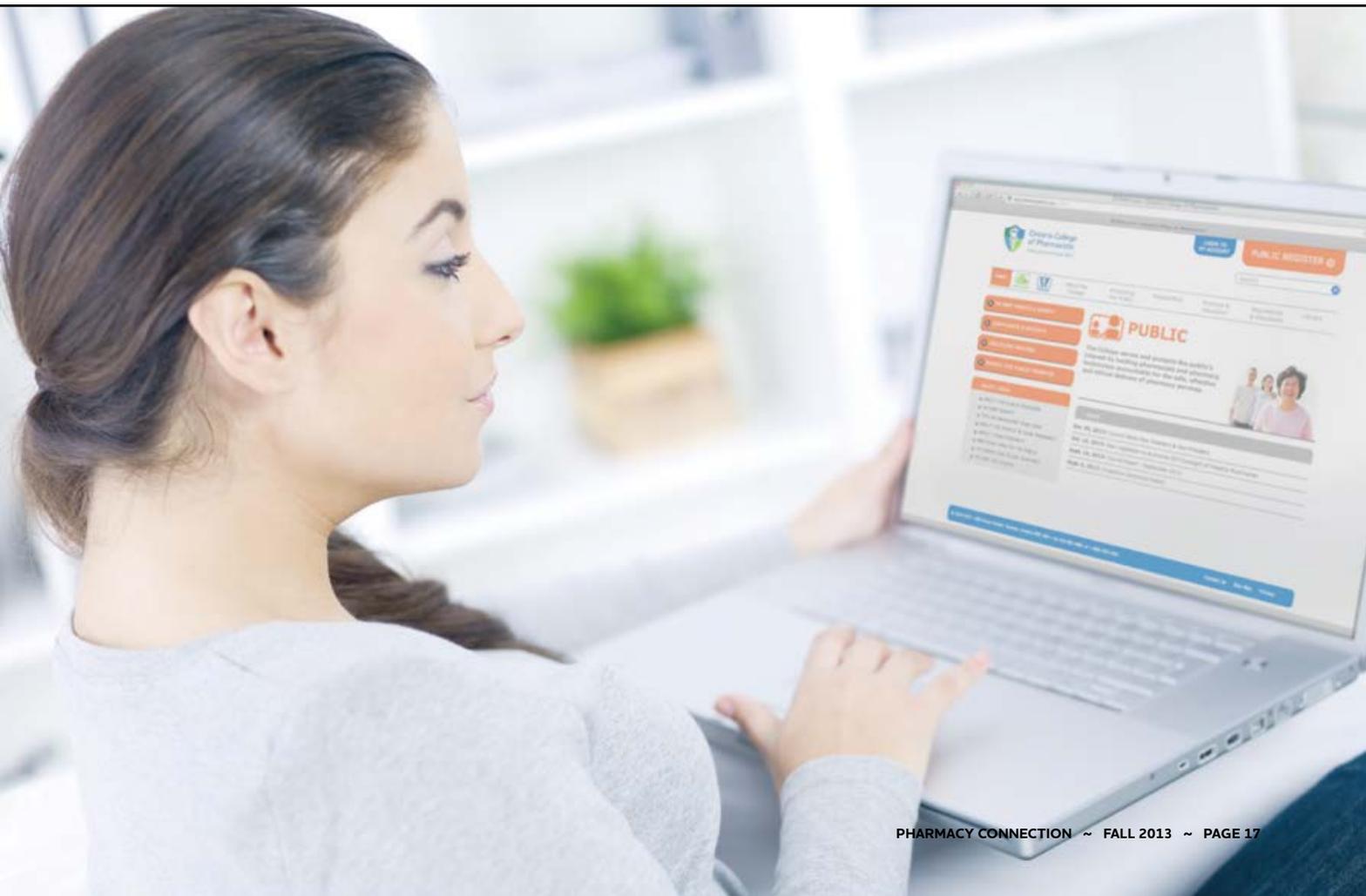


# Transparency – evolving the way we think about what we share

It would be virtually impossible and definitely irresponsible to ignore the public's growing call – particularly towards organizations with a public interest mandate – for greater transparency. As the regulatory body for the profession of pharmacy in Ontario, the College has always understood that the public's trust is contingent on our ability to demonstrate our accountability to this mandate.

Mr. Steven Lewis, a health policy consultant and adjunct professor of health policy at Simon Fraser University speaking on this topic to the College of Physician and Surgeons of Ontario's Council said, "public trust has taken a huge hit in the last 20 years. The result is a citizenry deeply skeptical about the motives of institutions."

This has led to a worldwide social movement of transparency and a



demand for access to information long kept private. And if that information is not provided willingly, it will often be taken forcibly. If organizations are not opening up, people will be prying them open, said Lewis.

Lewis does not believe that maintaining the status quo is an option for any organization, especially one with a mandate to protect the public interest concluding, "the culture has changed irreversibly".

Respecting this reality, this College, as part of a small group of health professional regulators (AGRE – Advisory Group of Regulatory Excellence), is working on a multi-staged initiative that will see us examine our information-sharing practices and determine how we might make more information available about decisions and processes. The approach recognizes that access to more information may assist members of the public in choosing a regulated health professional, enhance accountability, and better inform any evaluation of the performance of self-regulation of the profession.

The first step in this initiative has been the development of transparency principles which will ultimately guide regulatory colleges' future decisions about making more information available to the public.

In developing the draft principles (at right), the group – which consists of representatives from medicine, nursing, dentistry, pharmacy, optometry and physiotherapy – had several objectives:

- To keep the number of principles low, with good rationales and supporting evidence; and
- To strike a balanced tone, one that demonstrates openness to transparency, combined with a thoughtful, careful approach and recognition of the strengths of the existing legislative framework.

It is important to note that the principles are not meant to relate to member-specific concerns only, such as the outcome of complaint investigations. But also to address broader transparency issues, including information about processes and aggregate data about outcomes.

The eight draft principles can be summarized briefly as follows:

1. Public requires information to trust that the system works;
2. More information improves choice and accountability;
3. Information should be relevant, credible and accurate in order to support #2;
4. How information is provided matters – it must be timely, easy to find and understand, and have context;
5. Remediation protects the public and requires confidentiality;
6. Discussions about transparency should balance the principles of public protection and accountability, with fairness and privacy;
7. More risk requires more transparency; and
8. Consistency – the public should be able to expect to obtain the same kind of information about any regulated healthcare professional in Ontario.

These principles which were approved by College Council at their September meeting are currently in the final stages of consultation and are expected to be finalized by the end of 2013. Following this, the working group, under the direction of AGRE, will recommend means by which all regulatory colleges could adopt and operationalize these transparency principles to guide decisions regarding disclosure and access to information.

The concept of transparency however is not new to the College; in fact it is one of the College's three core values as outlined in Council's strategic plan. As such, there are a number of recent changes that demonstrate our ongoing commitment to this concept. For example, the most recent updates to College by-laws included the addition of the public posting of the status and outcome of routine inspections of community pharmacies and drug preparation premises.

Additionally, in the re-design of the College's website, scheduled to launch in early 2014, one of the principles driving the design has been to ensure that information currently available to the public is easily accessible. This principle is based on the understanding that transparency is an equal blend of disclosure and accessibility.

Although there is still much to debate, one thing is clear; the conversation on transparency is evolving the way we think about what we share. 

1. College of Physicians and Surgeons of Ontario (DIALOGUE – Issue 3, 2013) "greater transparency, more accountability". Available at <http://www.cpso.com>

# Transparency Principles

**Principle 1:** *The mandate of regulators is public protection and safety. The public needs access to appropriate information in order to trust that this system of self-regulation works effectively.*

**Principle 2:** *Providing more information to the public has benefits, including improved patient choice and increased accountability for regulators.*

**Principle 3:** *Any information provided should enhance the public's ability to make decisions or hold the regulator accountable. This information needs to be relevant, credible and accurate.*

**Principle 4:** *In order for information to be helpful to the public, it must:*

- *be timely, easy to find and understand.*
- *include context and explanation.*

**Principle 5:** *Certain regulatory processes intended to improve competence may lead to better outcomes for the public if they happen confidentially.*

**Principle 6:** *Transparency discussions should balance the principles of public protection and accountability, with fairness and privacy.*

**Principle 7:** *The greater the potential risk to the public, the more important transparency becomes.*

**Principle 8:** *Information available from Colleges about members and processes should be similar.*