

**SUBJECT: ROUTINE DISCLOSURE AND ACTIVE DISSEMINATION POLICY**

**1.0 PURPOSE**

The purpose of the Routine Disclosure and Active Dissemination Policy is to facilitate access to information by creating procedures that are less restrictive than the Municipal Freedom of Information and Protection of Privacy Act (MFIPPA) process to provide the public with timelier access to municipal records. The policy will ensure consistency across the organization with respect to how, when and which records are released by way of routine disclosure and active dissemination.

**2.0 POLICY STATEMENT**

The County of Lanark is committed to ensuring the public are provided with government records and information easily, informally, and in accordance with the County's commitment to accountability and transparency, as well as the principles of the Municipal Act and MFIPPA.

This policy will identify records and information that may be disclosed routinely to the public, and considers the following principles:

1. Make County records available to the public and ensure that information is easily accessible to the residents of the County;
2. Proactively streamline the access to information process;
3. Reduce staff time in responding to formal requests for information, resulting in greater cost efficiencies;
4. Assist in reducing administrative costs;
5. Provide greater accountability and transparency in its day-to-day operations;
6. Ensure a balance between providing greater access to County information, while at the same time protecting personal and confidential information.

**3.0 DEFINITIONS**

**Routine Disclosure or RD** is the routine or automatic release of certain types of administrative and operational records in response to informal rather than formal requests under the Freedom of Information and Protection of Privacy Act.

**Active Dissemination or AD** is the periodic release of certain records in the absence of a request, for example periodic posting of operational records to the County's website.

**The Act** means the Municipal Act, 2001, S.O. 2001, c.25, as amended, and includes any regulations passed under it.

**MFIPPA** means the Municipal Freedom of Information and Protection of Privacy Act,

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R.S.O., C.M.56, as amended, and includes any regulations passed under it.

### **4.0 POLICY REQUIREMENTS**

1. In order to ensure that an appropriate balance exists between ease of access to information and protection of privacy and of confidential information, County departments will adhere to the requirements of the Municipal Freedom of Information and Protection of Privacy Act in respect to exemptions to disclosure of personal information, proprietary third-party information, and other confidential information.
2. RD/AD should be the first avenue for the public to access County information and records. A formal access to information request is only required in instances where records are subject to the exemption provisions set out under MFIPPA. Where exemptions will not be applied, the request is to be handled at the operational level in accordance with this Policy.
3. Records or information identified in Schedule "A" will be provided or made available to the public or to any requester according to the noted conditions for releasing records. Records can be provided on request or actively disseminated as appropriate.
4. The records and information identified in Schedule "A" are not an exhaustive list of records that are available informally, but provide a baseline of what information can be obtained without filing a formal access to information request.
5. In determining which records are to be subject to RD/AD, staff should not consider the identity of the requester(s).
6. Requests for information received from a member of the public that departmental staff would not provide in the normal course of business should be directed to the Clerk's Department for review and disclosure under the MFIPPA process.
7. Requests for information that is routinely made available may be submitted verbally, by fax, email or in writing by regular mail. The County reserves the right to require that a request for information be submitted in writing where the verbal request is unclear or where the information being requested is of a personal, detailed or sizeable nature.
8. Repetitive requests by an individual or organization for significant volumes of records, the separation of a request into several small requests totaling a large volume, requests made to more than one department or branch related to a specific subject or issue will be centrally coordinated and referred to the County Clerk.

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9. Responses to requests for records made under this policy will be acknowledged and will be completed in a reasonable timeframe as determined by staff workload.

### **4.0 RESPONSIBILITIES**

All County staff must comply with the Routine Disclosure and Active Dissemination Policy.

Directors and Managers are responsible for identifying records suitable for RD/AD in their own respective areas.

The County Clerk is responsible for making updates to this policy as a result of changes to the Act or other provincial legislation.

### **5.0 MONITORING / CONTRAVENTIONS**

The County Clerk shall be responsible for receiving complaints or concerns related to this policy.

### **6.0 LEGISLATIVE AND ADMINISTRATIVE AUTHORITIES**

The Municipal Freedom of Information and Protection of Privacy Act (MFIPPA) governs the collection, use and disclosure of information by certain institutions in Ontario, including municipalities.

The purpose of MFIPPA is to provide a right of access to information in the custody of and under the control of the institutions with the principle that information should be made available to the public and that necessary exemptions from the right of access should be limited and specific.

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RECORD TYPE	RESPONSIBLE DEPARTMENT	CONDITIONS ON RELEASE	RD or AD
Agendas & Minutes of Council, Standing and Advisory Committees	Clerk's Department	Excludes Closed Session Materials.	AD – County Website
Corporate Policies & Procedures	Clerk's Department	Excludes drafts or working copies.  Excludes internal or departmental written procedures.	RD
By-Laws	Clerk's Department	Excludes drafts or working documents.	AD – County Website (commonly requested bylaws)  RD
Council Communications	Clerk's Department	Excludes communications from private individuals.	RD
Oaths of Office and Appointments	Clerk's Department		RD
Proclamations	Clerk's Department		RD
Emergency Planning and Services	Clerk's Department	Excludes appendixes to the Emergency Plan which contain personal contact information and confidential emergency planning resources.	AD – County Website
Municipal Freedom of Information and Protection of Privacy Act – Directory of Records (PIB Index)	Clerk's Department		AD – County Website
Audit Reports (including financial statements)	Finance		AD – County Website
Finance Information	Finance		RD

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Returns			
General Journal and General Ledger	Finance		RD
Operating & Capital Budgets	Finance	Excludes drafts or working documents.	AD – County website.
Extended Health Care Plans	Human Resources		RD
Job Descriptions	Human Resources		RD
Job Evaluations	Human Resources		RD
Corporate Organizational Charts	Human Resources	Excludes personal contact information.	RD
Salary and Wage Records	Human Resources	Excludes salary information of specific employees. Rates of pay by group and job title provided only.	RD
Union Agreements and Contracts	Human Resources		RD
Aerial Maps & Photographs	Planning		RD
Allotment Schedules	Planning		RD
Annexation	Planning		RD
Assessment Maps	Planning		RD
Condominium Plans	Planning		RD
Demographic Studies	Planning		RD
Planning Policy Documents including:	Planning		RD
<ul style="list-style-type: none"><li>• Official Plan &amp; Official Plan Mapping</li><li>• Site Plan Application Guidelines</li><li>• Land Use Planning Documents</li><li>• Master Plans</li><li>• Policy, Standards &amp; Procedures</li><li>• Environmental Planning</li><li>• Watershed Planning</li><li>• Zoning</li></ul>			
Mapping	Planning		RD

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Land Division & Subdivision	Planning		RD
Cycling Paths	Public Works		AD – County Website
Deeds	Public Works		RD
Disaster Recovery Plan	Public Works	Excludes personal contact information and confidential emergency planning resources.	RD
Easements Under Seal	Public Works		RD
Environment Study Review	Public Works		RD
Agreements and Contracts Including: <ul style="list-style-type: none"><li>• Subdivision</li><li>• Severances</li><li>• Site Plan &amp; Site Plan Control</li><li>• Encroachment</li></ul>	Various Departments	Excludes draft or unsigned agreements.	
Plans & Studies	Various Departments	Excludes draft or working documents.	AD – County Website
Permits including: <ul style="list-style-type: none"><li>• Driveway entrance</li><li>• Roadway occupation</li><li>• Sign</li><li>• Parking</li></ul>	Various Departments	Permit application forms with information of owner removed are released upon request.  Copies of sign applications may be given to applicant or property owner.  Confirmation of Sign permits issued is provided verbally.	RD
Media Releases	Various Departments		AD – County Website

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