

Freedom of Information (FOI) and Environmental Regulations Information (EIR) Policy

Freedom of Information Act 2000 Policy Document Management

Title of document	Freedom of Information Policy & Environmental Regulations Policy
Type of document	Policy
Description	This document sets out what the Clinical Commissioning Group (CCG) will do to comply with its obligations under the Freedom of Information Act 2000 (hereafter referred to as the Act) and includes the procedure to be followed when requests are received.
Target audience	This policy applies to any person directly employed, contracted or volunteering with the CCG

Author	Emma Follis, Corporate Services and Governance Manager
Department	Corporate Services
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Contact details (of main contact for this document)	Name: Emma Follis Address: Corby CCG Corby Enterprise Centre London Road Corby NN17 5EU Email: emma.follis@nhs.net
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Freedom of Information Policy

1. Introduction

This document sets out the Freedom of Information Policy for NHS Corby CCG. It explains what the organisation will do to comply with its obligations under the Freedom of Information Act 2000 (hereafter referred to as the Act).

The Freedom of Information Act 2000 (FOIA) (Ref 1) came into effect for all public sector organisations on 1 January 2005 and gives the public a general right of access to information held by public authorities. Its key theme is that public authorities are accountable to the public and should be open and transparent in their decision-making. The policy is guided by the Lord Chancellor's Code of Practice on the Discharge of Public Authorities Functions under Part 1 of the Freedom of Information Act 2000 issued under Section 45 of the Act (Ref 2).

This policy is supported by the procedures for responding to requests for information, as set out in Appendix A and B.

This policy will be published on the CCG Website.

2. Scope

It is the duty of each NHS body to establish and maintain arrangements for the purpose of monitoring and improving the quality of healthcare provided by and for that body. The organisation is committed to this policy and its implementation.

This policy applies to all contracted (permanent and temporary) staff employed by the organisation including non-executive directors, students, trainees, researchers, trainers, volunteers, and staff of other organisations including consultants and contractors.

This policy will be strongly recommended to independent practitioners as good practice guidance.

The organisation supports the Government's commitment to greater openness in the public sector. The Act will further this aim of greater openness by enabling members of the public to be able to access key documents and as such scrutinise and question the decisions of public authorities more closely and ensure that the services provided are properly delivered.

The organisation wishes to create a climate of openness and dialogue with all their stakeholders; improved access to information about the organisation will help to support this aim. The organisation will make such information available in a range of formats as required to meet the needs of the person requesting the information.

The organisation recognises that individuals also have a right to privacy and confidentiality. This policy does not overturn the common law duty of confidence or the statutory provisions that prevent disclosure of personal identifiable information. The release of such information is covered by the Data Protection Act 1998 and is dealt with in the Personal Information Policy and associated procedures.

3. Purpose

The policy will provide a framework within which the organisation will ensure compliance with the requirements of the Act and will underpin any operational procedures and activities connected with the implementation of the Act.

4. Duties and Accountability

The Chief Executive (Accountable Officer) has the ultimate responsibility for the organisation's compliance with the Act. The Accountable Officer will ensure that responsibility for bringing FOI issues to the Board is delegated to an appropriate Director (or equivalent).

The FOI Lead will be the Corporate Services and Governance Manager, reporting to the Chief Finance Officer. The FOI Lead is responsible for the operational management of FOI Service and ensures compliance with the Act through appropriate processes and procedures.

The duties of the FOI Lead include:

- providing a centralised point of contact for handling all CCG related FOI enquiries, liaising with colleagues across the organisation to agree responses;
- providing advice and assistance to applicants requesting information under the Act
- Informing the NHS England Area Team of any requests suspected of being "round robin" requests
- production and maintenance of FOI policy and procedures (see Appendix A and B)
- promotion of FOI awareness across the organisation through training and the dissemination of the FOI procedures to all staff;
- ensuring that all staff and the general public are provided with information about their rights and responsibilities under FOI, in an accessible format;
- monitoring the Guide to Information required under the Publication Scheme (i.e. the CCG's FOI website);
- maintaining appropriate records of requests for information;
- production of monitoring reports;
- supporting the appeals/complaints procedure in respect of FOI.

The FOI Lead will oversee the development and updating of FOI policies and procedures and ensure that awareness of FOI is maintained across the organisation.

All staff including Non-Executive Directors are obliged to adhere to this policy. They should be familiar with the requirements of the Act and be aware of their personal responsibilities under the Act.

In certain circumstances, to support equality and diversity, line managers will need to consider individual requirements of staff to support good practice in complying with this policy.

5. Environmental Information Regulations 2004

The organisation recognises that, in addition to the Act, there is also an obligation on public authorities to respond to requests for environmental information under the Environmental Information Regulations (EIR) 2004.

The organisation will, as far as possible, respond to requests for environmental information using the same procedures as for responding to Freedom of Information (FOI) requests,

while recognising that there are some differing regulations between EIR and FOI on the provision of information. These include rules governing what environmental information may be disclosed (exceptions under EIR) and the requirement to respond to requests for environmental information **whether the request is verbal or in writing.**

6. Equality and Diversity

The organisation recognises the diversity of the local community and those in its employment; and aims to provide a safe environment free from discrimination and a place where all individuals are treated fairly, with dignity and appropriately to their need. The organisation recognises that equality impacts on all aspects of its day to day operations and has produced an Impact Assessment Framework for all its policies.

This Policy has been assessed against this framework and the results presented in Appendix G.

7. Freedom of Information Act 2000

7.1 Main Features of the Act

The main features of the Act are:

- a General Right of Access from 1 January 2005 to recorded information held by public authorities, subject to certain conditions and exemptions;
- a duty on public authorities to inform the applicant whether they hold the information requested and communicate the information to them, subject to certain conditions and exemptions;
- a duty on every public authority to adopt and maintain a Publication Scheme. This duty has been applicable to the NHS since 31 October 2003;
- the establishment of the office of Information Commissioner with wide powers to enforce the rights created by the Act and to promote good practice together with an Information Tribunal;
- a duty on the Lord Chancellor to establish Codes of Practice for guidance on specific issues, such as Records Management (Ref 3)

7.2 Publication Scheme and Guide to Information

Section 19 of the Act makes it the duty of every public authority to adopt a Publication Scheme.

The CCG has adopted the Model Publication Scheme issued by the Information Commissioner in 2008 (Ref 4) which gives an overview of the information that the organisation publishes and intends to publish in the future. It details the format in which the information is available and whether or not a charge will be made for the provision of that information. The Publication Scheme is available on the public website. The CCG's compliance with the requirement to publish information as set out in the ICO Definition Document for Health Organisations will be regularly reviewed by the FOI Lead in accordance with ICO guidelines and the content of the website should be updated accordingly.

Information in the Publication Scheme will be made automatically and proactively available. In most cases information which is made available via the Publication

Scheme will be downloadable from the website. In the event that an enquirer is unable to download the information, applications for the information to be supplied in another format may be made verbally or in writing.

7.3 Requests for Information (General Right of Access)

Section 1 of the Act gives a general right of access from 1 January 2005 to recorded information held by the CCG, subject to certain conditions and exemptions. Any person making a request for information to the organisation is entitled to:

- be informed in writing, or any other appropriate format on request, whether the organisation holds the information described in the request; and
- have that information communicated to them if it is held by the organisation and in an appropriate format on request.
- The provisions are fully retrospective, meaning, that if the organisation holds the information when the request is received, it must be provided, subject to certain conditions and exemptions.
- The Act states that requests for information under the General Rights of Access must be received in writing and include the name of the applicant, an address for correspondence, and a clear description of the information requested. This includes email, which is the preferred method of correspondence for the majority of FOI enquirers.

7.4 Charges and Fees

Charges and fees will only be levied in exceptional circumstances, for example where large volumes of hard copy materials are requested, in which case the CCG will follow the Freedom of Information and Data Protection (Appropriate Limit and Fees) Regulations 2004 (see Appendix E).

In general, no charge will be made.

7.5 Time Limits for Compliance with Requests

The CCG will establish systems and procedures to ensure that the organisation complies with the duty to respond to requests within 20 working days of receipt of a request, in accordance with Section 10 of the Act. All staff will be required to comply with the requirements of these procedures; failure to do so may result in disciplinary action.

7.6 Re-use of information

The Re-use of Public Sector Information Regulations 2005 provides a framework for public sector organisation to license the re-use of their information, including the possibility of levying charges for re-use.

In providing information under the Freedom of Information act this does not give an automatic right to re-use it. "Re-use" means the use by a person of a document held by a public sector body for a purpose other than the initial purpose for which the document was produced. An example of this might be a private sector company wanting to re-publish CCG documents on their website as part of a commercial service.

A request for re-use will need to be in writing, state the name of the applicant, an

address for correspondence, specify the document requested and state the purpose for which the document is to be re-used.

The CCGs will respond to a request for re-use within 20 working days of receipt (beginning with the day after receipt). Please see Appendix – Re-Use Licence – Public Sector Information.

A database of requests for re-use licenses will be maintained by the FOI Lead to ensure that licenses are re-issued if required once lapsed.

8. Provision for dealing with FOI Applications

8.1 Service Management

The FOI Lead manages the provision of this service.

8.2 Receipt of a Request

It is accepted that requests for information can come from many sources and it is important for all members of staff to be able to recognise an FOI request so it can be processed quickly and appropriately. All staff have a responsibility to ensure that all FOI applications are identified and reported.

Not every application will clearly indicate the nature of the request as being FOI.

For all requests for information, staff must follow the 'Requests for Information Flow Chart' which can be found at Appendix A and the Procedure to Process Freedom of Information Requests Appendix B.

8.3 Provision of Advice and Assistance to Applicants

The FOI Lead will act as a key contact point for Applicants for the CCG and will provide advice and assistance to potential and actual applicants for information under the Act.

The FOI Lead will act as a source of advice and support for staff in regard to the Act.

8.4 Circular or "Round Robin" requests

If circular or 'Round robin' requests are suspected of being received the FOI Lead will liaise with other CCGs across the area to ensure that a cohesive approach will be taken and a consistent response for all CCGs can be provided to the applicant.

9. Complaints/Internal Review

Requests for review or complaints about handling of applications for information under the Act are specifically exempt from the NHS Complaints Regulations (NHS Complaint Regulations Part II, para 7(g)). A separate complaints/appeals process applies to such requests for review or complaints (see Appendix D).

10. Records Management

The CCG and other organisations holding information on behalf of the CCG will have systems and processes in place for managing their corporate records in both electronic and paper format in order to respond effectively to requests for information.

In line with NHS guidance on retention periods (Ref 12), electronic and paper records of FOI requests will be retained for three years and then destroyed, with the exception of requests where any information requested was refused, in which case they should be retained for 10 years

11. Monitoring Compliance

The CCG will regularly review their Freedom of Information arrangements to ensure compliance with this policy.

The FOI Lead will maintain records of all FOI requests to assess performance in meeting the standards and statutory timeframes set out in the Lord Chancellor's Code of Practice.

The FOI Lead will produce quarterly reports to the CCG to assess performance in meeting the statutory timeframes and applicant satisfaction with the process. These will be presented to the Governing Body.

Review findings will also be used by the FOI Lead to inform measures for improvement, including identifying any communications and training needs and whether new or revised procedures are needed to comply with the policy.

12. Training, Distribution and Implementation

Training

The FOI Lead will provide training to those managers tasked with handling FOI requests within the CCG and will consider specific training to identified groups as required or requested by the CCG.

Distribution

This policy will be published on the CCG website.

All staff will be notified of this and any new or revised document via the email policy alert system.

Implementation

It is the responsibility of line managers to ensure that their staff are aware of this policy and procedure and how to deal with a Freedom of Information request should they receive one.

13. Related Policies/Organisational Functions

A number of other policies are related to this Freedom of Information Act Policy and all employees should be aware of the full range:

- Records Management Policy
- Data Protection Policy (incorporating Access to Health Records Procedure)
- Complaints Management Policy and Claims Management Policy
- Access to Health Records Policy

14. Review

This policy will be reviewed within 2 years and revisions made as required to reflect changes in National and Local guidance.

15. Reference documents

- Data Protection Act 1998
- Freedom of Information Act 2000
- Secretary of State for Constitutional Affairs' Code of Practice on the discharge of public authorities' functions under Part I of the Freedom of Information Act 2000 Issued under section 45 of the Act .November 2004 Act, November 2002.
- Lord Chancellor's Code of Practice on the Management of Records under section 46 of the Freedom of Information Act 2000, November 2002

References

1. Freedom of Information Act 2000 <http://www.legislation.gov.uk/ukpga/2000/36/contents>
2. Lord Chancellor's Code of Practice on the Discharge of Public Authorities' Functions under Section 45 of the Freedom of Information Act 2000 <http://www.justice.gov.uk/information-access-rights/foi-guidance-for-practitioners/code-of-practice>
3. Lord Chancellor's Code of Practice on the Management of Records under Section 46 of the Freedom of Information Act 2000
<http://www.justice.gov.uk/guidance/docs/foi-section-46-code-of-practice.pdf>
4. Model Publication Scheme 2009
http://www.ico.org.uk/for_organisations/freedom_of_information/guide/publication_scheme
5. Definition Document for the Model Publication Scheme for Health Bodies in England
http://www.ico.org.uk/for_organisations/freedom_of_information/guide/publication_scheme
6. Information Commissioner's Guide: Vexatious or repeated requests, Version 4 (December 2008)
http://www.ico.gov.uk/upload/documents/library/freedom_of_information/practical_application/awareness_guidance_22_vexatious_and_repeated_requests_final.pdf
7. Information Commissioner's Guide: When should names be disclosed?, Version 1 (August 2008)
http://www.ico.gov.uk/upload/documents/library/freedom_of_information/practical_application/when_should_names_be_disclosed.pdf
8. Information Commissioner's Guide: The exemption for personal information, Version 3 (September 2008)
http://www.ico.org.uk/for_organisations/guidance_index/~media/documents/library/Freedom_of_information/Detailed_specialist_guides/personal-information-section-40-and-regulation-13-foia-and-eir-guidance.ashx
9. Statutory Instrument 2004 3244: The Freedom of Information and Data Protection (Appropriate Limit and Fees) Regulations 2004)
<http://www.opsi.gov.uk/si/si2004/20043244.htm>

10. Information Commissioner's Awareness Guidance 2: Information provided in Confidence, Version 4 (September 2008)
http://www.ico.gov.uk/upload/documents/library/freedom_of_information/detailed_specialist_guides/confidentialinformation_v4.pdf
11. Information Commissioner's Guide: Information provided in confidence related to contracts, Version 1 (October 2008)
http://www.ico.gov.uk/upload/documents/library/freedom_of_information/detailed_specialist_guides/confidenceandcontracts.pdf
12. Records Management: NHS Code of Practice (April 2006)
http://www.dh.gov.uk/en/Publicationsandstatistics/Publications/PublicationsPolicyAndGuidance/DH_4131747
13. <http://www.parliament.uk/>
14. Information Commissioners Office Freedom of Information Act webpage:
http://www.ico.gov.uk/what_we_cover/freedom_of_information.aspx

Contact for further Information:

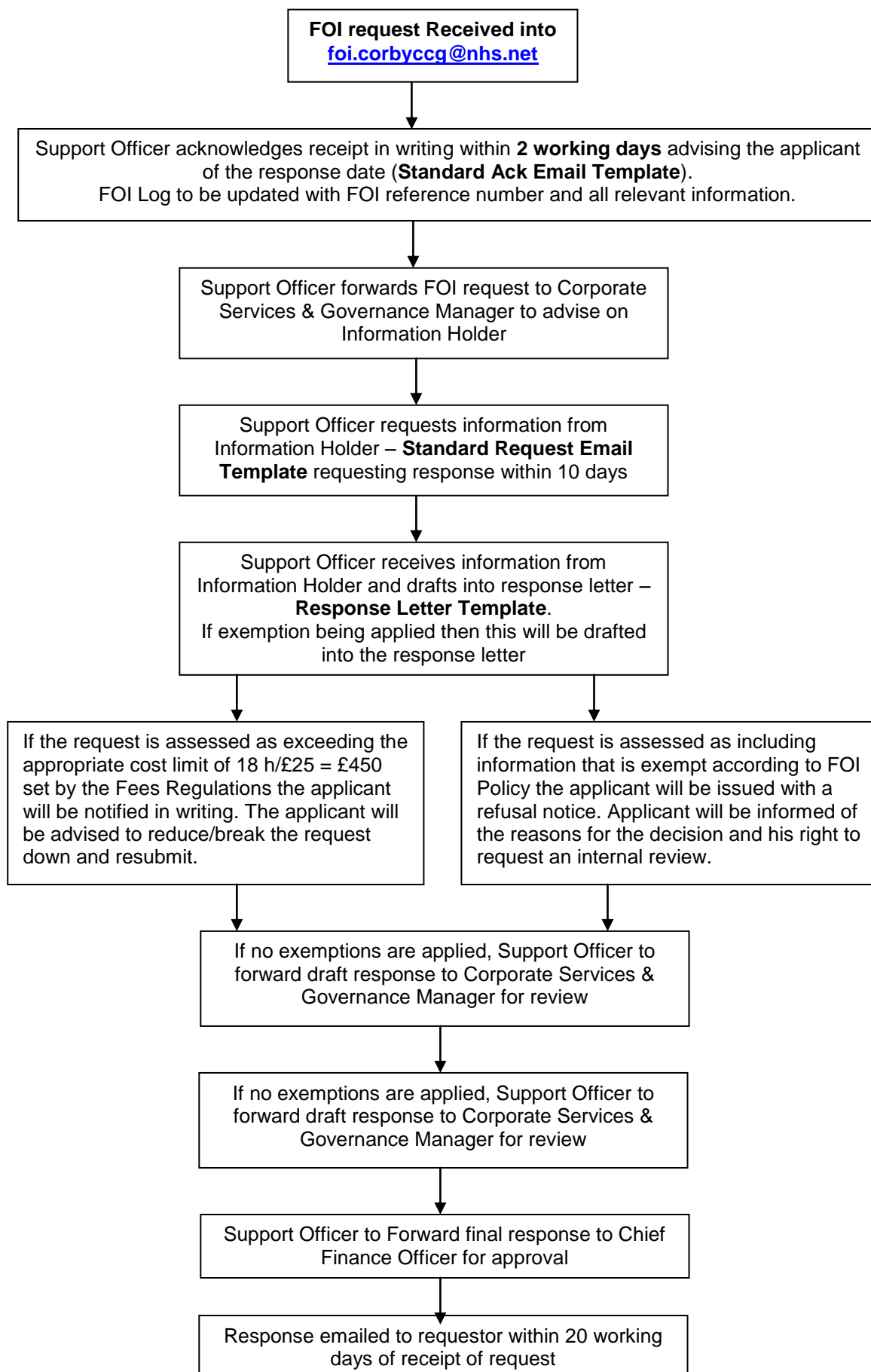
Emma Follis
Corporate Services and Governance Manager
NHS Corby CCG
Corby Enterprise Centre
London Road
Corby
NN17 5EU

foi.corbyccg@nhs.net

Tel: 01536 560420

Appendix A – NHS Corby CCG FOI Process

NHS Corby CCG FOI Process



APPENDIX B

DETAILED PROCEDURE TO PROCESS FREEDOM OF INFORMATION ACT (FOI) REQUESTS
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Introduction

The purpose of this procedure is to give staff a clear guide on how to manage incoming Freedom of Information Act 2000 (FOI) requests. The request must be made in writing (this includes emails, letters, faxes). A request for information does not need to quote the FOIA.

Legal Requirement

The CCG has 20 working days from the date of the request being received to comply with the legal requirements.

This requires staff to act without delay on receiving a request following the guidance below:

Steps to Follow:

1. Forward the document for processing

All requests received electronically should be received into the FOI inbox: foi.corbyccg@nhs.net. All other written requests should be received in writing to the NHS Corby CCG headquarters:

NHS Corby CCG
Corby Enterprise Centre
London Road
Corby
NN17 5EU

The most appropriate transmission method must be considered in relation to the format of the original request (electronic or paper) and any delay will impact on the 20 working days.

2. Acknowledgement of Request

Acknowledgement of the request should be made by the Support Officer within two-working days of receipt.

3. Providing the Information Requested

The person who was identified holding the information will be notified of the details of the request and given a deadline date for supplying the information to the Corporate Services Team.

The FOI Lead will then review the information and, if necessary, liaise with the person who provided the information in relation to further clarification or the potential application of exemptions.

Where it is considered that an exemption applies to release information the FOI Lead will forward the draft response to the Chief Finance Officer for approval.

Response Monitoring and Logging

This will be carried out by the FOI Lead who will liaise with the information holder and the requestor.

4. Collection of Costs

If applicable the FOI Lead will request, collect and deposit any fees received with the Finance Department prior to the release of the records.

5. Information Release

The information will be brought together and a response in form of a Decision Notice will be sent to the applicant by the FOI Lead.

APPENDIX C

Exempt Information under Part II of the Freedom of Information Act 2000

FOI Absolute Exemptions

- s 21 Information reasonably accessible to the applicant by other means
- s 23 Information supplied by, or relating to, bodies dealing with security matters
- s 32 Court records
- s 34 Parliamentary privilege
- s 36 Prejudice to the effective conduct of public affairs (but only absolute in relation to information held by the Commons or House of Lords)
- s 40 Personal Information
- s 41 Information provided in confidence (but only if this would constitute an actionable breach of confidence)
- s 44 Prohibitions on disclosure

FOI Qualified Exemptions subject to Public Interest test

- s 22 Information intended for future publication
- s 24 National Security
- s 26 Defence
- s 27 International relations
- s 28 Relations within the UK
- s 29 The Economy
- s 30 Investigations and proceedings conducted by public authorities
- s 31 Law enforcement
- s 33 Audit functions
- s 35 Formulation of government policy etc.
- s 36 Prejudice to effective conduct of public affairs
- s 37 Communications with Her Majesty etc. and honours
- s 38 Health and Safety
- s 39 Environmental information
- s 42 Legal professional privilege
- s 43 Commercial Interests

Public Interest Test

The public interest will be considered in every case where a qualified exemption may apply.

When applying the public interest test in the FOI context it means the public good, not what is of the interest to the public, and not the private interests of the requester.

In carrying out the public interest test the organisation should consider the circumstances at the time of the request or within the normal time of compliance.

Public interest arguments for the exemption must relate specifically to that exemption and the organisation must consider the balance of public interest in the circumstances of the request.

When considering the public interest to reach a decision on a qualified exemption, the organisation will seek legal advice when necessary. The organisation will aim to use the qualified exemptions sparingly and will, in accordance with Section 17 of the Act, justify their use.

APPENDIX D

Freedom of Information (FOI) Appeals

FOI Appeals Procedure and FOI Appeals Panel Terms of Reference

1. Introduction

The right to appeal is a fundamental part of the Freedom of Information Act and the Environmental Information Regulations. This right can be exercised in two ways: by an internal review using the organisation's appeal procedures and by an external appeal to the regulatory the Information Commissioner's Office (ICO). The ICO will not usually investigate any appeal which has not been thoroughly investigated through the organisation's internal process.

Dissatisfied applicants therefore have the opportunity for an initial review of how their request for information was handled. Having gone through this process, applicants who are still unhappy can complain to the ICO and will be dealt with in accordance with the ICO procedures.

2. Freedom of Information (FOI) Appeals Procedure

Appeals must be submitted in writing within 20 working days after receiving the organisation's response. After this time period, the organisation will not hear appeals and applicants will be advised to contact the ICO directly.

On receipt, the request for internal review will be acknowledged before it is assigned to one of a panel of reviewers, who are usually senior members of staff. The FOI Lead will provide the reviewer with a summary and details of the original handling of the request. The job of the internal reviewer is threefold:

1. To assess whether the authority has complied with its responsibilities under the FOIA, including timeliness and the duty to advise and assist.
2. To consider the information released against the information requested and make a full review of the papers associated with the original application, if appropriate, discussing the decisions with staff who dealt with the initial application.
3. To re-consider any public interest in disclosure and determine whether the information should be disclosed.

The internal reviews constitute a fresh inquiry into the request, rather than taking as a starting point the decision already reached and submitting it to a test of reasonableness. Reviews are also undertaken in the light of the general presumption in the FOIA in favour of release of information. Useful procedural guidance and advice on the application of the exemptions can be obtained from the FOI Lead or the Information Commissioners Office (ICO). The ICO recommends that an internal review should take no longer than 20 working days.

The internal reviewer sets out their decision in the form of a document outlining their conclusions and recommendations. Following management approval, the outcome of the review is communicated to the applicant.

On completion of the review, records relating to the review are returned to the FOI Lead. They are retained in order to assist in any investigation by the Information Commissioner.

APPENDIX E

FEE'S FOR APPLICATIONS UNDER THE FREEDOM OF INFORMATION ACT 2000

The Freedom of Information and Data Protection (Appropriate Limit and Fees) Regulations 2004 indicate that the scheme set in place by the Act is not expected to be self-financing. These Regulations provide that an applicant would be charged the full cost of the authority's 'disbursements' (such as costs for photocopying, printing and postage)

The following charges may apply:

Photocopies:	
A4 Black and White	10p per sheet
A3 Black and White	20p per sheet
A4 Colour	£1.00 per sheet
A3 Colour	£1.50 per sheet
Fax:	
To UK and Ireland	£1.00 per page
To Europe	£1.75 per page
To Rest of the World	£2.00 per page
Print-Outs from a Computer	
Black and White:	10p per page
Colour	50p per page
Photo Quality Paper Prints	£1.00 per page
Electronic Media:	
CD-R Disc in a Plastic 'Jewel' Case	£1.00
Floppy Disc (1.44MB)	£1.00
Scanning of A4 Paper Records	£1.40 per image
Scanning of A3 Paper Records	£2.10 per image
Email Attachment	No Charge

APPENDIX F

Re-use of Public Sector Information Regulations 2005

This creates a general legal right by the worldwide public, hereafter referred to as applicants, to re-use that information that has already been requested from public authorities through the Freedom of Information Act 2000/Environmental Information Regulations 2004

Rights under the Re-use of Public Sector Information Regulations

In summary the Regulations promote the re-use of information for CCGs own the copyright.

When the CCG releases information, which was requested the Freedom of Information Act 2000/Environmental Information Regulations 2004, an applicant may ask if they can re-use the information for a purpose other than the initial purpose for which the document was produced. An applicant's intentions may be for commercial purposes, in a way, which, without permission, might breach the CCG copyright. It is this sort of situation with which the Regulations are concerned.

What are the basics of the Regulations?

The CCG is not obligated to make public sector information available for re-use, but if the CCG does allow re-use of any of our public sector information, this has to be done in accordance with the Regulations. In these circumstances the Regulations set out:

- A 20 working day time-frame for a response to a request for re-use. This period may be extended where the request is extensive in quality or raises complex issues.
- That the Trust has the right to refuse the re-use of documents provided they fall outside the scope of the Regulations.
- The Trust may charge for a licence

How can people make a request

Rights of access will apply to all types of Freedom of Information Act 2000 / Environmental Information Regulations 2004 information, held by the CCG regardless of the date of the information:

- Any person or organisation may apply. Access is not confined to UK citizens and permanent residents; foreign nationals may also apply.
- A request must be in writing.
- An applicant must state their full name in writing.
- A request must give an address for correspondence.
- A request must specify the document requested.

The applicant must state the purpose for which the document is to be re-used.

Information Asset List

The CCG has an obligation to publish a list of the main documents available for re-use, preferably in an electronic format. These information sources have been developed as "*Publication Schemes*" to meet local authorities' obligations under the Freedom of Information Act 2000. The Publication Scheme can be found on the CCG website.

Conditions of Re-use

If an applicant makes a request to re-use information for which the CCG holds the copyright, and the CCG agrees in principle to the request, the CCG would communicate to them the conditions for re-use and other licence terms. The CCG can issue licenses, which will include the conditions for re-use, on a case-by-case basis.

Response Times

The Re-Use of Public Sector Information Regulations will, normally require the CCG to respond to an applicant's enquiry within 20 working days from the day the request was received.

Exemptions to Disclosure

Once the CCG has agreed to make types of information available for re-use, thereafter the basis for refusing to provide any of the specific information of that type will be limited. Re-use can be refused if:

- The activity of supplying the document is one, which falls outside its public task.
- The document contains content in which relevant intellectual property rights are owned by a third party.
- The content of the document is exempt from access by virtue of the Freedom of Information Act 2000/Environmental Information Regulations 2004.

Complaints and Appeals

Complaints - Applicants of information may complain to NHS Corby CCG:

- Failure to respond to their request within 20 working days (or failure to explain why longer than 20 working days is needed).
- Failure to provide information in the form in which they requested it.
- Failure to provide them with proper advice and assistance.

Appeals – If the CCG has declined to provide information; then an applicant will have been sent an explanatory Refusal Letter. The reasons may include:

- Failure to provide all/part of the information that they requested.
- Failure to correctly apply an:
 - Exemption under the Freedom of Information Act 2000 and/or;
 - Exception under the Environmental Information Regulations 2004.
- Failure to properly explain any reasons for refusing their request.

The proposed appeals procedure set up by Re-Use of Public Sector Information Regulations 2005 works in the same way as the appeals procedure under the Freedom of Information Act 2000/Environmental Information Regulations 2004, except that the Government's Office of Public Sector Information is the ultimate authority to which to complain for Re-Use of Public Sector Information Regulations 2005 appeals.

The applicant can complain to the [Office of Public Sector Information](#) (external) only after their complaint has first been sent to the CCG (as the authority to which their request for re-use of information was made) and if they are not satisfied with the response to their complaint/appeal.

If an applicant is unhappy with the way the CCG has handled their request, they may ask for an internal review. Applicants are advised to contact the Information Governance Team, who will arrange an internal review of their case.

Contact Details

NHS Corby CCG
Corby Enterprise Centre
London Road
Corby
NN17 5EU
FOI.corbyccg@nhs.net

Appendix G

Policy Impact Assessment

NHS Corby CCG

Date of Assessment: November 2014

Policy being assessed: Freedom of Information Policy

Assessment Carried out by: Emma Follis, Corporate Services and Governance Manager (FOI Lead)

Policy Title	Who is affected	Statutory requirements	Full Assessment Needed Yes / No	Priority High / Medium / Low
Freedom of information	All staff, Non-Executive Directors, FOI requestors.	Freedom of Information Act 2000 – Section 45, Code of Practice requires procedures to be communicated to staff. Requirement of the IG Toolkit	No	Low