



ROUTINE DISCLOSURE

Policy Number:	18.211.01 2023 ADP
Policy Review:	Every 5 Years or upon Legislative change
Policy Owner (Dept.):	Corporate Services
Reference(s):	Freedom of Information and Protection of Privacy Act, RSA 2000, c F-25 (FOIP), Bylaw 402 - FOIP Bylaw (including its amendments or successors)

1. PURPOSE OF POLICY

- 1.1. To provide guidelines to the staff of the City of Lacombe for the routine disclosure of information, either to the public at large or for individuals to whom it directly relates. Specifying that records will be available without a formal request for access under the Freedom of Information and Protection of Privacy Act (FOIP) demonstrates that the City of Lacombe is operating in the spirit of the FOIP Act.

2. POLICY STATEMENT

- 2.1. The City of Lacombe strives to provide excellent customer service by streamlining services and information flow, presenting an open, accountable and transparent process for the routine disclosure and active dissemination of information in the custody and control of the City, with consideration to the Province of Alberta’s Freedom of Information and Protection of Privacy Act (FOIP).
- 2.2. Any request made through FOIP to the Head of Public Body of the City of Lacombe will be reviewed to determine whether the request for information can be met through routine disclosure.
- 2.3. The disclosure of an employee’s name, business contact information and personal information in relation to municipal business, activities and expenditures is not an unreasonable invasion of privacy, as this information may be disclosed under the provision of FOIP. Personal information that is unrelated to municipal duties is not disclosed.
- 2.4. The City’s FOIP Coordinator or the Head of Public Body will be consulted for clarification before proceeding to routinely disclose information under this policy.

3. APPLICABILITY

- 3.1. This Policy applies to the staff of the City of Lacombe.
- 3.2. This Policy comes into effect upon approval of the CAO.

4. DEFINITIONS AND ABBREVIATIONS

- 4.1. **CAO** - means the City of Lacombe’s Chief Administrative Officer.

- 4.2. **City** – the City of Lacombe.
- 4.3. **Head of Public Body of the City of Lacombe** – means the CAO as per FOIP Bylaw 402.
- 4.4. **Routine Disclosure** - means a process whereby access to a record is granted without a request under FOIP, usually in response to a routine inquiry or request. Includes when information or records are periodically released, under a program or release strategy such as a communications plan.
- 4.5. **FOIP** - means Alberta’s Freedom of Information and Protection of Privacy Act.

5. ROLES AND RESPONSIBILITIES

5.1. Chief Administrative Officer

- 5.1.1. Approve this Policy.
- 5.1.2. Ensure staff are aware of and comply with this Policy.
- 5.1.3. Implement and administer this Policy.
- 5.1.4. Advise staff if information can be released under this Policy.

5.2. Directors

- 5.2.1. To support compliance with the terms of this Policy.
- 5.2.2. Ensure staff are aware of and comply with this Policy.

5.3. FOIP Coordinator

- 5.3.1. To support compliance with the terms of this Policy.
- 5.3.2. Review all FOIP requests made to the City of Lacombe to evaluate if the information requested/released can be routinely disclosed.
- 5.3.3. Advise staff if information can be released under this Policy.

6. POLICY DETAILS

6.1. Fees and Timelines

- 6.1.1. Fees for the reproduction and the provision of records released under this policy may be charged in accordance with City bylaws, policies, and fee structure. The City of Lacombe will respond to any routine disclosure requests in a reasonable and timely manner.

6.2. Routine Disclosure of Information

- 6.2.1. The criteria used to determine which records could be routinely disclosed are:
 - 6.2.1.1. Is there a statutory requirement?

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- 6.2.1.2. The type of information is requested on a regular basis
- 6.2.1.3. Material is publicly available
- 6.2.1.4. No FOIP Act exceptions apply to the release of the record(s)

6.3. Exceptions

- 6.3.1. Any information withheld from release is in accordance with FOIP but not in response to a formal access request under the FOIP Act. Records containing the personal information of third parties as defined in the FOIP Act section 1(n) will not be disclosed.

7. END OF POLICY

Original Signed by Matthew Goudy, P.Eng

Signature of CAO

September 20, 2023

Date

POLICY RECORD

Approval and Amendment History

Date of Approval	Description

Review History

Date of Policy Owner's Review	Description/Action Taken or Required
February 2023	Review and Convert Council Policy to Administrative Policy