



**HEDDLU  
DE CYMRU**  
**SOUTH WALES  
POLICE**

## FOI Improvement Plan July 2024

Compiled and published in response to an Enforcement Notice issued by the Information Commissioner's Office (ICO) June 2024

### 1. Governance and Assurance

Ref	Action	Purpose	Timescale
1.1	Liase with ICO to discuss this Improvement Plan and obtain their advice and guidance.	To assure transparency and that we are using all resources available to us.	Open ongoing liaison
1.2	Review Departmental Risk Register re. FOI compliance	To ensure adequate oversight re. the inability to meet demand so that sustainable improvements can be made.	Ongoing
1.3	Publish FOI Performance data on force website	To improve transparency and accountability of our force compliance rates by publishing the NPCC extract for FOI performance	Monthly
1.4	Monthly Performance data to be shared with SIRO and Head of IM	Stats being made available on a regular basis allows good monitoring and early implementation of management action when necessary.	BAU – Ongoing

1.5	Escalate matters through the Information Assurance Board (IAB) to ensure performance is appropriately managed and maintained bring on board areas of business as and when required.	Due to fluid movement of senior staff within the organisation, and BCUs, this will ensure consistency and accountability across all departments that have a responsibility for the publication of material as part of the publication scheme but also areas that are identified in providing regular responses such as PSD, BI and Performance.	Immediately
1.6	Quality Assurance and Skills Matrix to be designed with clear accountability. Consider the use of MS Planner / lists	To ensure compliance with legislation and process.	December
1.7	Data Quality exercise to ensure the status of a request is accurately reflected in our statistical reports and to gain clear understanding of who the request is sitting with.	To ensure accuracy and also to understand which department has responsibility to provide information so they can be monitored and prompted to get requests out within the legislative timescales	December

## 2. Process Improvement

Ref	Action	Purpose	Timescale
2.1	Increase the use of s.21 exemption – 'information readily accessible/available' to the public.	By improving the FOI team's knowledge of what information is already available online for common FOI requests, demand on SPOCs and Disclosure Officers will be reduced. Applicants can be signposted to the information to prevent duplication of information gathering. linked to 2.2	Ongoing December
2.2	Publication Scheme – ensure information listed as required in the Publication Scheme is up to date and published on our website, and increase the amount of material available online – particularly relating to information which is commonly requested via FOI	This will improve transparency and make data/information more readily accessible to the public.	December but process for review of the force publication has been initiated
2.2.1	Consideration to be given to uploading historical FOI responses (2years)	This will improve transparency and make data/information more readily accessible to the public.	BAU – Ongoing
2.3	Ensure that the request for information goes to the correct department at the time of logging with a clear date of when they require to provide the information.	This will improve our response time to the applicant, and compliance with the 20-day legislative timescale.	Immediately
2.4	Triage to be built into the FOI allocation process to ensure that the request has been picked up by an appropriate SPOC	To prevent delay in the system – consideration is to be given to include a workflow coordinator role	December for completion after CIT review
2.5	Explore the use of technology (IVANTI) for a logging and tracking system for FOIs as used by other areas of business within force	To improve and ensure accountability across the force	Scoping to begin immediately
2.6	Disclosure Officers to make robust, lawful and ethical decisions by providing the right level of support and training and awareness.	There needs to be less reliance on the FOI/DP Line Manager checking all responses as this causes a delay and reduces our ability to respond within 20 days.	In progress

2.7	Training – Establish a clear training and competency plan for permanent and temporary staff to provide assurance when they're ready for sign-off.	There is a high turnover of temporary staff who deal with less complex cases than permanent/established staff. The force needs assurance of the process leading to their competency and capabilities re training we need to include that staff will be building towards omni competency – staff need to be able to perform in each area of the business to prevent points of failure this will show that we are already looking at improvement of performance in other areas of business	in progress
2.8	Training – bespoke training to be implemented utilising the skills of SME experts on the BI and performance teams to improve the FOI team's ability to extract simple data from force systems	This will improve our response time to the applicant, and compliance with the 20-day legislative timescale	Immediately
2.9	Continuous Improvement Team to work with FOI to create detailed 'as is' process map, and propose a new process that includes clarity of ownership and responsibility at each stage of the FOI application's life cycle	To provide clarity in process and responsibility between the FOI team and divisional SPOCs which will improve quality and timeliness of responses. Also to identify the numbers of staff required in the FOI Team.	December – initial meeting held 26/07/24 first workshop booked 1 <sup>st</sup> August
2.10	Improve communication between departmental SPOCs and FOI Team	To improve timeliness of responses and ensure any explanations are received promptly.	Immediately
2.11	Clarify force position on communicating with applicants to advise them of delays/seek clarification/check whether they still require the information.	Good communication and engagement with the applicant can avoid complaints as we are being honest and transparent with reasons for delays. Some requests are for specific reasons – such as academic research that may no longer be required after a significant delay.	Immediately

2.12	Ensure that timescales are monitored in newly updated daily meetings, and that cases approaching the 20-day deadline are prioritised, and straight forward cases are identified	To improve compliance with the 20-day statutory timescale which is a performance indicator for the ICO. This is where the workflow co-ordinator role could be utilised, this will monitor	Immediately – DMM template produced and meetings initiated
2.13	Create Resilience by developing a skills matrix exploring the possibility of non-generic recruitment and promotion within the FOI area and areas of Info Management.	This recognises the specialist nature of roles and the requirement to build experience and expertise as a means of creating resilience across the organisation and high performing teams. This is a recommendation from the PSNI breach. This will work better if the omnicompetence is in place	December
2.14	Execute an executive level sponsored organisational awareness campaign including explaining the value of FOI, the message that info security and management is everyone's job.	Recommendation of the PSNI breach which will benefit the organisation in raising awareness and compliance.	October – Comms already initiated with communication team

### 3. Service Recovery and Improvement

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3.1	Review current communication standard with applicants. we will introduce a requirement to communicate with applicants if we are not going to reach the deadline and inform them what stage the request is at.	Ensuring that applicants are kept updated provides a better service and will reduce complaints.	October
3.2	Explore the use of technology – scope whether automation can be used to communicate with applicants to keep them informed and updated.	Reduce repetitive admin tasks that may get missed and leave applicants without contact	December Force is considering the use of IVANTI
3.3	Overtime to be offered to staff to assist in reducing the backlog.	To respond as quickly as possible to applicants who have been waiting the longest.	Ongoing
3.4	Calculate a realistic deadline for when backlog will be cleared.	To provide assurance to Chief Officers that the backlog will be cleared by 20th December as instructed in the Enforcement Notice.	December