

Report of the Head of Board Administration

Freedom of Information Monitoring Report for the period
1 April 2009 to 31 March 2010

Recommendation:

The NHS Board is asked to note the Monitoring Report on the operation of the Freedom of Information (Scotland) Act 2002 in NHS Greater Glasgow and Clyde for the period 1 April 2009 to 31 March 2010.

1 BACKGROUND

- 1.1 The Freedom of Information (Scotland) Act 2002(FOISA) came into force on 1 January 2005. The Act provides a statutory right of access to information held by Scottish public bodies including NHS Boards.
- 1.2 Information is available through the Board's Publication Scheme and the website (www.nhsggc.org.uk). Where information is not available through these sources, the applicant can, under the Act, make a request for information. The request must be in a permanently recorded form (eg in writing or by e-mail).
- 1.3 Requests for access to information can be made by anyone, whether resident in the UK or not, and can be made for information held prior to enactment of the Act.
- 1.4 While most information requested can be released, some information is exempt under the Act. The right of access to information is subject to 17 exemptions, many of which also require a public interest test to be applied.
- 1.5 The Act specifies that requests for information and requests for reviews must be responded to within 20 working days.
- 1.6 Under the Environmental Information (Scotland) Regulations 2004 there is a separate but complementary requirement on public authorities to respond to requests for information held relating to information on the air, water, soil and land and about energy, noise, radiation, waste and other things that may affect the earth. It may include information about our policies, plans and activities likely to affect the state of human health and safety.

2 REPORT

- 2.1 This report covers the 12-month period from 1 April 2009 to 31 March 2010. The report summarises the requests for information received by NHS Greater Glasgow and Clyde during this period. It refers to requests made under the Freedom of Information (Scotland) Act as our experience is that there is little or no evidence of individuals or organisations making requests under the corresponding provisions within the Environmental Information Regulations which also came into effect from 1 January 2005. There are only minor

changes in the way in which we are required to respond to requests under the environmental Regulations.

3 OPERATION OF THE ACT WITHIN NHS GREATER GLASGOW AND CLYDE

- 3.1 Since the Act came into force on 1 January 2005, the organisation has always sought to ensure that robust arrangements for managing Freedom of Information (FOI) requests within NHS Greater Glasgow and Clyde are in place. These have been adapted where necessary to respond to the changing needs of the organisation during transitional periods such as the integration of the Clyde part of the former NHS Argyll and Clyde, and the dissolution of the former Divisions to form the Acute Services Division and Partnerships. The arrangements currently in place are now well-established and requests are managed in a number of ways depending on the source of the request, or the nature of the information being requested.
- 3.2 All requests from a media source (eg journalist, newspaper/magazine, TV/radio organisation) are managed through the Corporate Communications Directorate. Requests for information on Board-wide functions and requests from MSPs are managed through the FOI Manager based within Board HQ. Requests for information on services or functions managed by the Acute Services Division are dealt with centrally through their Corporate Administration Department and managed by the Head of Administration for the Acute Services Division. Similarly, requests for information relating to services provided by the Mental Health Partnership are managed by the Head of Administration for that Partnership. The organisation has dedicated 'FOI' email addresses to enable those wishing to make a request to route this to the appropriate area, although arrangements are in place to forward requests on to appropriate FOI colleagues.
- 3.3 Requests for CHP information are handled through local management structures. Joint arrangements exist within the Glasgow and East Renfrewshire Council CH(C)Ps to handle FOI requests, acknowledging each organisation's responsibilities. However, in cases where an applicant has submitted the same request for information to all CHP/CH(C)Ps simultaneously, there are occasions when a single response will be co-ordinated and issued by the FOI Manager based at the Board.

4 NUMBER OF REQUESTS RECEIVED

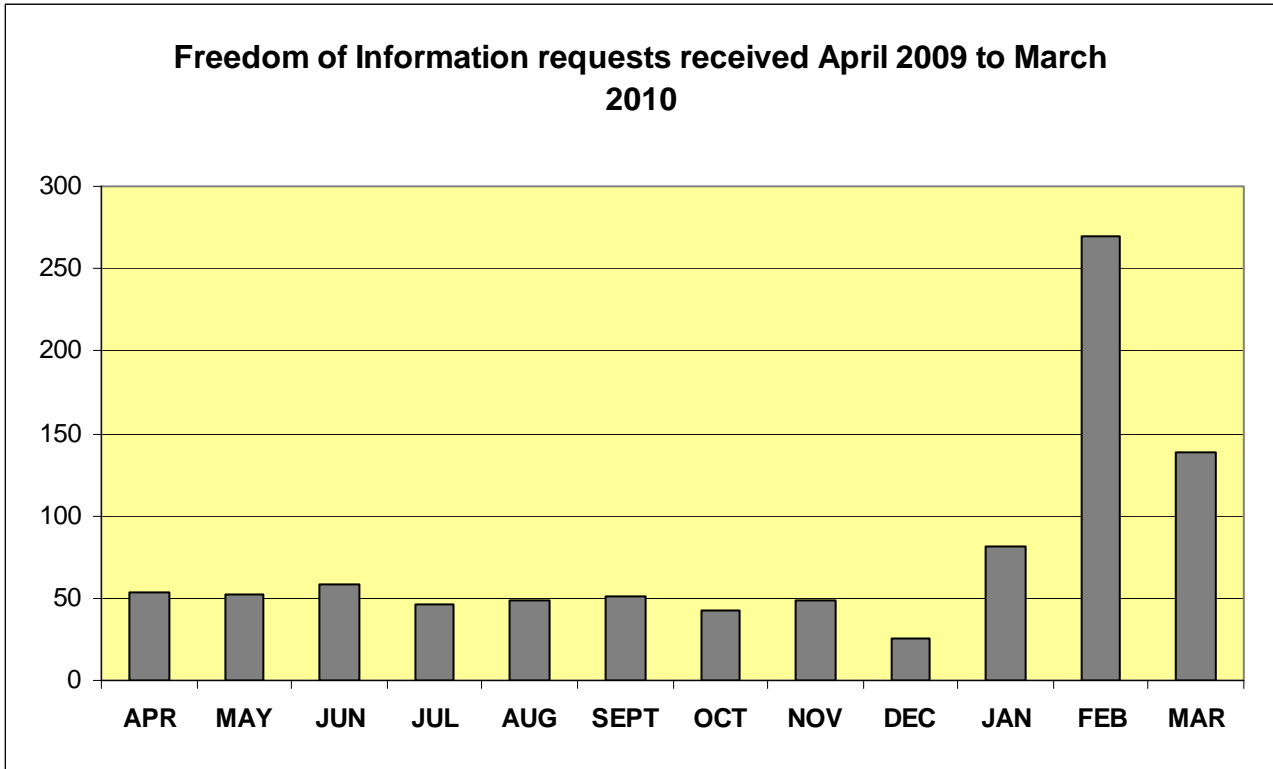
- 4.1 Table 1 below shows the number of FOI requests received each month from 1 April 2009 to 31 March 2010. Fig 1 shows this information represented in graphical form.

Table 1 – April 2009 to Mar 2010 – Number of Requests Received

	April	May	June	July	Aug	Sept	Oct	Nov	Dec	Jan	Feb	Mar	Total
Number of FOI Requests Received	53	52	58	46	48	51	43	48	26	81	270	138	914

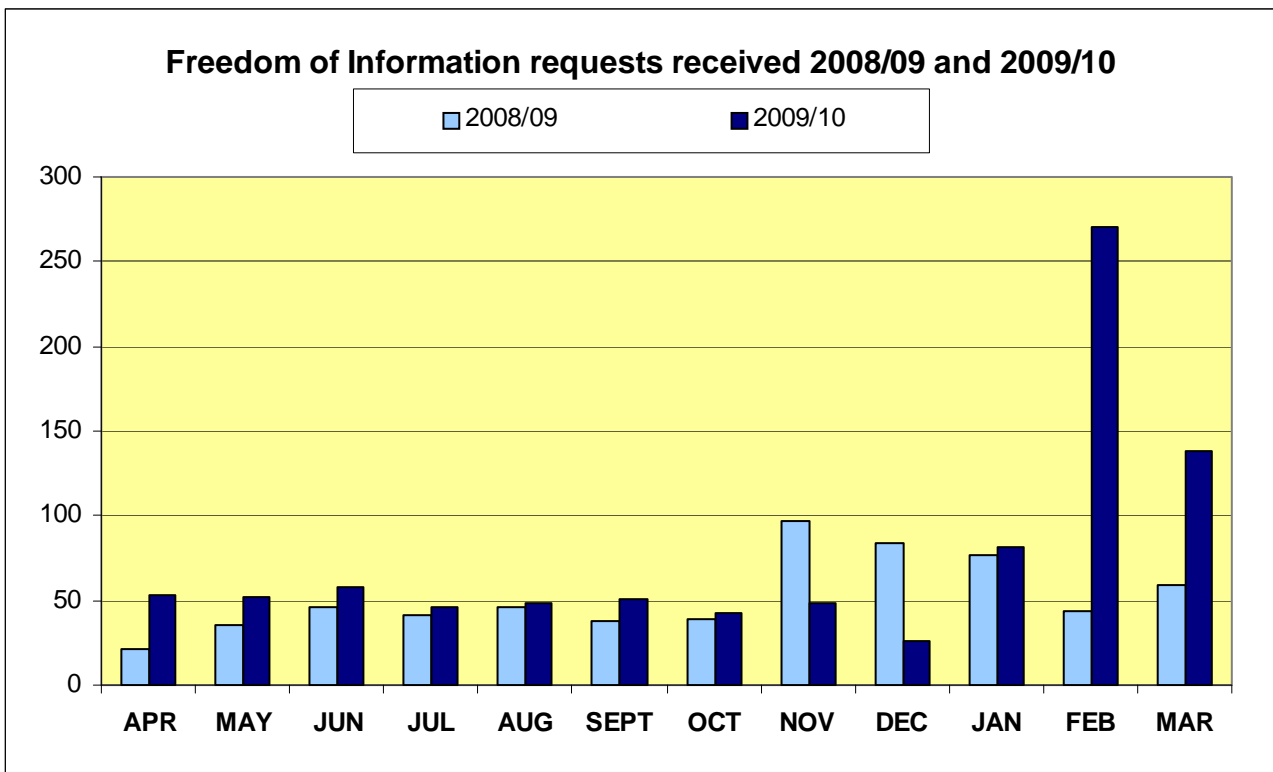
- 4.2 The overall number of FOI requests received by NHS Greater Glasgow & Clyde during 2009/10 has increased significantly, with 914 requests received in 2009/10, compared to 628 requests received in 2008/09. This represents a 45% increase from last year. A greatly increased number of requests were submitted in the latter part of the reporting period. This was due to an extremely large number of FOI requests received from NHS Greater Glasgow & Clyde employees, following completion by Human Resources of outstanding reviews of Agenda for Change assimilations and the simultaneous communication in January 2010 of review outcomes to a large number of employees.

Fig 1 – Freedom of Information requests received April 2009 to March 2010



4.3 Fig 2 below shows a comparison between the number of requests received from April 2008 to March 2009, and the number received from April 2009 to March 2010.

Fig 2 Freedom of Information requests received 2008/09 and 2009/10



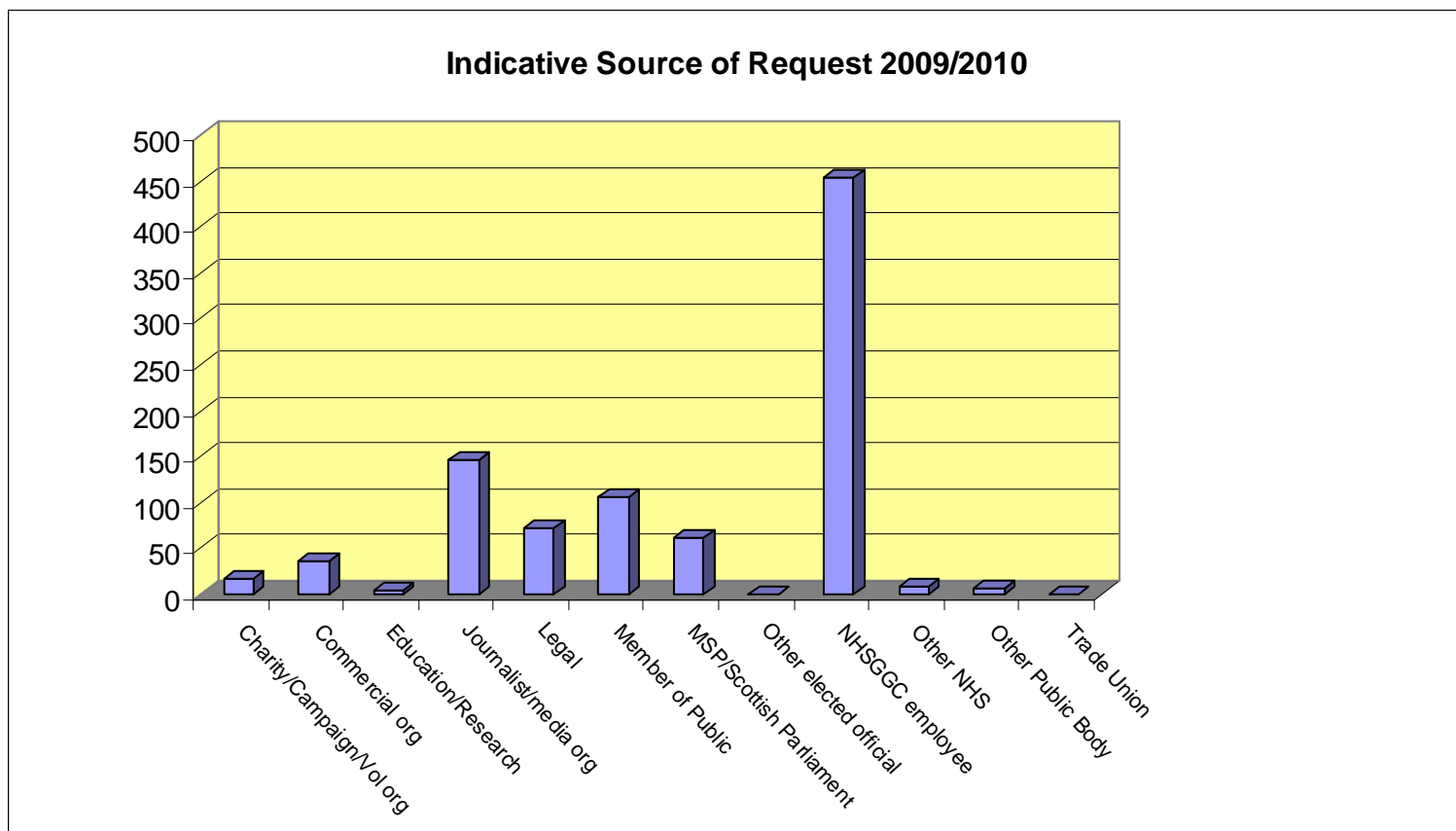
5 SOURCE OF REQUESTS AND AGENDA FOR CHANGE REQUESTS

5.1 A breakdown of the source of requests for information is shown below in Table 2 and Fig 4.

Table 2 – Indicative Source of Request 2009/10

Indicative source of request	2009/10		2008/09	
	Number	% of total requests	Number	% of total requests
Charity/Campaign/Voluntary organisations	17	1.9	22	3.5
Commercial organisations	35	3.8	32	5.1
Education/research	5	0.6	4	0.6
Journalist/Media organisation	147	16.1	120	19.1
Legal	71	7.8	46	7.3
Individuals	107	11.7	77	12.3
MSP/Scottish Parliament/Other elected official	62	6.8	41	6.5
NHSGG&C Employee	454	49.7	267	42.6
Other NHS	9	1.0	10	1.6
Other Public Body	6	0.7	2	0.3
Trade Unions/Professional Representative Bodies	1	0.1	7	1.1
Total	914	100%	628	100%

Fig 4 – Indicative Source of Request 2009/10



- 5.2 Continuing the trend recognised over the previous two reporting periods (2007/08 and 2008/09), there has been a further increase in the number of requests received from NHSGGC employees for information relating to the Agenda for Change (AfC) process. During December 2009, the Human Resources Directorate concluded an exercise to review a large number of assimilations under AfC, and approximately 4,000 employees were advised of the outcome of their review in letters issued during January 2010. As the AfC process did not provide for a further mechanism of appeal beyond the review, employees submitted requests under FOISA for information relating to the outcome of their review, in order to gather evidence in support of possible grievance proceedings.
- 5.3 In January 2010 44 of the 77 requests received were from NHSGGC employees. In February 210 out of 267 were from employees and in March 2010, there was a total of 91 out of 136. Additional resources were provided from existing members of the Board Administration team to support the handling of the exceptional circumstances of receiving and responding to such a high volume of requests.
- 5.4 Due to the extraordinarily large volume of requests, it became necessary to adopt a more flexible approach to managing this category of requests for information, to ensure that information to respond to all of the requests being received by NHSGGC during that time could continue to be provided. NHSGGC employees who submitted requests for AfC information from mid-March onwards were therefore advised that their request for information would be forwarded to the Job Evaluation Unit who then provided information direct to the applicant without the need for a formal request under FOISA, although the spirit of the legislation was applied in respect of the timescale for providing the information to the applicant (ie 20 working days). A standard pack of the most commonly requested information was sent to each applicant, and any subsequent queries from individuals regarding the information they received were dealt with on a case by case basis, either by staff within the Job Evaluation Unit or within the FOI function, as appropriate. Approximately 63 cases were dealt with in this way during March 2010. Requests of this nature continued after the end of the reporting period although in fewer numbers with 85 requests being received during the first quarter of the 2010/2011 reporting period.
- 5.5 Despite having instituted this arrangement however, difficulties in dealing with the large number of requests already in the system resulted in an overall reduced performance against the 20 working day timescale.
- 5.6 The process of assimilating existing employees to AfC pay bands has now largely concluded. It is therefore unlikely that such a large-scale submission of requests of this nature in a short time period will be repeated. Requests for information relating to AfC information do continue to be received although in much smaller numbers.
- 5.7 Aside from requests for information relating to AfC, the distribution of requests from other sources showed an increase in the number of requests received from journalists/media organisations, members of the public, MSPs (and their researchers) and legal firms. Due to the large number of requests from NHSGGC employees, most of these categories do not show an increase as a percentage of the total requests. However when compared to the number of requests received in 2008/09, the following areas are highlighted:
- Requests from journalists/media organisations have increased from 120 in 2008/09 to 147 in 2009/10 representing an increase of 23%;
 - Requests from members of the public have increased from 77 in 2008/09 to 107 in 2009/10 representing an increase of 38%;
 - Requests from MSPs/researchers showed an increase from 41 in 2008/09 to 62 in 2009/10 representing an increase of 50%;

- Requests from legal firms increased from 46 in 2008/09 to 71 in 2009/10, an increase of 52%.
- Overall the remaining categories were fairly static with the exception of requests from trade unions which showed a decrease from 7 requests in 2008/09 to only 1 request in 2009/10. However set against the total number of requests received (even excluding AfC requests), this is not felt to be significant.

6 TYPE OF INFORMATION REQUESTED

- 6.1 FOI requests were received on a wide range of subjects, sometimes influenced by topical or high profile issues which generated national, local and media interest. The high profile tender to contract for taxi services was one such topic. While this did not attract a large number of requests, the requests which were submitted were complex, and required careful consideration of the application of FOISA before information was released. Information relating to IT security and data loss was a fairly popular theme, as was information relating to salaries of senior officers and employees with salaries above £100k.
- 6.2 As stated earlier, requests for information on Agenda for Change featured heavily in the type of information requested. Pharmacy and prescribing issues continued to attract a number of requests, including information on applications for inclusion to the pharmaceutical list, and requests for information on 'non-formulary' prescribing of, for example high cost cancer drugs.
- 6.3 MSPs and their researchers submitted requests on a variety of topics including workforce information, control of infection, health and safety issues, waiting times, cost of external meetings and clinical services.
- 6.4 Other subject areas which have also attracted a number of FOI requests are:
- Policies and procedures
 - Car parking
 - Contracts for goods and services
 - Compensation and claims
 - Waiting times
 - Salaries and expenses of employees and Board members
 - St Margaret's Hospice
 - Violence and aggression/health and safety issues
 - Board-owned property
 - Finance and expenditure
- 6.5 In some cases, information requested is considered by the Board to be exempt from disclosure under the Act. Where it is considered there is a valid reason for withholding information, an appropriate exemption must be applied. The use of an exemption to withhold information must be exercised with care, and in most cases only after further consideration of whether it is in the public interest to withhold or disclose the information, with the presumption being in favour of disclosure. Examples of exemptions that have been applied are:
- Section 27 – Information intended for future publication
 - Section 30 – Prejudice to effective conduct of public affairs
 - Section 33 – Commercial interests and the economy
 - Section 34 – Investigations by Scottish public authorities and proceedings arising out of such investigations
 - Section 36 – Confidentiality
 - Section 38 – Personal Information

7 PERFORMANCE MONITORING

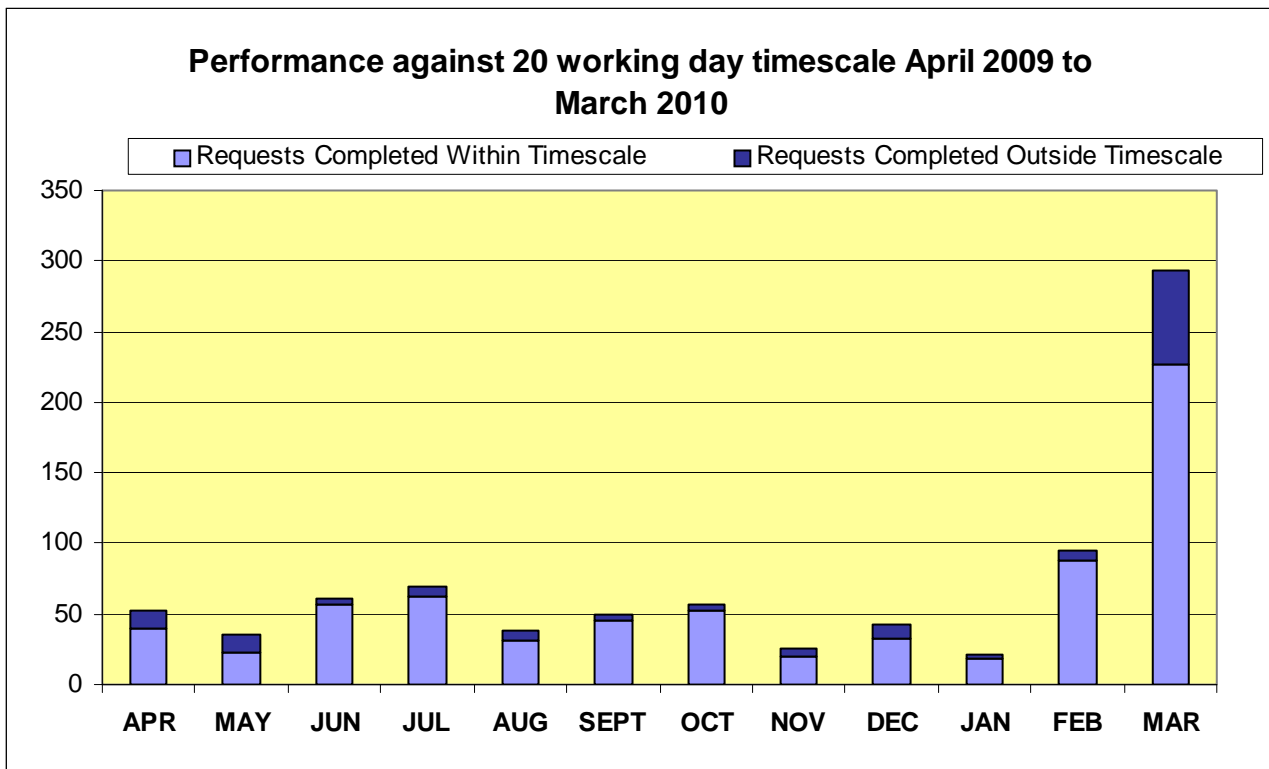
7.1 Overall, 83% of Freedom of Information requests were responded to within the requirement of 20 working days (Table 3). This shows a decrease from the 90% of requests completed within 20 working days in 2008/9, although is an improvement on the 2007/08 figure of 78%. It should be noted however that this overall reduction in performance is set against an increase in the volume of requests of 45%.

Table 3 – Number and percentage of requests responded to within 20 working days – 2009/10

	APR	MAY	JUN	JUL	AUG	SEPT	OCT	NOV	DEC	JAN	FEB	MAR	TOTAL
Total Number of FOI Requests Responded	29	36	61	69	38	48	59	28	43	22	97	295	848
Number of Requests Completed within 20 Working Days	23	23	57	63	31	45	53	22	33	21	90	229	707
Number of Requests Completed Outwith 20 Working Days	6	13	4	6	7	4	4	6	10	2	7	66	141
Percentage completed within 20 Working Days	77	64	93	91	82	94	90	79	77	95	93	78	83

7.2 Fig 5 below shows a graphical representation of the number of requests completed both within and outside the 20 working day timescale.

Fig 5 – Performance against 20 working day timescale April 2009 to March 2010



- 7.3 May 2009 shows a considerably reduced performance, with only 23 out of 36 requests (64%) being responded to within the 20 working day statutory timescale. During the period that these requests were being responded to, the FOI Manager based at the Board was also involved in responding to an investigation by the Commissioner of a case which had been appealed to him for a decision. This involved discussions with staff and investigation into procedures prior to the compilation of detailed submissions to the Commissioner's office by the FOI Manager in support of the Board's case. However, the 13 requests which breached the 20 working day timescale were all answered within a maximum of 5 working days after their due date.
- 7.4 Information on the organisation's performance in respect of the percentage of FOI requests responded to within the statutory 20 working day timescale has been provided to the Board's Performance Review Group on a quarterly basis.

8 REQUESTS FOR REVIEW

- 8.1 Following a request for information, an applicant has a right to request a Review of the Board's handling of a request, if they are dissatisfied with the response received. An applicant has up to 40 working days following receipt of a response, in which to submit their request for a Review. Reviews are carried out by a Non-Executive Director of the Board, with the support of senior staff involved in the FOI process. Four Non-Executive Directors are trained to participate in Reviews.
- 8.2 Four Reviews were carried out in 2009/2010. Three of these originated from the same applicant and centred on circumstances surrounding a particular event in which the applicant had a personal interest, including requests for information on phone calls made by individuals and personal information regarding another individual. Some of the information requested by the applicant was not held by the Board and other information was not provided, as it was considered personal information and therefore exempt from disclosure under section 38 of FOISA. In all three of these Reviews, the original position of the Board was upheld by the reviewer.
- 8.3 The fourth Review centred on information requested in respect of the Board's tender for taxi services. The Review found that the Board was correct to rely on exemptions in section 30 and 36 of FOISA to withhold certain information. However it found that the use of the exemption in section 35 (law enforcement) to withhold information was not correct and instead substituted the exemption in section 36. Additional information was also provided to the applicant following the Review.

9 SCOTTISH INFORMATION COMMISSIONER DECISIONS AND ANNUAL REPORT

- 9.1 Following the outcome of a Review, there is a further right for an applicant to appeal to the Scottish Information Commissioner for a decision on the case, if an applicant remains dissatisfied with the outcome. An applicant has up to 6 months following the outcome of the Review in which to apply to the Commissioner.
- 9.2 Of the four Reviews carried out during 2009/10, one applicant appealed to the Commissioner in respect of three Reviews requested. Of these, the Commissioner issued a Decision on two of the appeals. These were published on the Commissioner's website under Decision 116/2009 (published in October 2009) and Decision 102/2010 (published in June 2010). Both Decisions found in favour of NHSGGC. One further appeal from this applicant has yet to be decided on by the Commissioner.

- 9.3 One further Decision was issued by the Commissioner during 2009/10 (Decision 011/2010, issued in January 2010). The Board considered that it did not hold the particular information requested by the applicant and the Commissioner upheld the Board's position in this respect. However, the Board was able to provide some alternative information to the applicant.
- 9.5 In December 2007 UNISON applied to the Commissioner for a decision regarding their request to NHSGGC for information relating to PPP/PFI contracts. The Commissioner investigated the case and submissions were made on behalf of the Board's position. Considerable additional information was provided to UNISON, who subsequently withdrew their application to the Commissioner for a Decision. Confirmation of this was received from the Commissioner in January 2010.
- 9.6 A summary of the Decisions issued by the Commissioner in 2009/10 is given in Table 4 below. All Decisions issued by the Commissioner are published on his website at www.itspublicknowledge.info

Table 4 – Summary of Decisions Issued in 2009/10

Decision	Summary
Decision Notice 102/2010 Mr K – Times and lengths of phone calls	<p>The Commissioner found that NHS GG&C complied with Part 1 of FOISA in advising Mr K that the information in relation to telephone calls was not held by NHSGGC. The Commissioner therefore did not consider whether this information would have been exempt from disclosure under section 38(1)(b) of FOISA, or whether if it had been held by NHSGGC, it should have been provided to Mr K.</p> <p>The Commissioner accepted that NHSGGC had taken all reasonable steps to establish whether it held any recorded information about relevant phone calls and that none had been found. The Commissioner therefore found that NHSGGC was correct to give Mr K notice under Section 17 of FOISA that it did not hold the information he had asked for.</p>
Decision Notice 011/2010 Mr L – Efficacy of specific treatment options	<p>The Commissioner found that NHSGGC had dealt with Mr L's request in accordance with Part 1 of FOISA by advising Mr L that it did not hold the requested information.</p>
Decision Notice 116/2009 Mr Q – Record of events on a particular day at a medical practice	<p>The Commissioner found that NHSGGC complied with Part 1 of FOISA in responding to Mr Q's request - that the Board did not hold the information Mr Q had requested and that the Board had fulfilled its duty to provide Mr Q with advice and assistance in terms of section 15 of FOISA.</p>

- 9.7 The Scottish Information Commissioner issued his Annual Report in March 2010, together with an interactive on-line version of the report. A full copy of the Commissioner's report can be obtained from Alison Flynn FOI Manager, or through the Commissioner's website at <http://www.itspublicknowledge.info/ask/>

10 DEVELOPMENTS IN FOISA

10.1 **Opinion of the Court of Session in Glasgow City Council and Dundee City Council –v- Scottish Information Commissioner**

On 30 September 2009 the Court of Session published an Opinion on appeals made by Glasgow City Council and Dundee City Council against decisions made by the Scottish Information Commissioner. The Court found that, in the particular circumstances of the cases, the requests were invalid. The Opinion of the Court of Session clarified that FOISA provided a right of access to information but not a right of access to copies of specific documents. The Opinion also clarified that a request for information must state the name of the applicant. A request for information may be made on behalf of another person, but that person must be named.

In January 2010 the Commissioner published new guidance explaining the practical effects for public authorities and applicants of the Opinion of the Court of Session. The guidance highlighted that public authorities should not automatically refuse requests for copies of documents where it is reasonably clear from the request that it was the information recorded in the document that the applicant wanted. The guidance provided practical advice on the interpretation of information requests, alongside the important duty to advise and assist applicants.

10.2 **Consultation on a revised Code of Practice for public authorities on the discharge of their function under FOISA (Section 60 Code of Practice)**

In December 2009 the Scottish Government consulted on a revised Code of Practice which provides guidance for public authorities in discharging their functions in respect of FOISA and the Environment Information Regulations (EIRs). NHSGGC submitted a response to the consultation, and further information is awaited on the publication of a revised Code of Practice.

10.3 **Practice Assessment by the Office of the Scottish Information Commissioner**

In line with the Commissioner's Enforcement Strategy published in May 2008, a programme of assessments of the practice of various public authorities has commenced by staff from the Commissioner's office. A number of public authorities have now been assessed and the reports published on the Commissioner's website. NHSGGC have been advised that the Commissioner intends to carry out an assessment of the organisation's practice in relation to FOISA and the EIRs, and it is anticipated that this will take place in January 2011. The assessment is expected to take place over 2 days and will be conducted by staff from the Commissioner's office.

The assessment will cover all aspects of NHSGGC's handling of requests for information under the two regimes, including:

- Compliance with statutory timescales;
- Adequacy of refusal or other notices;
- Explanation of review or appeal procedures;
- Adequacy of review procedures;
- Staff training;
- Publication scheme;
- Duty to advise and assist applicants;
- Records management including strategic responsibility, whether adequate strategy, policy or procedures are in place, destruction arrangements and management of electronic files;
- Adequacy of searches for information.

The Commissioner's staff will meet with all NHSGGC staff involved in dealing with FOISA and the EIRs and will look at the systems in use throughout the organisation for the management of requests for information.

A Working Group has been set up in order to prepare for the assessment, and to identify any areas of the Board's practice which may require attention or which could be improved prior to the assessment taking place.

10.3 **Publication Scheme**

During the year, the Board, along with other health service organisations was required to review and submit for approval a new Publication Scheme. This involved the development of a new model publication scheme for Scottish NHS Boards. A considerable body of work was undertaken to develop this new model publication scheme. The new Scottish model scheme was approved by the Commissioner, and NHSGGC's own publication scheme was also given approval by the Commissioner to take effect from 1 June 2010. The work which took place to develop the new model publication scheme, and to ensure the approval of NHSGGC's publication scheme, is described in detail in Appendix 1 of this report.

11 **MONITORING AND DEVELOPMENT**

- 11.1 Since 1 April 2009 the Datix Request For Information (RFI) module has been used as the method for recording, monitoring and reporting of requests for information within NHSGGC. Plans are now being developed to extend the use of the Datix RFI module to CH(C)Ps in West Dunbartonshire, East Dunbartonshire, Renfrewshire, East Renfrewshire and Inverclyde and it is planned that this will be introduced from 1 October 2010.
- 11.2 A number of awareness training sessions on the operation of FOISA within NHSGGC were delivered during 2009/10 by the FOI Manager based at the Board, which were open to any staff to attend. In addition, four half-day training sessions were carried out for staff within Renfrewshire CHP. These sessions were held at the Abercorn Centre at the Reid Kerr College campus, and were conducted jointly by the FOI Manager and the Sector Records Manager based at Dykebar Hospital, and covered FOISA, data protection and data security issues. Further work is currently being undertaken to progress development of an on-line e-learning package covering FOISA and the EIRs which would form part of the induction process for new staff and would also be rolled out to existing staff.
- 11.3 The FOI Steering Group continues to meet quarterly to review the operation and management of the Act. The Steering Group acts as a forum for the discussion of FOI-related issues such as reviewing the Board's Publication Scheme, accessibility of information on the website, training and awareness, requests for reviews, and learning lessons from the decisions issued by the Commissioner. The Steering Group also considers new guidance issued by the Commissioner and ensures its dissemination and implementation as necessary. Membership of the group includes staff directly involved in the day-to-day handling of requests and those with a wider management responsibility for the operation of the Act.
- 11.5 Quarterly monitoring information on the organisation's performance in respect of the percentage of FOI requests responded to within the statutory 20 working day timescale has been provided regularly to the Board's Performance Review Group in the NHSGGC Performance Report and is also submitted to the FOI Steering Group.

12 CONCLUSION

- 12.1 The FOI Steering Group will continue to meet on a regular basis, and work will continue on refining the processing and handling of requests, data capture, and content and accessibility of information. Work will also continue on awareness training for staff, training and development for those staff involved in the day-to-day management of requests for information, and improved accessibility of information. The working group established to prepare for the practice assessment in January 2011 will also continue to meet regularly to ensure that the organisation is fully prepared for this event.
- 12.2 Members are asked to note this Annual Monitoring Report on the operation of the Freedom of Information (Scotland) Act 2002 within NHS Greater Glasgow & Clyde, and give any comments or view on the presentation or format of the Report, or on any area with regard to implementation of the Act within NHS Greater Glasgow & Clyde.

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August 2010

Publication Scheme

Every public authority subject to FOISA is legally obliged under Section 23 of the Act to adopt and maintain a publication scheme which has the approval of the Scottish Information Commissioner. A publication scheme is a document which describes the information which a public authority actively publishes or intends to publish. It provides an outline of the organisation structure and explains by reference to various type or categories the information that is made available without the formality of a request of information under section 1 of the Act.

It may be summarised as a document which provides the public with information about:

who we are - what do we do - the decisions we take - and how to obtain information

During 2008 the Scottish Information Commissioner commenced a programme for the renewal of publication schemes which were first adopted in 2004. The Commissioner adopted detailed guidance for public authorities on what a scheme should contain, which was far more extensive than the requirements specified when the first round of publication schemes were adopted. Under the programme for renewal of publication schemes health service bodies were required to submit their schemes for approval by 28th February 2010 to come into effect from 1st June 2010.

The main Health Boards in Scotland agreed to develop a model publication scheme which could be adopted by individual Boards with little or no variation or – as was the case with Special Health Boards – used as a basis for development of their own bespoke schemes. Development of the model scheme was led by the Head of Administration for the Mental Health Partnership with a small representative group of staff with FOI responsibilities across NHS Boards and with input from a Policy Officer from the Office of the Scottish Information Commissioner. In developing the model scheme account was taken of the view of the Commissioner that an effective publication scheme:-

- provides clear evidence that an authority is meeting its obligations under the FOI Act to be accessible, open & transparent;
- enables the public to see what information is already published, and to access it without having to make a formal written request under section 1 of the Act. (Section 1 is the provision which states that if a public authority holds information it is obliged to make it available on request to any person unless one of a number of specific exemptions apply)
- gives employees clear guidance about the information that they can and should give out to the public so they can respond to information requests efficiently;
- helps reinforce leadership messages about openness and accountability to staff at all levels in the organisation;
- is easily accessible and designed to be easy to understand and to use – by everyone (including those with no web access).

Additionally in developing the model scheme the working group ensured, so far as possible, that the document was drafted in Plain English to improve accessibility and to ensure that it was Equality Sensitive i.e. compliant with Boards' Equality Schemes. It was also necessary to ensure that the scheme followed the Commissioner's guidance which sought

- improved content;
- increased stress placed on showing due regard to the public interest in developing schemes;
- inclusion of environmental information in publication schemes;
- promoting best practice in making information available;
- compliance with a standard template which set out the minimum information expected to be included in publication schemes.

The Commissioner gave approval to the model scheme as developed in early February 2010 and this has since been adopted by most Boards in Scotland through the inclusion of local information. The amended scheme will be valid for a period of four years during which time authorities have an on-going obligation to keep their individual schemes under review.

The approved scheme is required to be published on the authority's web-site; available to access via the search facility on the web; and from any public office of the Board. Steps are being taken to raise awareness of the existence of the new publication scheme via posters, leaflets and the usual communication processes within the Board.

Members wishing to view the publication scheme may do so at:-

<http://library.nhsggc.org.uk/mediaAssets/library/Final%20Scheme%20as%20at%201st%20June%202010.pdf>

The current version is as published on 1st June 2010. Arrangements have been made for the content to be the subject of review every two months, or more frequently in the case of significant changes to content.