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Interim Group Manager – FOI Casework
Information Commissioner’s Office
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Updated FOI Action Plan

I am contacting you to provide an update on our action plan following the practice recommendation issued to us on the 15th October 2020 regarding compliance with the Freedom of Information Code of Practice.

It has been helpful in focusing our approach and I am grateful that the Commissioner’s analysis has identified the continuing trend of improvement in our compliance with section 4.1 of the Code and 10(1) of the FOIA following our self-reporting in July 2018.

Since our initial action plan was submitted to the ICO in January 2020, we have invested in Supervision within the unit by recruiting a Police Sergeant and a Records Manager. Additionally six police officers and an Inspector are temporarily attached to the unit to stabilise the workflows and support the current team ahead of the recruitment of 4.8 additional permanent posts (appendix A).

In an emergency call **999**
For non emergencies call **101**



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All new staff will receive initial in-house training in Data Protection and Freedom of Information and Subject Access work. Further specialised training will be sourced (when available) for all staff via the programmes developed by the College of Policing. It is our goal that all staff within the unit will gain better knowledge of all work streams and become multi-skilled. Their omni-competence will build in resilience to the unit for both planned and unplanned abstractions and provide resilience for all the individual work streams should demand increase unexpectedly in any area.

We have commenced work on upgrading the unit's information and disclosure management system. This will enhance our capabilities further, as the newer system enables better tracking and management of information requests from their receipt through to completion, in accordance with the Freedom of Information Act and Data Protection Act.

The system also has auditing capabilities and will enable us to perform easier statistical analysis and real time management reporting. It will deliver a tasking functionality and allow us to better understand any additional opportunities for improvements across the organisation and improve our ability to readily access information required in a more timely fashion.

In an effort to manage demand we have published completed FOI responses on our website. To date this does not seem to have had a significant impact on demand, however we will continue to look for new opportunities and themes to share with the public.

Since receiving the practice recommendation in October 2020, we have written to 104 requestors who had overdue Freedom of Information Request's, 38 of those requestors stated that they still required the information and therefore these will be progressed accordingly. As a result of this activity we closed 66 outstanding aged requests, and of those initially written to only 26 overdue requests remain. These have been prioritised for action, with the anticipation that by the end of February 2021 none of these requests will remain outstanding.

The staffing uplift as described above should assist us in keeping any further overdue requests to a minimum and help us achieve the targeted in time compliance rates as set by the ICO. It is our intention to achieve an 'in time' compliance rate of between 75-80% by the end of April 2021, and 90%+ by the end of June 2021.

We are committed to identifying continued opportunities for improvement, and through weekly performance monitoring we will be able to assess the anticipated compliance milestones and continue to update you as to our progress.

Based on the above actions and wider ICO compliance work, we will also continue to review the capabilities of the unit against other competing demands to assess if we can invest in additional technology, or systems, that will yield further improvements.

We have completed the Commissioners FOI self-assessment toolkit, and this is attached (appendix B).

In compliance with the practice recommendation we have published this plan on our force website, along with our information access request statistics in accordance with part 8.5 of the code. (appendix C & Infographic). As recommended, these include the number of requests that have not been processed, and the number where the processing took longer than the statutory deadline. We have also linked this to the vacancies we are advertising.

If you require any further information please do not hesitate to contact me.

Yours Sincerely



Simon Nickless
Deputy Chief Constable

Appendices

A-Structure Chart



Information Unit
November 2020 and I

B- Self Assessment Toolkit



Copy of
foi-final-action-report

C- Stats/ Infographic



Suggested FOI Force
Website Stats.xlsx



Suggested FOI
Infographic for force \