



## ESSEX POLICE ACTION PLAN TO RECOVER FOI RESPONSE PERFORMANCE

### Introduction

This action plan is in response to a letter from the ICO to the Chief Constable dated 24<sup>th</sup> May 2019. In the letter the ICO acknowledges the progress made since Essex Police self-reported performance issues in 2018 but noted that *'given that performance remains short of the ICO's minimum performance target of responding to 90% of [FOI] requests within the statutory timeframe, we need to see an action plan as to how Essex Police intends to recover performance.'*

### 1. Performance Milestones

Reporting Period (4 weekly)	Milestone Compliance Rate	Overdue by 6 months or more
29/6/19 to 26/7/19 (Period 1)	85%	0
27/9/19 to 23/8/19 (Period 2)	80%*	0
24/8/19 to 20/9/19 (Period 3)	85%*	0
21/9/19 to 18/10/19 (Period 4)	90%	0
19/10/19 to 15/11/19 2019 (Period 5)	90%+	0
16/11/19 to 13/12/19 2019 (Period 6)	90%+	0

*\*A drop in compliance is predicted due to the holiday period. Contingency plans are in place to address the short terms issue.*

### 2. Key Mitigations and Actions to achieve Milestones

#### 2.1 Context;

- i) In time compliance of FOI applications due between 22<sup>nd</sup> April 2019 and 12<sup>th</sup> May 2019 = 42.8%
- ii) In time compliance of FOI applications due between 13<sup>th</sup> May 2019 and 2<sup>nd</sup> June 2019 = 78.2%.
- iii) In time compliance of FOI applications due between 3<sup>rd</sup> June and 28 June 2019 = 77%.
- iv) As at 28 June 2019 1 FOI application is overdue by more than 6 months and 15 overdue by less than 6 months.

## 2.2 Inefficient internal business processes by FOI staff identified and addressed including:

- Allocation of work and the escalation processes have been improved;
- Weekly team meet in place to improve knowledge sharing, learning/guidance;
- Measures to avoid the current 'Quality assurance pinch point', including low risk responses to be sent without Quality Assurance and the training of staff to undertake the assurance work;
- A weekly review of delayed cases by the Head of Information Management and his staff to identify trends, mitigations etc. is in place

## 2.3 Resources have been reviewed and addressed, including:

- Having regard to the forthcoming summer holiday period, leave related absences of the Information Rights Team staff are being managed robustly to ensure that sufficient resource is available to deliver the performance that is expected both consistently and sustainably. In addition, during the summer leave period, the Head of Information Management will cover periods when the Senior Information Officer responsible for FOI request is absent.
- Documentation is being developed by the Head of Information Management in conjunction with the Senior Information Officer responsible for FOI to enable relatively new recruits can confidently quality assure FOI responses.
- The secondment of four police officers to the Information Rights team has been extended until December 2019 to cover current vacancies within the Information Rights Team. Active steps are being taken to fill those vacancies at the earliest opportunity.
- A skills audit of Information Rights team staff is underway and will be complete by early August 2019. This will feed into the development of personal training plans and the ePDR process for all members of the Information Rights team.

- Head of Information Management personally assisting in finalising the response to the FOI application which is overdue by more than 6 months. It is anticipated that this will be sent out during Period 1.
- The Performance Analysis Unit have concentrated resources on clearing its backlog of responses to FOI requests and ensuring it has the capacity to process 14 requests per week

2.4 Measures to improve levels of awareness of FOI issues across the wider force, including:

- Briefings on the matter are planned for Chief Officers' Group and the Senior Leadership Team meeting in July 2019; this will emphasise the crucial role played by other departments in enabling the FOI team to comply with statutory deadlines
- Gold Group reviewing the timeliness of responses by departments on a weekly basis to ensure any delay is identified and addressed
- The Information Rights Manager has updated business processes and is improving communications with departments when seeking assistance in dealing with a request. Emphasis has been placed on the importance of a timely response, clearly defined response times and a follow up procedure where a response has not been provided in the time required
- The Performance Analysts Unit has been identified as a key 'partner' department in the handling of FOI requests. This unit has developed processes and procedures to ensure the timely response to requests and address any delays identified through regular monitoring

2.5 A proactive approach to the publication of information in order to reduce demand is ongoing and is expected to be completed and implemented by end of September 2019.

### **3 Performance Oversight and Governance**

3.1 The following oversight is in place:

- Daily reporting of performance to the Head of Information Management
- Weekly reporting of performance to FOI Gold Group chaired at Chief Officer level (with escalation to Deputy Chief Constable where required)

- Bi-monthly reporting of performance to force Information Management Board (Chaired by the Deputy Chief Constable)
- Regular FOI Group reporting to Chief Officer Group chaired by the Chief Constable.
- Performance will be subject to daily review by the Head of Information Management with his subordinate staff involved in processing FOI requests.
- Early warning indicators adopted to identify at the earliest stage deviation from the performance milestones set out at 1 above and trigger expeditious measures to rectify the situation.
- Reports to the ICO every four weeks using the template attached.

**Dated: 28 June 2019**

Dr Victoria Harrington, Director of Strategic Change

Andy Begent, Head of Information Management



# Freedom of Information Action Plan

## 4 Weekly Update to ICO

### Date of Report

30 July 2019 (Period 1)

Current Number of FOI Requests	71	Number Overdue	6

### 'In Time' Performance

FOI requests responded to within statutory time frame within reporting period	95%
Milestone (from Action Plan)	85%

### FOI Requests More Than 6 Months Overdue

Reference #	FOI	Date Due	Days in Excess of 6m	Comments
[nil return]				

**COMMENTS:** There are no FOI requests more than 6 months overdue. The oldest overdue FOI is dated 8<sup>th</sup> April 2019 which we aim to complete by the date of the next report.



# Freedom of Information Action Plan

## 4 Weekly Update to ICO

### Date of Report

29 August 2019 (Period 2)

Current Number of FOI Requests

68

Number Overdue

6

### 'In Time' Performance

FOI requests responded to within statutory time frame within reporting period

94%

Milestone (from Action Plan)

80%

### FOI Requests More Than 6 Months Overdue

Reference #	FOI	Date Due	Days in Excess of 6m	Comments
[nil return]				

**COMMENTS:** There are no FOI requests more than 6 months overdue. The oldest overdue FOI was due on 12<sup>th</sup> August 2019 which we aim to complete by the date of the next report.



# Freedom of Information Action Plan

## 4 Weekly Update to ICO

### Date of Report

24 September 2019 (Period 3)

Current Number of FOI Requests

57

Number Overdue

2

### 'In Time' Performance

FOI requests responded to within statutory time frame within reporting period

95%

Milestone (from Action Plan)

85%

### FOI Requests More Than 6 Months Overdue

Reference #

FOI

Date Due

Days in Excess of 6m

Comments

**COMMENTS:** There are no FOI requests more than 6 months overdue. The oldest overdue FOI is dated 12<sup>th</sup> September 2019 – we have an expectation that this will be completed by 31<sup>st</sup> September 2019.