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<b>Report To:</b>	<b>Inverclyde Integration Joint Board</b>	<b>Date:</b>	<b>18 August 2016</b>
<b>Report By:</b>	<b>Brian Moore, Corporate Director (Chief Officer), Inverclyde Health and Social Care Partnership</b>	<b>Report No:</b>	<b>VP/LP/092/16</b>
<b>Contact Officer:</b>	<b>Vicky Pollock</b>	<b>Contact No:</b>	<b>01475 712180</b>
<b>Subject:</b>	<b>Freedom of Information Arrangements</b>		

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## **1.0 PURPOSE**

- 1.1 The purpose of this report is to seek approval for the adoption of a draft publication scheme for the Inverclyde Integration Joint Board (IJB), as required by the Freedom of Information (Scotland) Act 2002 (FOISA).

## **2.0 SUMMARY**

- 2.1 The IJB is designated as a public authority for the purposes of FOISA. This means that it is subject to obligations under FOISA and will need to respond to requests for information which it holds within the statutory timescales and have its own publication scheme.
- 2.2 This report advises the IJB of the proposed arrangements for meeting the legislative requirements placed on it in terms of FOISA relating to how the IJB holds and processes information.

## **3.0 RECOMMENDATION**

- 3.1 It is recommended that the Inverclyde Integration Joint Board:-

(1) approves the adoption of the Publication Scheme as detailed in Appendix 1 of this report and agrees to its submission to the Scottish Information Commissioner for approval;

(2) delegates authority to the Chief Officer to complete the preparation of the Guide to Information as detailed in Appendix 2 of this report;

(3) delegates authority to the Chief Officer to prepare, complete and publish policies and procedures, an internal review/appeals process and leaflet to staff and the public detailing the Inverclyde Integration Joint Board's arrangements for dealing with requests for information in terms of the Freedom of Information (Scotland) Act; and

(4) delegates authority to the Chief Officer to review and amend as necessary the Publication Scheme, Guide to Information, policies and procedures, internal review/appeals process and draft leaflet to staff/the public in response to legislative changes, best practice and operational requirements.

Brian Moore  
Corporate Director  
(Chief Officer)  
Inverclyde HSCP

## **4.0 BACKGROUND**

- 4.1 The Freedom of Information (Scotland) Act 2002 (FOISA) – and the related Environmental Information (Scotland) Regulations 2004 (EIRs) – provide any applicant with the right to request – and be provided with – any recorded information held by Scotland’s public authorities. If an authority considers that information should not be released it is required to justify its decisions by applying one or more defined exemptions (or under the EIRs – exceptions).
- 4.2 The IJB has been designated as a “public authority” for the purposes of FOISA. This means that it is subject to both FOISA and the EIRs and must put in place the necessary arrangements for properly responding to requests for information.
- 4.3 The IJB’s responsibilities under FOISA and the EIRs are supplemented by Codes of Practice issued by the Scottish Government and compliance with the legislation is monitored by the Scottish Information Commissioner, who provides advice and guidance on the operation of the legislation
- 4.4 The IJB is required to have the following:-
- i. A Publication Scheme – Section 23 of FOISA imposes a specific duty on all Scottish public authorities to adopt and maintain a scheme that relates to the publication of information by the authority (a “Publication Scheme”). A Publication Scheme sets out the types of information that a public authority routinely makes available. The IJB will need to put in place a Publication Scheme, along with a guide setting out which information it will make available. The Publication Scheme at Appendix 1 follows the model approved by the Scottish Information Commissioner and it is proposed that this Publication Scheme is adopted by the IJB. Once a public authority has agreed to adopt the scheme, the Scottish Information Commissioner must be notified of its adoption.
  - ii. A guide to information, a draft of which is attached at Appendix 2.
  - iii. Policies and procedures in place on how the IJB responds to requests for information.
  - iv. An internal review/appeals process to consider cases where an applicant is dissatisfied with a response to a request for information, or there has been a failure to respond.
  - v. Arrangements in place to make staff and the public aware of the procedures to follow and to distinguish appropriately between requests that should be processed by Inverclyde Council or Greater Glasgow and Clyde NHS Board rather than the IJB. The determining factor is who holds the information.

The information needed for iii to v is being developed and authority is sought to prepare, complete and publish these documents on the relevant website.

- 4.5 It is likely that the IJB will only hold a very limited amount of information to begin with and the Publication Scheme and Guide to Information reflect that position. It is also important to note that the IJB must respond to requests made directly to the IJB for information which it holds. The IJB cannot simply refer requests on to the Council or Health Board to deal with – unless the information requested is held by those parties rather than the IJB. The Council and Health Board will continue to be responsible for requests relating to information they hold about the delivery of health and social care services under their own existing freedom of information policies and procedures.
- 4.6 In order to comply with its duties under FOISA and the EIRs, the IJB will be supported by officers from both Inverclyde Council and Greater Glasgow and Clyde Health Board with relevant experience in dealing with freedom of information matters.

## **5.0 IMPLICATIONS**

### **Finance**

- 5.1 The IJB is entitled to charge fees for certain types of requests for information and the IJB's charging policy is set out in the Guide to Information.

#### One Off Costs

Cost Centre	Budget Heading	Budget Years	Proposed Spend this Report	Virement From	Other Comments
N/A					

#### Annually Recurring Costs/(Savings)

Cost Centre	Budget Heading	With Effect From	Annual Net Impact	Virement From (if Applicable)	Other Comments
N/A					

#### Legal

- 5.2 The IJB is required under the Freedom of Information (Scotland) Act 2002 to respond to requests for information and have a Publication Scheme in place.

#### Human Resources

- 5.3 There are no HR implications arising from this report.

#### Equalities

- 5.4 The relevant legislation requires that equality issues are taken into account in responding to requests for information.

### 6.0 CONSULTATIONS

- 6.1 The Corporate Director (Chief Officer) and the Chief Financial Officer of the Inverclyde Health & Social Care Partnership, and the Head of Board Administration of Greater Glasgow and Clyde NHS Board have been consulted in the preparation of this report.

### 7.0 CONCLUSIONS

- 7.1 The IJB requires to adopt a Publication Scheme and have in place suitable arrangements to deal with freedom of information requests.

# Model Publication Scheme

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**Produced and approved by the Scottish  
Information Commissioner on 29 March 2016**

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**Cross-referenced VC documents (for internal use)**

<b>VC No</b>	<b>VC name</b>
69812	Model Publication Scheme: Guide for Scottish Public Authorities
69676	Model Publication Scheme: Notification Form
69815	Model Publication Scheme: Self-assessment checklist

## Introduction

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1. The Freedom of Information (Scotland) Act 2002 (the Act) requires Scottish public authorities to adopt and maintain a publication scheme. Authorities are under a legal obligation to:
  - (i) publish the classes of information that they make routinely available
  - (ii) tell the public how to access the information they publish and whether information is available free of charge or on payment.
2. The Act also allows for the development of model publication schemes which can be adopted by more than one authority. **The Commissioner's Model Publication Scheme was approved on 29 March 2016.**
3. The Commissioner has issued a [Guide for Scottish Public Authorities](#) to accompany the model scheme. This is **essential reading** for authorities adopting the model scheme as it explains the requirements of the scheme in detail and provides lists of types of information the Commissioner expects authorities to publish.

## Definition of “published” information

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4. For the purposes of this Model Publication Scheme, to be “published”, information must be:
  - (i) already produced and prepared and
  - (ii) available to anyone to access easily without having to make a request for it
5. Research and information services which involve the commissioning of new information are **not** “publications”.

## Adopting this model scheme

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6. It is expected that the model scheme will be adopted by any authority which is subject to the Freedom of Information (Scotland) Act 2002. For more information about which bodies this applies to, please visit <http://www.itspublicknowledge.info/YourRights/Whocanlask.aspx>
7. Adoption commits an authority to:
  - (i) adopting the model scheme, and any updates to it, without amendment
  - (ii) publishing the information, including environmental information, that it holds and which falls within the classes of information below.
  - (iii) ensuring that the way it publishes its information meets the Model Publication Scheme Principles.
  - (iv) producing a Guide to Information which sets out the information the authority publishes through the model scheme, how to access it, whether there is a charge for it and how to get help to access information.
  - (v) notifying the Scottish Information Commissioner that it has adopted the model scheme.

8. Where an authority fails to meet the above commitments, it cannot be considered to have adopted the Commissioner's model scheme and may be failing with the duty to adopt and maintain a publication scheme in line with section 23(1) of the Act.

### **Notifying the Commissioner**

9. Authorities adopting the model publication scheme for the first time must notify the Commissioner that they have done so. Thereafter no further notification is required unless the Commissioner has revoked approval (because the authority is not complying with the scheme).
10. The Commissioner will regularly review the model scheme and will consult authorities before making any substantive changes. The Commissioner will notify authorities of any changes.
11. The Commissioner will continue to monitor the effectiveness of authorities' application of the model publication scheme. As required, she may contact individual authorities about practice issues, in line with her Enforcement Policy.

## **Model Publication Scheme principles**

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### **Principle One: Availability and formats**

12. Information published through this model scheme should, wherever possible, be made available on the authority's website.
13. There must be an alternative arrangement for people who do not wish to, or who cannot, access the information either online or by inspection at the authority's premises. An authority may e.g., arrange to send out information in paper copy on request (although there may be a charge for doing so).

### **Principle Two: Exempt information**

14. If information described by the classes cannot be published and is exempt under Scotland's freedom of information laws e.g., sensitive personal data or a trade secret, the authority may withhold the information or provide a redacted version for publication, but it must explain why it has done so.

### **Principle Three: Copyright and re-use**

15. The authority's Guide to Information must include a copyright statement which is consistent with the fair dealing provisions of the Copyright, Designs and Patents Act 1988. Where the authority does not hold the copyright in information it publishes, this should be made clear.
16. Any conditions applied to the re-use of published information must be consistent with the Re-Use of Public Sector Information Regulations 2015.
17. The Commissioner recommends that authorities adopt the Open Government Licence and/or the non-commercial Government Licence, produced by The National Archives for their published information.

### **Principle Four: Charges**

18. The Guide to Information must contain a charging schedule, explaining any charges and how they will be calculated.



19. No charge may be made to view information on the authority's website or at its premises, except where there is a fee set by other legislation e.g., for access to some registers.
20. The authority may charge for computer discs, photocopying, postage and packing and other costs associated with supplying information. The charge must be no more than these elements actually cost the authority e.g. cost per photocopy or postage. There may be no further charges for information in Classes 1 – 7 below. An exception is made for commercial publications (see Class 8 below) where pricing may be based on market value.

### **Principle Five: Contact details**

21. The authority must provide contact details for enquiries about any aspect of the adoption of the model scheme, the authority's Guide to Information and to ask for copies of the authority's published information.
22. The Act requires authorities<sup>1</sup> to provide reasonable advice and assistance to anyone who wants to request information which is not published. The authority's Guide to Information must provide contact details to access this help.

### **Principle Six: Duration**

23. Once published through the Guide to Information, the information should be available for the current and previous two financial years. Where information has been updated or superseded, only the current version need be available (previous versions may be requested from the authority).

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<sup>1</sup> Section 15 of the Freedom of Information (Scotland) Act 2002 and regulation 9 of the Environmental Information (Scotland) Regulations 2004

## The Classes of Information

	<b>Class</b>	<b>Description</b>
<b>1</b>	About the authority	Information about the authority, who we are, where to find us, how to contact us, how we are managed and our external relations
<b>2</b>	How we deliver our functions and services	Information about our work, our strategies and policies for delivering functions and services and information for our service users
<b>3</b>	How we take decisions and what we have decided	Information about the decisions we take, how we make decisions and how we involve others
<b>4</b>	What we spend and how we spend it	Information about our strategy for, and management of, financial resources (in sufficient detail to explain how we plan to spend public money and what has actually been spent)
<b>5</b>	How we manage our human, physical and information resources	Information about how we manage the human, physical and information resources of the authority.
<b>6</b>	How we procure goods and services from external providers	Information about how we procure goods and services and our contracts with external providers
<b>7</b>	How we are performing	Information about how we perform as an organisation and how well we deliver our functions and services
<b>8</b>	Our commercial publications	Information packaged and made available for sale on a commercial basis and sold at market value through a retail outlet e.g., bookshop, museum or research journal.
<b>9</b>	Our open data	Open data made available by the authority as described by the Scottish Government's Open Data Strategy and Resource Pack, available under an open licence.

## Document control sheet

<b>Document Information</b>	
Full name of current version: Class, Title, Version No and Status. <i>E.g. C5 Key Documents Handbook v01 CURRENT ISSUE</i>	C2 Model Publication Scheme v01 CURRENT ISSUE
VC FileID	69809
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Approver	SMT
Responsible Manager	HOPI
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<b>Corrections / Unplanned or Ad hoc reviews (see Summary of changes below for details)</b>	
Date of last update	

<b>Summary of changes to document</b>				
Date	Action by <i>(initials)</i>	Version updated <i>(e.g. v01.25-36)</i>	New version number <i>(e.g. v01.27, or 02.03)</i>	Brief description <i>(e.g. updated paras 1-8, updated HOPI to HOOM, reviewed whole section on PI test, whole document updated, corrected typos, reformatted to new branding)</i>
05/04/16	JAW	01.00	01.01	New document created
05/04/16	JAW	01.01	01.02	Addition of VC FileID
14/04/16	JAW	01.02	01.03	Correction to cross references to VC documents
14/04/16	KB	01.03	01.04	DCS updated
14/04/16	KB	01.04	01.05	DCS updated, published on website

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## Inverclyde Integration Joint Board

### GUIDE TO INFORMATION AVAILABLE UNDER THE MODEL PUBLICATION SCHEME 2016

#### Contents

<b>SECTION 1:</b>	Introduction to the Integration Joint Board – Guide to Information
<b>SECTION 2:</b>	About Inverclyde Integration Joint Board
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<b>SECTION 4:</b>	Information that we may withhold
<b>SECTION 5:</b>	Our Charging Policy
<b>SECTION 6:</b>	Our Copyright Policy
<b>SECTION 7:</b>	Records Management Policy
<b>SECTION 8:</b>	Contact details for enquiries, feedback and complaints
<b>SECTION 9:</b>	How to access information which is not available in the Guide to Information
<b>SECTION 10:</b>	Classes of Information
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	Class 3: How we take decisions and what we have decided
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## Section 1: Introduction

The Freedom of Information (Scotland) Act 2002 (the Act) requires Scottish public authorities to adopt and maintain a publication scheme which has the approval of the Scottish Information Commissioner, and publish information in accordance with that scheme. The publication scheme must:

- publish the classes of information that the authority makes routinely available; and
- tell the public how to access the information and whether information is available free of charge or on payment

Inverclyde Integration Joint Board has adopted the **Model Publication Scheme 2016** which has been produced and approved by the Scottish Information Commissioner.

You can see this scheme on our website at: <https://www.inverclyde.gov.uk/health-and-social-care>

You can also contact us at the address below if you prefer a copy of the Model Publication Scheme 2016, or this Guide to Information, to be provided in a different format.

The purpose of this Guide to Information is to:

- allow you to see what information is available (and what is not available) for the Inverclyde Integration Joint Board in relation to each class in the Model Publication Scheme 2016;
- state what charges may be applied;
- explain how you can find the information easily;
- provide contact details for enquiries and to get help with accessing the information; and
- explain how to request information we hold that has not been published.

Alongside the Act, the Environmental Information (Scotland) Regulations 2004 (the EIRs) provide a separate right of access to the environmental information that we hold. This guide to information also contains details of the environmental information that we routinely make available.

## Section 2: About Inverclyde Integration Joint Board

The Inverclyde Integration Joint Board (the Board) was established on 27 June 2015 as a corporate body under the terms of the Public Bodies (Joint Working) (Scotland) Act 2014. It is one of 29 Integration Joint Boards each created covering one or more areas coterminous with that of local authorities. The function of the Board which contains representatives of Inverclyde Council, Greater Glasgow and Clyde NHS Board and a number of professional and stakeholder representatives, is to provide arrangements for the development of the integration of health and social care. This integration will improve the outcome for patients, service users, carers and their families. The Board has delegated to it, in terms of the Act and an Integration Scheme approved by the Scottish Ministers, functions and resources of Inverclyde Council and Greater Glasgow and Clyde NHS Board.

The Board is commonly referred to as the Inverclyde Health and Social Care Partnership. This is the public facing aspect of the Board and comprises the organisation drawing staff from the Council and the Health Board which supports the Board in delivering its objectives.

### Introducing the Inverclyde Integration Joint Board

The Board has its principal offices at

Hector McNeil House  
7-8 Clyde Square  
Greenock  
PA15 1NB

Telephone 01475 715365 Fax [ ] e-mail [HSCP.Communications@ggc.scot.nhs.uk](mailto:HSCP.Communications@ggc.scot.nhs.uk)  
The Chief Officer of the Board is Brian Moore.

We cover the area of Inverclyde Council.

We work in co-operation with other Integration Joint Boards, Inverclyde Council and Greater Glasgow and Clyde NHS Board and other agencies in planning and commissioning health and social care services.

The governing body is the Integration Joint Board, which comprises 8 voting members – 4 members appointed from Councillors on Inverclyde Council; 4 members from the Non-Executive Board Members of Greater Glasgow and Clyde NHS Board. Additionally there are non-voting stakeholder members and professional members. For more information on the Board see Section 10 – Classes of Information – Class 1.

### **Section 3: Accessing Information under the Scheme**

#### **Availability and formats**

The information we publish through this Guide to Information is, wherever possible, available on our website. We offer alternative arrangements for people who do not want to, or cannot, access the information online or by inspection at our premises. For example, we can usually arrange to send information to you in paper copy (although there may be a charge for this – see Section 5: Our Charging Policy).

Information in our Guide to Information will normally be available through the routes described below. Section 10 – Classes of Information provides more details on the information available under the Guide, along with additional guidance on how the information falling within each class may be accessed.

#### **Online:**

Most information listed in our Guide to Information is available to download from our website. In many cases a link within Section 10: Classes of Information will direct you to the relevant page or document. If you are having trouble finding any document listed in our guide, then for further assistance please contact:

Head of Administration & Business Support (Freedom of Information)  
Hector McNeil House  
7-8 Clyde Square  
Greenock  
PA15 1NB

Telephone: 01475 715365

Email: [HSCP.Communications@ggc.scot.nhs.uk](mailto:HSCP.Communications@ggc.scot.nhs.uk)

Website: <https://www.inverclyde.gov.uk/health-and-social-care>

#### **By email:**

If the information you seek is listed in our Guide to Information but is not published on our website, we can send it to you by email, wherever possible. When requesting information from us, please provide a telephone number so that we can telephone you to clarify details, if necessary.

#### **By phone:**

All information in the guide will be available in hard copy form for example, paper copies. Hard copies of information can be requested from us over the telephone. Please call us to request information available under this scheme.

**By post:**

You can also request hard copies of any information in the Guide by post. Please address your request to:

Head of Administration & Business Support (Freedom of Information)  
Hector McNeil House  
7-8 Clyde Square  
Greenock  
PA15 1NB

When writing to us to request information, please include your name and address, full details of the information or documents you would like to receive, and any fee applicable (see Section 5: Our Charging Policy for further information on fees). Please also include a telephone number so we can telephone you to clarify any details, if necessary.

**Personal visits:**

If you prefer to visit us to inspect the information you may do so during our normal office hours of 9.00 am to 5.00pm Monday to Thursday and to 4.00pm on a Friday. It may avoid delay if you notify us in advance that you intend to visit. In a limited number of cases you may be required to make an appointment to view the information. In such cases, this will be set out within Section 10 – Classes of Information, and contact details will be provided within the relevant class.

**Advice and assistance:**

If you have any difficulty identifying the information you want to access, then please contact us to help you.

**Exempt information**

We will publish all the information we hold that falls within the classes of information in the Model Publication Scheme 2016. We publish this information in Section 10 of this guide. If a document contains information that is exempt under Scotland's freedom of information laws (for example sensitive personal information or a trade secret), we may remove or redact the information before publication but we will explain why.

**Section 4: Information that we may withhold**

All information covered by our Guide to Information can either be accessed through our website, or will be provided promptly following our receipt of your request. Our aim in adopting the Commissioner's Model Publication Scheme 2016 and in maintaining this Guide to Information is to be as open as possible. You should note, however, that there may be limited circumstances where information will be withheld from one of the classes of information listed in "Section 10 – Classes of Information". Information will only be withheld, however, where the Act (or, in the case of environmental information, the EIRs) expressly permits it. Information may be withheld, for example, where its disclosure would breach the law of confidentiality, harm an organisation's commercial interests, or endanger the protection of the environment.

Information may also be withheld if it is another person's personal information, and its release would breach data protection legislation.

Whenever information is withheld we will inform you of this, and will set out why that information cannot be released. Even where information is withheld it will, in many cases, be possible to provide copies with the withheld information edited out. If you wish to complain about any information which



has been withheld from you, please refer to Section 8 – Contact details for enquiries, feedback and complaints.

## **Section 5: Our Charging Policy**

This section explains when we may make a charge for our publications and how any charge will be calculated.

There is no charge to view information on our website, at our premises (except where there is a statutory fee, for example to access registers), or where it can be sent to you electronically by email.

We may charge you for providing information to you, for example photocopying and postage, but we will charge you no more than it actually costs us to do so. We will always tell you what the cost is before providing the information to you.

Our photocopying charges per sheet of paper are shown in the table below:

### **Black and white photocopying**

<b>Size of paper</b>	<b>Pence per sheet of paper</b>
A1	Not available
A2	Not available
A3	20p
A4	10p
A5	10p

### **Colour photocopying**

<b>Size of paper</b>	<b>Pence per sheet of paper</b>
A1	Not available
A2	Not available
A3	60p
A4	30p
A5	30p

Information provided on CD-Rom will be charged at £1.00 per computer disc.

Postage costs will be recharged at the rate we pay to send the information to you. Our charge is based on sending information by Royal Mail First Class.

When providing copies of pre-printed publications, we will charge no more than the cost per copy of the total print run.

We do not pass any other costs on to you in relation to our published information.

Details of any individual charges which differ from the above charging policy are provided within Section 10 – Classes of Information.

## **Section 6: Copyright**

Inverclyde Integration Joint Board holds the copyright for the vast majority of information in this Publication Scheme. All of this information can be copied or reproduced without our formal permission, provided it is copied or reproduced accurately, is not used in a misleading context, is not used for profit, and provided that the source of the material is acknowledged.

Providing access to information does not mean that copyright has been waived, nor does it give the recipient the right to re-use information for commercial purposes. If you intend to re-use information obtained from the Scheme, and you are unsure whether you have the right to do so, please make a request to re-use the information to:

Head of Administration & Business Support (Freedom of Information)  
Inverclyde Integration Joint Board  
Hector McNeil House  
7-8 Clyde Square  
Greenock  
PA15 1NB

Telephone: 01475 715365

Email: [HSCP.Communications@ggc.scot.nhs.uk](mailto:HSCP.Communications@ggc.scot.nhs.uk)

Your request will be considered under the Re-use of Public Sector Information Regulations 2015, which may provide the right to impose a charge. In the event that a charge is payable you will be advised what this is and how it is calculated. If you require more information on the re-use of information go to <http://www.nationalarchives.gov.uk/information-management/re-using-public-sector-information/> or contact the Head of Administration & Business Support.

The Publication Scheme may contain information where the copyright holder is not the Integration Joint Board. In most cases, the copyright holder will be obvious from the documents. In cases where the copyright is unclear it is the responsibility of the person accessing the information to locate and seek the permission of the copyright holder before reproducing the material or in any other way breaching the rights of the copyright holder. This includes, for example, Ordnance Survey Maps, which are Crown Copyright.

## **Section 7: Records Management Policy**

Inverclyde Integration Joint Board regards its records as a major asset of the organisation. It confirms that its records are one of the essential resources, which support management in the efficient and effective fulfilment of its governance, business and legal responsibilities. The Board will over coming months develop records management and retention policies which will be applied to the management of information held by the Board.

## **Section 8: Contact details for enquiries, feedback and complaints**

The Act requires that we review our publication scheme from time to time. As we have adopted the Model Publication Scheme 2016, this means we will review our Guide to Information from time to time. As a result, we welcome feedback on how we can develop our guide further. If you would like to comment on any aspect of this Guide to Information, or comment or complain that information is not included then please contact us via.

Head of Administration & Business Support (Freedom of Information)  
Hector McNeil House  
7-8 Clyde Square  
Greenock  
PA15 1NB

Telephone: 01475 715365

Email: [HSCP.Communications@ggc.scot.nhs.uk](mailto:HSCP.Communications@ggc.scot.nhs.uk)

Website: <https://www.inverclyde.gov.uk/health-and-social-care>

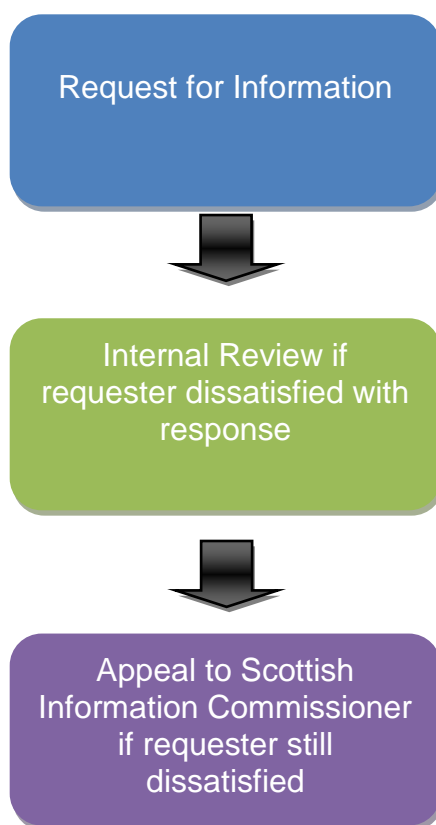
You may, for example wish to tell us about:

- other information that you would like to see included in the guide;
- whether you found the guide easy to use;
- whether you found the guide to information useful;
- whether our staff were helpful;
- other ways in which our guide to information can be improved.

Our aim is to make our guide to information as user-friendly as possible, and we hope that you can access all the information we publish with ease. If you do wish to complain about any aspect of the Guide then please contact us and we will try and resolve your complaint as quickly as possible.

Any complaint will be acknowledged within three working days of receipt and we will respond in full within twenty working days.

You have legal rights to access information under the Model Publication Scheme 2016 (as described in this Guide to Information) and a right of appeal to the Scottish Information Commissioner if you are dissatisfied with our response. These rights apply only to information requests made in writing<sup>1</sup> or another recordable format. If you are unhappy with our response to your request you can ask us to review it and if you are still unhappy, you can make an appeal to the Scottish Information Commissioner



The Commissioner's website has a guide to this three step process, and she operates an enquiry service on Monday to Friday from 9:00am to 5:00pm.

Her office can be contacted as follows:

Scottish Information Commissioner  
Kinburn Castle  
Doubledykes Road  
St Andrews  
Fife KY16 9DS

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<sup>1</sup> Verbal requests for environmental information carry similar rights

Tel: 01334 464610

Email: [enquiries@itspublicknowledge.info](mailto:enquiries@itspublicknowledge.info)

Website: [www.itspublicknowledge.info/YourRights](http://www.itspublicknowledge.info/YourRights)

## **Section 9: How to Access Information which is not available in the Guide to Information**

If the information you are seeking is not available through the Model Publication Scheme 2016 (as described in this Guide) then you may wish to request it from us. The Act provides you with a right of access to the information we hold, subject to certain exemptions. The EIRs separately provide a right of access to the environmental information we hold, while the Data Protection Act 1998 (DPA) provides a right of access to any personal information about you that we hold.

Again, these rights are subject to certain exceptions or exemptions. Should you wish to request a copy of any information that we hold that is not available under the Model Publication Scheme 2016 (and described in this Guide), please write to:

### **For requests under Freedom of Information and the EIRs please contact:**

Head of Administration & Business Support (Freedom of Information)  
Inverclyde Integration Joint Board  
Hector McNeil House  
7-8 Clyde Square  
Greenock  
PA15 1NB

Telephone: 01475 715365

Email: [HSCP.Communications@ggc.scot.nhs.uk](mailto:HSCP.Communications@ggc.scot.nhs.uk)

### **For requests under the Data Protection Act please contact:**

Head of Administration & Business Support (Data Protection)  
Inverclyde Integration Joint Board  
Hector McNeil House  
7-8 Clyde Square  
Greenock  
PA15 1NB

Telephone: 01475 715365

Email: [HSCP.Communications@ggc.scot.nhs.uk](mailto:HSCP.Communications@ggc.scot.nhs.uk)

### **Charges for information that is not available under the scheme:**

The charges for information that is available under this Guide to Information are set out under Section 5 – Our Charging Policy.

If you submit a request to us for information that is not available in this Guide the charges will be based on the following calculations:

General information requests:

- There will be no charge for information requests that cost us £100 or less to process.
- Where information costs between £100 and £600 to provide you may be asked to pay 10% of the cost in excess of £100. That is, if you were to ask for information that cost us £600 to provide, you would be asked to pay £50 calculated on the basis of a waiver for the first £100 and 10% of the remaining £500 being chargeable.
- We are not obliged to provide information in response to requests which will cost us over £600 to process.

- In calculating any fee, staff time will be calculated at actual cost per staff member hourly salary rate to a maximum of £15 per person per hour.
- We do not charge for the time to determine whether we hold the information requested, or for the time it takes to decide whether the information can be released. Charges may be made for locating, retrieving and providing information to you.
- In the event that we decide to impose a charge we will issue you with notification of the charge (a fees notice) and how it has been calculated. You will have three months from the date of issue of the fees notice in which to decide whether to pay the charge. The information will be provided to you on payment of the charge. If you decide not to proceed with the request there will be no charge to you.

#### **Charges for environmental information:**

Environmental information is provided under the EIRs rather than the Act. The rules for charging for environmental information are slightly different. We do not charge for the time to determine whether we hold the environmental information requested, or deciding whether the information can be released. Charges may be made for locating, retrieving and providing information to you, for example photocopying and postage. In the event that we decide to impose a charge we will issue you with notification of the charge and how it has been calculated. The information will be provided to you on payment of the charge. If you decide not to proceed with the request there will be no charge to you.

Charges are calculated on the basis of the actual cost to the IJB of providing the information without any disregard for the first £100 and without any discount on the elements above £100.

- Photocopying is charged at 10p per A4 sheet for black and white copying, 30p per A4 sheet for colour copying.
- Postage is charged at actual rate for Royal Mail First Class.
- Staff time is calculated at actual cost per staff member hourly salary rate.

The IJB may elect to waive the fee:-

- if satisfied that there is a widespread public interest in the publication of the information in question. This is unlikely to be the case where a request appears to be driven by commercial interests or is highly specific in terms of focus or geographical area;
- if satisfied that it would be uneconomical to issue a fees notice and process payment. The IJB may elect to waive the fee where information is requested which consists of a mixture of environmental and non-environmental information, and the non-environmental information would not be subject to a fee in terms of the FOI legislation.

The IJB may elect to apply a disregard of the first £100 of any fee and charge only 10% of the marginal costs between £100 and £550 if it has processed an environmental information request as a mainstream FOI request. This should not be taken as an indication that the same disregard will be applied to any similar requests in future.

#### **Charge for request for your own personal data:**

The minimum cost is £10 rising to a maximum of £50 depending on the volume and type of information requested, plus reproduction and postage costs (both on the same basis as for FOI requests).

## **Section 10 – Classes of Information**

### **CLASS 1: ABOUT INVERCLYDE INTEGRATION JOINT BOARD**

**Class description:**

Information about Inverclyde Integration Joint Board, who we are, where to find us, how to contact us, how we are managed and our external relations.

**The information we publish under this class**

### **CLASS 2: HOW WE DELIVER OUR FUNCTIONS AND SERVICES**

**Class description:**

Information about our work, our strategy and policies for delivering functions and services and information for our service users.

**The information we publish under this class**

### **CLASS 3: HOW WE TAKE DECISIONS AND WHAT WE HAVE DECIDED**

**Class description:**

Information about the decisions we take, how we make decisions and how we involve others.

**The information we publish under this class**

### **CLASS 4: WHAT WE SPEND AND HOW WE SPEND IT**

**Class description:**

Information about our strategy for, and management of, financial resources (in sufficient detail to explain how we plan to spend public money and what has actually been spent).

**The information we publish under this class**

### **CLASS 5: HOW WE MANAGE OUR HUMAN, PHYSICAL AND INFORMATION RESOURCES**

**Class description:**

Information about how we manage the human, physical and information resources of Inverclyde Integration Joint Board

**The information we publish under this class**

**Human Resources**

**Physical Resources**

**Information Resources**

Data Protection; Policy for the Retention and Disposal of Documents and Records Paper and Electronic; Environmental Information Regulations; Freedom of Information; Re-use of Public Sector Information.

### **CLASS 6: HOW WE PROCURE GOODS AND SERVICES FROM EXTERNAL PROVIDERS**

**Class description:**

Information about how we procure goods and services, and our contracts with external providers.

**The information we publish under this class**

### **CLASS 7: HOW WE ARE PERFORMING**

**Class description:**

Information about how we perform as an organisation, and how well we deliver our functions and services.

**The information we publish under this class**

## **CLASS 8: OUR COMMERCIAL PUBLICATIONS**

**Class description:**

Information packaged and made available for sale on a commercial basis and sold at market value through a retail outlet e.g. bookshop, museum or research journal.

**We do not publish any information in this class**