

Casino Gaming Commission

Information Disclosure Policy

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Introduction

1. The Casino Gaming Commission (CGC) is committed to making information about its activities available to the public. The CGC considers public access to information a key component of effective engagement with all stakeholders. Public access to CGC information facilitates transparency and accountability and enhances trust in CGC's activities to effectively regulate casino gaming in Jamaica.
2. This Information Disclosure Policy ("this Policy") encapsulates CGC's existing rules, policies and practices regarding information disclosure.

Purpose and objectives

3. This Policy is intended to ensure that information concerning CGC's activities is made publicly available, subject to the limitations set out in this Policy. To that end, this Policy explains principles, practices and procedures and defines clear categories of information according to their status with regards to public disclosure.
4. Information held by CGC is made available primarily through the CGC website, or by contact with CGC representatives at the CGC's office located at 78cef Hagley Park Road, Kingston 10, St. Andrew.

Scope of this Policy

5. This Policy applies to all CGC staff and to all Information in the custody of CGC. For the purposes of this Policy, "Information" means any produced content, in any medium (paper, electronic or sound, visual or audio- visual recording) concerning a matter relating to CGC's activities.

General principles of access to Information

6. Information accessible to the public shall be made available, as far as reasonable and practical, through the CGC website. An overview of information presently available to the public (or which is made available on an on-going basis) is listed in [Annex 1](#).
7. This Policy is guided by the principles of openness and transparency, such that any information concerning CGC is publicly accessible, or available upon request, unless one or more of the exceptions to the Policy applies.
8. Unauthorized disclosure of Information by a CGC staff member could result in disciplinary measures.

Access to Personal Data

9. The disclosure of personal data is subject to the Data Protection Act, which lays down the rules and principles relating to the onward transfer and processing by and within CGC of personal data of individuals. Any requests for access to personal data are subject to, and should be made pursuant to, the relevant provisions of the Data Protection Act.

Categories of Information

10. CGC is committed to open and transparent disclosure of information. Nevertheless, there are legal, operational and other practical considerations that are necessary to preserve the interests of the organisation, as well as those of its stakeholders. The application of these considerations has resulted in some exceptions to the principle of disclosure. As such, CGC information is classified by reference to three broad categories: publicly available information, information available on request,

and confidential information.

Category 1: Publicly available Information

11. [Annex 1](#) sets out an overview of publicly available information (i.e. information which is available on the CGC website).

Category 2: Information available on request

12. CGC makes available certain types of information on request only. In some cases, limitations may apply with regard to the types of requestor to whom information will be made available. In addition, restrictions (e.g. redaction of content) or conditions may be applied to the use of information available on request. [Annex 2](#) sets out an overview of information available on request.

Category 3: Confidential information

13. Information identified as confidential by CGC constitutes an exception to the principle of public disclosure. [Annex 3](#) provides an overview of information considered by CGC to be confidential. The exceptions to disclosure reflect what is necessary to preserve legitimate public or private (including personal privacy) interests, and to address the interests of the organisation as a matter of priority in the event that the interests of the organisation could conflict with private interests.
14. In exceptional circumstances, CGC reserves the right to disclose information deemed "confidential". CGC may exercise this right if it determines that the overall benefits and public interest of such disclosure outweigh the likely harm to the interest(s) protected by the exception(s). This may include situations in which the disclosure of certain confidential information would, in CGC's view, be likely to avert imminent and serious harm to public health or safety, and/or imminent and significant adverse impacts on the environment. Such disclosure by CGC would be on the most restricted basis necessary to achieve the purpose of the disclosure.

Procedure for submitting requests for disclosure of information

15. Any individual or entity may request the disclosure of CGC's non-confidential information that is not otherwise available through CGC website. Requests for disclosure of information should be clearly formulated and as specific as possible, and should identify the individual or entity making the request, the information being requested (with the title of the document, if known), and the time period covered by the request, where relevant.
16. This Policy does not apply to data existing only in raw form, either physically or electronically. CGC is not able to respond to requests that require the selection and/or manipulation of data to produce content.
17. Any request for disclosure of information must be submitted to the following email address: enquiries@cgc.gov.jm.

Conditions for facilitating requests for disclosure of information

18. CGC will endeavour to process requests for disclosure of information as promptly as possible. Depending on the complexity of the request, CGC will seek to respond to requests within 30 days of receipt of the request, and may extend the response time by a further 30 days where it is reasonable to do so. If no specific form of disclosure is requested, CGC may disclose information in any form which the CGC determines provides the requestor with reasonable access to inspect the information.
19. CGC may charge a fee to cover the cost of material and labour related to the disclosure of information, based on the estimated costs of retrieving and supplying the information requested, which will be communicated to the requestor in advance and must be paid in advance. CGC will refund the fee if the information requested is not provided. CGC reserves the right to charge an additional fee in complex cases.
20. CGC may deny a request for disclosure of information, in whole or in part, if any of the following situations apply if one or more of the limitations set out or referred to in this Policy or its Annexes applies.
21. The implementation of this Policy is subject to the intellectual property and other proprietary rights of CGC and third parties, including but not limited to patents, copyrights, and trademarks, which may, *inter alia*, limit the right to reproduce or exploit information.
22. The disclosure of information pursuant to this Policy shall not be construed as conveying any intellectual property or other rights to any third parties, including any requestor, of Information, which shall remain vested in CGC or parties collaborating with CGC, as the case may be.
23. No representation is made or warranty given, express or implied, as to the completeness or accuracy of information made available by CGC. Moreover, CGC does not warrant that the use of any third-party-owned individual component contained in the requested information will not infringe on the rights of those third parties. The risk of claims resulting from such infringement rests solely with the requestor/user. It is the responsibility of the requestor/user to determine whether permission is needed for any use of the information and to obtain permission from the copyright holder. In no circumstances will CGC be liable for any direct or indirect loss arising from the use of information.
24. Nothing contained in or relating to this Policy, or done pursuant to it, shall be construed as a waiver of any of the privileges and immunities enjoyed by CGC under national or international law, and/or as submitting CGC to any national court jurisdiction. Without limiting the generality of the previous

sentence, the disclosure of information in response to a request for disclosure, will not constitute a waiver, express or implied, of any of the privileges and immunities of CGC.

25. Disclosure requests as well as decisions taken with regard to disclosure requests and requests for internal review shall be logged by CGC. Responses to information requests and requests for internal review shall be copied to enquiries@cgc.gov.jm.
26. The CGC CEO, or his or her designated representative, may issue internal directives, procedures or guidelines with regard to the implementation of this Policy, including with regard to the delegation of authority to disclose Information on behalf of CGC.

Entry into force and application of this Policy

27. This Policy shall enter into force on the date it is approved by the Board of Commissioners of CGC. It applies to information created or coming into CGC's possession after its entry into force.
28. Heads of CGC Departments are responsible for ensuring compliance with this Policy, and for defining and periodically reviewing the classification of information for which they are responsible, in accordance with this Policy.
29. This Policy will be reviewed by the CGC Corporate Secretariat within three years of entry into force.

ANNEX 1

Overview of CGC information available on dedicated CGC website ("Publicly available information")

1. Institutional information

1.1 About CGC

1.2 The work of CGC

- Governing legislation
- Governing Regulatory Policies and Directions

2. Governance and Oversight

2.1 Board Composition

- Board Charter
- Committee Terms of Reference
- Code of Ethics
- Annual Reports

3. Management information and internal governance

3.1 Management profiles

Disclaimer: This list is not exhaustive. CGC may, at its discretion, following a case-by-case review, decide to classify other types of information as "Publicly available information".

ANNEX 2

Overview of types of CGC information available on request ("Information available on request")

This comprises all remaining information which is not publicly available on the CGC website ([Annex 1](#)), but is not classified by the Organization as confidential information ([Annex 3](#)).

Access to some information in this category may be restricted.

ANNEX 3

Overview of types of CGC information considered to be confidential ("Confidential information")

Confidential information is not normally subject to disclosure.

Confidential information encompasses "strictly confidential information", which applies to data assets and information that are highly sensitive and whose unauthorized disclosure, alteration or destruction could represent a significant risk of grave damage to the organization or stakeholders.

The following categories of information are classified as "Confidential information":

1 Personal information

CGC does not provide access under this Policy to information and documentation pertaining to either staff members or collaborators that has not already been made public by a staff member, collaborator or third party, including:

- Private and employment-related information beyond the title of a position, including human resources records, medical records, salaries and benefits, personal communications;
- Personal information received from individuals performing work for CGC including technical and scientific experts;
- Personal information received from or in respect of individuals applying for licences from CGC;
- Information on staff appointment and selection processes;
- Specific information on claims and internal conflict resolution proceedings;
- Personal declaration of interest forms and related internal deliberations or similar issues submitted by CGC staff members, as well as other individuals performing work for CGC and experts participating in CGC technical meetings;
- Prior to conclusion of a disciplinary process following an investigation, personally identifiable information of a subject of an investigation, allegations and/or investigations of allegations of misconduct (other than as reported to CGC Governing Bodies, or as required on a confidential basis to comply with inter-agency protocols/mechanisms, international or humanitarian obligations, or as a condition of donor funding).

2 Security and safety

- Information, the disclosure of which may endanger the life, safety or security of any individual, or
- Information, the disclosure of which may endanger the security of the public or prejudice the security or proper conduct of any operation or activity of CGC;
- Information, the disclosure of which may compromise the security and safety of any organisation (or its personnel) with which CGC collaborates;
- Information, the disclosure of which may jeopardize CGC property;
- Information about logistical and transport arrangements related to CGC's operations.

3 Information obtained or shared in confidence

- Information received from or sent to third parties under an expectation of confidentiality;
- Information obtained in confidence from a government, international organisation or other entity or person that would or would be likely to, if disclosed, compromise the CGC's relations with that party.

4 Confidential internal documents

- Internal email correspondence;
- Internal reports, analyses, reviews, notes for the record of internal meetings or meetings with third parties, statistics prepared solely to inform CGC's internal decision-making processes;
- Investigation reports of the CGC's investigators and officers;
- Medical records and personal medical information that is subject to doctor/patient confidentiality;
- Internal policy, guidelines, standard operating procedures, unless otherwise decided;
- Internal telephone directories;
- Information pertaining to corporate administrative matters.

5 Deliberative information

- Information concerning CGC's own internal deliberations, communications (including internal inter-office or intra-office documents such as emails, memos, and draft documents);
- Documents relating to the communications, deliberations and decisions of CGC internal bodies and internal advisory committees;
- Contributions to and deliberations of CGC expert panels and committees, technical advisory groups, including communications between CGC and its experts;
- Internal management documents produced by CGC for the information of senior management including without being limited to internal briefings, reports, self-assessments, corporate risk register;
- CGC's communications and deliberations with other entities with which CGC collaborates.

6 Privileged information

- Information covered by legal privilege, or the disclosure of which may expose CGC to legal risk;
- Legal advice and requests for legal advice;
- Information related to due process rights of individuals involved in internal audits and investigations;

7 Financial information

- Documents, analyses, correspondence or other information prepared for financial and budgetary transactions, or for the development of internal or external financial reports;
- Banking or billing information of CGC offices, contractors and vendors (companies or individuals), including consultants.

8 Commercial information

- Commercial information which, if disclosed, may harm either the financial interests of CGC or those of third parties;
- Information that is subject to obligations of confidentiality or non-disclosure pursuant to confidentiality agreements or other contractual or legal obligations of the organisation or which could, if disclosed, expose the organisation to disproportionate legal risk or violate applicable law or the organisation's internal regulations, rules and procedures.

9 Cabinet Documents

- Cabinet Submissions, Cabinet Notes or other document created for the purpose of submission to the Cabinet for its consideration and it has been or is intended to be submitted;
- Cabinet Decisions, or other official record of any deliberation of the Cabinet;
- opinions, advice or recommendations prepared for or a record of consultations or deliberations arising in the course of proceedings of the Cabinet or of a committee thereof.

10 Other

- Other kinds of information, which because of its nature, content or the circumstances surrounding its creation, use or communication is deemed confidential in the interests of CGC or third parties;
- Passwords, pins and other access codes for CGC systems.

Disclaimer: This list is not exhaustive. CGC may, at its discretion, following a case-by-case review, decide to classify other types of information as "Confidential information".

Version Control

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Approved by:	Board of Commissioners, CGC

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0-1	March 27, 2025