

**Report of the Head of Administration**

**Freedom of Information Monitoring Report for the period**  
**1 April 2015 to 31 March 2016**

**Recommendation:**

The NHS Board is asked to note the Monitoring Report on the operation of the Freedom of Information (Scotland) Act 2002 and the Environmental Information (Scotland) Regulations 2004 in NHS Greater Glasgow and Clyde for the period 1 April 2015 to 31 March 2016.

**Statistical Summary:**

	<b>2015/16</b>	2014/15
Requests for information received	<b>801</b>	779
Requests for information responded to	<b>785</b>	771
Percentage of requests responded to within 20 working days	<b>92%</b>	89%
Average response time (working days)	<b>16.8</b>	17
Number of Reviews carried out	<b>13</b>	18
Number of cases appealed to the Scottish Information Commissioner	<b>0</b>	1
Decisions issued by the Scottish Information Commissioner	<b>0</b>	0

**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 recorded information held by Scottish public bodies including NHS Boards and incorporates the Environmental Information (Scotland) Regulations 2004 (the EIRs).
- 1.2 The Board maintains a Publication Scheme which describes information that the organisation routinely publishes and that can be obtained without the need for a formal request under the Act. Most of this information can be accessed through the Board's website ([www.nhsggc.org.uk](http://www.nhsggc.org.uk)). Where information is not available through these sources, an applicant can, under the Act, make a request for information. The request must be in a permanently recorded form (e.g. 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. The Act specifies that requests for information must be responded to within 20 working days.
- 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 a number of exemptions within FOISA, or exceptions under the EIRs, many of which also require a public interest test to be applied.

**2 REPORT**

- 2.1 This report covers the 12-month period from 1 April 2015 to 31 March 2016. The report summarises the requests for information received by NHS Greater Glasgow and Clyde under both FOISA and the EIRs during this period.

### 3 OPERATION OF THE LEGISLATION WITHIN NHS GREATER GLASGOW AND CLYDE DURING 2015/16

- 3.1 Since the Act came into force on 1 January 2005, the organisation has sought to ensure that robust arrangements for managing requests for information made to NHS Greater Glasgow and Clyde are in place. These have been adapted where necessary to respond to the changing needs of the organisation.
- 3.2 During 2015/16, the corporate administration teams for the Board and Acute Services division were reviewed, with the aim of consolidating the functions into one department. This has resulted in the FOI function being concentrated into one small dedicated team dealing with the majority of FOI requests directed to NHSGGC. Requests from media sources (e.g. journalist, newspaper/magazine or broadcast media) continue to be managed through the Corporate Communications Directorate.
- 3.3 Requests for former CHP information were handled through local management structures and they also dealt with FOI requests relating to services hosted by them.
- 3.4 With the creation of Integrated Joint Boards/Health & Social Care Partnerships, these new bodies are now each responsible for responding to freedom of information requests in the same way as the health Board and for other obligations under FOISA such as the requirement to adopt a model publication scheme. The guiding principle to be followed remains that it is the organisation which holds the information being requested, that is responsible for complying with the legislation.

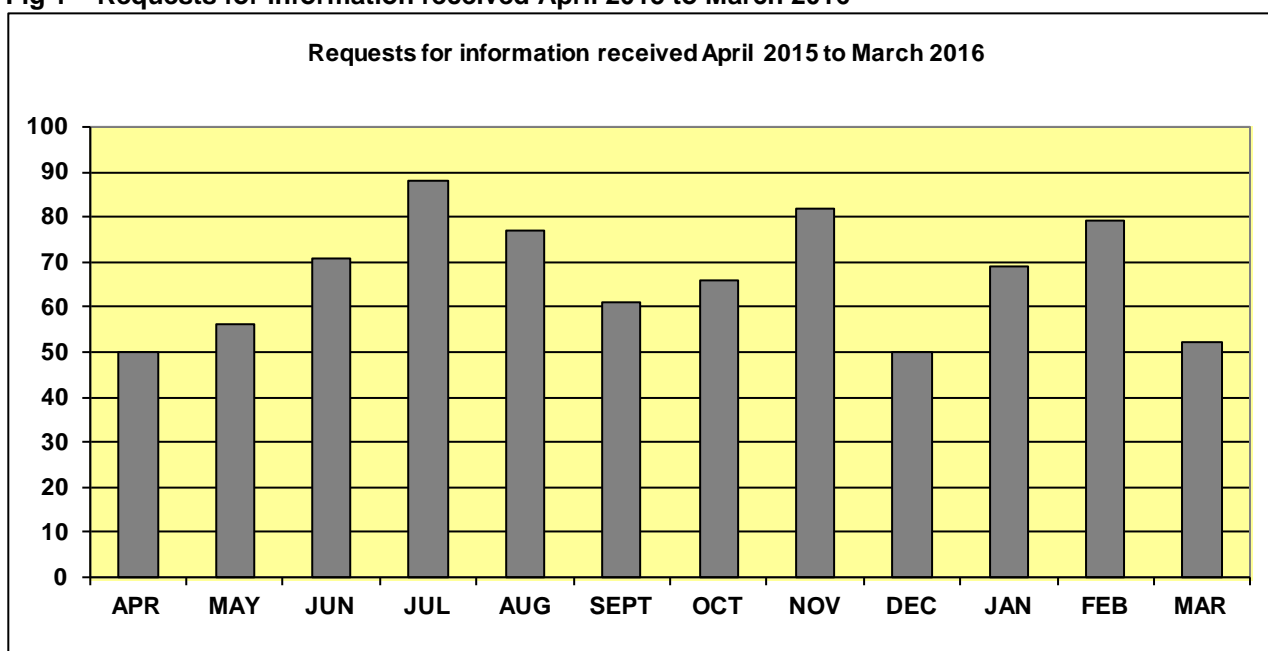
### 4 NUMBER OF REQUESTS RECEIVED

- 4.1 The overall number of requests received during 2015/16 of 801 increased slightly compared to 779 requests in 2014/15.
- 4.2 Table 1 below shows the number of requests for information received each month from 1 April 2015 to 31 March 2016. Fig1 shows the information represented in a chart format.

**Table 1 – April 2015 to Mar 2016 – Number of Requests Received**

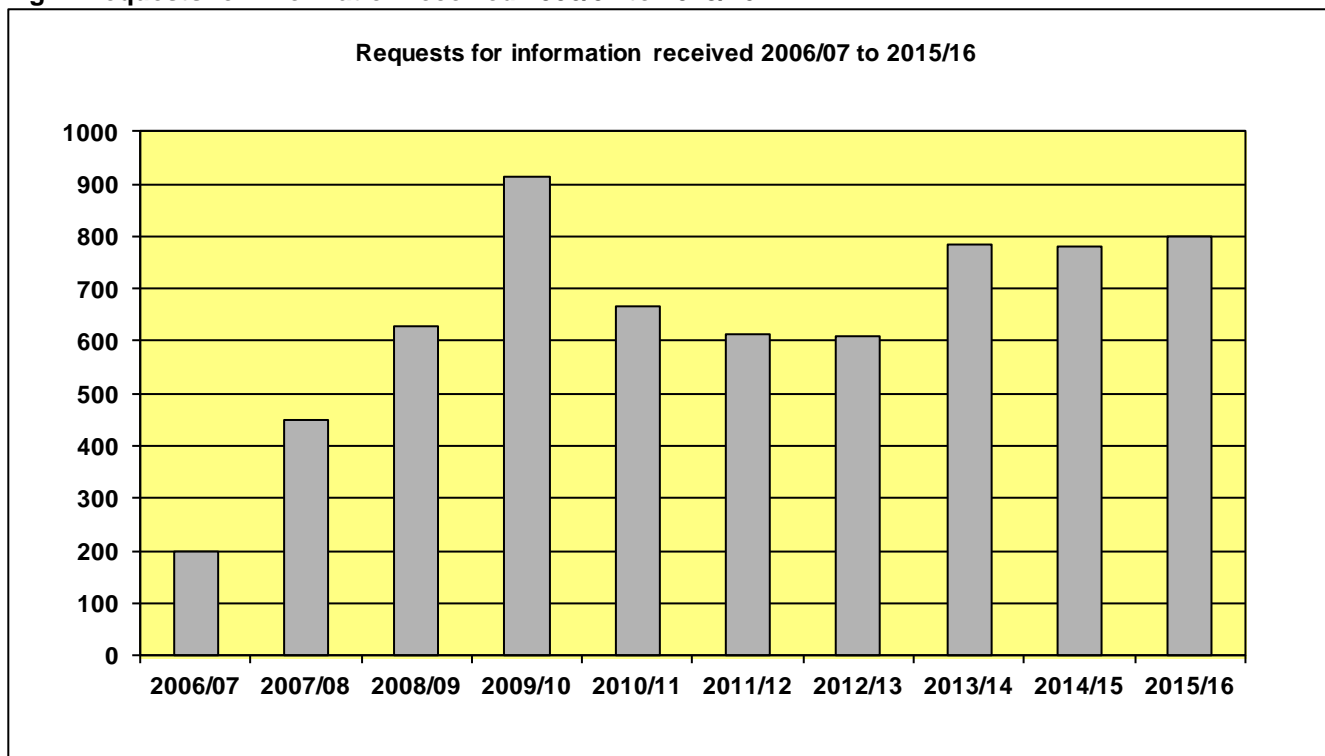
	April	May	June	July	Aug	Sept	Oct	Nov	Dec	Jan	Feb	Mar	Total
<b>Number of Requests Received</b>	50	56	71	88	77	61	66	82	50	69	79	52	<b>801</b>

**Fig 1 – Requests for information received April 2015 to March 2016**



4.3 Fig 2 below shows a comparison of the overall number of requests received from 2006/07 to 2015/16. This shows that requests increased during the early years of the legislation coming into force. The last 3 years have seen a levelling off in the number of requests received, at around 800 requests per year. As previously reported, the high number of requests received in 2009/10 was due to an increased number of requests from NHSGGC employees in relation to Agenda for Change issues but such requests have now all but ceased.

**Fig 2 -Requests for information received 2006/07 to 2015/16**



## 5 PERFORMANCE MONITORING

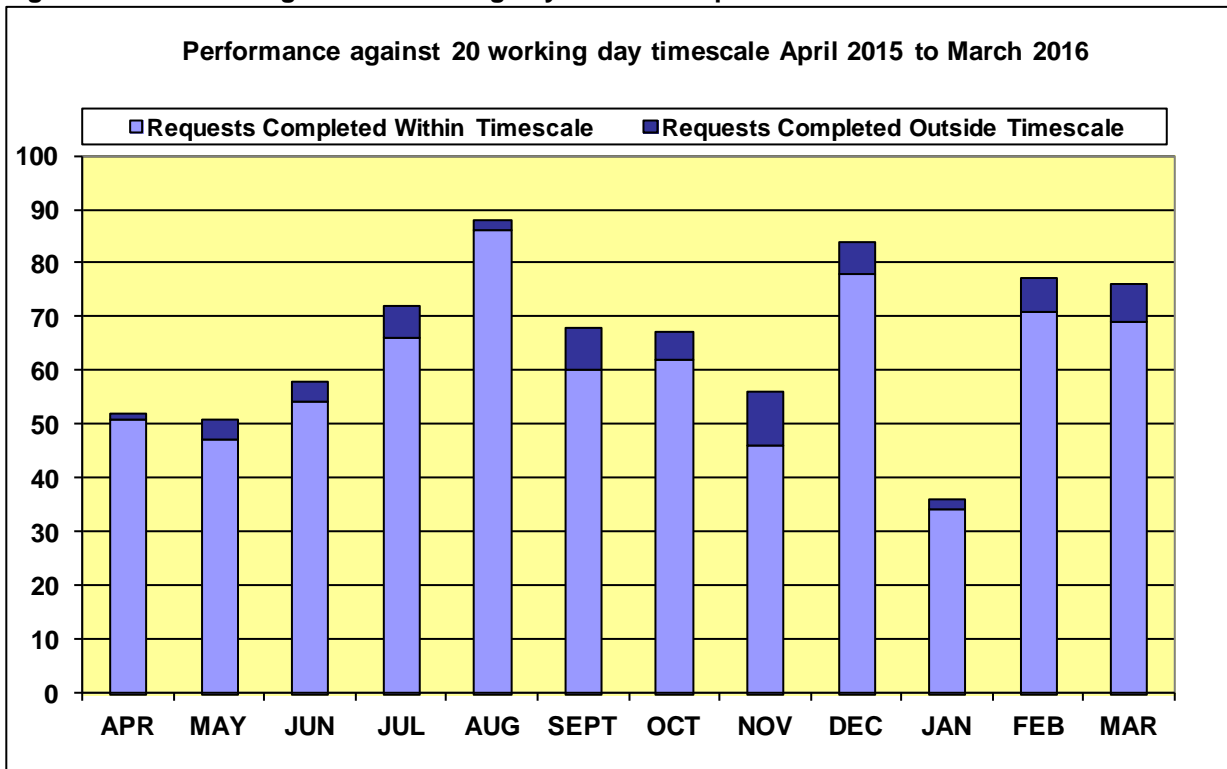
5.1 785 requests were responded to during 2015/16. Of these, 724 requests (92%) were responded to within the requirement of 20 working days (Table 2) compared to 89% in 2014/15.

5.2 Table 2 and Fig 3 show the number of requests completed both within and outside the 20 working day timescale.

**Table 2 – Number and percentage of requests responded to within 20 working days – 2015/16**

	APR	MAY	JUN	JUL	AUG	SEPT	OCT	NOV	DEC	JAN	FEB	MAR	TOTAL
<b>Total Number of Requests Responded</b>	<b>52</b>	<b>51</b>	<b>58</b>	<b>72</b>	<b>88</b>	<b>68</b>	<b>67</b>	<b>56</b>	<b>84</b>	<b>36</b>	<b>77</b>	<b>76</b>	<b>785</b>
Number of Requests Completed within 20 Working Days	51	47	54	66	86	60	62	46	78	34	71	69	724
Number of Requests Completed outwith 20 Working Days	1	4	4	6	2	8	5	10	6	2	6	7	61
<b>Percentage completed within 20 Working Days</b>	<b>98</b>	<b>92</b>	<b>93</b>	<b>92</b>	<b>98</b>	<b>88</b>	<b>93</b>	<b>82</b>	<b>93</b>	<b>94</b>	<b>92</b>	<b>91</b>	<b>92</b>

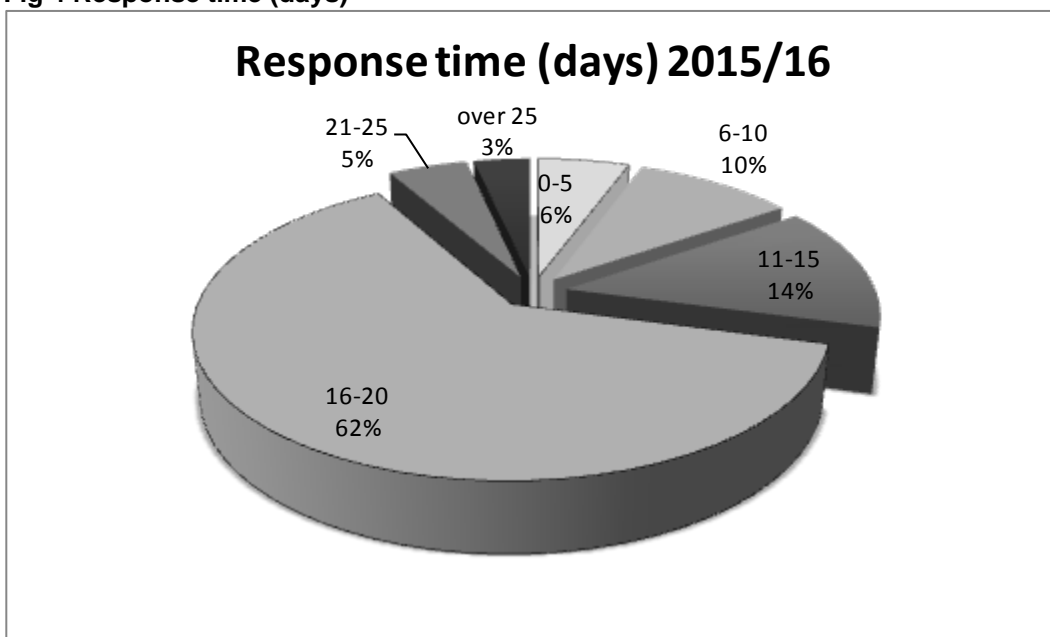
**Fig 3 – Performance against 20 working day timescale April 2015 to March 2016**



5.3 We seek to respond to all requests within 20 working days, but inevitably we are not able to achieve 100% performance. In 2015/16, 8% of requests exceeded the statutory timescale, with 3% of the total requests responded to being significantly over the requirement. The 20 working day turnaround presents challenges where there are complex cases. Other issues may contribute to difficulties in meeting the timescale, such as delays in processing requests or where the initial request was not initially sent to the correct part of the organisation.

5.4 Fig 4 below shows the breakdown of request response time in days. On average, requests for information were responded to within 16.8 working days.

**Fig 4 Response time (days)**



5.5 Information on the organisation's performance in respect of the percentage of FOI requests responded to within the statutory 20 working day timescale was provided quarterly to the Board's former Quality and Performance Committee and now the NHS Board and for the performance within Acute Services, the Acute Services Committee as part of the integrated score-card report. Performance was within agreed targets.

5.6 From 1 April 2013 the Scottish Information Commissioner introduced a requirement for Scottish public authorities to submit quarterly statistics to her office. Statistics continue to be submitted via an on-line portal providing details such as performance against the 20 working day target, number and type of exemptions applied and number of reviews carried out. The information within the on-line portal is publicly available to view and download.

## 6 SOURCE OF REQUESTS

6.1 The total number of requests received in 2015/16 has not changed significantly compared to 2014/15 and most of the main sources of requests show only minor fluctuations.

6.2 The number of requests from journalists and media sources has seen an upward trend over recent years, from 141 requests in 2011/12 to 258 requests in 2014/15. However the number of requests received in 2015/16 dropped at 227 requests.

6.3 The number of requests received from members of the public increased from 224 (28.8%) in 2014/15 to 270 (33.7%) in 2015/16. Requests from MSPs and their researchers also increased slightly from 115 (14.8%) in 2014/15 to 125 (15.6%) in 2015/16.

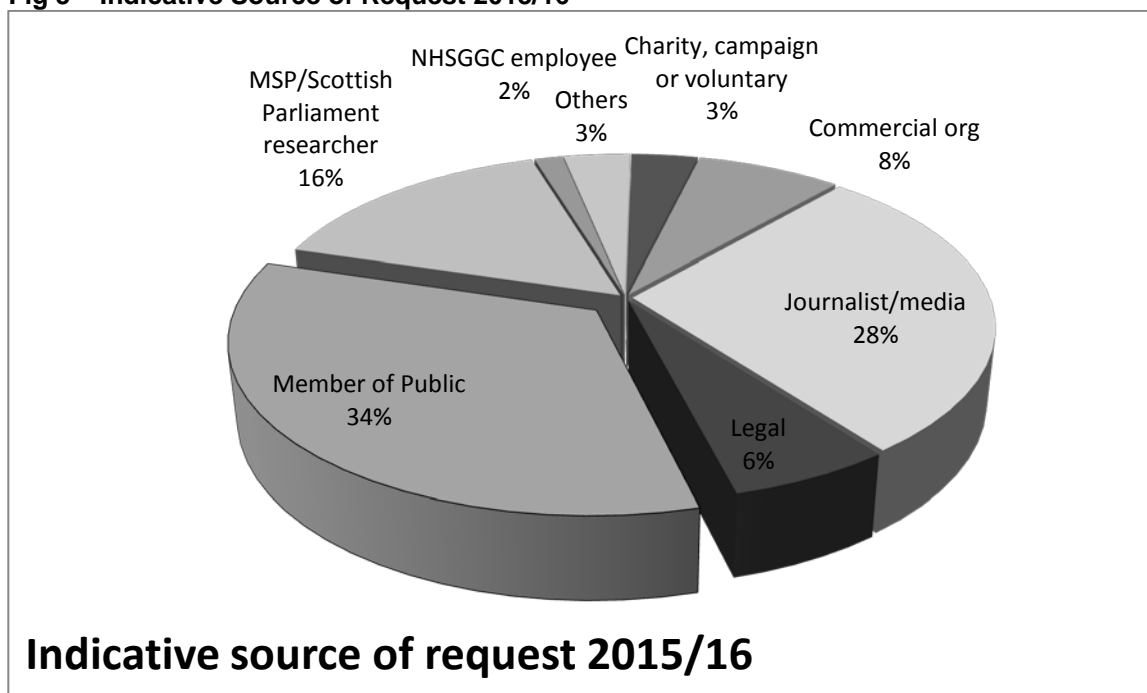
6.4 Requests from charities/voluntary organisations, commercial organisations and from NHSGGC employees all decreased slightly.

6.5 A breakdown of the source of requests is shown below in Table 3 and in Fig 5.

**Table 3 – Indicative Source of Request 2015/16 and 2014/15**

Indicative source of request	2015/16		2014/15	
	Number	% of total requests received	Number	% of total requests received
Charity/Campaign/Voluntary organisations	28	3.5	33	4.2
Commercial organisations	61	7.6	71	9.1
Journalist/Media organisation	227	28.4	258	33.1
Legal	50	6.2	36	4.6
Member of Public	270	33.7	224	28.8
MSP/Scottish Parliament/Other elected official	125	15.6	115	14.8
NHSGG&C Employee	12	1.5	16	2.1
Others:				
Trade Union/Professional Representative body	9	1.1	10	1.2
Other NHS	8	1.0	3	0.4
Other Public Body	0	0	4	0.5
Education/research	11	1.4	9	1.2
<b>Total</b>	801	100.0%	779	100.0%

**Fig 5 – Indicative Source of Request 2015/16**



## **7 TYPE OF INFORMATION REQUESTED**

7.1 As in previous years a wide range of information was requested from NHS Greater Glasgow and Clyde, with some requests generated by issues of local interest. Requests for information often contained a significant number of separate elements, or a large number of requests submitted in a single email or letter. Many of the requests submitted were complex, and required careful consideration of the application of the relevant legislation before information was released.

7.2 Several recurring themes were identified in the subject matter of requests for information.

- Land and property
- Corporate policies and reports
- Finance and expenditure
- Use of locum and agency staff
- Violence and aggression/health and safety issues
- Pharmacy and prescribing issues
- IT contracts, data loss and IT security
- Drug and alcohol use and treatment
- Clinical incidents, protocols and guidelines
- Bariatric Surgery
- Child incidences of abuse of drugs/alcohol
- Accident and Emergency
- Cosmetic Surgery

## **8 OUTCOME OF RESPONSES**

8.1 In some cases the information requested was considered by the Board to be exempt from disclosure under the Act. Where there is a valid reason for withholding information an appropriate exemption must be applied and the Board's response must clearly state the exemption within FOISA (or exception within the EIRs) that is being relied upon to withhold the information. The use of an exemption must be treated 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.

- 8.2 During 2015/16 the following exemptions were used to withhold information requested under FOISA:
- Section 25 - Information otherwise accessible
  - Section 30 - Prejudice to effective conduct of public affairs
  - Section 33 - Commercial interests and the economy
  - Section 36 – Confidentiality in legal proceedings
  - Section 38 - Personal Information

Only 2 requests were handled under the EIRS but no exceptions were applied to the information requested under these regulations.

- 8.3 An analysis of the outcome of responses is shown in Table 4 below:

**Table 4 – Outcome of responses**

Outcome of responses	2015/16	
	Number	%
<b>Full response:</b> The number of requests for which information was provided in full		
<b>Full response Total</b>	<b>544</b>	<b>69%</b>
<b>Partial response:</b> The number of requests for which part of the information requested was not provided *		
<b>Partial response Total</b>	<b>160</b>	<b>21%</b>
<b>Information not held:</b> The number of requests for which all of the information was not held by NHSGGC		
<b>Information not held Total</b>	<b>55</b>	<b>7%</b>
<b>Other Refusals:</b> The number of requests for which all of the information requested was not provided **		
<b>Refusals Total</b>	<b>26</b>	<b>3%</b>
<b>Total responses</b>	<b>785</b>	<b>100.0%</b>

\* Partial response – where part of the information is not provided for one or a combination of the following reasons:

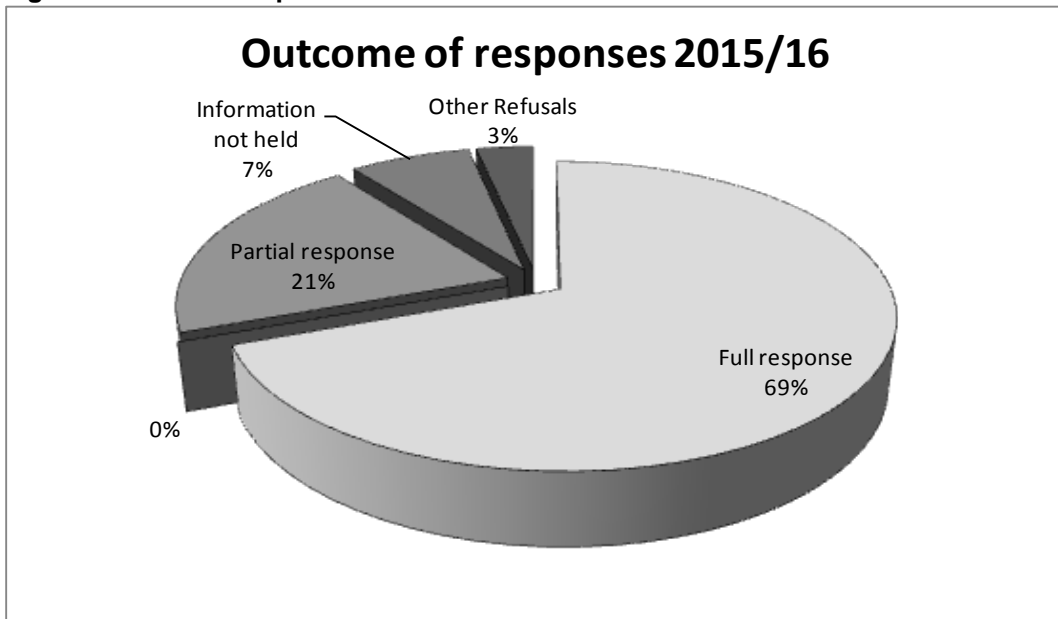
- Excessive costs
- Information not held
- Exemption(s) applied.

\*\* Refusals – where all the information is not provided for one or a combination of the following reasons:

- Excessive costs
- Vexatious or repeated requests
- Information not held
- Exemption(s) applied.

- 8.4 In a number of cases requests were responded to under Section 12 of FOISA, where the Board did not provide all or part of the information being requested as it estimated that the cost of complying with the request would exceed the cost threshold set by Scottish Ministers (currently £600). These cases were typically those where a large amount of information was requested that would take an excessive amount of time and resources to provide, for example cases where the information could only be provided by analysing a significant number of individual records. The Board was required to demonstrate to the applicant how the estimated costs had been arrived at, and was also obliged to provide reasonable advice and assistance to the applicant either to modify the request or suggest what information could be provided in order to bring the estimated costs under the cost threshold.

**Fig 6. Outcome of responses 2015/16**



## 9 REQUESTS FOR REVIEW

- 9.1 Following a request for information, an applicant has the 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.
- 9.2 In line with the procedures agreed by the NHS Board, Reviews are carried out by a Non-Executive Director of the Board with the support of an FOI practitioner. Two Non-Executive Directors participated in the reviews during 2015/16.
- 9.3 13 requests for review from 9 different applicants were responded to in 2015/16. This represents 1.7% of all requests responded to in 2015/16. 8 of the reviews were responded to within the statutory time period of 20 working days. A summary is given in Table 5 below:

**Table 5 – Reviews completed during 2015/16**

	<u>Review No</u>	<u>Details of Review</u>	<u>Outcome</u>
Applicant #1	1	<p>Review Ref 11565</p> <p>The applicant requested information regarding composition of a panel. The applicant requested a review on the grounds that names and job titles of panel members had been withheld.</p> <p>The review found that the application of the public interest did not demonstrate that the information should continue to be withheld and that the names and job titles of the panel members should be disclosed to the applicant.</p>	Additional information was provided to the applicant.
Applicant #2	2	<p>Review Ref 11069</p> <p>The applicant requested information regarding risk assessment for a specific car park on an NHSGGC site. The applicant was advised that consultants within specific specialties had not been considered as an individual group of staff within the context of parking. Portering staff could be contacted to allow vehicles to exit car park at night. A review was requested on the grounds that the response was late and inaccurate and that the wrong email address had been used to respond to the applicant.</p>	Additional information was provided to the applicant.



	<u>Review No</u>	<u>Details of Review</u>	<u>Outcome</u>
		The applicant was offered an apology that the original response had not been sent to the requested email address. Facilities staff were requested to provide the applicant with a copy of instructions issued to portering staff regarding vehicles exiting the car park at night. The applicant was encouraged to pursue further issues through management channels.	
Applicant #3	3	<p>Review Ref 11273</p> <p>The applicant requested information on the number of medical locums employed by NHSGGC for 1 year or more, broken down by length of time in post, gender and ethnicity, and sub-divided by Directorate. The applicant expressed dissatisfaction with accuracy and completeness of the information provided and that information on gender and ethnicity had not been provided.</p> <p>The review confirmed that the information provided on the number of locums was correct and that aggregated information on gender and ethnicity would not present a significant risk. The information was therefore provided in a way that would not reveal the identity of individuals.</p>	Additional information was provided to the applicant
Applicant 4	4	<p>Review Ref 10878</p> <p>The applicant requested documents with specific input from one individual, relating to health and safety compliance. The request was considered to be vexatious and the applicant was asked to amend the request to remove reference to the individual. The applicant did this but the request was subsequently refused on the grounds of excessive costs. A review was requested on the grounds that the applicant was dissatisfied with the handling of the request.</p> <p>The review noted that as the earlier request was considered to be vexatious, no further consideration had been given as to whether any further barriers to providing the information would apply, had the request not been considered vexatious. The review concluded that in refusing the subsequent request on the grounds of excessive cost, the applicant had not been provided with the appropriate advice and assistance to narrow or amend the request to within cost limits.</p>	Applicant was issued with an apology that advice had not been given regarding narrowing or amending the request. Applicant was subsequently given the appropriate advice.
Applicant 5	5	<p>Review Ref 10991</p> <p>The applicant requested family history documents held in the NHSGGC Archive. The request was initially refused under Section 25 since the information was available for inspection. The response acknowledged that it was not easy for the applicant to inspect the records in person, but that the applicant could engage a genealogical research agent to undertake the search on their behalf. The Board's Archive policy also states that staff will not search records but will provide access to users to search them. A review was requested on the grounds that the information was not available for inspection by the applicant (who lived abroad) and that it was not reasonable to engage a research agent.</p> <p>Archive staff undertook a search to identify whether information falling within the scope of the request was</p>	Information was provided to the applicant.

	<u>Review No</u>	<u>Details of Review</u>	<u>Outcome</u>
		actually held within the Archives. The search identified several documents and entries in registers. This information was provided to the applicant. It should be noted that the applicant offered his thanks and appreciation for the work undertaken and the information provided.	
Applicant 6	6	<p>Review Ref 10876</p> <p>The applicant requested a copy of the winning bid for a tender. At the time of the request the tender process had not been fully concluded. All the information requested was therefore withheld on the grounds of commercial interests. The applicant requested a review on the grounds that information had been withheld.</p> <p>The review concluded that the exemption in Section 33 (commercial interests) was used appropriately at the time of the request. However it was felt that the information should be reviewed as the tender process had since been concluded. A copy of the tender submission was provided to the applicant with appropriate redactions for commercial sensitivity.</p>	Applicant was provided with some information that had previously been withheld.
Applicant 7	7	<p>Review Ref 10995</p> <p>The applicant requested In-patient costs for a specific treatment unit. The request specified a number of elements that the costs should include. The applicant was provided with the in-patient cost per week and per bed day for the unit. A review was requested on the grounds that the response did not provide a full breakdown of the costs. In the review submission the applicant requested a full breakdown of costs and also went on to ask for further information not specified in the original request. This was handled separately as a new request.</p> <p>The review concluded that the original response was appropriate. The new request for information contained in the applicant's review submission was completed within the statutory timescale.</p>	Original decision upheld. Additional information as provided to the applicant in response to the additional request.
Applicant 8	8	<p>Review Ref 11435</p> <p>The applicant requested information on the identity of the Lead Investigator for a Significant Clinical Incident (SCI). A review was requested on the grounds that it contradicted other information that had been provided to the applicant.</p> <p>The review confirmed that the correct information had been provided to the applicant in the original response.</p>	Original decision upheld.
Applicant 8	9	<p>Review Ref 11432</p> <p>The applicant requested information held in connection with material gathered in the course of an investigation. A review was requested on the grounds that information held by NHSGGC had not been provided.</p> <p>The review found that no further information falling within the scope was identified and that appropriate advice and assistance had been provided to the applicant. The response had been issued to the applicant outwith the statutory timescales set out in FOISA. The applicant was offered an apology for this delay.</p>	The applicant was provided with an apology for the delay in responding.

	<u>Review No</u>	<u>Details of Review</u>	<u>Outcome</u>
Applicant 8	10	<p>Review Ref 11434</p> <p>The applicant requested information relating to a handbook issued to ICGPs in April 2014 including creation dates and dates modified, and evidence of transmission by email to senior staff. The review was requested on the grounds that the applicant disputed the information provided regarding created dates and asserted that NHSGGC held the information but had not provided it, or had destroyed it subsequent to the applicant's request.</p> <p>The applicant was provided with an apology for the delay in issuing the Review outcome. No further information was identified as falling within the scope of the request but some of the information requested was identified as being not held under Section 17.</p>	An apology was provided to the applicant for the delay in completing the review.
Applicant 8	11	<p>Review Ref 11426</p> <p>The applicant requested all information held by NHSGGC in relation to a Significant Clinical Incident. A review was requested on the grounds that the applicant considered information to be held which had not been provided, and questioned whether exemptions had been used correctly.</p> <p>An apology was issued to the applicant for the delay in providing the original response and the Review outcome. The review found that the use of the exemption in Section 30 was considered to be inappropriate and that witness statements should be provided, subject to any personal information being considered. The use of the exemption in Section 38 was upheld.</p>	Additional information identified in the review was provided to the applicant.
Applicant 8	12	<p>Review Ref 11433</p> <p>The applicant requested all information relating to a grievance involving a named individual. The review was requested on the grounds that not all the information held by NHSGGC had been disclosed, and the response had been issued outwith the statutory timescale.</p> <p>The review acknowledged that the response had been issued outwith the statutory timescale set out in FOISA. The applicant was provided with an apology for the delay. An interim response had been provided, however the review found that it should have been made clearer that this was not the final response.</p>	Applicant provided with an apology for the delay in issuing the response.
Applicant 9	13	<p>Review Ref 11228</p> <p>The applicant requested statistics and percentages of the number of staff clocking in and out in a specific department. The applicant was provided with information from the NETR Time Management system. A review was requested on the grounds that the applicant considered some of the information to be incorrect.</p> <p>As a result of the review, the applicant was provided with an apology and issued with amended information. As part of the applicant's review submission, further information had been requested. However this was not provided as it was considered to be cost exempt.</p>	Applicant provided with an apology and issued with amended information

## **10 DECISIONS ISSUED BY THE SCOTTISH INFORMATION COMMISSIONER**

- 10.1 In the event that a public authority fails to respond to a request or the requester is not satisfied with the response, 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. Following a Decision by the Commissioner, an applicant who is still dissatisfied has a further right of review to the Court of Session, but on a point of law only.
- 10.2 No Decisions have been issued by the Scottish Information Commissioner during 2015/16 in relation to cases involving NHS Greater Glasgow and Clyde. However a number of cases reviewed during 2015/16 have since been appealed to the Commissioner for a Decision, and these will be reported in due course.

## **11 SCOTTISH INFORMATION COMMISSIONER**

- 11.1 Working with the Commissioner  
During 2015 and 2016, the Board's FOI Manager continued to work as part of a small group of FOI practitioners from a cross-section of Scottish public authorities who have contributed to the content and provided feedback on a suite of self-assessment tools for public authorities. The self-assessment tools are in the form of modules, each module covering a separate aspect of managing and processing requests for information under the legislation. In May 2015 the Board's FOI Manager also co-presented a workshop with an FOI colleague from Fife Council at the Commissioner's Practitioner Conference held at the Centre for FOI at the University of Dundee.
- 11.2 Commissioner's Roadshow  
In March 2016, NHSGGC participated in a Roadshow event run by the Scottish Information Commissioner held at the Royal Concert Hall, Glasgow. The Roadshow was attended by FOI practitioners from a wide range of public authorities in the Glasgow area including NHSGGC, Glasgow City Council, local universities and further education institutions. Trisha McAuley from NHSGGC chaired the event which provided informative workshops on a range of subjects relating to FOI legislation and practice. Robert Calderwood also attended a working lunch with the Commissioner together with Chief Executives of other public authorities participating in the programme.

## **12 TRAINING AND DEVELOPMENT**

- 12.1 An E-learning training module for FOISA and the EIRs has been available to all staff in NHS Greater Glasgow and Clyde through the LearnPro E-learning platform since June 2012. The E-learning module provides staff with general awareness training on FOI legislation and includes information on the basic principles of FOISA and the EIRs, including how to recognise and respond to requests, circumstances where information might not be disclosed and the differences between FOISA and the EIRs. Staff who use the module also undertake an assessment of their learning in order to successfully complete the module.
- 12.2 During the reporting period of 1 April 2015 to 31 March 2016, a total of 2931 staff successfully completed the module. A brief summary of the uptake by staff group is given in Table 6.

**Table 6 –Number of staff successfully completed FOISA/EIR E-Learning Module – 2012/13 to 2015/16**

Job Family	Number of staff completing module				Total
	2012/13*	2013/14	2014/15	2015/16	
Admin/Senior Manager	253	479	518	352	1,602
Senior Manager Exec level	5	5	14	13	37
Allied Health Professions	372	493	430	433	1,728
Health Science Services	82	134	134	139	489
Medical & Dental Support	19	26	15	20	80
Medical & Dental	80	98	67	80	325
Nursing& Midwifery	1,747	1,926	1,666	1,728	7,067
Other not specified	59	118	118	86	381
Other Therapeutic	19	46	44	39	148
Support Services	47	56	55	41	199
<b>TOTAL</b>	<b>2,683</b>	<b>3,381</b>	<b>3,061</b>	<b>2,931</b>	<b>12,056</b>
Acute Division	1,824	2,119	1,911	1,819	7,673
Partnerships	783	1,109	1,015	952	3,859
Corporate Services	76	153	135	160	524
<b>TOTAL</b>	<b>2,683</b>	<b>3,381</b>	<b>3,061</b>	<b>2,931</b>	<b>12,056</b>

\* part year only, 26/06/12 to 31/03/13

- 12.3 Greater awareness of this legislation and its importance will be reinforced by re-publicising the E-Learning module through team brief and other internal communications to ensure that all staff are aware of the need to complete the module and that senior management support that principle. The aim of the module is to increase the knowledge and understanding of FOI within the organisation, so that we can improve performance against legislative timescales, improve the quality of responses and continue to develop the culture of FOI within the organisation.
- 12.4 Resources available to staff via StaffNet include a Guide to Freedom of Information which contains standard text for responses and guidance through the process of handling requests made under FOISA and the EIRs. The resources on StaffNet also contain guidance to staff who are asked to provide information in response to requests. Although these resources are available on StaffNet, staff who receive requests for information are advised to make early contact with an FOI officer for appropriate advice and assistance.
- 12.5 The FOI Steering Group chaired by the Head of Administration for Glasgow City CHP met quarterly during 2015/16 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 Decisions issued by the Commissioner. The Steering Group also considers new guidance issued by the Commissioner and other related issues such as records management and data protection 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 including all Heads of Administration.
- 12.6 NHS Greater Glasgow and Clyde is also represented on the NHS Scotland FOI Leads Forum, and members of the FOI Steering Group attend quarterly meetings of the Forum.

### **13 CONCLUSION**

- 13.1 The FOI Steering Group will continue to meet on a regular basis, and FOI practitioners within NHS Greater Glasgow and Clyde will continue to refine and improve compliance with the Act, including the processing and handling of requests, data capture, and content and accessibility of information. Work will also continue on training and development for those staff involved in the day-to-day management of requests for information, and improved accessibility of information.
- 13.2 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 and Clyde.

**Alison Flynn**  
**Freedom of Information Manager**  
**NHSGGC**  
**8 August 2016**