

Action	Ref	Category	Details	Purpose/Impact	Timescale	Owner	Current Status (To Do/Pending)
Review/update/reiterate FOI roles and responsibilities across the council	1.1	Procedural	Ensure the responsibility for handling requests is understood by all levels, the function is clearly delegated to key staff, and the expectations about timeliness are clearly communicated	Compliance with FOIA/EIR is an organisational commitment, and requires involvement from all areas of the council. Improvement will only be possible if the clear roles and responsibilities in relation to compliance are established and maintained throughout the organisation	1. Immediate	Service Areas	Complete
Reiterate senior support and commitment to FOIA/EIR compliance	1.2	Organisational	Identify ways in which senior management can promote a culture of adherence to FOI requirements, ensuring it is recognised as a core function within all services, and especially in services who receive a high proportion of requests	In order for the council to comply with requests on-time, especially in circumstances of reduced resource across the organisation, the importance of FOI compliance alongside other work needs to be embedded within the culture of the organisation. This can only happen with strong support from senior leadership, which is cascaded down through each service area. Reiterating such commitment would help strengthen a positive FOI culture	1. Immediate	Executive Office	Complete
Review available resource and resource allocation for FOI compliance across the council	1.3	Procedural	Explore whether it is possible to assign further staff to request handling in the short term, to work through backlogs of requests, where they exist	Workload/lack of resource in some services has been highlighted as the primary cause for poor timeliness performance. Additional resource will better enable service areas to clear backlogs of requests that have accumulated and therefore improve compliance rates for new requests	1. Immediate	Service Areas	Ongoing
Increased visibility of Central Disclosures Team and better understanding of role in FOI compliance	1.4	Organisational	There is inconsistency in how aware the wider organisation is of the central team and what role they play in FOI compliance. As the main support channel for the organisation, a lack of awareness of the central team harms BCC's ability to respond to FOI requests effectively	Increased visibility, i.e. via DMTs, on the Source, etc, will keep FOI compliance near the forefront of the organisation's thinking, and will better enable those tasked with case handling to obtain training and support	1. Immediate	Information Governance	Ongoing
Review and update triage stage of FOI process	2.1	Procedural	Review triage process to identify where burden on the organisation can be reduced at an early stage, and ensure that requests are being directed to the correct service area in a timely manner	The council receives on average 5 requests for every day of the year. Where possible the triage stage should address requests at the point of receipt where possible, and ensure that adequate processes are in place to get the request to the relevant service area in time. This will reduce the burden on the organisation and ensure that the service who will issue the response have the maximum time possible to comply with the request	2. Short-Term (2023-early 2024)	Information Governance	Ongoing
Update team structure and membership on iCasework	2.2	Technical	Review necessity of the 'team' tier on the iCasework organisational structure, update the structure to reflect the current status of BCC, and update team membership lists	iCasework is the core tool for ensuring FOI compliance, however the organisational structure is out-of-date, overly complex, and difficult to maintain as a result. This can lead to cases being lost to teams where all members have left BCC, or unnecessary delay whilst the correct team is identified. Updates and improvements will reduce a substantial amount of time currently lost as a result of these issues.	2. Short-Term (2023-early 2024)	Information Governance	Ongoing
Update reporting resource to make service-level performance and trends clearer to senior management	2.3	Organisational	In order for meaningful action to be taken in relation to FOI compliance, senior leadership need to be provided with meaningful data in a timely way and which allows for immediate action. Reporting lines already exist, however the data currently presented could be improved to better show key problem areas and trends over time	A better understanding of where issues exist and associated trends will allow senior leadership to take necessary steps earlier and more effectively, and will avoid the gradual decline in compliance which the council has seen over the last two years	2. Short-Term (2023-early 2024)	Information Governance	Ongoing
Review and update training and support offer	2.4	Organisational	Review training and support offer to ensure staff are provided with the necessary technical and legislative skills to comply with requests correctly. This should include eLearning, in-person sessions, reference materials, routes for raising queries, and refresher training. Training material already exists, but there is more than can be done to bring it under one roof, and make it more practically useful for staff directly dealing with FOI requests	In order to respond to requests effectively, staff need to be aware of both the technical and legislative requirements of FOI compliance. A strong training and support offer will enable them to carry out FOI compliance duties more confidently and efficiently, and therefore speed up the response process	2. Short-Term (2023-early 2024)	Information Governance	Ongoing
Obtain training for make better use of iCasework functionality and ensure most efficient use of the software and associated reporting functions	3.1	Technical	There is little in the way of formal training available for the use of iCasework, which is the primary tool for managing FOI compliance. There are areas in relation to both case handling and reporting functions which are currently highly manual or rely on workarounds. The software provider can deliver detailed training, and this should be explored	Consulting with the software provider, and incurring the cost which would accompany that process, to obtain better training and training materials would improve efficiency when using the system, and better enable the Disclosures Team provide technical support to the organisation	3. Long-Term (mid-2024 onwards)	Information Governance	Ongoing
Review existing approach to redaction across the organisation	3.2	Technical	At present, each service area is responsible for carrying out its own redactions, and the tools necessary to securely redact data (i.e. Acrobat Pro) have to be sourced at a service level. This may not be the most efficient approach and should be reviewed	A factor in delays can include the time it takes for a staff member to obtain an Acrobat Pro licence and be shown how to use the software, especially in teams which receive a relatively small number of FOIs a year. A more efficient approach to redaction should reduce the instances of such delays	3. Long-Term (mid-2024 onwards)	Information Governance	Ongoing
Establish a Teams channel or similar forum for FOI contacts to consult with other key FOI contacts across the organisation	3.3	Technical	At present, there is no forum through which staff carrying out the operation side of FOI compliance can consult with each other, leaving individuals working in silos. The only route to raise queries is with Information Governance, but a response may take days depending on existing workloads and priorities. A Teams channel for key FOI contacts across the organisation would allow meaningful consultation and collaboration between services	The time in which a staff member is waiting for a formal response to what may be a straightforward question may be the difference between an on-time response and an overdue response. Opening up more channels for collaboration may reduce instances of this happening	3. Long-Term (mid-2024 onwards)	Information Governance	To address during 2024
Address deficiencies in approach to proactive publication	3.4	Procedural	At present, BCC's publication scheme is outdated and little work is done to proactively publish data via channels such as the Open Data platform, especially in cases where the council is asked for the same data across multiple requests	Increased proactive publication satisfies the aims of FOIA/EIR, and over time will reduce the number of requests received by the council and/or reduce the amount of officer time spent responding to requests (either the requester will locate the information without BCC involvement, or the service can simply direct the requester to where the information is already published)	3. Long-Term (mid-2024 onwards)	Information Governance	To address during 2024
Provide clarity on the handling of 'multi-service' requests	3.5	Procedural	The current policy for case handling is that whoever holds the majority of the requested information is responsible for co-ordinating the response on behalf of BCC. This can lead to confusion or disagreement over ownership, as the ID of who holds the majority of information will not always be clear from the outset. It can also cause confusion as the policy for where responsibility lies is not always understood/accepted by the wider organisation	An improved approach to multi-service requests will enable better timeliness in issuing a response, as time is not wasted trying to identify an owner or dealing with confusion over what the various roles/responsibilities are	3. Long-Term (mid-2024 onwards)	Information Governance	Ongoing
Provide targeted support by Central Disclosures Team for poor performing areas	3.6	Procedural	Each area is currently responsible for their own compliance. The role of IG has been to report on compliance, but there has been limited intervention in areas which display consistently poor performance. The lack of an independent quasi-external presence to promote good practice can let poor performance take root	Identifying areas with poor performance and then taking targeted steps to identify the cause of issues and possible solutions will help improve overall performance	3. Long-Term (mid-2024 onwards)	Information Governance	Ongoing