

Standard Operating Procedures – Requests for Information

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IPSA OFFICIAL

Scope

This document sets out how IPSA manages requests for information. It is designed to ensure that requests are managed efficiently and in accordance with current legislation and guidance.

Freedom of Information Act 2000

[The Freedom of Information Act \(FOIA\)](#) came into force in January 2005 and provides individuals a right of access to all types of recorded information held by public authorities. It sets out exemptions from which information can legally be withheld and places several obligations on public authorities. FOI requests can only be made via written communication but as a public authority IPSA has a duty under the Equality Act 2010, to make reasonable adjustments if required.

Environmental Information Regulations 2004

[The Environmental Information Regulations 2004 \(EIRs\)](#) provides the public access to environmental information held by public authorities. This includes information about land, air, water, soil, buildings, pollution of all kinds, waste, and health and safety. EIR requests can be made via the telephone, in person, or via written communication. Historically, IPSA has received very few EIR requests.

UK General Data Protection Regulation (UK GDPR)

Under the UK General Data Protection Regulation (UK GDPR) individuals have a right to see the personal information we hold on them– this is called ‘right of access’, this is also known as a [Subject Access Requests \(SAR\)](#). Individuals can make SAR’s verbally or in writing, including via social media. The full SAR process is set out in a separate document: [SAR Process Note DRAFT v3 - Copy.docx](#)

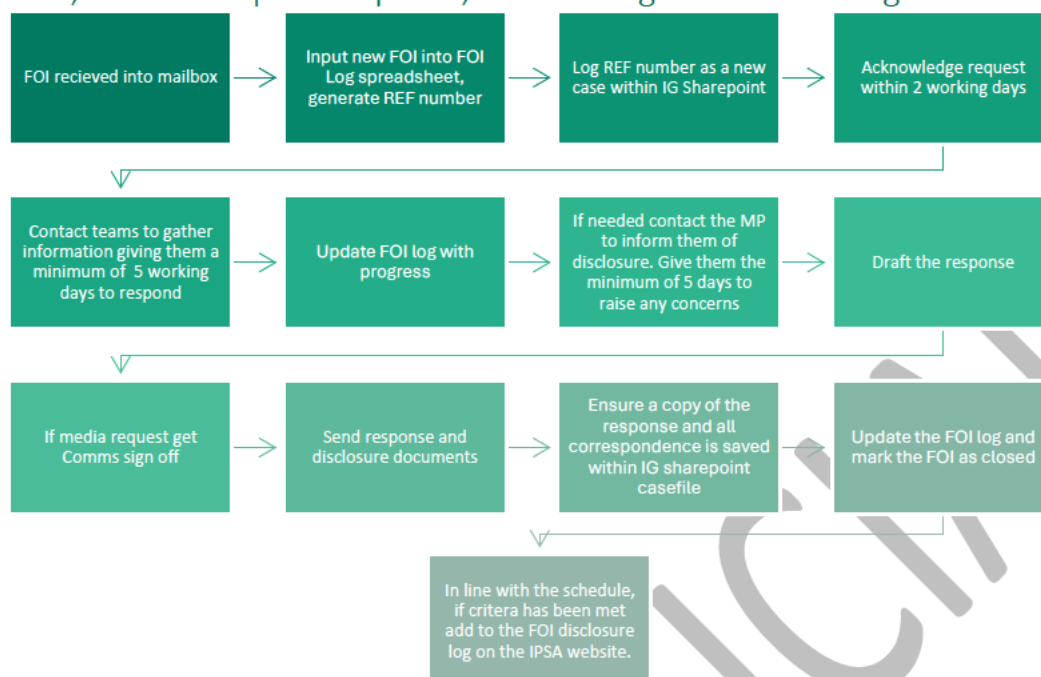
Who enforces the process?

The legislation is enforced by the [Information Commissioner's Office \(ICO\)](#), which oversees the Freedom of Information Act 2000, the UK General Data Protection Regulation 2016, the Data Protection Act 2018, and the Environmental Information Regulations 2004. Like IPSA, they are an independent public body, reporting directly to Parliament.

Responsibilities within IPSA in relation to FOI requests

<u>Job Titles</u>	<u>Responsibilities</u>
<u>Data Protection Officer (DPO)</u>	<ul style="list-style-type: none">• Regularly assessing compliance against ICO best practice.• Ensuring FOI and Subject Access Requests are responded to within statutory deadlines and liaising with all areas of the organisation to obtain relevant information.
<u>Information Governance Officer (IGO)</u>	<ul style="list-style-type: none">• Responding to all information requests within the statutory timeframe.• Liaising with all areas of the organisation to obtain relevant information.• Ensuring IPSA's FOI Publication Scheme and Disclosure Log are kept up to date.
<u>IPSA Colleagues</u>	<ul style="list-style-type: none">• Supporting the Information Governance team with responding to FOI requests.• Helping to locate and extract information.

FOI Inbox, initial receipt of requests, case management and filing



The majority of FOI's arrive as emails into the FOI inbox, which is monitored daily by the IG Lead, who is a member of the Information Governance (IG) Team. There is a weekly rota for this activity which is set by the DPO.

The IG Lead will update the [FOI log \(the Log\)](#). This is an excel spreadsheet which tracks the progress of each case, from receipt and acknowledgment of the initial request to eventual publication in the Disclosure Log on the website. A link to the FOI log is available to view on the right-hand side menu of the IPSA intranet, it is also available on the Information Governance SharePoint under the tab labelled FOI log. A separate document on how to maintain the FOI Log and how to calculate performance is available at: [Completing the FOI Log 2024-25.docx](#)

Each new request received is turned into a 'case'. This means the IG Lead assigns the request a unique case reference number and creates a **casework folder** within the [FOI sub casework folder](#) within the [IG SharePoint site](#)¹ into which all documents including emails and notes relating to the case must be saved. The case reference number should follow the format RFI-

YEARMONTH-ORDEROFNUMBERRECEIVED, i.e. RFI-202409-01 is the first request for information that was received within September 2024.

Together, the FOI Casework folder and FOI Log allow any member of the IG Team to work out exactly what stage an FOI request has reached in its lifecycle, this will only happen however if **ALL** emails and documents are saved in the Casework folder immediately upon receipt/creation, and **ALL** actions are recorded in the Log as soon as they have been taken. The goal is that if all members of the IG Team were unavailable, someone else would be able to take over and continue to progress cases to their conclusion.

Once the case folder and unique case reference number have been created, the email with the request should be saved to the case folder and the text of the request should be copied into the Log or typed in if necessary.

The IG Lead should use the wording from the appropriate template to issue an acknowledgment² email to the requester within 2 working days of receiving a request and save this email into the case file. The template email requires you to tell the requester when they can expect a response to their request. Note that, when the receipt date for a request is entered into the FOI log, this deadline is generated automatically so you do not need to calculate it yourself. All emails relating to a case must be sent from the FOI inbox and not from the team member's personal inbox.

Generally, the IG Lead allocates any new requests received to themselves. On occasion, it may make sense to allocate a case to another member of the IG Team, e.g. when someone else has been dealing with a related case.

While one person leads on monitoring the FOI inbox, all members of the IG Team should also check it daily. This is because all emails that are received in relation to ongoing FOIs that have already been allocated should be picked up by the case owner. When emails have been dealt with and filed, they can be deleted from the FOI inbox.

² This can be found in the Forms and Templates Document Library on the IG SharePoint site

The use of colour-coded tags in the inbox

In order to provide clarity on who is dealing with any emails in the FOI inbox, all team members must assign a coloured category to them with their initials.

Requirements for FOI requests

A valid FOI request must:

- Be in writing (email or letter)
- Have a real name and the return email/postal address
- Be clear and unambiguous

Section 10 of FOIA specifies that public authorities must respond promptly, and no later than 20 working days following the date of receipt of the request. The requester does not need to direct their FOI request to a designated member of staff, the 'clock' for FOI requests starts as soon as anyone within IPSA receives the request. Therefore, all FOI requests should be forwarded to the IG team as soon as possible. A request doesn't necessarily need to be labelled as an FOI request to be treated as one. Equally, some requests for information can be dealt with outside the formal FOI procedures, this is known as business-as-Usual requests and are reserved for requests that can be easily answered. It is important to note that if a request for information states it is an FOI request it must be dealt with via the formal procedures, even if it can be dealt with quickly.

EIR requests

Requests asking for environmental information will also be logged and acknowledged by the person monitoring the IG inbox, due to the low number of EIR requests received annually, the IG Team does not have a separate EIR log. As a result, EIRs are also logged on the FOI Log but processed under the Environmental Information Regulations 2004.

Requests received via post

The Facilities Team scan any FOIs/EIRs received via post and email them to the FOI inbox. The date of the request is the date that the post was received by the Facilities Team. Once a digital copy is made, the Facilities Team securely destroy the original physical copy. The number of requests received via post is now very small.

Request for clarification

A request may have more than one possible interpretation, or be unclear and ambiguous, if this occurs both FOIA and EIR permit public authorities to contact the requester and ask for clarification. As IPSA predominately receives FOI requests the below focuses on FOIA. However, the process will be the same for EIR requests.

When IPSA receives an ambiguous FOI request, we have a duty to advise and assist under section 16 of the FOIA. We therefore must go back to the requester to ask for clarification. The FOIA states this should be done as soon as possible and within the 20-working day limit for responding³. Once we have informed the requester that we require further clarification, the 'clock' will pause. When the requester responds with enough detail to enable us to identify and locate the information, the clarified request now represents a new request for information. The 'clock' will reset, and we now have a new 20 working day time limit.

If no clarification response is received

If a clarification response has not been received, the case owner should chase the requester 10 days after the clarification has been sent. If no response has been received then the request should be closed on the 20-working day mark, and a notification of closure should be sent to the requester.

³ Template wording can be found in the Forms and Template Document Library

Parliamentary Questions and the FOIA

Parliamentary Questions (PQs) are questions put formally to a government minister about a matter they are responsible for by an MP or a member of the House of Lords. They cannot be treated as requests for information under FOIA or under the EIR; to do so would be considered to infringe parliamentary privilege because PQs are considered to be part of parliamentary proceedings. PQs are managed at IPSA by IPSA's Chief of Staff.

Business as Usual (BAU)

The IG Lead for the FOI mailbox is also in charge of responding to any BAU requests. For practical purposes, if a question can be answered as a business-as-usual enquiry (in full and quickly), then there is no need to treat the question as a formal FOI request.

If a question meets the above criteria but has FOI written anywhere within the text, then we should log the request under FOIA. All BAU questions should be logged in the BAU worksheet of the FOI Log and saved in a "BAU" folder, along with any other documents. There is a BAU folder for each year (e.g. 2024-25) in the relevant casework folder.

Requesting information internally

If we receive a request that requires assistance from other teams within IPSA, we should email them as soon as possible, with an outline of the information we require, and a deadline for them to respond (this should ideally be 5 working days from the day the email is sent). For clarity, we should also copy and paste the body of the request. All copies of all emails relating to a case should be stored in the casework folder on SharePoint.

Forms and Templates

All forms and templates are available in the Forms and Templates Document Library of the IG SharePoint site.

Exemptions

Whilst the FOIA provides for the right of access to information held, it also affords a number of exemptions from this right in order to permit public authorities to withhold some or all of the information requested where a justifiable reason exists. Where this is the case, we will try to explain clearly which exemption we have applied and why, unless this in itself would release the sensitive information (i.e. neither confirm nor deny) The exemptions fall into two categories: Absolute exemptions and Qualified exemptions.

Public Interest Test

Qualified exemptions require a Public Interest Test, this is a test to see whether consideration needs to be given to see if it is in the public interest to disclose sensitive information or to withhold it. In cases where we conclude it is in the public interest to withhold the information we will refuse to disclose. We will explain our reasons and refer to the exemption. Full guidance on the exemptions including standard lines is available on the IG SharePoint – see link here: [Public Interest Test.dotx](#)

Below is a list of absolute exemptions where Public Interests tests do not apply. those which are used most often by IPSA are highlighted in yellow:

Absolute exemptions

Section of the FOI Act	Absolute exemptions
S.21	Information accessible by other means (e.g. on IPSA's website)
S.23	Information supplied by or relating to, bodies dealing with security matters

S.32	Court records, and information held in relation to court proceedings
S.36	Prejudice to effective conduct of public affairs
S.40	Personal information
S.41	Information provided in confidence
S.44	Information whereby disclosure is prohibited by an enactment or would constitute contempt of court

Qualified Exemptions

Below is a list of qualified exemptions where Public Interests tests apply:

Section of the FOI Act	Qualified Exemptions
S. 22	Information intended for future publication
S. 30	Investigations & proceedings conducted by public authorities
S. 31	Law enforcement
S. 36*	Prejudice to effective conduct of public affairs
S. 38	Health & Safety
S. 39	Environmental information
S. 40	Personal information relating to a third party
S. 42	Legal professional privilege
S. 43	Commercial interests

Qualified Person

Section 36 is an exemption that applies when the information could 'prejudice the effective conduct of public affairs'. Information to which this section applies is exempt from disclosure if, in the reasonable opinion of a **qualified person**, disclosure of the information under this Act would do the following:

(a) would, or would be likely to, prejudice—

(i) the maintenance of the convention of the collective responsibility of Ministers of the Crown, or

(ii) the work of the Executive Committee of the Northern Ireland Assembly, or

[F2(iii) the work of the Cabinet of the Welsh Assembly Government.]

(b) would, or would be likely to, inhibit—

(i) the free and frank provision of advice, or

(ii) the free and frank exchange of views for the purposes of deliberation, or

(c) would otherwise prejudice, or would be likely otherwise to prejudice, the effective conduct of public affairs.

Section 36 requires that the qualified person must give their reasonable opinion that the exemption is engaged. IPSA's Board is required by law to include someone who has held High Judicial Office and this Board member usually acts as the qualified person for the purposes of considering a possible Section 36 exemption. Circumstances may arise in which the qualified person cannot give their opinion because they are absent or not available. In this circumstance, section 36 cannot be relied on unless someone else has been formally designated to act in that capacity.⁴

Other grounds for refusing to comply with a request

In addition to being refused on the grounds of an exemption, as set out below, FOI requests may also be refused if, in defined circumstances, it would cost too much to provide the information requested; or if they are "vexatious" or repeated.

FOIA and the appropriate limit

Section 12 of the FOIA does not oblige a public authority to comply with a request for information if the authority estimates that the cost of complying with the request would exceed the "appropriate limit". The appropriate limit is currently a maximum of 18 hours of staff time spent

⁴ See the Guidance Document Library for more on section 36 and the Forms and Templates Document Library for the templates to complete if a section 36 opinion is required

finding, retrieving, collating and editing information. The FOIA Fees Regulations sets a standard hourly rate of £25 for these activities, which means that the appropriate limit is also expressed as a cash figure of 450 cost.

The IG team often apply section 12 where a requester has asked to view receipts for a large volume of claim lines. The team completes the Calculating s.12 template,⁵ to determine if the appropriate limit applies for large volumes of information. Crucially, ICO guidance states explicitly that the time taken to redact information cannot be included in the assessment of time it would take to redact information requested, which is often the most time-consuming part of the process.

EIR and appropriate limit

There is no 'appropriate limit' to the cost of complying with requests for environmental information. Regulation 12(4)(b) allows public authorities to refuse requests that are 'manifestly unreasonable'. Requests may be manifestly unreasonable if:

- dealing with a request would create unreasonable costs or an unreasonable diversion of resources; and
- an equivalent request would be found 'vexatious' if it was subject to the Freedom of Information Act.

FOIA and "vexatious" requests

Section 14 of the FOIA does not oblige a public authority to comply with a request if it is "vexatious" or repeated. ⁶ Section 14(1) is designed to protect public authorities by allowing us to refuse any requests which have the potential to cause a disproportionate or unjustified level of disruption, irritation or distress.

⁵ This can be found in the Guidance Document Library

⁶ Guidance on section 14 can be found in the Guidance Document Library and a template assessment for vexatious requests in the Forms and Templates Document Library

Extensions

Section 10 specifies that public authorities must respond promptly, and no later than 20 working days following the date of receipt of the request. However, under section 10(3) of the FOIA, there is a provision for public authorities to claim a reasonable extension to this limit, up to an additional 20 working days to consider the public interest test.

Missing the deadline

Whilst we try to get all responses issued within the legislative deadline, situations may arise where this is not possible. If we are aware that we are going to miss the 20-day deadline, we should email the requester informing them of this and provide them with a date or timescale within which they should expect to receive a response.

Locating Receipts:

Many FOI requests include requests for invoices and/or receipts for claims made by MPs for reimbursement of their business costs. Since 2019, IPSA's receipts have been stored on

All the IG team should have access to the system; receipts and attachments can be pulled and then redacted if needed. Validation, publication, or MP services can help with pulling receipts if required.

Locating Receipts:

contains historical data for MP expenses and costs. Automatic access to is not provided therefore any additional IG team members need to contact I.T. to request individual access.

Redactions

Information in receipts, invoices or any other documents that is exempt should be redacted, for this, we can either use An individual license for is required, at the moment

all members of the team need to contact I.T. to set this up. This license needs to be renewed on a yearly basis. Ideally should be preloaded onto every new IG members staff laptop.

When redacting the case owner should save a copy of the blank Redaction Log,⁷ within the case folder and then complete it, making sure to detail what information has been redacted and the exemptions that have been applied. The redactions should then be double-checked by another member of the IG team before the receipts are shared with the relevant MP.

We keep both a copy of the original unredacted document and the redacted document within the casework folder on SharePoint.

Problems with this approach

The IG team are unaware of further context around the claims, e.g., if claims are being investigated or disputed. It's also unclear if the claims have been repaid at a later date.

Additional information about claims: contacting MP Account Managers

Correspondence associated with the claims is stored in which is the name of the Customer Relationship Management (CRM) system which IPSA uses to record contact with MPs and their staff. For this information, we contact MP services. Each Account Manager within MP services has [a region within the UK](#) that they are responsible for; they are the first point of contact and correspond with all MPs that serve in their region.

The case owner should contact the Account Manager if the potential disclosure warrants further discussion or if the office may require further support. It is also useful as it keeps the Account Managers up to date as the MPs will sometimes contact them.

Compliance Officer

The Compliance Officer's remit is defined in statute and is to conduct investigations into expenses paid to MPs and, at the request of an MP, to review a determination by IPSA. The Compliance Officer is a separate legal entity to IPSA, more information about which can be found on their website at: <https://www.parliamentarycompliance.org.uk/>

⁷ This can be found in the Forms and Templates Document Library of the IG SharePoint site

Sometimes members of the public send in FOI requests to IPSA FOI mailbox for the Compliance Officer, we should let the requester know as soon as possible that the Compliance Officer is considered a different organisation and that there is a separate email to contact them via: compliance@theipsa.org.uk

Notification for MPs – Consulting with third parties

We notify MPs that a request for information has been received and attach both a copy of the unredacted and redacted information. Templates for notifications can be found in the Forms and Templates Document Library of the IG SharePoint site. Documents should be retrieved, redacted and reviewed as soon as possible after the receipt of the request to increase the chance that we are able to respond to the request within the statutory deadline.

If a file size is over 20 MB, it is too large to send via Outlook, we then must save a new folder in the case folder titled 'Shared Externally' and share the link with the MP.

MPs should be given 5 working days to respond and raise any concerns; if no contact has been made after a week, we release the information. We have seen an increase in engagement from the MPs offices, when they respond they normally provide additional context which is often included within our response under the Advice and Assistance subheading.

All emails to and from MPs (and their staff, where relevant) must be saved in the casework folder and the Log updated.)

Drafting the Response

The template for the FOI [Response Letter](#) can be found here. It's also available with [the IG SharePoint under Forms and Templates](#). All responses must use the template, if exemptions are going to be applied, the response must state which exemptions have been applied and an explanation as to why the information has been redacted. Again, templates for the exemptions are available within the IG SharePoint.

Is sign off required?

Information released under FOIA is information released to the world. Under the FOIA we are not permitted to take account of the identity of the person making the request, or their motives, when deciding what information will be disclosed in response to an FOI request.

As IG professionals a judgement call should be taken if we believe something may need sign off before it is released. If needed sign off should be obtained by the Data Protection Officer or by the Director of Policy and Engagement.

Media Sign off

If we receive a request from a journalist, once the response is prepared and ready to be released a final copy of the response will need to be sent to the Head of Comms for final sign-off. This is because the Comms team may need to prepare a statement in advance of the information being disclosed and are often contacted by journalists with follow-up questions to FOI responses.

Attachments

All attachments should be converted to PDFs, and spreadsheets should be checked for hidden data.

Internal Reviews

Public authorities are obliged, under section 17(7) of the Act, when responding to a request for information, to notify applicants of the internal review process including how applicants request an internal review. IPSA must receive internal review requests within 40 working days of the response being sent. Under the Act, we are not obliged to provide an internal review if it is requested after more than 40 working days.

As soon as a request for an internal review is received, it will need to be acknowledged and logged within the FOI-Log under the tab 'Internal Reviews'. A template for the acknowledgment email can be found in the IG SharePoint, under Forms and Templates.

Our internal reviews are conducted by the Data Protection Officer. It is good practice for the internal review to be carried out by someone who was not involved with the initial response.

Publication Scheme

As well as responding to requests for information, we legally must publish responses to FOI requests proactively. The Freedom of Information Act requires every public authority to have a publication scheme, we publish our responses to FOI requests on the IPSA website. There is selection criteria and schedule to follow which can be found:

[Disclosure Log Paper.docx](#)

[Disclosure Log Process and Procedures.docx](#)

A guide to managing Contentful can be found here:

 [A guide to managing Freedom of information content.docx](#)

ICO Correspondence

The ICO investigates complaints from members of the public who believe that an authority has failed to respond correctly to a request for information. The ICO will ask IPSA to explain our decision-making processes or provide further evidence. Once the information has been issued to the ICO, we must await a decision notice, the ICO may find against IPSA or may decide that we have handled the request correctly. There are three stages of complaints:

- Initial complaint and decision notice
- An appeal to the Tribunal (Upper Tribunal and First Tier Tribunal)
- Court of Appeal

Currently, the Data Protection Officer oversees correspondence with the ICO, however, in the absence of a DPO, the Director of Policy and Engagement and IPSA's legal team, DLA Piper, will take over and handle correspondence with the ICO.

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Procedure for processing Freedom of Information requests

1. Introduction

1.1 PURPOSE

This procedure is designed to ensure the efficient processing of requests for information, within the IPSA, under the Freedom of Information Act 2000 (FOIA) and Environmental Information Regulations 2004 (EIR)

1.2 SCOPE

- The procedure is divided into 5 stages, though staff generally will only need to concern themselves with stages 1-4.
- The procedure does not cover requests received under the UK General Data Protection Regulation 2016 and Data Protection Act 2018. [\[link\]](#)
- All emails regarding FOI requests will be easily identifiable, with the reference number, action required and internal deadline in the subject line; responses should be sent by return and only to FOI@theipsa.org.uk

1.3 DEFINITIONS

Term	Definition
IGO	Information Governance Officer
IGT	Information Governance Team
DPO	Data Protection Officer
IAO	Information Asset Owners
HOS	Head of Service
Internal Stakeholders	Anyone at IPSA who may have an interest in the request, but who does not need to provide information
External Stakeholders	Anyone outside of IPSA who may have an interest in the request; also MPs and former MPs who are notified of disclosures
Internal Allocation	Circulating a request asking for relevant information, comment, advice
Notification	Informing an MP of a request and providing copies of redacted and unredacted information
External Consultation	Circulating a request to someone outside IPSA for comment, advice
Redaction	Removal of information

Not held	Information that IPSA does not hold, or which it may have but not in the way specified in the request -additional work would be required to create this
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2. Procedure

The 5 stages of processing a request for information

Stage	Description
Stage 1	receipt, logging, acknowledgment, analysis
Stage 2	clarification, allocation, information gathering
Stage 3	information review, redaction, response drafting, consultation
Stage 4	sending response, closing request, publishing information
Stage 5	dealing with feedback, complaints and appeals

Stage 1: Receipt, logging, acknowledgement, analysis

Activity	Action	Day	Responsibility
New Request Received	send to FOI@theipsa.org.uk	within 1 working days	all staff
Logging Request	unique reference number; new line on FOI Log and creation of request folder in SharePoint	within 2 working days	IG Team
Acknowledging Request	by email	within 2 working days	IG Team
Analysing Request	checking existing similar requests/ on the website	within 2 working days	IG Team

All requests are recorded in the FOI Log, which is available for anyone to see on the IG Hub at [https://theipsa.sharepoint.com/sites/Information Governance SP/SitePages/Freedom-of-Information.aspx](https://theipsa.sharepoint.com/sites/Information%20Governance%20SP/SitePages/Freedom-of-Information.aspx)

All staff are encouraged to regularly check out the Log to see what new requests have been received and the status of active requests.

Stage 2: clarification, allocation, information gathering

Activity	Action	Day	Responsibility
Internal allocation	by email	within 2 working days	IG Team
[sending for clarification, if required]	by email	within 2 working days, [or when required]	IG Team
Gathering Information	extensive searching of all relevant locations	within 5 working days	Information Asset Owners
[gathering information from existing sources]	checking existing similar requests/ information/ on the website	within 5 working days	IG Team
Responding to IG Team	by email and/ or link to SharePoint folder with the information	within 5 working days	Information Asset Owners
[responding to IG Team by exception, with agreement]	by email and/ or link to SharePoint folder	as agreed	Information Asset Owners

Internal Allocation will be to the relevant Information Asset Owner(s):

- Payroll Manager
- Head of Policy and Assurance
- Head of Data and Validation
- Head of Finance
- Head of Operations
- Head of Communications

The Head of Communications will be copied into internal allocations, where no information is required from them

Information Asset Owners are responsible for

- Escalating to a Director if believed necessary
- Advising the IG Team
 - If a Director needs to see the response before it goes out
 - If the request needs to be allocated elsewhere
 - If they cannot meet the internal deadline
 - If there is some other issue with the request
- Answering the questions being asked without ambiguity

- Locating all the information relevant to the request (i.e. in IPSA-Online – claims created, direct payments)
- Providing the information by the means specified in the allocation email

Stage 3: information review, redaction, response drafting, consultation

Activity	Action	Day	Responsibility
Reviewing Information	as appropriate	Day 7-10	IG Team
Redacting Information	and retaining a copy of unredacted material	Day 7-10	IG Team
Drafting Response	In Word	Day 7-10	IG Team
[consulting with Internal stakeholders if necessary]	online meeting and/ or link to draft response etc.	Day 7-10	IG Team
[consulting with external stakeholders if necessary]	by email, with copy of redacted and unredacted information	Day 7-10	IG Team
[comment from internal stakeholders]	online meeting and/ or link to draft response etc.	as agreed	Internal Stakeholders
[comment from external stakeholders]	by email or may contact their MP Support Account Manager	as agreed - usually 5 working days	External Stakeholders

The IG Team will

- Consult with internal and external stakeholders if necessary
- Will send a Notification of FOI Disclosure to MPs
 - Bcc to:
 - The Head of Operations to advise appropriate account manager
 - The Head of Communications and the Head of Data and Validation for information

The IGO will notify the DPO if they believe section 36 may apply. The IGO may send out directly, without approval:

- Refusals under section 21 and 22
- Information not held
- Response to an identical request using information from previous response

All other response types will require approval from the Information Asset Owner who has provided the information.

Stage 4: sending response, closing request, publishing information

Activity	Action	Day	Responsibility
Finalising draft and information for release	as appropriate – include spelling and grammar check	before 20 th working day	IG Team
Seeking approval of response and disclosures	by email	before 20 th working day	IG Team
Approving response and disclosures	By email	time indicated – usually 2 working days	IAO
Send out response and information	by email	before 20 th working day	IG Team
Closing request	completing FOI Log	within 2 days of response being sent	IG Team
Filing	ensuring all key records are saved and renamed if necessary; all other documents are deleted	within 2 days of response being sent out	IG Team
Preparing information for publication	redaction and commentary if needed	within 28 days	IG Team
Publishing information	in FOI Disclosure Log on the website, with relevant metadata	within 28 days	IG Team/ Communications

Stage 5: Dealing with feedback, complaints and internal reviews

Activity	Action	Day	Responsibility
New feedback received	send to FOI@theipsa.org.uk	within 1 working day	all staff
Reviewing feedback	to see if it is positive, or a request for internal review or a complaint	within 2 working days	IG Team

Logging complaint/internal review	retain the original reference number	within 2 working days	IG Team
Acknowledging complaint/internal review	by email	within 2 working days	IG Team
Identifying the internal reviewer	Online meeting and/ or email	within 2 working days	IG Team
Preparing the Internal Review/Complaint Report	completing the report template	within 2 working days	IG Team
Notifying the internal reviewer	by email and/ or online meeting, providing link to the request folder with all correspondence	within 2 working days	IG Team
Reviewing the original request, all records and response	reading the correspondence	Day 3 - 16	Internal Reviewer
Drafting the decision	on the Internal Review Report	Day 3-16	Internal Reviewer
Notifying the IG Team		Day 3 - 16	Internal Reviewer
Sending out decision response	by email	before 20 th working day	IG Team
Closing the decision request		within 2 days of response being sent out	IG Team

3. Roles and responsibilities

All Staff

- promptly send all new requests labelled FOI or which they believe could be FOI to FOI@theipsa.org.uk
- not retaining their own copies of material related to an FOI request

IGT

- general administration of requests:

- logging
- acknowledging
- analysing new and previous requests
- allocating internally
- consulting
- notifying MPs and dealing with FOI queries
- drafting response
- redacting and preparing information for disclosure
- sending out approved response
- filing
- informing Comms

HOS

- quoting the RFI number on all FOI correspondence
- responding promptly to the allocation email and by the due date
 - promptly advising IGT if this cannot be met
 - providing the information requested in the allocation email or explaining why this is not held
- flagging any requests they believe need escalation and doing so
 - also advising IGT that this has been done
- advising IGT if they believe exemptions apply or information should not be disclosed
- approving the response

4. Related policies and procedures

5. Review, approval & publication

6. Annexes

7. Document control information

Title:	<i>Freedom of Information Procedure</i>
Version:	<i>V0.1</i>
Original author(s):	
Owner:	<i>[Job title]</i>
Effective from:	<i>[Day/month/year that this version of the procedure comes into effect]</i>
Approval body:	<i>[Committee, e.g. SIRO Group, Directors, IPSA Board]</i>
Approval date:	<i>[Day/month/year]</i>
Last review:	<i>[Day/month/year. If no changes are made, effective date remains the same for the version, but review date will change]</i>
Next review date:	<i>[Month/year]</i>
Equality Impact Assessment	<i>[Decision from Equality Analysis and form submission date]</i>
Related IPSA policies	<i>[List all applicable]</i>
Keywords for tagging and search function	FOIA, Freedom of Information, procedure

Change History				
Version	Date	Status	Updated by	Comment