

Management of Freedom of Information (FOI) Requests

- 1.1 The risks in respect of the management of FOI requests is included in the Resources directorate risk register and is currently assessed as green.
- 1.2 The council monitors compliance with the FOIA through its Customer Relationship Management system – Firmstep, that was introduced in April 2016. All FOI requests received by the council are logged onto Firmstep to ensure they are appropriately recorded, allocated and approved prior to the response being released. The council has 20 working days to complete and respond to an FOI and since April 2017, the Information Commissioners Office (ICO - the regulatory body for FOI) has set a requirement that 90% (previously 85%) of all FOIs should be completed and responded to within this timescale. For the year to date, data received from the system shows that the council's performance has been slightly below the ICO requirement and has fluctuated between 80%-85%. However, officers within the council's Information Management Unit are aware of a small number of issues that result in some discrepancies with this data, that would increase the response rate to approximately the required rate. For example:
 - a response to a FOI is sometimes issued outside of the Firmstep system within the deadlines but may not be logged onto the system until after the deadline has passed. In such instances, the date of response recorded and calculated by the system is the date the system is updated and not the actual date responded, and as such this will mean that the system response date is calculated as late,
 - analysis of the data has shown that there are a number of FOI requests that are completed on day 21, where sufficient time was not taken into consideration to obtain the necessary approvals from a Director, as required by the internal protocol the council has in place.
- 1.3 The process outlined above is currently being revised to improve the council's performance. This includes, updating the Firmstep

system to provide increased functionality, reporting and monitoring of requests. Principally, specific deadlines will be allocated to each step of the FOI process (allocation, collation of information, response and approval) as opposed to one deadline of 20 days for the entire FOI. This will ensure that sufficient time is provided to meet the requirements of each step of the FOI. Enhanced management reporting and work flow will enable these incremental deadlines to be monitored and identify any delays so that where necessary corrective action can be taken earlier in the process.

- 1.4 In addition, a formal reporting mechanism will be established whereby regular reports are presented to the council's Corporate Governance Board on the council's FOI performance.
- 1.5 The ICO can monitor public authorities' performance where it is felt that those authorities are significantly below the monitoring threshold. However, these are generally for low level performing authorities over a period of time. The council does not fall into this category and is not subject to any enhanced monitoring from the ICO.
- 1.6 The above information informs the current risk assessment of green in the directorate register.