1.0 Purpose

1.1 The purpose of this policy is to establish principles and guidance for providing access to First Nations Health Authority’s (FNHA) Corporate Information.

1.2 This policy supports all 7 Directives and the Shared Values.

2.0 Scope

2.1 This policy applies to Workers, the Board of Directors (Board), and External Parties authorized to do business on behalf of FNHA.

2.2 This policy applies to Corporate Information in the Custody or under the Control of FNHA regardless of format or medium.

2.3 This policy applies when responding to requests for Corporate Information by the general public, News Media, partners, and others who may request Corporate Information.

3.0 Policy Statements

3.1 FNHA will strive to be as open and transparent as possible with its Corporate Information. While not subject to freedom of information legislation applicable to public bodies, FNHA will respond to requests for Corporate Information by the general public in the spirit of organizational openness and transparency.

3.2 FNHA values and benefits from reciprocal information sharing with its partners and is committed to fostering effective relationships underpinned by trust and honesty. FNHA may share Corporate Information requested by its partners when it complements or strengthens the relationship, is consistent with laws and FNHA Policy Documents, and/or is part of usual business disclosure.
3.3 Access to Corporate Information will be supported by efficient decision-making and responsible information sharing.

3.4 When Corporate Information is requested, FNHA will consider the sensitivity of the information from a financial, economic, social, and operational perspective.

3.5 FNHA may refuse to disclose Corporate Information if it reasonably expects the disclosure to be harmful to the financial, economic, social, or operational interests of FNHA, its partners, or First Nations communities.

3.6 Any fees charged will be commensurate to the costs of processing the request and providing access to the Corporate Information.

(a) Fees will be charged to non-Indigenous applicants.

(b) Requests that are made by BC Indigenous applicants will be processed at no cost.

(c) Fees may be charged to non-BC Indigenous applicants.

3.7 In the spirit of accountable and transparent decision-making, FNHA will respond to requests in a timely manner and, if access is refused, the reason(s) for the refusal will be explained.

3.8 FNHA will ensure that the Corporate Information it is required to keep under the Societies Act is made available upon request to Members, the Board, and others who may be designated by the Board in accordance with the Societies Act and the First Nations Health Authority Bylaws.

3.9 Financial information will be disclosed in accordance with the Financial Information Approval and Disclosure Policy Documents.

3.10 Any information requested by auditors will be disclosed in accordance with the External and Internal Audit Policy Documents.

3.11 Requests for First Nations non-identifiable health and wellness Data and Information will be managed in accordance with the Health Data and Information Governance Policy Documents.

3.12 Personal Information requested by applicants or collected from applicants will be managed in accordance with the Personal Information Privacy Policy Documents.

3.13 Any release of Corporate Information to News Media will be conducted in accordance with the Corporate Communication Policy Documents.

Compliance

3.14 Any violations of this policy may result in Disciplinary Action, up to and including termination, in accordance with the Progressive Corrective and Disciplinary Action Policy Documents.

Exceptions

3.15 Exceptions to this policy require approval by the Chief Executive Officer (CEO).

Delegation

3.16 This policy will be further defined and elaborated upon through an executive directive of the CEO.
First Nations Health Authority
Board Policy

4.0 Responsibilities

4.1 Board of Directors (Board): approve the Access to Corporate Information Policy.

4.2 Chief Executive Officer (CEO): provide overall leadership and support to Senior Executives in the oversight and management of requests for Corporate Information; approve exceptions.

5.0 Definitions

Control: having the authority and responsibility to decide what other parties do with Information or Data under their Custody, even though that Information or Data is not necessarily owned or possessed by FNHA.

Corporate Information: information about the operation of FNHA, including fulfilment of its obligations and the delivery of its services, mandates, and programs (e.g., annual report, corporate financial statements).

Custody: having physical possession and Control of Information or Data, but not necessarily ownership.

Data: individual or multiple facts or statistics that, when analyzed, become Information. Data can be expressed in qualitative and quantitative terms.

Disciplinary Action(s): a process for dealing with job-related behaviour that does not meet expected and communicated performance standards, including non-compliance with Policy Documents.

External Party(ies): any FNHA business partner entity or other non-FNHA entity.

Information: Data organized and analyzed in a structured manner that provides context.

News Media: print, broadcast, and internet outlets and their representatives that deliver Information to the public.

Personal Information: information that can identify an individual (whether alone or in combination with other information) or that is about an identifiable individual. Personal information includes Worker personal information but does not include their business contact or work product information.

Policy Document(s): all existing documents within a policy set, including the Board-approved policy that provides principles and guidance and delegates authority to the CEO; consistent with approved policy, CEO-approved executive directives that provide direction for the approach, outline required and prohibited actions, and delegate accountabilities to Senior Executives; and, consistent with approved executive directives, any procedures approved by Senior Executives that outline specific steps to be followed.

Senior Executive(s): includes the Chief Executive Officer, Chief Officers, and Vice Presidents.

Worker(s): includes individuals employed or contracted with FNHA while engaged in an FNHA work activity; specifically, employees (union, non-union; permanent, term, casual; full-time, part-time); people working at FNHA through an Interchange Agreement; people paid via third party agencies (temporary workers); contractors; consultants; trainees; students; volunteers.
6.0 Related Documents

Mandatory Compliance Documents
First Nations Health Authority Bylaws
Societies Act (British Columbia)

Supporting Documents
Access to Corporate Information Executive Directive
Access to Corporate Information Procedure

Other FNHA Policy Documents
Corporate Communication Policy Documents
External and Internal Audit Policy Documents
Financial Information Approval and Disclosure Policy Documents
Health Data and Information Governance Policy Documents
Personal Information Privacy Policy Documents
Progressive Corrective and Disciplinary Action Policy Documents

7.0 Rescind and Interpretation Statements

7.1 With the approval of this policy, older versions are considered to be replaced and/or rescinded and are no longer in effect.

7.2 Where interpretation is required regarding the relationship between Policy Documents, the CEO has sole discretion to provide the interpretation.

8.0 Summary of Changes

<table>
<thead>
<tr>
<th>Replaces</th>
<th>Dated</th>
<th>Key Changes to Previous Version</th>
</tr>
</thead>
<tbody>
<tr>
<td>IAC-18-002-004 Access to Corporate Information Policy</td>
<td>May 3, 2018</td>
<td>• Updated to current conventions.</td>
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9.0 Attachments

None