



INFRASTRUCTURE, GOVERNMENT AND HEALTHCARE

Bury Metropolitan Council
Information Review
September 2009

AUDIT

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1 Executive summary

1.1 Introduction

From data protection and electronic communications to freedom of information and environmental regulations – there are now legal obligations placed on public bodies to protect personal information and promote public access to official information. All public and private organisations are legally obliged to protect any personal information they hold. Public authorities are also obliged to provide public access to official information. Legally, all public bodies must comply with:

- The Data protection Act;
- The Freedom of Information Act (FOI); and
- Environmental Information Regulations (EIR).

This review has focused on the effectiveness of the corporate and departmental arrangements in place to deal with access to information requests.

1.2 Key findings

During our review we identified a number of aspects of good practice across the Council, such as:

- The Council has excellent working relationships with the AGMA information officer. The Information Officer provides high quality training and promotes the sharing of innovative practice across Manchester.
- The Council has developed a series of e-learning modules to support staff development.
- The Council has a network of Information Champions across each department to process access to information requests. This includes key partner organisations such as Six Town Housing.
- The Council has put effective processes in place to address underperformance highlighted by the Information Commissioner.

1 Executive summary (continued)

Whilst the Council continues to develop its approach to managing information requests further and reflect best practice it should ensure that the following areas are strengthened:

- Access to information is currently governed at the departmental level. There is a lack of corporate ownership, challenge and coordination of this agenda.
- Data Protection, FOI and EIR access requests are closely interlinked. The Council should govern these processes holistically in terms of the wider access to information agenda.
- The Council should ensure that key individuals involved in the access to information requests process should have clear defined responsibilities. This should be documented in Job Descriptions as far as possible.
- The Council should develop an overarching access to information policy. Supporting procedures should clearly outline the full requirements of staff within this process.
- The Council should ensure they keep up-to-date and consistent management information to support all access to information requests.
- The Council should develop robust performance management and reporting arrangements in order to assure those charged with governance that procedures in place are effective. This needs to be undertaken at the corporate and departmental level.

1.3 Way forward

We will discuss the findings of the review with Officers and Members to agree an action plan to address the key issues going forward.

2 Introduction

2.1 Background

Information sharing is key to the Government's goal of better public services - delivering better outcomes for citizens, for businesses and for society as a whole.

2.2 Vision

Bury Council is committed to the freedom of information, in promoting a shared understanding of the work they undertake within the Council, and with partners. The Council aims to provide clear and timely information about the way decisions are made. They aim to deal with individual requests for information by providing clear advice and assistance courteously, promptly and effectively. Bury Council would like the public to become more involved in local government enabling them to become more responsive to the needs of the people who live and work in the borough.

The introduction of the Freedom of Information Act is seen as a welcome opportunity both to inform the public it serves and to improve the way in which it manages the vast amounts of information it holds. The Freedom of Information Act provides an opportunity to make one of Bury Council's most important assets, information, more widely available enabling the public to know and understand the work of the Council through improved access to information.

2.3 Legislation

We have reviewed how effectively the Council has implemented three important pieces of information legislation. These include The Data Protection Act (1998), The Freedom of Information Act (2000) and The Environmental Information Regulations.

The Data Protection Act requires all organisations which handle personal information to comply with a number of important principles regarding privacy and disclosure. The Act allows people to find out what personal information is held about them by making a subject access request. This covers information held electronically and in some paper records, and includes credit reference details. Once the organisation receives a request it should acknowledge it within 5 working days and respond in full within 40 calendar days.

The Freedom of Information Act (FOI) applies to most public authorities. The Act gives the public a general right of access to information held by public authorities. The Act also requires public authorities to have an approved publication scheme, which is a means of providing access to information which an authority proactively publishes. When responding to requests, there are procedural requirements set out in the Act which an authority must follow. There are also valid reasons for withholding information, which are known as exemptions from the right to know. The Freedom of Information Act (FOI Act) imposes certain obligations on a public body receiving a request made under the Act. An acknowledgment should be issued within 5 working days. A requester must be informed in writing whether the public authority holds the information requested and if so, have the information communicated to them, promptly, but not later than 20 working days after they receive the request. In some circumstances a request may be refused. If this is the case, generally a Refusal Notice should have been issued. This should state the exemption providing the basis for refusal within the Freedom of Information Act and why it applies to the information you requested. This notice must also be communicated within the 20 working day time period.

2. Introduction (continued)

The Environmental Information Regulations allows the public to request environmental information from public authorities. The information covered can be divided into the following six main areas:

- The state of the elements of the environment, such as air, water, soil, land, fauna (including human beings);
- Emissions and discharges, noise, energy, radiation, waste and other such substances;
- Measures and activities such as policies, plans, and agreements affecting or likely to affect the state of the elements of the environment;
- Reports, cost-benefit and economic analyses;
- The state of human health and safety, contamination of the food chain; and
- Cultural sites and built structures (to the extent they may be affected by the state of the elements of the environment).

An acknowledgment should be issued within 5 working days. An authority must respond as soon as possible and at the latest within 20 working days, except in circumstances where the information requested is particularly complex and voluminous. In such cases the time limit can be extended by a further 20 working days. If the time limit is extended, the public authority must notify the applicant of this delay within 20 working days of the initial request, and state when they believe they will be able to respond in full.

In order for access to information legislation to be managed effectively, an organisation must have the following in place:

- robust governance and management arrangements;
- clear and accessible policies and procedures;
- the appropriate supporting technology and systems; and
- a knowledgeable workforce.

These arrangements should be underpinned by an ethos of transparency.

2. Introduction (continued)

2.4 Objectives and scope of our review

We have reviewed the effectiveness of the arrangements in place to deal with information legislation. Where possible we have compared the Council's arrangements to best practice. Our review has specifically considered on:

- Leadership and responsibilities;
- Policies and procedures;
- Systems and processes;
- Monitoring and reporting;
- Records management;
- The estimation of costs;
- The approach to refusals and vexatious requests;
- Complaints and appeals;
- Training and awareness;
- Publication of information; and
- Reviews of implementation performance.

2.5 Audit approach

Our approach has been to:

- Review key documents;
- Interview key contacts;
- Share best practice; and
- Provide constructive challenge and support.

2.6 Acknowledgements

We would like to take this opportunity to thank all those staff at the Council who have supported this review.

3 Key findings

3.1 Leadership and responsibilities

An effective organisation should have clear leadership and responsibility for information governance.

Bury MBC have allocated responsibility for processing access to information requests at various levels throughout the organisation. However, the informality of some arrangements and lack of corporate capacity means there is a lack of leadership driving this agenda forward.

The Executive Member for Resources has political responsibility for this agenda through close liaison with the Executive Lead, the Director of Finance and E-Government .

The Monitoring Officer has responsibility for providing corporate leadership. This corporate role is important in terms of providing leadership around the information agenda, promoting a consistent 'one council' framework for handling information requests, driving compliance, consistency, and a joined up efficient response across all departments.

Supporting officer level capacity in this area is limited. The Council does have a designated corporate Data Protection Officer in post to coordinate responses to Data Protection requests across all departments but no corporate officer support in terms of responding to FOI and EIR requests. Support in terms of legal advice is provided corporately by the Monitoring Officer and from a member of the Legal team with considerable experience in this area.

Bury is one of thirteen authorities that contribute to a designated sub-regional resource across Greater Manchester. The Information lead across AGMA is an external resource in place to provide advice, assistance, support, and training. The aim is to offer a strategic response to emerging issues and facilitating the sharing of best practice.

To a certain extent this arrangement compensates for the lack of capacity at the corporate level but does still leave a gap internally in terms of corporate rigour, enforcing compliance, the use of consistent systems and consistent reporting and performance management arrangements.

Each department has identified a network of officers who act as information champions. Information champions are the departmental expert on access to information issues and are responsible for the day to day management and processing of requests that are received.

A high level overview of the information champion role is included within corporate procedures. This is not documented in job descriptions. There are therefore no mechanisms in place to ensure that the responsibilities, standards and expectations associated with this role are carried out consistently across all departments.

The structure and selection of information champions was undertaken a number of years ago. The Council needs to ensure that this structure is accurate and is reviewed and updated on a regular basis. All service areas need to have a visible information champion. In addition to this, information champions should be in place to deal with the most frequently raised issues, even if this cuts across a number of service areas.

3 Key findings (continued)

Recommendation 1

The Council should review the structure of departmental Information Champions. This should be done in line with the revised publication scheme to assure all departments have a named lead, Champions reflect the revised class list and the most frequent issues have an allocated officer even if this cuts across a number of departments.

Recommendation 2

The Council should formally document the roles and responsibilities of Information Champions.

Recommendation 3

The Council should consider how it could bolster corporate capacity for managing access to information requests.

3.2 Polices and Procedures

The Council does not have an overarching access to information policy but the Council have developed a set of separate procedures to deal with information requests. These include:

- a procedure for dealing with requests that are covered by the Freedom of Information Act 2000 including a policy on fees and charges;
- a procedure for dealing with requests that are covered by the Environment Information regulations 2004; and
- a procedure for dealing with requests that are covered by the Data Protection Act 1998.

Procedure notes give a step by step breakdown on how to respond to information requests, this includes guidance on how to compile responses that cut across a number of council departments. Policies and procedures are applicable and are shared with partner organisations such as Six Town Housing. All of these procedures can be accessed via the Council's intranet site. Procedure notes are supported by a suite of best practice documents including model responses, frequently asked questions and training materials.

The documents are easy to follow and understand. However, they do not include guidance requirements to log, monitor or report data relating to information requests.

Procedures are formally updated on an annual basis.

3 Key findings (continued)

Recommendation 4

The Council should put a high level access to information policy in place. This policy should be supported by the existing detailed procedures and should clearly set out how FOI, Data Protection and EIR interrelate and how compliance across all three must be enforced and performance managed.

3.3 System and Processes

The Council does not have a single corporate system for the management and monitoring of information requests. Departments have put varying local systems in place to manage departmental data needs. Systems are often excel based, basic and are not integrated with wider Council systems. Often departmental systems track different sets of data which makes aggregating data at the corporate level difficult. An effective system should track the complete end- to end process and allow officers to upload supporting material that can act as a robust audit trail.

The development of a corporate system is now in progress. This is being led by the Council ICT team. This module will be interactive and web based and will link to the wider CRM system. It should allow Information Champions to track the progress of completing requests, ensuring they are monitored and responded to within the appropriate timescales. A single system ensures that departments are tracking consistent sets of data and monitoring against the appropriate corporate standards.

Recommendation 5

The Council should develop a single system for managing all information requests. This system should be used to monitor and manage information at the departmental and corporate level.

3.4 Monitoring and reporting

Compliance with standards should be monitored and reported on a frequent basis. Progress should be reported to those charged with governance to provide assurances that arrangements in place are effective. The lack of corporate minimum standards for logging information and the absence of a corporate system means that it is difficult to collate robust management data on the number and nature of information requests that the council receives and more importantly whether these have been processed within standard.

Processes for monitoring information at the departmental level are inconsistent. Not all services keep a formal rolling log of requests received. This therefore impacts on the level and detail of information that can be reported, both internally and externally.

Data on information requests is collected corporately, however, this tends to be on an ad hoc basis and not in a formally timetabled manner.

3 Key findings (continued)

Below are some types of data the Council may benefit from collecting, both at the departmental and corporate level:

- Personal details, address etc of requester;
- Whether the request is an FOI/ DP/ EIR request;
- Is the requester a citizen/ press/ business;
- Date received;
- Response deadline;
- Method of communication (email/letter/telephone);
- Subject area;
- Detail of query;
- Lead department;
- Lead Information Champion;
- Management sign off/ approval (does the response need to be signed off by management before issuing);
- Date acknowledged (has the five day standard been met);
- Is further information necessary to process the request;
- Date formally responded in full (has the deadline standard been met);
- Any exemptions applied;
- Was the request refused;
- Vexatious request;
- Have charges applied (include the amount);
- Total cost for responding;
- Linked to a previous request;
- Progressed to appeal;
- Appeal/ reviewing officer; and
- Date of review (have standards been met).

3 Key findings (continued)

Currently the Council is not able to provide that level of detailed information consistently across all of its services or collectively at the overall Council level.

It is best practice to monitor the day to day management of information requests on a frequent basis. This role could be undertaken by the Information Champion in each department. Overall compliance against standards should be monitored on a regular basis and be a standing item at each Departmental Management Team meeting. This information should be aggregated corporately and reported to the relevant Executive meeting as part of the corporate performance dashboard.

Recommendation 6

The system solution that the Council develops should be able to effectively monitor and manage compliance with standards at the departmental and corporate level.

3 Key findings (continued)

3.5 Records management

Currently departments have their own processes in place to manage the retention of documents. There are no corporate minimum standards specified as part of the procedure notes in terms of capturing this level of information. The Council are in the process of updating their retention schedule. To support this the Council should ensure that the corporate IT solution will be able to act as a warehouse, storing and filing all the supporting evidence and responses that needs to be retained for each access to information request. A robust audit trail is essential if an information requests is appealed or investigated by the Information Commissioner.

Recommendation 7

The Council should ensure that it has a robust audit trail in place to support every access to information request.

3.6 The estimation of costs

The Council has a policy covering fees and charges relating to FOI and Data Protection requests. Both Acts deem £450 (18 hours charged at £25 an hour) to be an appropriate limit for fees. The Council estimates on a case by case basis whether a request is likely to fall within or exceed this limit. Subject access requests have a standard £10 charge applied to them.

The Council does not stipulate that this information must be recorded. At present it would therefore be difficult to accurately assess how much is being spent on responding to information requests across the Council.

There is a growing concern with EIR requests that as environmental data becomes more accessible, the Council is not able to charge for access to certain types of environmental information, planning/ building regulations information for example. This has a serious detrimental impact on the Council in terms of achieving income targets in this area.

Within this context it is extremely important to understand the levels of costs, not only to ensure that they are being applied consistently, but to also proactively charge for the release of information where it is appropriate to do so.

Recommendation 8

The Council should ensure that it collects standardised data on the costs of responding to all access to information requests.

3 Key findings (continued)

3.7 The approach to exemptions and vexatious requests

The Council has an exemptions guide in place that applies to all departments across FOI, Data Protection and EIR requests. Information Champions liaise directly with the Council Monitoring Officer as appropriate. The Monitoring Officer has ultimate responsibility for determining whether information should be absolutely exempt or whether the request fails the public interest test. The AGMA Information Officer plays a key role in terms of sharing best practice and offering independent advice in this area.

The Council has clear procedures in place to refuse access to information that is deliberately designed to be offensive, irritating, insulting or otherwise vexatious. Again, Information Champions liaise informally with the Council Monitoring Officer or the AGMA Information Officer as appropriate for further advice.

The Council does not keep a corporate log of exemptions or vexatious requests that have been refused, therefore, the reasons underpinning why data has not been disclosed recorded and reported.

Recommendation 9

The Council should keep an updated corporate log of exemptions that have been applied and vexatious requests that have been refused as part of a robust audit trail.

3.8 The approach to handling complaints and appeals

The Council has a clear procedures in place for dealing with any requestor expressing dissatisfaction with the Council response across FOI, Data Protection and EIR requests. All issues of this nature are dealt with as requests for review. Clear timescales are set for investigating the response deadlines (20 days) and the Monitoring Officer has ultimate responsibility for ensuring that this is carried out effectively. The Council is dealing with a declining number of appeals, this is estimated as less than ten per year. The Council has had cases sent to the Information Commissioner in the past that have not been coordinated effectively across a number of departments. The Council has put appropriate processes in place to resolve the issues that this raised. For example, the Council Monitoring Officer is now responsible for allocating a lead champion to effectively liaise and coordinate complete responses that cross cut a number of services and departments.

3 Key findings (continued)

3.9 Training and awareness

The Council has provided training and support for all staff involved in the information request process, including key partners such as Six Town Housing. Training and support is also coordinated at the AGMA level and includes regular updates and dissemination of best practice led by the AGMA Information Officer.

The Council has developed a system of e-learning packages to ensure that all staff have access to up-to-date knowledge when dealing with information requests. These modules cover FOI, Data Protection and EIR requests. This sits alongside the suite of procedures and guidance for staff on the intranet site. The AGMA information portal also acts as a one stop shop for wider best practice across Greater Manchester.

Whilst members do have access to e-learning modules, formal access to information training has not been given to elected members as part of the member development programme.

Minimum training requirements for staff or members have not been defined. There is no formal log or system in place to track the training that Information Champions have received.

Throughout the review, staff demonstrated good awareness of current legislation and processes in place to satisfy requirements. However, the understanding of departmental or corporate management information and the potential impact on service delivery was less well developed throughout the organisation.

Corporate working groups have been pulled together but on an ad hoc basis. Information Champions do not meet formally or regularly to share best practice or discuss compliance with information standards.

Recommendation 10

The Council should make access to information requests a formal element of the member development programme.

Recommendation 11

Minimum training requirements for staff should be defined. A formal log of training received should be kept up-to-date and reviewed on a regular basis to ensure all individuals have the skills and knowledge needed to undertake their roles effectively. This is especially important for Information Champions.

3 Key findings (continued)

Recommendation 12

The network of Information Champions should meet on a regular basis. A chair should be chosen. A work programme should be developed to further embed a consistent approach to maintaining information requests across the organisation. This should include monitoring, reporting and tackling underperformance.

3.10 Publication Scheme

The Council has adopted a publication scheme in line with Information Commissioner requirements and AGMA best practice. The scheme clearly signposts to where further information can be accessed. The publication scheme is visible on the Council website. Compliance with the Information Commissioner framework will be externally audited moving forward. The Council is currently reviewing the Publication Scheme in order to make it more user friendly and ensure that the most appropriate class lists are being used.

3.11 Public information

The Council should provide clear instructions on how to make access to information requests to the public. The Council has used the external website and service information leaflets as a key mechanism for providing information.

The Council has published FOI information on the website to provide citizens with:

- An overview of FOI legislation;
- An explanation of the Council publication scheme;
- A guide to requesting information;
- Information on charges that may be incurred;
- Clarity on how information is provided;
- A guide to exemptions;
- A contact officer; and
- Links to further information including the Information Commissioner website.

This information could be further strengthened and be more user friendly. The standards for acknowledging requests and responding to them in full should be clear. Furthermore, it is important to be explicit about the processes in place for compiling responses, who will answer, who will review and what assurances are in place for citizens if they are not satisfied with the initial response.

The Council should provide clarity around how the public can make an access for information request especially via email which is the most popular contact method.

3 Key findings (continued)

The Council has named the Director of Legal and Democratic services as the FOI contact officer, stating her full email, postal and telephone details. This is not in line with best practice. Whilst other authorities have named corporate leads for the collation of FOI requests, this tends to be someone less senior, dealing with the day to day management of FOI requests and not involved in the review process. The use of generic email addresses and e-forms is a more robust, secure and consistent communication channel.

The Council has a substantial amount of information published on the website in relation to Data Protection issues. This includes:

- An overview of citizens rights;
- How to make a request for subject access;
- Who to contact;
- Appropriate charges and costs;
- Timetable for compiling responses;
- Limits on the rights to subject access; and
- How to complain about the handling of requests.

Citizens are asked to make requests via the Director of Finance and E-Government, again this is not in line with recommended practice. It would be more appropriate to direct communication via the corporate Data Protection officer or via an generic e-form.

The Council has not published any information regarding EIR on this section of the website. A generic paragraph is included under the environment section of the website however, no detail is given regarding how to request information of this nature.

Recommendation 13

The data that is publically available on the Council's website should be clear, consistent and complete. Information on the website should collectively cover FOI, data protection and EIR processes in one complete section. Information should be regularly reviewed to ensure it is as up-to-date as possible. The website should outline information processes step by step so that citizens are fully aware of what is involved and what they can expect to receive in terms of responses and by when. The Council should avoid publishing the contact details of individuals officers where possible. The use of e-forms and generic email addresses should be utilised.

3 Key findings (continued)

3.12 Performance management

The Council does not formally publish or report compliance with access to information requests to those charged with governance. This should be an integral part of joined up corporate and departmental reporting arrangements. Progress against standards should be viewed alongside customer care data as part of regular performance dashboard reports.

The Council should also produce a formal annual report and highlight to Executive Members high-level progress, statistics, compliance rates alongside and any issues that may impact on the organisation or need to be fed back into service delivery.

Recommendation 14

The Council should develop robust departmental and corporate performance management arrangements for access to information requests.

Appendix 1- Recommendations and action plan

***	<i>Significant residual risk</i>	**	<i>Some residual risk</i>	*	<i>Little residual risk</i>
	Recommendation	Priority	Management response	Responsibility and timescale	
1	The Council should review the structure of departmental Information Champions. This should be done in line with the revised publication scheme to assure all departments have a named lead, Champions reflect the revised class list and the most frequent issues have an allocated officer even if this cuts across a number of departments.	**	An analysis will be carried out in line with the new publication scheme classes and reviewed by members of Management Board. Any cross cutting issues will be dealt with by one Champion who will lead on the request and co-ordinate with others. For these purposes Lead Champions will be identified in each Department.	Management Board December 2009	
2	The Council should formally document the roles and responsibilities of Information Champions.	***	These will be incorporated into the Council's Freedom of Information policy and procedures by way of revision.	Director of Legal and Democratic Services/Management Board March 2010	
3	The Council should consider how it could bolster corporate capacity for managing access to information requests.	*	Added capacity will come from the establishment and use of a new computerised system to log and monitor requests.	ICT/ Management Board December 2009	

Appendix 1- Recommendations and action plan

***	<i>Significant residual risk</i>	**	<i>Some residual risk</i>	*	<i>Little residual risk</i>
	Recommendation	Priority	Management response	Responsibility and timescale	
4	The Council should put a high level access to information policy in place. This policy should be supported by the existing detailed procedures and should clearly set out how FOI, Data Protection and EIR interrelate and how compliance across all three must be enforced and performance managed.	**	A policy will be drafted to support the existing procedures.	Director of Legal and Democratic Services March 2010	
5	The Council should develop a single system for managing all information requests. This system should be used to monitor and manage information at the departmental and corporate level.	***	A system has been developed and demonstrated to the Information Champions. This will be implemented to manage all information requests. The system will better co-ordinate FOI request recording and monitoring across the Council.	ICT/Risk and Special Projects Manager/Management Board March 2010	
6	The system solution that the Council develops should be able to effectively monitor and manage compliance with standards at the departmental and corporate level.	***	The system will include the definition and scope of monitoring as set out by the Ministry of Justice for local authorities.	ICT/Risk and Special Projects Manager/Management Board March 2010	

Appendix 1- Recommendations and action plan

	***	Significant residual risk	**	Some residual risk	*	Little residual risk
	Recommendation		Priority	Management response		Responsibility and timescale
7	The Council should ensure that it has a robust audit trail in place to support every access to information request.		***	Requests for access to information will be audited via the system. The system has been developed to allow a unique reference to be allocated to each request and tracking of each live request. The system will be developed to track and audit both live and archived requests. Archived requests will be stored under specific categories as determined by the Local Government Category List. This will allow for auditing of previous requests and monitoring (for example duplication etc.)		ICT/Risk and Special Projects Manager/Management Board March 2010
8	The Council should ensure that it collects standardised data on the costs of responding to all access to information requests.		*	The system will be developed to allow time and cost to be calculated from officer time against each request. The fees and charges policy will be reviewed and support this.		ICT/Champions March 2010
9	The Council should keep an updated corporate log of exemptions that have been applied and vexatious requests that have been refused as part of a robust audit trail.		***	The system will log all actions and decisions being taken against each request (including vexatious requests and exemptions applied).		ICT/Champions March 2010
10	The Council should make access to information requests a formal element of the member development programme.		*	This will be managed through the Member Development Group and Member Induction programme.		Member Dev. Group March 2010

Appendix 1- Recommendations and action plan

	***	Significant residual risk	**	Some residual risk	*	Little residual risk
	Recommendation		Priority	Management response		Responsibility and timescale
11	Minimum training requirements for staff should be defined. A formal log of training received should be kept up-to-date and reviewed on a regular basis to ensure all individuals have the skills and knowledge needed to undertake their roles effectively. This is especially important for Information Champions.		**	This will be managed by the Information Champions and appropriate line managers through Employee Review documentation (Training Plans)		Senior Officers/Champions (within corporate Employee Review timescale)
12	The network of Information Champions should meet on a regular basis. A chair should be chosen. A work programme should be developed to further embed a consistent approach to maintaining information requests across the organisation. This should include monitoring, reporting and tackling underperformance.			Noted. The structure is to be reviewed and a working group formed to meet to share experience and problems. Use of the Ministry of Justice spreadsheets for monitoring purposes will be implemented as a template and once the computerised system is put into place the Champions can then monitor and report on a quarterly basis.		Champion January 2010

Appendix 1- Recommendations and action plan

	*** <i>Significant residual risk</i>	**	<i>Some residual risk</i>	*	<i>Little residual risk</i>
	Recommendation	Priority	Management response		Responsibility and timescale
13	The data that is publically available on the Council's website should be clear, consistent and complete. Information on the website should collectively cover FOI, data protection and EIR processes in one complete section. Information should be regularly reviewed to ensure it is as up-to-date as possible. The website should outline information processes step by step so that citizens are fully aware of what is involved and what they can expect to receive in terms of responses and by when. The Council should avoid publishing the contact details of individuals officers where possible. The use of e-forms and generic email addresses should be utilised.	***	Details of individual officers will be removed from the publically available information and use will be made of a generic email address and an on line request form (as part of the Council's E Form facilities). The Council is currently carrying out work to revise the content management and accessibility of the Council web site, which will make data in the Publication Scheme (on the web site) more accessible, clearer and complete.		ICT/Risk and Special Projects Manager/ Director of Legal and Democratic Services March 2010
14	The Council should develop robust departmental and corporate performance management arrangements for access to information requests.	***	The Council's Performance Team will work with the Director of Legal and Democratic Services and the Champions to develop and implement a performance management system for FOI procedures. This will ensure that Management Board and Executive/Scrutiny can monitor performance and address any concerns in a timely and effective manner.		Performance Team/Director of Legal and Democratic Services March 2010