Open All Hours

A Template Guide to Information for Registered Social Landlords

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Open All Hours - A Template Guide to Information for Housing Associations and Co-operatives

Background

This guidance updates the document *Open All Hours - A Model Publication Framework for Housing Associations and Co-operatives* that was jointly commissioned by SFHA and GWSF in 2016. The guidance was developed to provide guidance and recommendations about the range of information that should be readily available to tenants, customers and members of the public – especially through publication on a Registered Social Landlord's (RSL's) website.

At the heart of its production was a recognition that RSLs have a strong existing culture of openness and transparency – with the categories of information identified for publication linked to the outcomes within the Scottish Social Housing Charter.   This was with particular emphasis on Charter Outcome 2:

"Social landlords manage their businesses so that tenants and other customers find it easy to communicate with their landlord and get the information they need about their landlord, how and why it makes decisions and the services it provides."[1]

The guidance also took account of the requirements of the Environmental Information Regulations (EIRs) which already applied to RSLs at that time – and include a requirement to "actively disseminate" certain environmental information.   In this respect, the framework took account of the *2015 SFHA Briefing on EIRS*.

The framework sought to equip the sector with a means to demonstrate the significant amount of information made available to stakeholders and other interested parties. It was anticipated that those who adopted the guidance would benefit from a reduced volume of information requests – or at the very least a quick and straightforward means to refer requesters to information on the website. It also would place RSLs in a strong position should Freedom of Information legislation ever be extended to the sector – specifically in meeting the requirements the Freedom of Information (Scotland) Act 2002 (FOISA) [2] places on bodies to proactively publish information.

Since 2016, anticipated legislative changes have necessitated an update to *Open All Hours* to take account of revised requirements.   From 11 November 2019, FOISA will apply to RSLs in Scotland in relation to certain functions.   In addition to the duties the Act places on organisations to respond to requests for information within set timescales (which are not the focus of *Open All Hours* but will be covered in other SFHA/GWSF guidance), FOISA places a duty on RSLs to publish certain types of information. Section 23 of the Act requires that organisations subject to the act adopt and maintain a publication scheme that has the approval of the Scottish Information Commissioner (SIC).   It also states that all publication schemes must:

- Be published by the organisation
- Contain the classes (or types) of information that the authority publishes or will publish

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[1] Scottish Government (2017) *Scottish Social Housing Charter*
[2] Scottish Government (2002) *Freedom of Information (Scotland) Act 2002*

- Explain the manner in which the information is published or will be published
- State whether there is a charge for the information.
- Take into consideration the public interest of the information held by the organisation, allowing access to:
  - Information about services, cost of services and standards attained
  - Facts or analysis which informed decisions of importance to the public
  - The reasons for decisions taken

Under Section 60 of FOISA, Scottish Ministers must issue a Code of Practice detailing the practices expected of bodies in order to meet the requirements of the Act. The Code was last revised in December 2016, and Section 3 relates to the duty to publish. Part 2 Section 3.2.1 states:

"Authorities are free to publish as much information, of whatever type, they wish to publish. As a minimum, to meet the requirements of section 23 of FOISA, this should include information about:
- *their functions, how they operate (including their decision-making processes), and their performance; and*

- *their finances, including funding allocation, procurement and the awarding of contracts."³*

To help organisations meet this requirement, the SIC has developed a ***Model Publication Scheme*** (MPS) – for all authorities subject to FOISA. The SIC has also provided an accompanying *Guide to the Model Publication Scheme* to help organisations implement the MPS. Whilst this update to *Open All Hours* refers to this guidance, it is essential that RSLs also read the SIC guide as a key part of their preparation.

To achieve compliance with the MPS, all organisations must publish a Guide to Information (GTI) detailing where all of the required information under the MPS is available. As described by the SIC, this is effectively an index of the information you publish and a "how to" guide to access it. For the most part, it will be a series of hyperlinks to the information detailed.

The GTI published on your website must contain the following elements:

- Show that it meets the Scottish Information Commissioner's six MPS Principles (see p4)
- A charging schedule (See Charges, p5)
- Details of information you publish under each of the 9 classes of information in the MPS (effectively your publication scheme).

This update to *Open All Hours* provides a *Template Guide to Information* at Appendix A that can be adapted by RSLs as the basis for their own GTI. This template has been developed with the support of the SIC, to ensure effective compliance with the MPS, making it an effective tool to achieve and demonstrate compliance with the duty to publish in FOISA.

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³ Scottish Ministers (Dec 2016) *Section 60 Code of Practice*

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Many organisations will have adopted (or be in the process of adopting) the SFHA/GWSF Model Publication Framework (MPF) from 2016 – which detailed the types of information organisations should publish on their websites as a matter of good practice. Those who have done so will be in an excellent position to adopt the requirements of the MPS.

However, publishing the information outlined in the 2016 SFHA/GWSF guidance will not alone meet the requirements of the MPS. For ease of use, this guide highlights the main aspects of the MPS that were not contained in the SFHA/GWSF Framework. This ensures that where any RSL has adopted (or partially adopted) the MPF, they are clear on which aspects where not previously included.

The table at Appendix B summarises the differences between the SFHA/GWSF MPF "*categories of information*" and the "*classes of information*" in the MPS.

Six Principles of Model Publication Scheme (MPS)

In order to comply with the MPS, the GTI published on your website must comply with the six MPS principles identified by the SIC in section 3 of its Guide to the MPS.

The *Template Guide to Information* at Appendix A complies with each of these principles, which are summarised below:

1. **Availability and formats**

   This requires all information published must be available for anyone to access easily – which includes links to the information in the GTI. These links must be directly to the information listed, and not to a home page.

   An important principle of the MPF produced in 2016 applies here, in that the availability of information should not be restricted by geography. By focussing publication on the organisation's website, information is available to anyone who wants to access it. It must be recognised, however, that not everyone has access to the internet or is comfortable using it.

   Information must be equally accessible to everyone who has an interest in the sector's activities. Consequently, the *Template GTI* also includes provisions for information to be provided in a printed format on request. Unlike requests for information under Freedom of Information (FOI), requests for printed copies of published information do not have to be made in writing. It is a requirement that RSLs provide a telephone/e-mail service to make such requests – with contact details included in the GTI (see principle 5). Please note – that if you intend to charge for such information (see principle 4) then it is legitimate to not provide the information until you have received the payment.

   Information should also be made available for inspection in the RSL's office (free of charge) if this is convenient for the requester. Other formats may be more appropriate to meet the needs of people with disabilities and it is important that, when

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responding to requests for information, any specific needs are met appropriately and that the requirements of the Equality Act 2010 are met.

Should a request be made for information to be provided in a format other than that which the document is published (e.g. as a Word document rather than a PDF), the RSL should consider if it is reasonably practicable to do so. Scottish Minister's Section 60 Code of Practice states at part 2 section 9.10.2:

"If the information is not yet held in the preferred format, the authority must consider whether it would be reasonably practicable to convert the information into that format. In considering what is "reasonably practicable", the authority should have regard to all the circumstances applicable to the request. Where an authority considers providing the information in the requested format not to be "reasonably practicable", it should inform the applicant of the reasons for its decision." [4]

2. Exempt information

Under this principle, any information described under the MPS that is held by the RSL must be published – unless the information is subject to one of the exemptions under FOISA or the EIRs. The example given in the SIC guidance highlights governing body minutes and when personal data is contained within this. Under these circumstances, publishing a redacted version would be appropriate – explaining why this was the case. In other cases it may be appropriate to exclude a whole document when the content or subject matter is, for instance, confidential or commercially sensitive. A statement should be made to this effect on the website. As individuals could still request any non-published information under FOI, it is recommended by the SIC that the language used is tied to exemptions in FOISA, e.g.:

- Item 2 board report -CONFIDENTIAL DUE TO COMMERCIAL SENSITIVITY (information withheld because disclosure would harm commercial interests).
- Item 3 board report – Confidential (disclosure would be an actionable breach of confidence)

Please note, that in the *Template Guide to Information* at Appendix A, we have removed any elements from the MPS that are not relevant to RSLs and these aspects do not apply to this principle – i.e. no further statement about these is required in the GTI.

3. Copyright and re-use

It is a requirement to include a statement in the GTI on copyright and re-use. Whilst this is not likely to be relevant to the information published by RSLs for the most part, a basic statement is included in the *Template Guide to Information* at Appendix A that can be adapted by each RSL as necessary.

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[4] Scottish Ministers (2016) *Section 60 Code of Practice*

4. Charges

The GTI must contain a charging schedule, explaining charges for providing published information and how they will be calculated.   There is no set maximum or minimum amounts that can be charged for providing published information – but these must be reasonable.   The charge cannot be more than what it costs the RSL to provide the information, and typically relate to printing/photocopying costs and postage.

The charge cannot relate to the cost of putting the information together in the first place and no charge can be made for providing the information online or to view the information at your office.   Please note: it is not compulsory to charge for providing published information.   However, SIC recommends that all organisations have a charging schedule in place even if they do not plan to ever use it. This provides the option should the need ever arise – e.g. a far reaching request for printed information. In order to impose any charge, a charging schedule must be included in the GTI or else you cannot impose any charge.

An important distinction to be made is that that the required schedule in the GTI relates to charges for providing published information only (e.g. posting a printed copy) – and does not relate to charges for FOI or EIR requests for unpublished information which require a separate charging schedule. This also must be included in your GTI.

A good example of the distinction between charging schedules is provided in Edinburgh Leisure's Guide to Information[5].   Its GTI highlights charges it makes not only for providing published information, but also how it may charge for FOI requests, EIR requests and Subject Access Requests (SARs). This is shown at Appendix C.

As a further illustration of the levels that other bodies charge, the Scottish Housing Regulator's Guide to Information[6] outlines its charging schedule for published information – charging similar levels to those outlined by Edinburgh Leisure for printed copies, postage, and CD Roms.

The Template Guide to Information at Appendix A does not specify a set amount that organisations should charge for published information and leaves this blank.   It is up to each organisation to set the levels it will charge for providing published information based on the parameters outlined above.   The template only includes a schedule for providing published information – but RSLs may wish to also include details of how they may charge for FOI, EIR and SAR requests (as demonstrated by Edinburgh Leisure) within the narrative of their GTI.

SIC strongly recommends that RSLs refer to the SIC guidance on this principle (especially paragraph 65).   If there were ever a complaint made to the SIC about

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[5] Edinburgh Leisure (2019) *Guide to Information*
[6] Scottish Housing Regulator (2017) *Guide to Information*

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unreasonable charges, the standards outlined under Principle 4 within the SIC guidance would be used to assess this.

5. Advice and assistance

There is a duty under FOISA to provide help to those seeking to access your information. For this purpose, the GTI must provide contact information so that the public can ask for help with finding information, and also must provide guidance on how to access information that is not published.

The *Template Guide to Information* at Appendix A includes space to provide these details.

6. Duration

Whilst the MPS predominantly relates to making information publicly available, rather than how long documents should be retained, SIC guidance states that information must be available for at least two years following publication (unless it is updated during this period). It also states that where information is continually updated – only the current version should be included. So for example, only the current version of a policy and not the previous version(s) should be available on the website to avoid confusion. It is important to also be aware that there are both legal requirements and separate guidance[7] that relate to the retention of documents (such as annual accounts, minutes etc.).

We strongly recommend - for the most part - the adoption of a "day one" approach, where you decide when the MPS will be implemented and start to publish information from then, rather than trying to publish information retrospectively. This is about ensuring that the key information is uploaded without unnecessary delays – whilst consideration is given to publishing older information that may be in the public interest. For example, with governing body minutes - if you do not currently publish and were attempting to publish retrospectively, it may be necessary to redact information from the last two years' minutes before publication would be possible. This would have a large impact on resources, and delay the completion of your GTI unnecessarily. Publishing your most recent minutes and continuing to do so thereafter will meet the requirements, and any subsequent requests for older minutes can be provided as necessary   It is recommended that if you do receive an FOI request for older minutes and fulfil that request, that the information subsequently be published in recognition of the public interest in viewing that information.

It is, of course, important to bear in mind the maintenance obligations that are associated with a website that contains an extensive range of information that covers a long period. It is also important to remember that 'retaining' information doesn't necessarily mean (or require) publishing it on your website – beyond the two years

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[7] National Housing Federation (2019) *Document retention and disposal for housing associations*

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highlighted by the MPS.   When deciding what older information to keep up on the website, it is important to consider what the public interest might be in this information, and base any decision to include or remove from the website on this.

The SIC guidance also recommends that you maintain a record of what information was published and when it was available. This is in case there is ever any information that you have removed from the website that there is subsequently a request for – so that this can easily be accessed.   It also serves as a useful record to demonstrate your compliance with the FOISA requirements regarding publishing information. Simply saving and retaining earlier versions of your GTI – e.g. on an annual basis or prior to any major review - will provide this record. Please note that any information that you remove from the website will no longer have a relevant hyperlink in an old version of the GTI, so you may wish to add a statement as to where to find the information (if it is still retained).

The GTI must be regularly reviewed and updated, and include a "last reviewed" date to show when it was last updated.   It is good practice to set review dates and to maintain a schedule of information due for publication – e.g. when governing body minutes are due to be added and by whom.   It is a good idea to incorporate processes for updating the GTI with your existing processes for updating and reviewing policies and procedures etc. It is very important that the information published is current and up-to-date. Where information is included in the GTI, we recommend that it should be published as soon as it is approved.

The SIC periodically reviews the MPS and accompanying guidance and when it does, we will update this guidance as required.

Your website

As the MPS recommends that the main method of publication should be via the organisation's website, it is essential that all RSLs have a website and that it should be up to date and easy to navigate. It is also a requirement under the Scottish Housing Regulator's Regulatory Framework[8] that all RSLs must have a website as it requires certain information to be made available online.   These requirements are also reflected in the *Template Guide to Information* at Appendix A.

We recommend some key characteristics of your website:

- The website address should be published and promoted on all information issued by the organisation
- Signposting on and to the website should be clear – it should be easy for people to find what they are looking for
- Websites should be just as accessible and navigable when accessed from mobile devices as from a PC

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[8] Scottish Housing Regulator (2019) Regulatory Framework, page 7 - 9

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- The website should (wherever possible) reduce barriers to use by incorporating software such as 'browse aloud' (for audio use) and a translation facility (or equivalent)
- Staff should know what is available on the website and be able to direct people to it
- There should be a separate FOI tab/link on the website homepage. The SIC guidance highlights that it is good practice to link the GTI to an FOI section on the website and to ensure that the guide to information can be easily searched on the website. This is likely to be the most significant structural change to your website that will be necessary, as most of the other content that requires to be uploaded will sit in existing sections of your website.

It is important to note that there is no requirement – nor would it be logical – to structure the content of your website around the headings in the *Template Guide to Information*. The content for each class of information does not have to be in the same place – provided the relevant link is included in the GTI. Sections in the website such as "what we do" or "key policies" may be useful in finding an appropriate spot for some of the information required. Of course, documents and publications should always appear professional in their style, content and tone but it might be that templates and house (or corporate) styles will be more rigorously applied following adoption of the MPS to ensure consistency.

For the avoidance of doubt, there is no need to post the same items in different parts of your website – links are perfectly adequate when it is necessary to include them in more than one section. Where possible, we recommend that relevant information is included in publications that are widely distributed (such as the ARC Report) – again to make it easier for people to find. For this approach to be successful, it is essential that websites are well maintained and are up to date with current information.

Table 3 below summarises some of the key elements you should aim for with your website, and some areas you should aim to avoid.

Table 1 – Website dos and don'ts

Aim to	Aim to Avoid
Make sure the website is up-to-date	Allowing the website to become out-of-date
Make sure it is easy to find things – use clear titles	Using labels that are unclear
Make sure it is easy to navigate	Making it necessary for people to know the title or location of what they're looking for
Promote use of the website by signposting to what is available in other publications (e.g. newsletter)	Jargon
Publish as much relevant information as possible (without cluttering the website)	Restructuring your website to use the headings in the Model Publication Scheme
Use plain English	
Include an FOI link/tab on the website homepage – that leads to information about how to make requests and the Guide to Information	

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Aim to	Aim to Avoid
Ensure the website has a simple to use "search" function – and that the Guide to Information is easily found using this function	

Newsletters and other regular briefings can be used to remind readers about the GTI and how to access information – and to signpost to the website where appropriate. The FOI section of your website should contain a prominent statement to the effect that you have adopted the MPS and contain a link to your GTI. Some examples of FOI sections on websites included below:

- Edinburgh Leisure FOI Section on Website
- Scottish Housing Regulator FOI Section on website

Classes of Information

In identifying the content of the *Template Guide to Information*, we have taken account of the content of both the content of the MPS and the 2016 SFHA/GWSF MPF. This means that the language used may slightly differ in places to that within the MPS – although the classes identified are broadly similar. This is with a view to making the content more user-friendly for the sector, and more user-friendly for tenants and members of the public who will ultimately use the GTI.

The *Template GTI* is divided into nine categories (or classes) of information (in line with the MPS), and then a number of sub-categories under each of these classes. Under each of these sub-categories a detailed list of the information that you should publish (where held) is provided at Appendix A. The categories, sub-categories and some key points to think about are detailed below.

Please note that two of the nine classes of information in the MPS do not apply to RSLs. We had hoped to remove these from the template to make it more user friendly, but the SIC stated that if an organisation is to be consistent with the MPS then these cannot be removed. A statement is therefore included within the Template GTI that Class 8 "Commercial Publications" and Class 9 "Our Open Data" do not apply to RSLs.

1. **About Us**

Information about the RSL – who the RSL is, where to find the RSL, how to contact the RSL, how the RSL is managed and its external relations. The information detailed in the Template GTI under this class is further divided into the following sub-categories:

- Descriptions of who we are
- Location and opening arrangements
- Information relating to Freedom of Information
- About our governing body
- About our staff

- Governance documents and corporate policies
- Relationship with regulators
- Group details
- Key partnerships

This is the most detailed class under the MPS – but most of the information included will be information that you already include on your website.   It is worth noting that the information provided about staff and governing body members will relate to their professional background only, and not to their personal lives.

2. How we deliver our functions and services

Information about the RSL's work, its strategy for delivering its functions and services; and information for its service users. In the Template GTI the information under this class is further divided into two sub-categories:

- How to use our services
- Policies and procedures

RSL functions are all performed through the services it provides – which is reflected in the way the Template GTI is laid out. Functions, and the legislation that underpins them, will be reflected in the suite of policies that we recommend are published under this class.   An RSL's overall functions will also be described in its mission statement.

There are a broad range of policies included in the Template GTI, but it could be that there are others you have in place you wish to publish.   SIC accept there may be limited cases where organisations are unable to publish information online immediately or in every case – and that this might particularly affect small organisations with a limited online presence, a small staff team, or limited technical resource. In such cases, it may be appropriate to make information available on request, but this should only be a temporary solution, and the organisation should be seeking to work towards publication online wherever possible – ideally including an intended publication date in their GTI.

In terms of procedures, you can only publish these if you have them in place.   If any of your internal procedures are in the public interest, then these should be included in your GTI. The SIC view is that all procedures that fall under this category should be published where held.

From a brief analysis of other GTIs of organisations subject to FOI, it is clear that not all internal procedures have been published in many cases – and a more proportionate approach has been used rather than publishing them all.   This has been based on an assessment of the public interest. We discussed this with the SIC, who highlighted that if they were to become aware of an organisation not publishing procedures that it has in place that fall under this class – it would regard this as a breach of the duty to publish and may take intervention action.

3. How we take decisions and what we have decided

Information about the decisions the RSL takes, how it makes decisions and how it involves others. In the Template GTI, the information under this class is further divided into the following sub-categories:

- Governing body meetings
- Consultation and participation

One of the more complex elements included under this class is the publishing board or management committee minutes/reports. This will require care to ensure that personal, business sensitive and commercially confidential information is not included. You must be careful when publishing information that is redacted (i.e. has words and paragraphs blocked out) to ensure that this does not send out the wrong message – e.g. like the RSL is "hiding something" or has a desire to conceal. When minutes or reports are published and it is necessary to obscure sections because the information is likely to be exempt from disclosure under FOISA, it is important that a brief note is added at the relevant part to say, for example, 'personal information removed' or 'commercially sensitive information'.

We suggest that a protocol is adopted that sets the parameters for the style and content of minutes Other than when providing a list of attendees, individual names (of governing body members, staff and advisers) should not normally be included and references should instead be to 'a member' or to designations in the case of staff and advisers.

The level of detail in minutes is a matter of judgement for each RSL. Minutes should be written with FOI in mind, but the key principle to keep in mind is that minutes should, in a proportionate manner, record the information required to evidence good governance. A degree of detail will sometimes be entirely appropriate, whilst always seeking to avoid the inclusion of unnecessary detail.

Information which is genuinely exempt, for example because it is commercially sensitive, can be redacted from publication, and can have the appropriate exemptions applied where it is subject to an FOI request.

It is not recommended that you publish papers/reports where the majority of the paper would have to be redacted.   It would be better under these circumstances to state that the paper could not be published and why (see "Exempt Information" p5).

4. 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). The information detailed in the Template GTI under this class is further divided into the following sub-categories:

- Information about our accounts and budgets
- Our programme of work and projects
- Our spending relating to staff and governing body

When describing your funding sources, you should include rental income and any loan funding not covered under the "project funding" category. This category relates to external funding (i.e. other than through rent or loan finance) such as development funding, Big Lottery or charitable funding; or energy efficiency funding.

When describing budget allocation, this could be in the form of a '*how we spend your rent money*' pie chart, which some landlords may already include in their Charter report, annual report or elsewhere.

When describing "capital works", this is likely to have been the subject of a paper to the governing body, and may cover a year or a longer period where specific longer term plans exist.

Under "our spending", the SIC requires that senior staff and governing body member expenses be published. These should be published from when you publish your GTI, and you should not seek to do so retrospectively unless this would be in the public interest. "Senior staff" in most organisations will only include the CEO, but you should consider the public interest of also including expenses for your senior management team (if you have one).

From a brief analysis of other GTIs produced by organisations subject to FOI, there is quite a variance in approach to the publication of expenses. Some state "available on request", and others have published for board members but not senior staff. We discussed this with the SIC, who highlighted that if they were to become aware of an organisation not publishing expenses as per the MPS or making these available on request instead of publishing – it would regard this as a breach of the duty to publish and may take intervention action.

5. How we manage our resources

Information about how the RSL manages its human, physical and information resources. The information detailed in the Template GTI under this class is further divided into the following sub-categories:

- Human resources
- Physical resources
- Information resources

It is possible that many of the policies and procedures listed in the Template GTI may be included in one place – e.g. a staff handbook. Under these circumstances you can hyperlink to this one document as appropriate.

The general description of our land and property holdings included under this class should be a general overview and not a description of each individual property.

It is also important to note that under "estate management", that this may cover the same information as is available under "capital works programme included under Class 4.

6. How we procure goods and services from external providers

Information about how the RSL procures works, goods and services, and its contracts with external providers. The information detailed in the Template GTI under this class is further divided into the following sub-categories:

- Our contractors and suppliers
- Our procurement

In terms of the register of contracts, procurement regulations state that this must contain all regulated procurement over £50k for goods and services, and all over £2m for works. However, as anything below these thresholds still need to be advertised, it is recommended practice by the Scottish Procurement Alliance (SPA) to include all contracts within the register.   Examples of registers of contracts are included below:

- Scottish Housing Regulator Register of Contracts
- Public Contracts Scotland (PCS) Example

7. How we are performing

Information about how the RSL perform as an organisation and how well it delivers its services.

For performance standards/indicators, it should be noted that such standards may often be included in individual policies. Where there are customer-related targets, for example on different categories of repairs these may be covered in the Charter Report.

Under benchmarking, information comparing the landlord's performance with that of others, where this exists, should be published only where the information about other landlords is already publicly available (e.g. Charter data) or where the other landlords have given their consent for the data to be published.

Implementing the Template Guide to Information

Whilst the *Template Guide to Information* at Appendix A is a useful tool in meeting the requirements of the MPS, there will still be a lot of work involved. Even for those organisations who have already adopted the previous SFHA/GWSF MPF from 2016, adopting the MPS is going to take organisations some time to achieve. We strongly recommend - for the most part - the adoption of a "day one" approach, where you decide when the MPS will be implemented and start to publish information from then, rather than trying to publish information retrospectively. This is about ensuring that the key information is uploaded without unnecessary delays – whilst consideration is given to publishing older information that may be in the public interest. We recommend that a senior member of staff is allocated lead responsibility for both the initial development and the ongoing maintenance and review of the GTI.   The Scottish Minister's Section 60 Code, part 2 section 1.2 provides some further guidance in this respect.

Where you have a subsidiary (ies) that is (are) also subject to FOISA, it is important to note that you will have to either a) produce and publish a separate GTI for that subsidiary; or b)

produce a "group" GTI – as in many cases much of the information included will link to the parent website and information already included in the parent's GTI, which would make producing a separate GTI a largely repetitive exercise. The provided *Template Guide to Information* at Appendix A can be adapted to fit either approach.

Here are some things to consider and some tasks to ensure are undertaken:

- Who is most appropriate to co-ordinate implementation? (We recommend that this person should lead the initial implementation)
- What is the initial process for reviewing the Template GTI, identifying potential variations and consulting with staff?
- How will you 'audit' what information is already available on your website and identify what should/could be added?
- Is your website able to accommodate your plans about adopting the GTI content?
- What is the process for adopting and publicising the GTI?
- What timescale is appropriate for your organisation to adopt (prior to 11 November)?
- How will the governing body be involved? (Governing body oversight of adoption is essential)
- Who is the primary point of contact for people seeking to access information?
- Will you make a charge for providing information in a printed format? If so, how will the charging structure be developed, agreed and publicised?
- How will you ensure that new documents/publications/information are identified as being part of your GTI? (We suggest that the drafting process you follow includes specific consideration of whether the document falls into any of the information categories in the Template GTI. Similarly, your policy review schedules and calendars should identify those documents that are included in your GTI.)

Once all of the required information has been published, RSLs must contact the Scottish Information Commissioner to confirm they meet the requirements of the MPS – using this form:

[MPS Notification Form](#)

This form must be completed and sent to: publicationschemes@itspublicknowledge.info

It is a short two-page document, that must include a link to both your website and your GTI. (You will also be required to submit a separate form and GTI for any subsidiaries you have that are subject to FOISA – unless you are submitting a group GTI).   You are only required to submit this form once unless:

- The SIC's approval of your adoption of the MPS has been revoked because it does not comply, or
- The legal status of the RSL or subsidiary changes (e.g. it merges with another RSL, or there is a change of legal name).

The SIC aim to formally respond to submissions within two weeks.   It is recommended that this form be submitted to the SIC well in advance of 11 November 2019.

Whilst the SIC will not individually review a submitted GTI, it does undertake periodic monitoring of MPS compliance. In recent years this has involved a "mystery shopping"

exercise, through which a cross-sector sample of GTIs are reviewed to determine the extent to which organisations are complying with specific aspects of the publication duty.   Also, if it is brought to the SIC's attention that an organisation is failing to publish information in accordance with the MPS, the Commissioner may take intervention action, working with an organisation to support it to meet the standards of the MPS.

Keeping Your Guide to Information Up-to-Date

Once adopted, your GTI and the information that it contains need to be maintained. Since the intended primary means of accessing the information set out in the Template GTI is via the internet, it is essential that there is clear responsibility for maintaining and updating your website. It is important that all information is up-to-date but, for certain categories of information, it is essential that information is made available within specified, reasonable timescales (which might be determined individually).   Examples of where this is likely to be especially important are in respect of governing body minutes and posting performance information such as the ARC report.

On an ongoing basis, it will also be important to monitor use of the website and to identify whether there are any gaps in the information you publish (indicated by additional requests for particular information) and the extent to which tenants and other service users' satisfaction levels about how you keep them informed are affected (as measured by the Charter indicators).

We recommend that you review your GTI annually to ensure that it continues to include all relevant information and is accessible to tenants, service users, stakeholders and any members of the public who are interested in what you do.

Once the GTI is implemented, here are some practical issues to consider:

- Who is responsible for keeping the information required in the GTI up-to-date and accessible? (If responsibility is shared, who is responsible for co-ordination?)
- What are the timescales for posting information on the website?
- Who is responsible for monitoring access activity on the website and how is this reported and used by your organisation?
- Is your information equally accessible to people who are using mobile and fixed electronic devices?
- How is information available to those without internet access?
- What is the volume of requests for printed information/information in different formats?
- Are the timescales that you operate for delivering printed information sufficiently short to ensure that people accessing information in this way are not unduly disadvantaged?
- Do you keep a record of information that was previously published?
- Is the volume of work associated with managing and maintaining your GTI reasonable and proportionate?
- After the 11 November 2019, you should also consider if any FOI requests received highlight additional information that should be published

Using the Template Guide to Information

The *Template Guide to Information* at Appendix A includes gaps for you to fill in/delete as appropriate in order for you to tailor it to fit your organisation:

- Throughout the template there are drafting notes and prompts highlighted in brackets and bold like **[this].** Please remove these or respond to the prompts as appropriate to complete.
- The Charging schedule included has been left blank in terms of the level you wish to charge. Please refer to Principle 4 of the SIC Guidance when considering the levels to set this at.
- The copyright statement included should be adapted as appropriate to your organisation
- For each piece of information outlined with the table in the section "information we make available to you" a gap is left in order for the organisation to insert hyperlinks as appropriate to where the information exists on your website.

An important principle to remember is that where you do not hold information contained the template, there is no expectation for you to create information in order to include. Under these circumstances it may be appropriate to delete reference to the information from the template and not to include it in your GTI. For instance: you may not produce or have in place a customer charter. It is legitimate to remove reference to this if that is the case, although you should include any alternative that your organisation does have in place that is close to the information asked for in the GTI – e.g. relevant service standards instead of a customer charter.

In other cases, it could be that you are in the process of developing the information, but it is not quite ready for inclusion on the website. When this is the case, it is appropriate to include a contact telephone number in advance of publishing, for anyone who wishes the information or more details about this.

Practically, it is likely that some elements required in the template will not be in place prior to your submission to the SIC – as some of these relate to arrangements for making FOI requests/FOI policies etc. These are not likely to be live on your website until the 11 November 2019 – and a statement can be included to this effect in your GTI that it will be updated once FOISA "goes live".

It is also important to note, the Template GTI represents the minimum that you should publish in order to meet the FOISA requirement to publish information. It is possible that you might hold other information that would be in the public interest that is not included in the template, and these should be added to your GTI.

Open All Hours – A Template Guide to Information for Registered Social Landlords

Appendix A

Template Guide to Information

August 2019

www.sfha.co.uk

sfha
**Scottish Federation of
Housing Associations**

We are housing Scotland

Glasgow and West of Scotland
Forum of Housing Associations

GWSF

[INSERT ORGANSIATION NAME] GUIDE TO INFORMATION

LAST REVIEWED: [INSERT DATE]

At a glance – terms used in this document

Term Used	Explanation
FOISA	Freedom of Information (Scotland) Act 2002 *Places a duty on those organisations covered to proactively publish certain types of information; and to respond to requests for information; and to provide advice and assistance to those making requests for information.*
EIRs	Environmental Information Regulations (Scotland) 2004 *Those organisations covered by EIRs have a duty to respond to requests for environmental information*
SIC	The Scottish Information Commissioner *Who is responsible for ensuring that those bodies covered by FOISA and EIRs comply with the terms of the legislation.*
MPS	Model Publication Scheme *Produced by the SIC – this details all of the information that those subject to FOISA should publish (if they hold it)*
Guide to Information	*A guide that all organisations subject to FOISA and adopting the MPS must produce to help people access the information it makes available*
Classes of Information	*Nine broad categories describing the types of information authorities should publish (if they hold it).*

Background

The Freedom of Information (Scotland) Act 2002 (FOISA) requires that all housing associations/co-operatives in Scotland must produce and maintain a publication scheme. This must detail all of the key information that we publish and how you can access it. This Guide to Information is our publication scheme, and contains links to where you can find all of the information listed online.

[INSERT ORGANISATION NAME] has adopted the Scottish Information Commissioner's (SIC) Model Publication Scheme (MPS), and this Guide has been approved by the SIC.

Formats other than online

All of the information listed is available on our website (unless stated), and completely free to access online. However, we understand that not everyone will have online access and where this is the case you can contact us to view this in our office (where this would be convenient).

If you would like a printed copy of any of the information listed, unfortunately we may have to charge a small fee to provide this. This fee will never exceed the cost of photocopying and postage – and we will let you know any total cost before we forward this to you.

Our charges for providing any information detailed in this guide are summarised below:

Format	Charge
Online	Free
View at our office	Free
Print in black and white	XXp per A4 sheet
Print in colour	XXp per A4 sheet
CD Rom	£X
Posted document/CD Rom	Cost of postage incurred

If you would like to request information that we publish in a format other than online, or arrange a visit to our office to view information, please contact:

[INSERT CONTACT DETAILS]

Information that we cannot publish

Whilst we will try to make all of the information we have detailed available, in rare cases there may be some information that we cannot make available. For example, sometimes if we were to publish certain **[committee/board]** minutes, it could reveal personal details about an individual. This would be a breach of Data Protection legislation if we were to do so. When this is the case, we will remove any personal details before publication and highlight where and why we have done so.

For how long will information be published?

We aim, where possible, to publish information for at least the current and previous two financial years. When we review any document – e.g. our policies – to avoid confusion we will only publish the current version once it has been updated.

Copyright and re-use

Where we hold the copyright on our published information, the information may be copied or reproduced without formal permission, provided that:

- It is copied accurately
- It is not used in a misleading context
- The source of the material is identified

Contact us

If you have any queries about anything contained within this Guide to Information, or if there is some information that you cannot find that you would like to access, please contact:

[INSERT ADDRESS]

[INSERT E-MAIL ADDRESS]

[INSERT TELEPHONE NUMBER]

The Information that we make available to you

Under the MPS, the information we provide must be listed under certain "classes" of information.   These are the categories of information that are detailed below.   As FOI applies to other bodies and sectors across Scotland – such as Scottish Government and Councils for example –this means that not all of the categories in the MPS apply to housing associations/co-operatives.[9]

The details of all the information we hold under each of the classes that apply to our organisation, and hyperlinks to access this information when available online, are outlined below.

Information	Where to access [INSERT HYPERLINKS BELOW TO DOCUMENTS/RELEVANT SECTIONS OF WEBSITE AS APPROPRIATE]
Class 1 - About [INSERT ORGANISATION NAME] *Information about [INSERT ORGANISATION NAME], who we are, where to find us, how to contact us, how we are managed and our external relations.*	
Descriptions of who we are	
Mission Statement	
Vision	
Values	
Corporate Objectives	
Area(s) of operation	
Key activities; strategic/corporate plan(s)	
Business Plan (or summary)	
Customer Code/Charter **[DELETE IF YOU DO NOT HAVE SOMETHING SIMILAR IN PLACE]**	
Location and opening arrangements	
Address	
Telephone number and e-mail address for general enquiries (and dedicated lines where appropriate)	
opening times	
General contact arrangements	
local/area office contact details	
Contact details for making a complaint	
Information relating to Freedom of Information	
Publication Scheme and Guide to Information	THIS DOCUMENT
Charging Schedule for Published Information	THIS DOCUMENT (See Page X)
Contact details and advice on making an FOI request	AVAILABLE FROM NOVEMBER 2019

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[9] *In the MPS Class 8: Commercial Publications and Class 9: Our Open Data do not apply to RSLs.*

Information	Where to access [INSERT HYPERLINKS BELOW TO DOCUMENTS/RELEVANT SECTIONS OF WEBSITE AS APPROPRIATE]
Freedom of Information policies and procedures	AVAILABLE FROM 11 NOVEMBER 2019
Charging Schedule for environmental information provided in response to requests made under EIRs	
About our Governing Body	
List of Governing Body Members • Names • when they became a governing body member • Professional biographical details • office-bearing responsibilities • when they became an office-bearer	
Description of the role of the Governing Body • governance structure chart (including sub-committees and working groups); • remits for governing body and any sub-committees	
How to become part of the governing body	
About our staff	
List of senior management team, including professional biography and contact details	
Organisational structure	
Governance Documents and Corporate Policies	
Rules/Articles	
Standing Orders	
Membership Policy	
Code of Conduct for Staff	
Code of Conduct for Governing Body Members	
Entitlements Payments and Benefits Policy (or equivalent, including arrangements for payments for expenses and subsistence)	
Register of Interests	
Equalities Policy	
Health and Safety Policy	
Sustainability Policy	

Information	Where to access [INSERT HYPERLINKS BELOW TO DOCUMENTS/RELEVANT SECTIONS OF WEBSITE AS APPROPRIATE]
Relationship with Regulators	
Engagement plan with Scottish Housing Regulator	
Assurance Statement	AVAILABLE FROM OCTOBER 2019
Annual Return on Charter Submission to SHR	
Financial Returns to SHR	
Charter report to tenants	
Internal and External Audit arrangements	
Group Details	
Details of our subsidiaries/parent organisation **[DELETE AS APPROPRIATE OR IF NOT APPLICABLE]**	
Key Partnerships	
Strategic agreements with other organisations	
Class 2 – How we deliver our functions and services *Information about our work, our strategy and policies for delivering services and information for our service users.*	
How to use our services	
List of services provided	
How to report a repair	
Right to Repair information	
How to apply for a house	
How to get information about tenancy support	
How to make a complaint	
How to speak to a housing officer	
How we consult with tenants and other customers to inform and improve service delivery and develop new services	
Policies and Procedures	
Allocations Policy	
Adaptations Policy	
Anti-Social Behaviour Policy	

Information	Where to access [INSERT HYPERLINKS BELOW TO DOCUMENTS/RELEVANT SECTIONS OF WEBSITE AS APPROPRIATE]
Asbestos Management Policy	
Arrears Management Policy	
Asset Management Policy (including stock condition information)	
Customer Care Policy	
Data Protection Policy	
Environmental Information Regulations Policy (EIR) **[DELETE IF COMBINDED WITH FOI POLICY]**	
Equality and Diversity Policy	
Estate Management Policy	
Health and Safety Policy and procedures	
Legionnaires Inspection/Prevention Policy	
Procurement Policy	
Risk Management Policy	
Rent Setting Policy	
Repairs Policy	
Sustainability Policy	
Tenant Engagement Policy	
Tenancy Sustainment Policy	
Internal procedures relating to above (where available)	
Class 3 – How we take decisions and what we have decided *Information about the decisions we take, how we make decisions and how we involve others.*	
Governing Body Meetings	
Governing body meeting minutes	
Governing body meeting reports/papers	
Governing body agendas	
Consultation and Participation	

Information	Where to access [INSERT HYPERLINKS BELOW TO DOCUMENTS/RELEVANT SECTIONS OF WEBSITE AS APPROPRIATE]
Tenant Participation Strategy	
Consultation reports noting the outcome of any recent consultations with tenants/others	
Tenant Scrutiny Panel composition **[DELETE IF NOT APPLICABLE]**	
Registered Tenant Organisations **[DELETE IF NOT APPLICABLE]**	
Class 4 – 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).*	
Information about our accounts and budgets	
Description of funding sources	
Audited accounts	
Budget policies and procedures	
Budget allocation to key service areas	
Our programme of work and projects	
Brief details of any project funding and how it's being spent	
Capital works programme/plans information (annual programme figure)	
Spending relating to Staff and Governing Body	
Expenses policies and procedures	
Senior staff/governing body member expenses at category level e.g. travel, subsistence and accommodation	
Board member remuneration other than expenses	
Pay and grading structure (levels of pay rather than individual salaries)	
General information about staff pension scheme	
Class 5 – How we manage our resources Information about how we manage our human, physical and information resources	
Human resources	
Strategy and management of human resources	
Staffing structure	

Information	Where to access [INSERT HYPERLINKS BELOW TO DOCUMENTS/RELEVANT SECTIONS OF WEBSITE AS APPROPRIATE]
Human resources policies, covering: • recruitment • performance management • salary and grading • promotion • pensions • discipline • grievance • staff development • Maintenance and retention of staff records	
Internal procedures relating to the above (where available)	
Trade Union information	
Summary of professional organisations/trade bodies of which we are a member	
Physical Resources	
Management of our land and property assets, including environmental/sustainability reports	
General description of our land and property holdings	
Estate development plans	
Information Resources	
Records management policy and records management plan, including records retention schedule	
Data protection or privacy policy	
Class 6 - How we procure goods and services from external providers Information about how we procure works, goods and services, and our contracts with external providers.	

Information	Where to access [INSERT HYPERLINKS BELOW TO DOCUMENTS/RELEVANT SECTIONS OF WEBSITE AS APPROPRIATE]
Our Contractors and suppliers	
Information about our key service delivery contractors who carry out: • responsive repairs • landscape maintenance • planned/cyclical maintenance	
List of suppliers and contractors used by organisation (provided to staff under our Entitlements Payments and Benefits Policy)	
Information about regulated procurement contracts awarded (value, scope, duration)	
Our Procurement	
Procurement Policy and procedures	
Information on how to tender for work and invitations to tender	
Register of contracts awarded which have gone through formal tendering, including name of supplier, period of contract and value	
Links to procurement information we publish on Public Contracts Scotland website	
Framework Agreements	
Class 7 – How we are performing Information about how we perform as an organisation, and how well we deliver our functions and services	
Annual Report	
ARC report to tenants	
Performance Standards/indicators	
Benchmarking information	
Complaints policy, guidance and forms	
Complaints reports or equivalent to show how complaints are handled and influence service delivery (aggregate reports rather than individual outcomes).	
Tenant scrutiny reports **[DELETE IF NOT APPLICABLE]**	
Class 8 – 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*	
This class does not apply to **[INSERT ORGNISATION NAME]** as we do not produce any publications for sale.	Not applicable

Information	Where to access [INSERT HYPERLINKS BELOW TO DOCUMENTS/RELEVANT SECTIONS OF WEBSITE AS APPROPRIATE]
Class 9 – Our open data Open data made available by us under the Scottish Government's Open Data Resource Pack and available under open licence.	
This class does not apply to **[INSERT ORGANISATION NAME]**	Not applicable

Appendix B

Key Differences Between MPF and MPS

August 2019

www.sfha.co.uk

sfha
Scottish Federation of Housing Associations

We are housing Scotland

GWSF

Glasgow and West of Scotland
Forum of Housing Associations

Key Differences Between MPF and MPS

SFHA/GWSF Model Publication Framework (MPF) Information Categories (7)	SIC Model Publication Scheme (MPS) Classes of Information (9)	Key Differences
About Us: Who we are and what we do	Class 1: 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	Whilst similar, the suggested content in the MPS is more detailed in this regard. However, the majority of additional content in the MPS is included elsewhere in the MPF under different categories – such as *How key decisions are made.* One key difference is that that the MPS states that the Register of Interests should be published on the website, when the 2016 Framework recommended having this available for inspection. The MPS also asks for a Publication Scheme/Guide to Information along with charging schedules for published information under FOISA and EIRs.
How we provide services	Class 2: How we deliver our functions and services Information about our work, our strategy for delivering functions and services and information for our services users	The MPS makes a distinction between functions and services and asks for the statutory basis of these to be stated. It is under this class that the majority of policies listed under the "*key policies*" section of the MPF would be included. The MPS also refers to internal procedures.
How key decisions are made	Class 3: How we take decisions and what we have decided Information about the decisions we take, how we make decisions and how we involve others	Much of what is listed under "*how key decisions are made*" in the MPF (e.g. governance structure, standing orders, business plan) is included under Class 1 in the MPS (*About the Authority).* One of the key differences is that whereas the MPF recommended the publishing of a "decisions taken"

SFHA/GWSF Model Publication Framework (MPF) Information Categories (7)	SIC Model Publication Scheme (MPS) Classes of Information (9)	Key Differences
		note of governing body meetings, the MPS requires that minutes are published. It also requires the publication of governing body meeting agendas and reports.
Where the money comes from and how it's spent	Class 4: 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)	The main difference is that the MPS requires more detailed information about budgeting policies and procedures. The MPS also refers to expenses for senior staff.
N/A	Class 5: How we manage our human, physical and information resources Information about how we manage the human, physical and information resources of the authority	There was no corresponding category of information for this class within the MPF. The MPF recommended that websites should carry a general statement that indicates the range of policies that are available on request/for inspection, in addition to those available directly from the website. The MPS however, is more explicit in stating that HR policies and procedures should be published.
Who we work with, including the contracts that we have awarded under procurement legislation (i.e. regulated procurements) and our approved list of contractors	Class 6: How we procure goods and services from external providers Information about how we procure works, goods and services and our contacts with external providers	The MPS specifies that a register of contracts awarded which have gone through formal tendering, including name of supplier, period of contract and value should be published. The MPS also recommends that procurement policies and procedures should be published, whilst the MPF only recommended that the policy be published.

SFHA/GWSF Model Publication Framework (MPF) Information Categories (7)	SIC Model Publication Scheme (MPS) Classes of Information (9)	Key Differences
Our Standards: How we measure and report performance	Class 7: How we are performing Information about how we perform as an organisation, and how well we deliver our functions and services	The MPS specifies some specific legislative requirements that do not in all cases apply to RSLs.
N/A	Class 8: Our commercial publications (i.e. information available for sale) Information packaged and made available for sale on a commercial basis	This category does not apply to RSLs.
N/A	Class 9: Our open data Open data made available by the authority as described by the Scottish Government's Open Data Resource Pack and available under an open license.	This category does not apply to RSLs.
Key policies	N/A	There is no key policies section in the MPS, and instead policies will fit under the relevant Class of information – most commonly "*how we deliver our functions and services*". A key difference within the MPS is that in most cases, it states that procedures should also be published when publishing policies.

Appendix C

Different Charging Schedules within Edinburgh Leisure's Guide to Information

August 2019

Summary of different Charging Schedules from Edinburgh Leisure's Guide to Information

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 or at our premises. We may charge for providing information to you, but we will charge you no more than it costs us to do so. We will always tell you what the cost is before providing the information to you. Our photocopying charge per side of paper is shown in the tables below:

Black and White Photocopying

Size of Paper	Pence per sheet
A4	10p
A3	20p

Colour Photocopying

Size of Paper	Pence per sheet
A4	20p
A3	40p

Alternative Formats

Format	Charge
Computer Discs	50p

Postage Costs

Postage costs may be recharged at the rate we paid to send the information to you. Our charge is for 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 on any other costs to you in relation to our published information.

Charges for information which is not available under the scheme

If you submit a request to us for information which 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 which 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. 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

- We are not obliged to respond 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, nor 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 FOISA.

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 e.g. photocopying and postage.

If 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 based on the actual cost to Edinburgh Leisure of providing the information:

- Photocopying is charged at 10p per A4 sheet for black and white copying, 20p 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 to a maximum of £15 per person per hour.

The first £100 worth of information will be provided to you without charge.

Where information costs between £100 and £600 to provide, you will be asked to pay 10% of the cost. 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.

Where it would cost more than £600 to provide the information to you, however, we will ask you to pay the full cost of providing the information, with no waiver for any portion of the cost.

Charges for requesting for your own personal data

There is no charge for requesting your own personal data under the General Data Protection Regulation (GDPR) Subject Access Request. We must provide a copy of the information free of charge.

However, we can charge a 'reasonable fee' when a request is manifestly unfounded or excessive, particularly if it is repetitive. We may also charge a reasonable fee to comply with requests for further copies of the same information. This does not mean that we can charge for all subsequent access requests. The fee must be based on the administrative cost of providing the information.

Further information on GDPR can be found on the Information Commissioner's Office website. Click here to access.