

Ref	Recommendation	Priority	Action	Status or date for completion	By Whom?
<b>Streamlining FOIA and EIR systems and responses as per suggestions from Browne Jacobson Report January 2011</b>					
3.7.1	Responding to requests that are for a statement of opinion.	1	<p>2A. Produce and implement a filter process to identify requests that are a statement of opinion.</p> <ul style="list-style-type: none"> <li>• <i>Occurs as part of initial review and triage</i></li> <li>• <i>Built into new guidance note and forms for completion by Information Holders (IH).</i></li> </ul> <p>2B i) Produce guidance for colleagues in services who typically deal with FOIs.</p> <ul style="list-style-type: none"> <li>• <i>New guidance form created (from 1<sup>st</sup> August 2011) to replace previous internal memo – which provides helpful information to colleagues on exemptions/exceptions, costs, opinions and advice. The document has been updated following colleague feedback.</i></li> </ul> <p>ii) Publish this guidance on line as part of the suite of information for user types on the new Information Governance (IG) case handling system, which will allow each user within the lifecycle of an FOI to directly access, view and upload information to the system.</p> <ul style="list-style-type: none"> <li>• <i>A new online training package is being produced to give guidance to colleagues on how to use the new IG case handling system and the benefits this system will</i></li> </ul>	<p><i>Complete</i></p> <p><i>Complete</i></p> <p><i>01.09.11.</i></p>	<p>SP</p> <p>SP</p>

			<p><i>bring. The training will be both interactive, online and class room based.</i></p> <p>Revise internal memo to departments notifying them of an FOI and requesting a response.</p> <p>iii) Cover this in the planned training (see ref 12) and in bespoke 121 interactions.</p> <ul style="list-style-type: none"> <li>• <i>See above comments with regards the new guidance form and also Ref 7 detailing the role of our Communications colleagues in assisting us with raising the IG profile.</i></li> </ul>	Complete	
3.7.2	That the Council seeks to ensure that it holds all recorded information on a centralised document management system. This would reduce the 'search and locate' workloads associated with responding to FOIA requests.	2	<p>3. To be considered as part of the Council's wider 'Corporate Records Management' function, having already been identified from a previous audit by the Archives Service.</p> <ul style="list-style-type: none"> <li>• <i>The IG Manager is in the process of preparing a scoping document to support a restructure of IG service to include corporate records management activities and business intelligence projects.</i></li> </ul>	TBC	MG

N/A	N/A – arising from internal source	1	<p>4A. Single point of contact within the Finance Service to be established to coordinate all finance requests.</p> <ul style="list-style-type: none"> <li>• <i>This has been agreed as Maria Balchin – the arrangement is that SP and MB meet fortnightly and review all cases with finance.</i></li> <li>• <i>Process is working extremely well with finance responding promptly and assisting other departments with enquiries as needed.</i></li> <li>• <i>MB handing over role to Barry Dryden on 15.08.2011.</i></li> </ul>	Complete	SP/AG
3.8	<p>The Council's publication scheme – which is required under FOIA to tell the world at large what types of recorded information the Council regularly creates and routinely publishes – is already used to good effect in publishing those documents that may routinely be created. It of course stands to reason that the more information that the Council can routinely publish through its publication scheme, the fewer requests will need to be dealt with by the Council's employees.</p>	1	<p>5A Review and update publication scheme to reflect the current state.</p> <ul style="list-style-type: none"> <li>• <i>Ongoing. Preparatory work is being undertaken to identify regularly requested information and to publicise this on our website.</i></li> <li>• <i>A classification scheme is being developed and this will link to the publication of all documents which are 'not protectively marked'.</i></li> <li>• <i>Departments are being supplied with monthly monitoring information and details of frequently asked questions in order to aid publication.</i></li> <li>• <i>Further investigatory work is being undertaken as to how best to present our publication scheme and make it more user friendly to both citizens and colleagues. To</i></li> </ul>	30.09.11	<p>SP</p> <p>SP</p> <p>SP</p> <p>SP/AG</p>

			<p><i>include built in review dates and accountable web authors.</i></p> <p>5B Produce short 1 or 2 page 'how to' guides and template documents for services to use and populate and them upload to their website. IG must be kept informed of any new uploads and these new items will be added to the Corporate Publication Scheme.</p> <ul style="list-style-type: none"> <li>• <i>Ongoing – this piece of work is currently being initiated and is linked to an IG Business Process Review being undertaken by Mark Ashford.</i></li> </ul>	30.09.11	
			<p>5C Review training materials to encourage publication where this is appropriate.</p> <ul style="list-style-type: none"> <li>• <i>Ongoing – training is being regularly reviewed and developed in accordance with evaluation feedback.</i></li> </ul>	30.09.11	
			<p>5D Publicise a disclosures log of previous FOIs.</p> <ul style="list-style-type: none"> <li>• <i>The Authority's Disclosure Log is available on the IG website. It shows last year's requests (in two separate 6 month reports) and all requests for the first 6 months of this year.</i></li> <li>• <i>Work is ongoing with IT colleagues to improve the Disclosure Log and to link released IG responses to requests – with all relevant information being uploaded to the website in an anonymised manner. All responses will be uploaded from week commencing 1<sup>st</sup> August 2011 – with retrospective responses being uploaded as and when resources permit.</i></li> </ul>	Complete	

Actions identified following ICO Commencing Monitoring of NCC April 2011					
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1.	<p><u>Heads of Service (HoS)</u></p> <p>Communication from Deputy Chief executive to Heads of Service with regards the role they play 1) in signing off FOI/EIR requests and 2) the need for this to be done;</p> <ul style="list-style-type: none"> <li>- Promptly (within 2 working days of receipt)?</li> <li>- With any necessary context background added.</li> <li>- With a holistic view that disclosure is to world at large and taking account of reputation risks to the Authority.</li> <li>- Any problems need to be reported to IG Officer or SP immediately.</li> <li>- In ensuring these are handled by an officer with appropriate levels of seniority in the organisations. SPoCs need to be instructed who to contact within each section upon receipt of requests.</li> </ul>		<p>1.1 Deputy Chief Executive to issue communication to all HoS reminding them of the important role they play in meeting the Authority's statutory obligations under FOIA.</p> <p>1.2 Remind them of the duties placed upon them in the communication issued to all Corporate Directors, Directors and Heads of Service from the Deputy Chief Executive (Team Nottingham).</p> <p>1.3 Remind them of the need to ensure the right level of colleague handles requests in the communication issued to all Corporate Directors, Directors and Heads of Service from the Deputy Chief Executive (Team Nottingham).</p> <ul style="list-style-type: none"> <li>• <i>A communication was issued to all colleagues reminding them of their statutory obligations under the legislation and the important role they all play in this process.</i></li> </ul>	<p><i>Complete</i></p> <p><i>Complete</i></p> <p><i>Complete</i></p>	<p>CME/MG</p> <p>CME/MG</p> <p>CME/MG</p>



<p>3.</p>	<p><u>Qualified Person</u> To ensure designations are made by Glen O’Connell to other colleagues to allow them to act as the ‘Qualified Person’ in instances when Glen is unavailable, thereby reducing delays awaiting an assessment to be conducted by the qualified person as to the application of the section 36 exemption.</p>	<p>3.1 Glen O’Connell to designate deputy monitoring officers who are able to act as the ‘Qualified Person’ for FOIA. FOIA states at S36; “In subsections (2) and (3) “qualified person”— means; (i)a Minister of the Crown, (ii)the public authority, if authorised for the purposes of this section by a Minister of the Crown, or (iii) any officer or employee of the public authority who is authorised for the purposes of this section by a Minister of the Crown. 3.2 Malcolm Townroe to raise this as a priority with Glen and to notify IG colleagues as to new arrangements. <ul style="list-style-type: none"><li>• <i>Two deputies monitoring officers have now been appointed to cover in the absence of the Director of Legal Services. These appointments will mitigate against any future delays.</i></li></ul></p>	<p><i>Complete</i></p> <p><i>Complete</i></p>	<p>G O’C</p> <p>MT</p>
<p>4.</p>	<p><u>Single Point of Contacts (SPoCs)</u> IG to supply SPoCs with monthly performance statistics for them to take to their DLT Performance meetings to help raise the profile of information rights within each Directorate.</p>	<p>4.1 IG to run monthly reports and to pass this to our SPoC colleagues for them in turn to ensure this information is used in DMT performance boards. <ul style="list-style-type: none"><li>• <i>Reports have been run for June and will be circulated at the end of July with SPoCs being advised to encourage their Directors/Heads of Service (HoS) to use this information to feed into their departmental management team meetings on a monthly basis to assess and seek to improve their directorate’s performance.</i></li></ul></p>	<p><i>Complete</i></p>	<p>All current SPoCs and IG.</p>

			<p>4.2 Evonne Rogers is conducting a Business Support review and IG will seek to link in their information to this review and any resultants procedures.</p> <ul style="list-style-type: none"> <li>• <i>IG colleagues are working closely with departmental representatives to ensure information on FOI/EIR performance is regularly reviewed and publication is proactively encouraged.</i></li> <li>• <i>IG colleagues have introduced a Triage system, whereby where the IG team are unsure whom to send a request onto – they contact the relevant SPoCs before issuing the memo to ensure the request is being sent to the correct department.</i></li> <li>• <i>SPoCs will also be asked to revisit the contact lists they have previously provided to IG to allow IG colleagues to have a better understanding of the sections contained within each directorate.</i></li> </ul>		
<p>5.</p>	<p><u>Endorsing and raising the profile of IG to ensure the Authority's meets its statutory obligations under Information Rights legislation</u></p> <p>Deputy Chief Executive to provide support and endorsement of the IG Function and to remind colleagues of the role they play in assisting the authority to meet its statutory obligations by;</p> <ul style="list-style-type: none"> <li>- Seeking to prevent unnecessary work for G'OC/legal colleagues without IG opinion having first</li> </ul>		<p>5.1 Deputy Chief Executive to issue a communication to Team Nottingham colleagues to endorse and raise the profile of the IG function to prevent delays and to remind colleagues of the important roles they each play.</p> <ul style="list-style-type: none"> <li>• See references 1 and 2 above.</li> </ul>	<p>Complete</p>	<p>CME/MG</p>



	<p>been requested following presentation of departmental concerns for assessment under the legislation.</p> <ul style="list-style-type: none"> <li>- Any differences of opinion should not delay process, Deputy Chief Executive to be arbiter if agreement on disclosure cannot be reached.</li> <li>- Director to resolve issues if requested by IG as part of escalation procedure.</li> <li>- Unless specifically agreed with IG, departments to supply IG with information, even where wish it not to be disclosed to prevent delay.</li> </ul>				
6.	<p><u>Restructure of IGO</u></p> <p>Restructure the current IG team to allow greater flexibility of task allocation and liaison with senior colleagues. Consider providing additional resource to allow the team to better handle the increasing number of requests received by the Authority, (up 32% on the first three months of last year) and encourage the creation of a records management arm of IG.</p> <p>The restructure is linked to reference point 10, as the creation and implementation of our new IG Database will allow all individuals involved in the lifecycle of an FOI to</p>		<p>6.1 To work with HR colleagues to put in place a new structure to more adequately deal with the demands on the team going forward – whilst being mindful of current landscape.</p> <ul style="list-style-type: none"> <li>• <i>A scoping document is currently being put together by the IG Manager for approved by the Director of IT.</i></li> </ul> <p>6.2 Restructure to take place as soon as possible after any outstanding HR issues within the team have been brought to a conclusion.</p> <ul style="list-style-type: none"> <li>• <i>HR issues are being tackled and only one matter now remains outstanding.</i></li> </ul> <p>6.3 IG budget to be increased to allow recruitment of more resources in line with records management proposals.</p>	<p>30.09.11</p> <p>30.09.11</p> <p>30.09.11</p>	<p>Carol McCrone/ SP/ MG</p> <p>CM/SP/ MG</p> <p>Ceri Walters/ MG/SP</p>



			<p><i>Director of Resources.</i></p> <ul style="list-style-type: none"> <li><i>The activity of educating colleagues on Information Governance issues will also be addressed with this assistance of Cheryl Connelly, a communications colleague. See ref 2 above.</i></li> </ul>		
8.	<p><u>Corporate Wide Finance</u></p> <p>Agree a definition of “corporate-wide finance” in order to avoid delays due to cases returned to departments and in obtaining HoS sign off.</p>		<p>8.1 Finance colleagues to provide definition of what constitutes a request for information held by finance colleagues on behalf of the Authority – for circulation to IG staff.</p> <ul style="list-style-type: none"> <li><i>Maria Balchin kindly produced a 2 page briefing note which was circulated with the communication from the Deputy Chief Executive and Corporate Director of Resources and is available on the IG Intranet pages.</i></li> </ul>	<i>Complete</i>	MB
9.	<p><u>Microfiche issues</u></p> <p>Solving the ownership issues with regards to microfiche stored at County Hall but owned by the City. This will allow the IG team to clear data subject access cases and thus allow more time to be given to FOIs.</p>		<p>9.1 Legal need to advise County of NCC’s position and agreement needs to be reached as to how cases should be handled going forward and a contract drafted and signed up to accordingly.</p> <p>9.2 Sarah Molyneux (SM) is acting as the Lead on this matter from legal and the issue now needs to be resolved as quickly as possible to prevent further delays.</p> <ul style="list-style-type: none"> <li><i>IG Manager met with SM and SM is now going to agree the way forward with the Director for Children’s Services and the Caldecott Guardian and whose budget any necessary alterations to process will come out of. SM is aware of this action plan and the deadline imposed.</i></li> </ul>	<i>30.09.11</i>	GO’C/SM /SP



			<ul style="list-style-type: none"> <li>• <i>All parties will be notified of their access being granted during w/c 15/08/2011 and 22/08/2011.</i></li> <li>• <i>The new management reporting tools will not be fully in use until October and the first reportable quarter will be quarter 3 (Oct – Dec 2011).</i></li> <li>• <i>The new database will include a traffic light system to allow for IG and other colleagues to highlight requests which may be potentially sensitive or contentious in nature or voluminous and complex to deal with. These cases will be marked as red with straightforward and routine cases marked as green.</i></li> <li>• <i>Work is ongoing to assess whether the new database can be linked to an improved Publication Scheme and to the responses produced by IG to enable automatic upload to the Disclosure Log.</i></li> </ul>		
<p>11.</p>	<p><u>Pro-active publishing</u>                  Departments to take responsibility for proactively publishing as much information as possible – thus updating the publication scheme. IG to assist as necessary, but with ultimate impact of reducing number of FOI/EIR received.</p>		<p>11.1 IG to produce a quarterly list of items regularly requested – such as: structure charts (name and contact details removed); contracts awarded (sensitive schedules removed); mobile phone mast sites; cooling tower registers; amounts sent to landfill/incineration; information on the new tram route; and information on budgets and grants. This information is then to be passed to departments for them to upload relevant documentation within their respective areas to the website.</p>	<p><i>Complete and ongoing</i></p>	<p>SPoCs</p>

			<ul style="list-style-type: none"> <li>• <i>Lists of items regularly requested have been and will continue to be produced and circulated to all SPoCs, placed on the IG Intranet and sent to MG. This list will be continually updated and the items feature on it uploaded to our Publications Scheme and website.</i></li> <li>• <i>Mark Ashford (IT Strategy Officer) has also been asked to undertake a business process review of the IG function to seek to make further improvements to systems and processes.</i></li> <li>• <i>A project has been raised with IT to seek to have all IG generated final responses automatically uploaded to the Council's website as part of the IG Disclosure Log. In the interim period however IG colleagues are uploading all responses as PDF documents (since 1<sup>st</sup> August 2011)</i></li> <li>• <i>Cheryl Connelly of Communications has also been tasked with assisting IG with marketing activities to improve the perception and response times of the service.</i></li> </ul> <p>11.2 Departments to update the Publication Scheme and to inform IG immediately upon receipt of an FOI request where information is already publicly available and give the link/location.</p> <ul style="list-style-type: none"> <li>• <i>This activity is already being encouraged in our new guidance note and in the monthly monitoring information issued to departments.</i></li> </ul>	<p>30.09.11</p>	<p>AG/GEE</p>
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			<ul style="list-style-type: none"> <li>• <i>The Publication Scheme is being revisited and overhauled to make it more user friendly and accessible.</i></li> </ul> <p>11.3 Information to be published in line with the Government's Data Transparency Recommended Code of Practice, to include;</p> <ul style="list-style-type: none"> <li>- Grants and payments under contract to the voluntary and community and social enterprise sector.</li> <li>- Senior salaries, names (with option for individuals to refuse consent for their name to be published), job descriptions, responsibilities, budgets and numbers of staff. Senior salaries are defined as being all salaries which are above £58,200 which is the Senior Civil Service minimum pay band</li> <li>- An organisational chart and staff structures.</li> <li>- Councillor allowances and expenses.</li> <li>- Expenditure over £500 (including costs, supplier and transaction information).</li> <li>- Policies, performance, audits and key indicators on the Council's fiscal and financial position.</li> <li>- Data of democratic running of the Council including the constitution, election results, committee minutes, decision – making processes and records of decisions.</li> <li>- Develop an inventory of data held and publish this list (similar to Asset list requirements under Re-Use of Public sector Information Regulations 2005).</li> </ul>	<p><i>Ongoing</i></p>	
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			<ul style="list-style-type: none"> <li>- Register the above inventories on <a href="http://www.data.gov.uk">www.data.gov.uk</a> to support single point of access to all public sector information.</li> <li>• <i>These activities will be addressed by IG colleagues in monthly communications to SPoCs but will also be addressed by Cheryl Connelly of Communications who is assisting IG with marketing activities.</i></li> </ul>		
12.	<p><u>Shared Services</u> In the medium term plan, consideration to be given to creating a shared service for IG with other local Authority's;</p> <ul style="list-style-type: none"> <li>- To market NCC as best practice model and take on others workload for fee.</li> <li>- To share resources at minimal cost.</li> </ul>		<p>12.1 To conduct consultation with other authorities as to the attraction of shared services and to develop adopted model/contract over the next three years.</p> <ul style="list-style-type: none"> <li>• <i>MG has asked that the date for work on this area be brought forward but only tackled after everything else in this plan has been addressed.</i></li> <li>• <i>In the interim the Nottinghamshire Information Officers Group will continue to work collectively to tackle any issues arising.</i></li> </ul>	01.04.14	SP/MG