

Shropshire Council FOI Improvement Plan - Review 25th October 2023

Topic	Statement	Action	Priority High/med/low	Owner responsible for the action	Start date	Target implementation date	Date last reviewed	Completed
Governance Structure	There is governance oversight in place to ensure compliance with FOI/EIR	Information Governance Leadership and Organisational Oversight (Executive Directors - Quarterly Meetings)	n/a	ED Resources	April 2023	n/a	July 2023	Completed
	Responsibility has been assigned to ensure compliance with FOI/EIR	Responsibilities have been assigned	n/a	ED Resources	April 2023	n/a	July 2023	Completed
	Sufficient resources are assigned to the handling of requests for information to ensure response within the statutory timescales	Information Governance Team structure has been reviewed. Resources identified across directorates.	High	ED Resources	April 2023	October 2023	July 2023	Completed
Policies and Procedures	Policies and procedures are in place which explain the organisation's approach to, and responsibilities for, FOI and EIR	FOI handling procedure has been reviewed. This will continue to be monitored.	High	HP&G	April 2023	September 2023	July 2023	Completed
	Policies and procedures are easily accessible by staff	Updated and approved procedures are available to all staff via the corporate Intranet.	High	IGTL	April 2023	September 2023	July 2023	Completed
	The organisation ensures that staff are informed of any changes to policies and procedures regarding FOI/EIR	Communications are cascaded via the Leadership Group and additional communication via ED Resources.	High	IGTL	April 2023	September 2023	July 2023	Completed

	Staff know who to contact for advice or assistance regarding policies and procedures for FOI/EIR	This information is published on the Intranet and Council website. Any changes will be communicated in a timely manner.	n/a	IGTL	April 2023	n/a	July 2023	Completed
	Policies and procedures for FOI/EIR account for personal information and how it should be dealt with	FOI handling procedure has been reviewed. This will continue to be monitored.	High	HP&G	April 2023	September 2023	July 2023	Completed
Compliance and Assurance	There are reporting mechanisms in place to provide oversight of requests and ensure that statutory deadlines are met	Real time compliance reporting is now available for monitoring by Directors.	n/a	HP&G	April 2023	n/a	July 2023	Completed
	There are mechanisms to monitor the quality of responses to requests and ensure that any reasons for refusal/application of exceptions are valid.	Procedures are in place to ensure that exceptions are managed.	n/a	HP&G	April 2023	n/a	July 2023	Completed
	Contracts with third parties do not restrict the release of information that should be available to the public and provide for access to information, by the public authority, when needed.	Contracts and agreements include appropriate clauses that mean third parties must support the council when responding to requests for information.	n/a	IGTL	April 2023	n/a	July 2023	Completed
	Documented governance arrangements exist where the authority works in partnership with other organisations in relation to the handling of requests and/or the management of records.	Information Sharing Agreements are in place and include relevant clauses about supporting the council when responding to requests for information.	n/a	IGTL	April 2023	n/a	July 2023	Completed

	The organisation is complying with statutory timescales for FOI/EIR	Corporate priority that timescales are adhered to. Response rates have shown improvement through 2023. Backlog has been reduced and further improvement in response rate since July 2023. As at 25 October only two live requests over the 20 working day limit, this is within a reasonable tolerance level.	High	ED Resources	1 June 2023	October 2023	October 2023	Completed
		Standing item on agenda Item on Senior Leadership Meetings: Live monitoring via Management Dashboards. Focused targetting at areas continuing to not meet necessary timescales. Weekly updates to Directors on FOI compliance since July 2023.	High	ED Resources	1 June 2023	26 November 2023	September 2023	Completed
	Internal review procedures comply with the relevant Codes of Practice and ensure that timely responses are provided to complaints.	Internal review procedures are in place and adhered to.	High	HP&G	April 2023	October 2023	September 2023	Completed
	Exemptions/Exceptions should be applied on a case-by-case basis, by appropriately trained staff, with no evidence of the use of blanket exemptions.	Information Governance Team undertake refresher training as overall specialists. Continue to keep skills up to date and undertake refresher training where gaps are identified.	High	IGTL	April 2023	n/a	July 2023	Completed

		Service Areas are provided with support from IGTL when required.	High	IGTL	April 2023	August 2023	September 2023	Completed
		Responsibilities are defined for applying exemptions and these will continue to be reviewed.	High	IGTL	April 2023	December 2023	September 2023	Completed
	There is evidence of an oversight or approval process for the use of exemptions.	Review of Information Governance Team Structure and Procedures will address this gap.	High	IGTL	April 2023	December 2023	September 2023	Completed
	Redactions should be applied on a case-by-case basis, by appropriately trained staff, and records should be maintained of what has been redacted.	Redaction software and procedures for using it, is available to teams requiring them.	n/a	IGTL	April 2023	n/a	July 2023	Completed
Training and Awareness	There is an induction training programme, with input from Information Governance or equivalent, which includes general training on how FOI/EIR applies to the organisation, what they currently do to comply, and how to recognise an FOI/EIR request.	Review training materials and training requirements and ensure this is included in the Induction Package. ICO general guidance video links are available to staff.	High	IGTL	April 2023	October 2023	September 2023	Completed
	Staff receive refresher training in the requirements of FOI/EIR, including, where appropriate, updates from the relevant decisions of the ICO and the Information Tribunal.	Link to guidance included with all requests. Guidance and specific advice provided by Information Governance Team with all new requests.	n/a	IGTL	April 2023	n/a	July 2023	Completed
	There is specific training for staff with responsibility for handling requests for information, on FOI, EIR and Codes of Practice.	Information Governance Team have refreshed skills and continue to do so where gaps are identified.	High	IGTL	April 2023	n/a	July 2023	Completed

		Training resources available from the ICO identified for new team members to undertake on commencing roles.	High	IGTL	April 2023	October 2023	September 2023	Completed
		Guidance is supplied to Service Areas for all requests they deal with. This is monitored on an ongoing basis.	High	IGTL	April 2023	October 2023	July 2023	Completed
	Records are maintained, either centrally or by local management, of the FOI/EIR training received by staff. These records are monitored to ensure that all staff receive or attend all relevant training.	Review of training material will include modules on a platform that allows training to be monitored. Module for internal training platform created and awaiting final publication.	High	IGTL	April 2023	December 2023	October 2023	
	Staff receive regular reminders of how to recognise FOI/EIR requests	All officers are made aware of FOI requirements through regular internal communications. These have increased throughout 2023.	High	IGTL	April 2023	December 2023	October 2023	Completed

ED Resources Exective Director Resources
(Senior Information Risk Owner)

HP&G Head of Policy and Governance

IGTL Information Governance Team Leader

Key:

Action completed - solution in place
Solution in place but improvements are required