

RICHMOND AND WANDSWORTH COUNCILS -SAR/FOI/EIR ACTION PLAN FOR THE ICO

1) Background and Introduction

Richmond and Wandsworth Councils have established a Shared Staffing Arrangement (SSA) whereby one staffing structure serves the two Councils. Both Councils are committed to ensuring they meet the seven key principles of GDPR in line with statutory requirements and the individual rights as set out in current data protection legislation: the General Data Protection Regulation and the Data Protection Act 2018.

Both Councils prepared for the introduction of GDPR in May 2018 with a GDPR Readiness Plan. They do however recognise that demonstrating accountability for data compliance is an evolutionary process, requiring ongoing effort.

Key steps that have been taken by both Councils to ensure the continued improvement, development, harmonisation and strategic oversight of Information Governance include:

- Reviewing and establishing a new Information Governance Framework and corporate governance arrangements. This included the establishment of an Information Governance Strategic Board (IGSB) with key members such as the SIRO and Caldicot Guardian, reporting directly to the Directors Board which is chaired by the Chief Executive and is the highest level of management within the SSA.
- Reviewing the terms of reference and remit for the existing Information Governance and Security Forum (IGSF). This Forum for service IG leads now reports to IGSB.
- Reviewing Information Governance (IG) capacity and resource and establishing a dedicated central IG Team alongside a centralised approach for the receipt, logging and monitoring of Freedom of Information, Environmental Information and Subject Access Requests.
- Appointment of a Data Protection Officer. In furtherance of GDPR Article 38 both Councils are committed to ensuring that the DPO is involved in all issues relating to the protection of personal data and the DPO will be closely involved in the supporting the implementation of the Action Plan outlined below.

In addition, following on from the GDPR Readiness Plan, an Information Governance Improvement Plan has been developed which is underpinned by four ongoing Strategic Service Reviews relating to:

- Transparency, open data and data quality
- Information sharing and compliance
- Information and records management
- Information security and protection

2) Action Plan

The following Action Plan sets out how Richmond and Wandsworth Councils intend to continue to strengthen their approach and improve performance in relation to all information requests (Freedom of Information – FOI, Environmental Information Regulation – EIR and Subject Access Requests – SAR).

Please also note that following on from the submission of performance figures to the Information Commissioner’s Office (ICO) at the end of July 2019, those information requests that were outstanding after six months have been responded to and closed as cases.

	Task /Activity	Start	Milestones	Officer Lead	Service Requirement	Progress
1	Undertake a comprehensive review of existing SAR policies, processes, procedures and practices to identify areas for improvement/efficiencies.	Sept to Nov 2019	Review to be completed by end Nov 2019, identifying short, medium and long- term improvements and actions.	EP/KW/AB		
2	Once improvements and efficiencies identified through the comprehensive review of SAR have been initiated, Internal Audit to undertake a review of changes, practices and improvements.	Nov 2019 to Jan 2020	Deadline for production of report to be agreed with Internal Audit but aim for Jan 2020 with the intention of implementing any recommendations within three months where practicable.	KW/AB	Internal Audit	
3	Progress the procurement of a new Case Management System which will streamline the receipt, logging, workflow and completion processes (FOI/EIR/SAR).	On-going	- Currently at the technical assurance stage - Anticipate procurement will be complete Oct 2019 to Jan 2020 - New system in place by January / Feb 2020.	KW/AL		
4	Strengthen and enhance scrutiny of performance reporting and escalation of	August 2019	- Performance reports based on ICO requirements went to IGSI in July and IGSI and Directors Board	KW/AB		

	Task /Activity	Start	Milestones	Officer Lead	Service Requirement	Progress
	overdue FOI/EIR/SAR cases.		<p>in Aug.</p> <ul style="list-style-type: none"> - Reports to IGSF and IGSB on a regular basis going forward. - Performance and progress on the Action Plan will be incorporated into the quarterly SIRO report to Directors Board. The next report is due in Nov. 2019 (ongoing on a quarterly basis thereafter). 			
5	Introduce a procedure to review and expedite as necessary all cases that are more than two months old to ensure that none reach the six month threshold.	August 2019	<ul style="list-style-type: none"> - Cases that are over two months old will be reviewed at IGSF and IGSB - IGSF service leads will be expected to escalate to their respective SMT/DMT - Updates will also be included within the quarterly SIRO report to Directors Board - Procedure to commence in Sept / Oct cycle of meetings. 	KW/AB		
6	Weekly review of recent ICO decisions and material on ICO website to identify any lessons and good practice that will help improve performance. Maintain engagement with other London Boroughs through involvement in IGFL meetings to pick up on good practice and learning.	August	<ul style="list-style-type: none"> - From the Sept / Oct cycle of IGSF/IGSB there will be a standing agenda item to discuss ICO decisions and best practice. - Where practicable potential improvements will be built into the separate IG Improvement Action Plan and reflected appropriately in staff newsletters and briefings and ongoing training of the IG and FOI Teams. 	AB/PA		

	Task /Activity	Start	Milestones	Officer Lead	Service Requirement	Progress
7	Continue to ensure that as much information as possible is available on the two Councils' web sites to reduce FOI requests.	Aug 2019 - On-going	<ul style="list-style-type: none"> - Ongoing improvements to ensure both Councils continue to meet their obligations in relation to the Transparency Code and Publication Scheme. - FOI Team is engaging with Services to identify and encourage proactive publication of frequently requested information (underway and ongoing). - Case studies will be developed to highlight the benefit of proactive publication (by Dec 2019); this material will be incorporated into the FOI/SAR newsletter 	AW		
8	<p>Reiterate to all staff the importance placed by the Directors' board on responding to SARs/FOIs promptly and within the statutory time frame.</p> <p>(This will be the first element of the broader IG Staff Communications and Engagement plan that is due to be launched in Sept.)</p>	Sept 2019	<ul style="list-style-type: none"> - Communication to all staff by end of Sept. - Continued roll out of staff IG Communications and Engagement plan in Sept and Oct - Communications colleagues now attending the bi-monthly IGSF meetings which helps ensure key emerging issues are disseminated in a timely, engaging and co-ordinated manner. 	KW/AB	Comms	
9	Meet with Business Support Hubs or other appropriate teams within individual Directorates to identify any barriers or bottlenecks in	Ongoing	Initial meetings have already begun with the aim of covering Business Hubs within all Directorates by end of Oct 2019.	AW/AL/EP/PA		

	Task /Activity	Start	Milestones	Officer Lead	Service Requirement	Progress
	existing processes, sharing lessons learnt and good practice.		The outcome of the meetings will feed into the scheduled comprehensive Review and Audit of the SAR process (see points 1 and 2 above) as well as FOI processes			
10	Establish an informal Community of Practice across those officers frequently involved in the FOI/EIR/SAR process (Note: this is in addition to the existing formal governance arrangements)	October 2019	<ul style="list-style-type: none"> - Key contacts already known - Identify appropriate opportunities for central and service-based officers to liaise/ share (from October 2019) - Ongoing regular liaison (bi-monthly basis linked to IGSF cycle) - Creating a central knowledge base (from Nov 2019) this will inform the overarching IG Staffing Communication and Engagement plan 	AL/AW/PA/AB/EP		
11	Periodic newsletters and FOI briefings to be shared from the central FOI and IG teams to all officers involved in FOI/EIR/SAR across both Councils. This will link in with the overarching IG Staff Communications and Engagement plan.		<ul style="list-style-type: none"> - Launch newsletter in (Jan 2020) 	AL/AW/PA/AB		
12	Refresh and accelerate existing training on FOI/EIR/SAR handling and ensure all appropriate staff have	September 2019	<ul style="list-style-type: none"> - FOI Training refreshed in August and there is now a rolling schedule of sessions - SAR training update will form part 	AL/AW/KW/AB	HR/CIT	

	Task /Activity	Start	Milestones	Officer Lead	Service Requirement	Progress
	undertaken it.		of the comprehensive review of SAR due in Sept-Oct 2019. - Launch and roll out new SAR training programme from Jan 2020			

3) Improvement targets to recover performance to within statutory deadlines:

	2019/20				2020/21			
Richmond Council	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4
	Actual	Target	Target	Target	Target	Target	Target	Target
FOI	81%	85%	85%	85%	85%	90%	90%	90%
SAR	71%	74%	77%	80%	85%	90%	90%	90%

	2019/20				2020/21			
Wandsworth Council	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4
	Actual	Target	Target	Target	Target	Target	Target	Target
FOI	72%	75%	75%	75%	80%	85%	90%	90%
SAR	58%	61%	64%	67%	75%	80%	85%	90%

Note: Q1 in 2020/21 is the target date for implementation of the comprehensive case management system that will facilitate a step change in performance for both FOI and SAR.