	Periodic	Posted to the Fraser Health Website on the Health Topics (Air Quality) page.
<b>Sewerage systems information</b>	Periodic	Posted to the Fraser Health Website on the Health Topics (Sewerage) page.

	Page 6 of 6
<b><u>POLICY TITLE</u></b> <b>TRANSPARENCY AND ACCESS TO FRASER HEALTH RECORDS</b>	<b><u>Number</u></b> 6210

Category of Record	Disclosure Timeframe	Location Details & Other Notes
<b>Food Facility Inspection Reports and Summaries of violation tickets issued</b>	As updated	Posted to the Fraser Health Website on the Health Topics (Food Safety) page.
<b>Fraser Health Internal Housekeeping Audits</b>	Periodic	Posted to the Fraser Health Website on the Accountability (Quality and Safety) page.
<b>Access and Eligibility Requirements for Home and Community Services</b>	Annual	Posted to the Fraser Health Website on the Health Topics (Home and Community Care) page.
<b>Licensed Community Care Facilities Inspection Reports</b>	As updated	Posted to the Fraser Health Website on the Health Topics (Community Care Facilities Licensing) page.
<b>Patient Care Quality Office Quarterly Reports and Fraser Health Responses to Patient Care Quality Review Board Recommendations</b>	Quarterly	Posted to the Fraser Health Website on the Accountability (Quality and Safety) page.
<b>Fraser Health Research Ethics Board Reports</b>	Annual	Posted to the Fraser Health Website on the Accountability (Quality and Safety) page.
<b>Research Study Database</b>	Quarterly or as updated	Posted to the Fraser Health Website on the Research (How We Can Help Your Research) page.
<b>Select Policies and Procedures</b>	Periodic	Posted on the Fraser Health Website (Accountability) page.