



County of Peterborough Policy Manual

Department:	Corporate
Policy No.:	CORP-23
Subject:	Routine Disclosure / Active Dissemination Policy
Approved by Leadership Team:	March 27, 2024
Originally Approved by Council:	May 15, 2024
Approved by:	Resolution No. 138-2024

1. Purpose:

The Corporation of the County of Peterborough (the “Corporation”) is committed to streamlining services to its customers to continue to provide excellent customer service in an expedient and transparent manner. The Corporation wishes to provide customers with public records and information through active dissemination and routine disclosure. This policy establishes the framework while meeting the requirements and abiding by the exemptions of the Municipal Information and Protection of Privacy Act (“MFIPPA”).

2. Scope:

This Policy shall apply to all corporate departments and records in the custody or under the control of the Corporation, regardless of their physical format or medium, save and except all records that fall under the Personal Health Information Protection Act (“PHIPA”).

3. Definitions:

1. “Active Dissemination” means the regular or periodic release of corporate Records in the absence of a formal request.
2. “Clerk” means the Clerk appointed by by-law for the Corporation of the County of Peterborough.
3. “Corporation” means the Corporation of the County of Peterborough.
4. “Confidential Information” means any information that is subject to the exemptions to disclosure found within MFIPPA and that, if disclosed, could result in loss or damage to the Corporation or could give the persons to whom it is disclosed an advantage. Includes information received in confidence by the Corporation.
5. “Department Head” means the appointed head of each department or their designate.

6. Frivolous or Vexatious means the request is intended to accomplish some objective other than to gain access without reasonable or legitimate ground (i.e. if made for a nuisance value, or to harass the government/staff).
7. “Informal Request” means a verbal or written request for access to a Record other than a formal request under MFIPPA.
8. “Personal Information” means recorded information about an identifiable individual, as defined in Section 2(1) of MFIPPA, including;
 - a) information relating to the race, national or ethnic origin, colour, religion, age, sex, sexual orientation, or marital or family status of the individual;
 - b) information relating to the education or the medical, psychiatric, psychological, criminal, or employment history of the individual, or information relating to the financial transactions in which the individual has been involved;
 - c) any identifying number, symbol, or other particular assigned to the individual;
 - d) the address, telephone number, fingerprints, or blood type of the individual;
 - e) the personal opinions or views of the individual;
 - f) correspondence sent to an institution by the individual that is implicitly or explicitly of a private or confidential nature, and replies to the correspondence that would reveal the contents of the original correspondence;
 - g) the views or opinions of another individual about the individual; and,
 - h) the individual’s name if it appears with other personal information relating to the individual or where the disclosure of the name would reveal other personal information about the individual.
9. “Record” means recorded information in any format or medium that documents the Corporation’s business activities, rights, obligations or responsibilities, or recorded information that was created, received, distributed, or maintained by the Corporation in compliance with legal obligations.
10. “Routine Disclosure” means the disclosure of corporate records in response to a routine inquiry or request for access that can be granted without filing a request under MFIPPA.

4. Policy:

1. The Corporation will actively disseminate information through its website, including but not limited to:

- Policies
- Staff Reports
- By-laws
- Agendas and Minutes

- Operating & Capital Budgets
- Audited financial statements

2. Where information is not available on the Corporation's website, the Department Head may consider the Routine Disclosure and Active Dissemination to other information that is not otherwise restricted from disclosure under MFIPPA, including but not limited to:

- Agreements and Contracts
- Tender results including results and names of bidders save and except unit pricing and bid details
- Corporate financial records including expenses, receivables, receipts, etc.
- Corporate Procedures
- Employment & salary information including organizational charts, but not individual wages, personal information, or any other exemption under MFIPPA
- Permits including entrance, road occupation, sign, special event, etc., and related records (i.e. inspections)
- Planning applications
- Policy documents, studies and reports (excluding draft or working documents)

3. Informal Requests will be accepted verbally, in writing or electronically, and the record will be disclosed in the format requested subject to any fees set out in the Corporation's Tariff of Fees By-law.

4. In response to an Informal Request, the Corporation is not required to create records which do not otherwise exist.

5. Any request for engineered drawings or studies accompanying planning applications should be reviewed by the Department Head in consultation with the Clerk, prior to disclosure.

6. The Corporation will not disclose personal information through routine disclosure or active dissemination. Anyone seeking access to records containing personal information will be required to submit a formal request in accordance with MFIPPA.

7. Requests determined to be frivolous or vexatious may be refused by the Clerk.

Review Cycle:

This Policy shall be reviewed at least once per term of Council.