

**FOI Assist Seminar Series 2026
Seminar #5**

Reducing FOI Request Volumes with the “Publicly Available Information” Exemption

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Reducing FOI Request Volumes
October 15, 2026



FOI Assist

FOI Assist Seminar Series 2026, Seminar #5:

Reducing FOI Request Volumes with the “Publicly Available Information” Exemption

Program: October 15, 2026, 10:00 a.m. – 11:00 a.m. Eastern Time

Learning Objectives:

- Identify opportunities to reduce formal FOI request volumes using routine disclosure and alternative access systems.
- Understand when FIPPA s.22 and MFIPPA s.15 allow institutions to direct requestors to alternative access systems.
- Learn how to establish effective alternative disclosure systems.
- Recognize important limitations involving fees, personal information, and third-party interests.

The FOI Assist Seminar Series

The FOI Assist Seminar Series (2026)

- Throughout 2026, FOI Assist is hosting free, live online seminars exploring Ontario's Freedom of Information legislation.
- Our goal is to provide practical guidance that helps FOI professionals improve their workflows and strengthen legislative compliance.
- Previous seminars:
 - Third Party Information and the Affected Person Process
 - Frivolous and Vexatious Requests
 - Bill 97: Significant Changes to Ontario's FOI Legislation
 - Time Extensions and Staged Access Plans
- At least one more seminar is planned for 2026.
- Future seminars will be announced through the FOI Assist Knowledge Base.

Why Does FOI Assist Offer These Seminars?

- I'm a lawyer and formerly managed the provincial FOI program at the **Toronto 2015 Pan/Parapan Am Games Organizing Committee.**
- FOI Assist develops software to help Ontario's public institutions manage Freedom of Information requests.
- To keep our software current, we closely follow legislative amendments, IPCO decisions, and developments affecting Ontario's FOI framework.
- These free seminars are a way to share that research with the Ontario FOI community.
- These are educational seminars, not product demonstrations.

Writing the Quiz and Obtaining Your Certificate

- After today's seminar, you will receive a link to the post-seminar quiz.
- Please complete the quiz to confirm your name and attendance.
- Participants may receive:
 - **Certificate of Attendance** — for attending the seminar and submitting the quiz.
 - **Certificate of Completion** — for attending the seminar and passing the quiz.
- Participants who successfully complete five or more seminars during 2026 will also qualify for the **FOI Practitioner Certificate — FOI Assist Seminar Series (2026)**.

Reducing FOI Request Volumes with the “Publicly Available Information” Exemption

Édouard Detaille, Une Grille de Jardin Public
(A Gate in a Public Garden), 1869



Today's Agenda

1. Alternative Disclosure Systems
2. Benefits of Alternative Disclosure
3. The “Publicly Available Information” Exemption
4. IPCO Decisions
5. Four Kinds of Alternative Disclosure Systems
6. Pitfalls and Tips
7. Conclusions & Takeaways
8. Questions

Alternative Disclosure and Its Advantages

Alternative Disclosure Systems (a.k.a. Routine Requests)

You don't have to use FOI requests for everything!

- Institutions can establish alternative procedures for providing records outside the formal FIPPA/MFIPPA process.
- These procedures go by various names:
 - Routine Requests
 - Routine Disclosure
 - Informal Requests
 - **Alternative Disclosure**
- Institutions may also **charge fees** for these requests, provided they have the legal authority to do so.

Examples of Alternative Disclosure Systems

- **City of London — Permit and Construction Plans**

- The City charges **\$95 + HST per address and permit**, with additional charges for extra permits.
- Requests are submitted using a designated form and email address.
- Requestors who are not the property owner must provide the owner's authorization.

- **London Police Service — Forensic Photographs**

- Written requests are submitted to the Forensic Identification Section.
- Fees are \$47 for up to 10 images, plus \$8 for each additional photograph + HST.
- The request process requires specified incident details and appropriate authorization.

Examples of Alternative Disclosure Systems

- Queen's University offers a process for obtaining reproductions of archival records.
- Requests are processed through the Archives rather than the FIPPA FOI process.

Reprographic Services

Price List

Archival Material	Format	Fee*
Print	pdf	\$20 per 15 minutes of time (minimum) to a maximum of two hours
Photograph, Negative, Transparency	jpeg, tiff	\$20 for one; 3 or more \$15 each
Sound Recording - Reel to Reel	.wav	\$25 per reel
Sound Recording - Audio-Cassette/CD	.wav	\$20 per audio-cassette/CD
Video Recording - Video	mp4	\$25 per tape
Video Recording - Film	mp4	\$35 per reel
Certified copy/ extract	pdf**	\$25 per extract (**copy sent by mail and email)
*Third-party costs will be an additional fee billed to the requester.		

Why Not Just Use FOI for everything?

- The formal FOI process exists to ensure “access by default”
 - This ensures members of the public always have an enforceable right of access to government records unless there’s a good reason to deny access.
- But that doesn't mean every request for records needs to go through the formal FOI process.
- In many circumstances, FOI should serve as a system of last resort.
- The formal FOI process is complicated, highly regulated, and somewhat adversarial.
- Institutions can make information available more efficiently in other ways.

Why Not Just Use FOI for everything?

- The formal FOI process is comparatively complicated, highly regulated, and somewhat litigious.
- Imagine walking into a store with a question or complaint and being told, **“If you have a question or a complaint, sue us!”**
- Nobody would consider that good service.
- Yet sometimes that's essentially what we're doing when we insist that every request for records must go through the formal FOI process.
- **Surely there must be a better way!**

The Better Way: Alternative Disclosure

- Alternative disclosure can be a win-win for institutions and requestors.
- Requestors appreciate having clear instructions and a straightforward process.
- Institutions can eliminate unnecessary steps and paperwork.
- Requests can often be completed more quickly.

- For many records, the entire “alternative” process may be:
 - Receive request (and any required payment)
 - Review request for correctness/completeness (and reject if faulty)
 - Provide records
- **Why use a complicated process when a simple one will do?**



Benefits of Alternative Disclosure

Benefit #2 — Flexible Timelines

- There is no automatic 45-business-day deadline for requests handled outside the statutory FOI process.
- Institutions can establish service standards that make sense for each type of request.
- And not every request needs a formal deadline!
 - “Service Levels” may be enough
 - What about no timelines at all?

Benefits of Alternative Disclosure

Benefit #3 — More Sensible Fee Structures

- Standard FOI fees generally don't reflect the cost of processing requests.
- Alternative fees do not have to follow the FIPPA/MFIPPA fee schedule.
- Fee structures can better reflect the services being provided.
- Examples:
 - \$25 per photograph, or \$100 for five photographs.
 - A fixed fee for a report or package of records.
 - A fee based on the length of the requested camera footage
- A single payment, rather than an **application fee**, followed by an interim **fee deposit** and then a **final fee**.
- Potential for consolidated invoicing for frequent requestors.

Benefits of Alternative Disclosure

Benefit #4 — Fewer Opportunities for Appeal

- Almost every decision (as well as mistakes and omissions) made processing an FOI request can be appealed.
- For example:
 - Access decisions
 - Deemed refusals
 - Fees, interim fee estimates and even decisions around fee waivers
 - Time extensions
 - Staged access plans
- Alternative disclosure typically involves fewer decisions with fewer opportunities to appeal.

Benefits of Alternative Disclosure

Benefit #5 — Distribute the Workload

- The FOI team doesn't need to manage every request!
- Alternative disclosure systems can direct requestors to the relevant department:
 - Archives
 - Building and Planning
 - Finance
 - Forensics
- Consider establishing dedicated email addresses or request forms for particular categories of records.
- This may require collaboration with the relevant departments.

Benefits of Alternative Disclosure

Benefit #6 — The IPCO Likes Routine Disclosure

- The Information and Privacy Commissioner of Ontario has long encouraged institutions to make information available through routine disclosure and active dissemination.
- The IPCO recognizes that alternative disclosure can:
 - Improve public access to government information.
 - Reduce administrative complexity.
 - Reduce reliance on the formal FOI process.
 - Allow institutions to provide information more efficiently.
- IPCO decisions support the idea that alternative access systems can replace the formal FOI process where appropriate.

Benefits of Alternative Disclosure

Benefit #7 — You Can Require Use of the Alternative System

- An alternative disclosure system doesn't have to be optional.
- Under certain circumstances, an institution can refuse to process a formal FOI request for records that are already available through an established alternative access system.
- The legal basis is the “Publicly Available Information” exemption:
 - FIPPA s.22 / MFIPPA s.15
- In other words, an institution may be able to establish a better request process for certain types of records — and then require FOI requestors to use that other process instead.
- **Of course, there are rules and limitations! More on that now...**

The “Publicly Available Information” Exemption

**a.k.a. “Information Soon to be Published”
FIPPA s.22, MFIPPA s.15**

The “Publicly Available Information” Exemption

- The basic rule is, if you have a **reasonable, regularized system of access** for providing certain types of records to the public, you can **refuse to disclose those records** in response to an FOI request.
- This is because of the **Publicly Available Information** exemption (FIPPA s.22 / MFIPPA s.15)
 - Also known as the **Information Soon to be Published** exemption.
- This exemption is what allows institutions to replace the standard FOI system and fee structure with a different disclosure framework for particular records, **and then refuse FOI requests for those same records.**

The “Publicly Available Information” Exemption

FIPPA s.22 / MFIPPA s.15

Information soon to be published

A head may refuse to disclose a record [if],

*(a) the record or the information contained in the record has been published or is **currently available to the public**; or*

*(b) the head believes on reasonable grounds that the record or the information contained in the record will be published by an institution **within 90 days** after the request is made or within such further period of time as may be necessary for printing or translating the material for the purpose of printing it.*

The “Publicly Available Information” Exemption

- The **Publicly Available Information** exemption typically applies to requests for commonly-requested types of records, where a customized disclosure system has been established
 - We’re generally talking about types of records where enough requests are made for them that it makes sense to set up a dedicated alternative process
- And generally, we’re talking about records that are fully disclosable to anyone upon request (subject to payment of any required fees)
- “**Available to the public**” does not necessarily mean **free, available online, or already published**
- Even records which contain **personal information** or other information that needs to be redacted can be part of an alternative disclosure system

The “Publicly Available Information” Exemption

What Does “Available to the Public” Mean?

- To rely on the **Publicly Available Information** exemption, the important consideration is whether the requested records are **available through a “regularized system of access”**

IPCO Order P-327 (July 14, 1992)

*In my view, in order for records to qualify [for the “Publicly Available Information” exemption], they must either be **published or available to members of the public generally, through a regularized system of access**, such as, for example, a public library or a government publications centre.*

The “Publicly Available Information” Exemption

- The key expression is “**regularized system of access.**”
- A record doesn't necessarily have to be sitting on a public website.
- It is enough that any member of the public can obtain it through an established procedure.

The “Publicly Available Information” Exemption

What Counts as a “Regularized System of Access”?

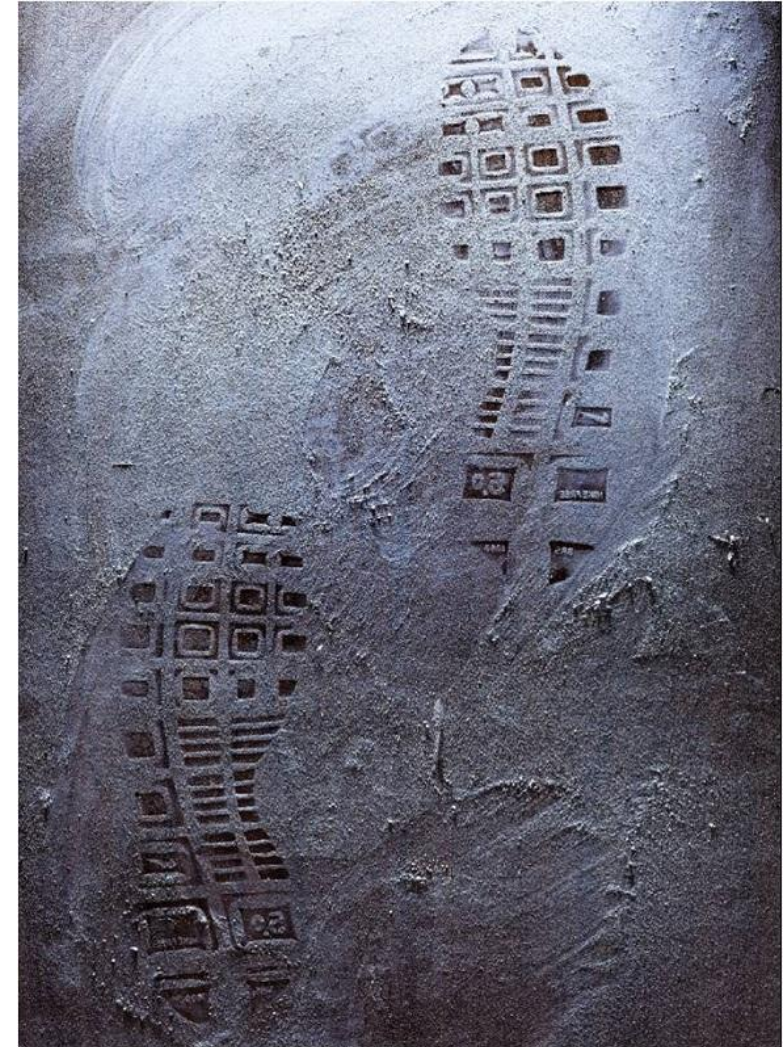
- The legislation leaves us with some important questions:
 - What exactly qualifies as a regularized system of access?
 - Must the records be available to absolutely everyone?
 - Is it acceptable to charge fees?
 - How much can an institution charge?
 - Can the alternative fees be higher than the standard FOI fees?
- To answer these questions, we need to look at IPCO decisions.

Information and Privacy Commissioner of Ontario (IPCO) Decisions

The “Publicly Available Information” Exemption

Order MO-4384 York Regional Police (May 30, 2023)

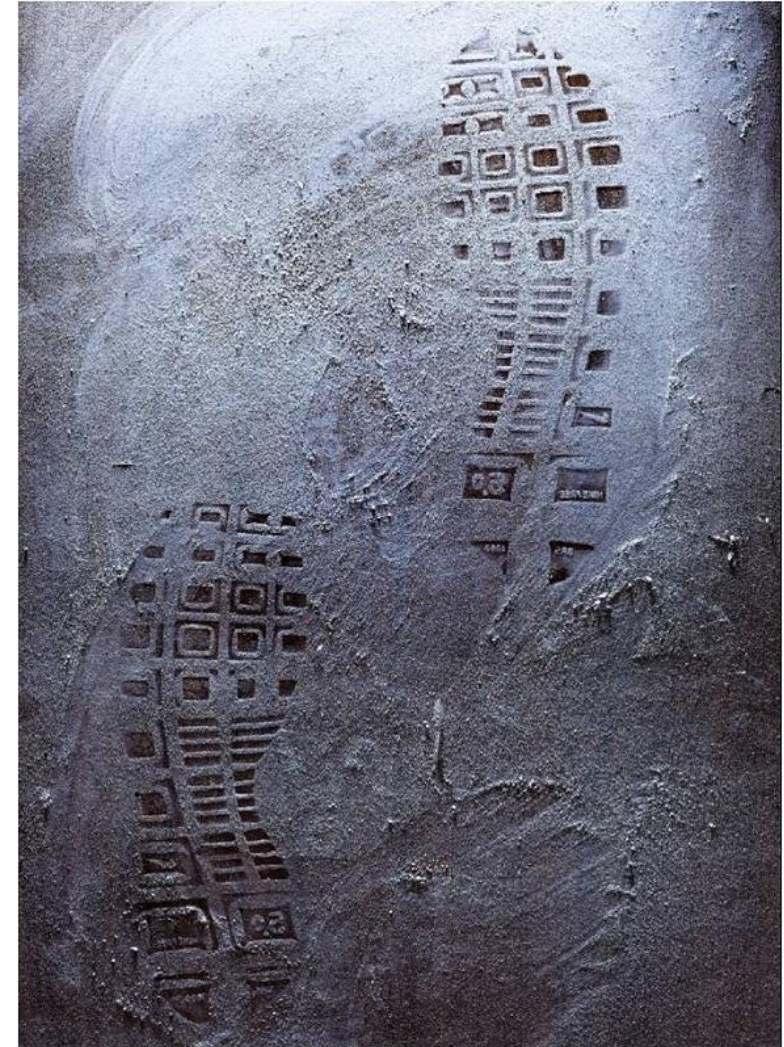
- York Regional Police received an MFIPPA request for various records relating to a particular incident.
- During mediation, the police disclosed several requested records.



The “Publicly Available Information” Exemption

Order MO-4384 *cont’d*

- However, the police refused access to 32 **crime-scene photographs** under MFIPPA s.15(a).
- They took the position that the photographs were already “**available to the public**” through an established alternative access system.



The “Publicly Available Information” Exemption

MO-4384 cont’d

- York Regional Police had a special process for requesting crime-scene photographs.
- The police took the position that:
 - The photographs were available to members of the public through this process by submitting a request and paying the required fees.
 - Therefore, the photographs qualified for exemption under MFIPPA s.15(a).
- The requestor objected to having to pay the alternative fees.
 - They would have paid less under an FOI request.

The “Publicly Available Information” Exemption

MO-4384 cont’d

- York Regional Police had established a procedure under which any member of the public could request crime-scene photographs.
- Requests could be submitted in writing or in person.
- A municipal by-law established fees of \$51 per 10 photographs.
- The requestor was charged \$153 for the 32 photographs.
- The requestor did not want to pay the \$153 charge and challenged the police's reliance on s.15.

The “Publicly Available Information” Exemption

MO-4384 cont’d

- **IPCO: What does it mean for a record to be “currently available to the public”?**
 - It does **not** necessarily mean that the record has already been published or placed somewhere for the public to browse.
 - A record can be “currently available to the public” as long as **any member of the public can obtain it through a regularized system of access.**

The “Publicly Available Information” Exemption

MO-4384 cont’d

- For s.15(a) to apply, the institution must establish that the record is **available to the public generally** through a regularized system of access.
- The institution must show that:
 - **a system exists;**
 - **the record is available to everyone; and**
 - **there is a pricing structure that is applied to all who wish to obtain the information.**

The “Publicly Available Information” Exemption

MO-4384 cont'd: Applying the Test

- The IPCO found that all three requirements were satisfied:
 - **An established system existed:** York Regional Police had a procedure for requesting and obtaining photographs.
 - **The records were available to everyone:** Any member of the public could use the system.
 - **A pricing structure applied:** The fees were established under a municipal by-law.
- The IPCO also confirmed that:
 - The alternative fees **did not have to match the MFIPPA fee structure.**
 - The \$153 charge was not so high that it amounted to **an effective denial of access.**

The “Publicly Available Information” Exemption

MO-4384 cont'd

- The IPCO upheld the police's reliance on MFIPPA s.15(a).
 - The photographs were currently available to the public through a **regularized system of access**.
 - Accordingly, York Regional Police was **entitled to refuse disclosure** under the formal FOI process and direct the requestor to its existing access procedure.
- **Takeaway: An institution can establish an alternative system of access — with its own fee structure — and rely on s.15 to refuse FOI requests for the same records.**

The “Publicly Available Information” Exemption

Important limits on MFIPPA s.15 / FIPPA s.22

- The exemption is **discretionary**.
 - An institution may still **choose to disclose** the records in response to an FOI request.
- A **regularized system of access** is not simply any alternative process the institution chooses to create:
 - the records must actually be **available to everyone**;
 - the fee cannot be so high that it amounts to an **effective denial of access**; and
 - to deny an FOI request, the institution must ensure that the **same records** are available through the alternative system.
- The purpose of the exemption is to **facilitate alternative access** — not to allow institutions to avoid their obligations under FIPPA or MFIPPA.

Other IPCO Decisions

P-1316 Ministry of Finance (December 16, 1996)

- The requestor sought municipal property assessment information.
- The Ministry had established a procedure for providing assessment-roll information on computer tape.
- The fee for obtaining the information was approximately **\$1,700**.
- Despite this substantial charge, the IPCO upheld the Ministry's reliance on the publicly available information exemption.
- **Takeaway: Alternative access fees can differ substantially from standard FOI fees without necessarily preventing reliance on the exemption.**

Other IPCO Decisions

MO-1573 Niagara Regional Police Service (September 24, 2002)

- The police had established a system for providing traffic reconstruction records, including “complete reports” costing \$2,500.
- An important question arose: **Can records be publicly available if they also contain personal information?**
- The IPCO accepted that the system could qualify even though:
 - The records contained personal information that would have to be redacted.
 - The redactions could vary depending on whether the requestor was involved in the accident.
- **Takeaway #1: The existence of personal information in a record does not disqualify it from being made available to the public under a regularized system of access.**
 - As long as it is redacted appropriately.
- **Takeaway #2: A regularized system of access does not necessarily require that every requestor receives exactly the same information.**
 - Redacting different personal information depending on the identity of the requestor is OK!

Other IPCO Decisions

MO-4530 City of Toronto (June 7, 2024)

- A requestor sought the addresses and amounts owing for all properties in Toronto with municipal tax arrears.
- The City argued that the information was already publicly available.
- Under the City's alternative system:
 - Members of the public could purchase tax certificates for individual properties.
 - Each certificate cost \$76.43.
- A requestor could theoretically purchase all the certificates and identify which properties had tax arrears.
- On this basis, the City relied on MFIPPA s.15(a) to refuse the request.

Other IPCO Decisions

MO-4530 cont'd

- The IPCO rejected the City's reliance on MFIPPA s.15(a).
- The requestor wanted to identify which properties had tax arrears.
- To obtain that information through the City's alternative process, the requestor would potentially have needed to **purchase certificates for every property in Toronto**.
- The IPCO found that:
 - The particular information requested was not genuinely available through the alternative system due to the “enormously high fee” required to obtain the records.
 - The cumulative fees would amount to an **effective denial of access**.
- **Takeaway: The alternative system must provide a reasonable method of obtaining the requested information — not merely a theoretical one.**

Not Every Alternative Disclosure System Qualifies

MO-4532 Hamilton Police (June 17, 2024)

- A requestor sought police records relating to motor vehicle collisions he was involved in.
 - These included witness statements and occurrence reports.
- The police argued that many of the records were available for purchase through an alternative access process and relied on MFIPPA s.15(a) to refuse disclosure.
- The IPCO rejected this argument, because the alternative system **restricted access** to only people or companies directly involved in the accident, their lawyers, and their insurers.
- Although the requestor could obtain the records through the alternative process, **the records were not available to members of the public generally.**
 - Therefore, s.15(a) did not apply.
- **Takeaway: A system that provides records only to “authorized” or “qualified” individuals is generally not a system of public access.**

Four Kinds of Alternative Disclosure Systems

Four Kinds of Alternative Disclosure Systems

- Institutions have considerable flexibility in how they make records available outside the formal FOI process.
- Consider four approaches:
 - **Scheduled Disclosure:** Publish records regularly, e.g., monthly or quarterly.
 - **Responsive Publication:** Publish records in response to public demand or interest.
 - **Free Routine Access:** Make specified types of records available to anyone who requests them, free of charge.
 - **Fee-Based Routine Access:** Establish a separate procedure and fee structure for obtaining particular types of records.
- Different approaches may be appropriate for different categories of records.

Four Kinds of Alternative Disclosure Systems

Approach #1: Scheduled Disclosure

- If an institution routinely publishes records on a schedule, you can refuse to disclose records in response to an FOI request under FIPPA s.22 / MFIPPA s.15, as long as such records will be published within 90 days after the request is made.
- This is why the exemption is also known as the “Information Soon to Be Published” exemption.

Four Kinds of Alternative Disclosure Systems

Approach #1: Scheduled Disclosure (cont'd)

- This has the effect of encouraging institutions to routinely publish information on a schedule.
- It prevents requestors from putting the institution through extra work just to get records a few days early.
- The 90-day deadline gives institutions more time than a typical FOI request, although this isn't as significant as it used to be before Bill 97 changed the basic deadline from 30 calendar days to 45 business days.

Four Kinds of Alternative Disclosure Systems

Approach #1: Scheduled Disclosure (cont'd)

- A.K.A. “Active Dissemination”
- Typical examples of Scheduled Disclosure may include:
 - Council / Committee meeting records
 - Expense reports
 - Procurement awards
 - Statistics (e.g., FOI requests received)
 - FOI disclosure (general records)
 - Accounting
- Your institution may already have obligations to publish certain records on a scheduled basis.

Four Kinds of Alternative Disclosure Systems

Approach #2: Responsive Publication

- Scheduled Disclosure isn't always practical.
- Another approach is to publish records once the institution becomes aware of public interest in them.
- For example:
 - An institution receives inquiries about a particular project.
 - Staff identify records that can be released publicly.
 - The institution publishes those records on its website.
- Instead of disclosing the same records repeatedly, the institution makes them available to everyone.

Four Kinds of Alternative Disclosure Systems

Approach #2: Responsive Publication

- Responsive disclosure allows the institution more time to respond than an FOI request.
 - You can refuse an FOI request if you know you'll be publishing the information within 90 days.
- It may reduce the volume of FOI requests the institution receives.
 - Requestors seeking the same information can simply find it on the website.
 - Other requestors may be satisfied with what is publicly available rather than going through the FOI process themselves.
 - Institutions can refuse further requests for the same records under s.22/s.15.

Four Kinds of Alternative Disclosure Systems

Approach #3: Free Routine Access:

- An institution can establish a procedure for providing particular types of records to members of the public upon request, free of charge.
- The records don't necessarily have to be published online.
- For example:
 - A designated email address receives requests for a particular type of record.
 - Staff retrieve and provide the requested records.
 - There is no charge for the service.
- This is a simple way to encourage requestors to obtain information without using the formal FOI process.
- A sufficiently established and genuinely public system may support reliance on FIPPA s.22(a) or MFIPPA s.15(a).

Four Kinds of Alternative Disclosure Systems

Approach #3: Free Routine Access (cont'd):

- It's one thing to say: “We would have given you those records informally if you'd only asked!”
- It's another thing to have an actual, established system for providing those records to the public.
- I would recommend:
 - Identifying the categories of records available.
 - Publishing instructions for obtaining them.
 - Providing a dedicated contact method.
 - Establishing internal procedures to ensure consistent disclosure.
- Even a simple webpage identifying categories of records and providing an email address can be a good starting point.
- The more clearly established the system, the easier it will be to demonstrate that public access is genuinely available.

Four Kinds of Alternative Disclosure Systems

Approach #4: Fee-Based Routine Access

- An institution can also establish an alternative system under which requestors pay to obtain particular records.
- Depending on the institution's legal authority, the system may involve:
 - Application fees
 - Fixed fees per record
 - Fee deposits
 - Final fees payable before disclosure
- Alternative fees may be structured differently from the fees prescribed under FIPPA and MFIPPA.
- However, fees must be **legally authorized** and **cannot be so prohibitive that they effectively deny access.**

Pitfalls and Tips

Tips on Establishing Alternative Disclosure Systems

Pitfall #1: Records Not Genuinely Available to the Public

- To rely on the publicly available information exemption, the records must be available to all members of the public.
- A system restricted to “approved” or “involved” requestors likely will not qualify.
- However, public availability does not necessarily require identical disclosure to everyone.
 - E.G., it’s OK to redact personal information for requestors to whom it does not relate.

Tip: If requestors must somehow “qualify” to use your alternative disclosure system, the records are probably not genuinely available to the public.

- (For example, requiring requestors to be involved in an incident, to own the relevant property, or to be acting as a legal representative to obtain records.)

In which case, you can't rely on FIPPA s.22(a) or MFIPPA s.15(a) to refuse FOI requests for those same records.

Tips on Establishing Alternative Disclosure Systems

Pitfall #2: Personal Information and Confidential Information

- Alternative disclosure does not eliminate an institution's obligations to protect personal information, confidential third-party information, and any other information that is exempt from disclosure.
- Where records contain information that would ordinarily trigger the affected-person notification process under FIPPA or MFIPPA, institutions should be especially cautious about releasing those records informally.

Tip: If an affected person process might be warranted, handle the request using the formal FOI process.

Tips on Establishing Alternative Disclosure Systems

Pitfall #3: No Authority to Charge Fees

- Do you actually have legal authority to impose fees?
- The answer can depend on the type of institution:
 - Municipalities and police services typically will rely on municipal by-laws.
 - Colleges, universities, and other public institutions may have different sources of authority for charging for records or services.

Tip: Before establishing a new fee structure, confirm you have appropriate legal authority in place to charge fees.

(Obtain legal advice where necessary!)

The FOI Assist Software

The FOI Assist Software

The FOI Assist software supports both **formal FOI requests** and **Routine Requests**.

- Institutions can establish separate Routine Request types for different categories of records.
- Each request type can be customized, including:
 - Application fees, deposits, and final fees
 - Requirements for forms and supporting documents
 - Internal approvals and processing steps
 - Optional deadlines and time extensions
 - Acknowledgement, decision, and disclosure letters
- Routine Requests can be configured with or without fees.

The FOI Assist Software

 **FOI Assist**

Photos Request 2026-02: Photos of new building

R







Routine Request Status

Date Received:	May 18, 2026
Request Wording:	Can you provide any photos of your the new office building
Additional Fees Charged:	\$30.00
Total Fees Charged:	\$30.00
Fees Collected:	\$0.00
Fees Owning:	\$30.00

Edit Request Details

Quick Memo to File

Memo Title:

Date of Memo: 2026-05-18 

Save Memo to File

Summary of Recent Events

Date	Event	Description
May 18, 2026	New request created	Can you provide any photos of your the n...

View or Edit Events

Standard Actions

Acknowledge Request

Application Fee Missing

Fee Required

Documentation Needed from Requestor

Internal Approval Received

Minimal Letter

Multi-Purpose Letter

Disclosure Letter

Issue Time Extension

Application Fee Received

Fee Payment

Request Form Received

Identification Received

Supporting Documentation Received

Decision Letter

Close Request

Return to Routine Request Selection R

Custom Actions

No custom action templates saved yet.
Create and save templates when working on actions to see them here.

Request Configuration

Custom Actions

Letter Templates

Conclusions & Takeaways

Conclusions

- Formal FOI requests shouldn't be the only way the public obtains access to government records.
- Alternative disclosure systems can:
 - Make information easier and faster to obtain.
 - Reduce the administrative burden on FOI staff.
 - Allow institutions to establish procedures better suited to particular types of records.
 - Provide greater flexibility in service standards and authorized fees.
 - Reduce the number of requests requiring formal FOI processing.
- FIPPA s.22 and MFIPPA s.15 can be employed to require requestors to use an alternative access system.

Key Takeaways

Where to start?

- Identify frequently requested records. Look for categories of records that repeatedly generate FOI requests.
- Consider which alternative disclosure process to use.
 - Could the records be published routinely, provided free of charge upon request, or made available under a separate fee structure?
- Consider your authority to charge fees, and how personal information, third-party information, and other exempt information will be handled.
- Establish a regularized system of access. Make sure the procedures are clear, consistently applied, and genuinely available to the public.
- Rely on FIPPA s.22 or MFIPPA s.15 to refuse FOI requests where appropriate.
- Start with one category of frequently requested records — and build from there.
 - Photographs? Property records? Surveillance videos? Body camera footage?

Next Steps

You will receive two separate emails:

- One later today with the link to the quiz, and
- Another at a later date with information about the next seminar in the FOI Assist Seminar Series.

Today's slides will be posted to the FOI Assist Knowledge Base this week.

Please keep an eye on your inbox (and your junk/spam folder, just in case!)

Thank you for attending!

Justin Petrillo
President & Founder
FOI Assist Corporation

foiassist.ca