

For Information	
Public/Non Public*	
Report to:	Audit and Scrutiny Panel
Date of Meeting:	24th February 2021
Report of:	Force Report on Monitoring, Review and Assurance of the Publication Scheme 2019/2020
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Agenda Item:	15

*If Non Public, please state under which category number from the guidance in the space provided.

Force Report on Monitoring, Review and Assurance of the Publication Scheme end of calendar year 2020

1. Purpose of the Report

- 1.1 The Freedom of Information Act requires every public authority to have a publication scheme, approved by the Information Commissioner's Office (ICO), and to publish information covered by the scheme.
- 1.2 The ICO has published a "Definition document for police forces" - **Appendix A** This guidance is for those police forces which are strategically managed by a Police and Crime Commissioner (PCC) or Police Board. It gives examples of the kinds of information that the ICO would expect them to provide in order to meet their commitments under the model publication scheme.
- 1.3 **Appendix B** shows the local position in compliance with the ICO definition document
- 1.4 **Appendix C** shows an analysis of the themes of requests received via Freedom of Information in 2020
- 1.5 The guidance also states that where information is readily and publicly available from an external website (such as that of a PCC or Police Board) to which the police force has already provided it – the police force must provide a direct link to that information.
- 1.6 The guidance is not meant to give an exhaustive list of everything that should be covered by a publication scheme. The legal commitment is to the model publication scheme, and forces should look to provide as much information as possible on a routine basis
- 1.7 The purpose of this report is to update the Audit & Scrutiny Meeting on the current Force position on the Publication Scheme requirements as listed within the definition document.

2. Recommendations

- 2.1 The Audit & Scrutiny Meeting is asked to note the contents of this paper

3. Reasons for Recommendations

- 3.1 To provide awareness of the current position of Nottinghamshire Police in terms of the Publication Scheme requirements

4. Summary of Key Points (this should include background information and options appraisal if applicable)

- 4.1 In reviewing our Publication Scheme, we are required to have regard to the public interest in:
- allowing public access to information we hold; and
 - to the publication of reasons for the decisions we make.
- 4.2 Our publication scheme provides the information as detailed in the ICO definition document by:
- setting out the classes of information which we publish or intend to publish;
 - saying how we will publish the information in each class; and
 - saying if we will provide the information free or charge for it.
- 4.3 The purpose of our Publication Scheme is to let the public know what information is “readily available” from Nottinghamshire Police. By readily available we mean that the information is available on our website, can be obtained from us upon request by letter, e-mail or telephone call, can be purchased from us or can be found in a local library.
- 4.4 Our Publication Scheme sets out the classes or types of information we publish or intend to publish, sets out the list of publications we make available, how they can be obtained and whether they are free or if a charge is payable.
- 4.5 Classes of information:
- Who we are and what we do.
 - What we spend and how we spend it.
 - What our priorities are and how are we doing.
 - How we make decisions.
 - Our policies and procedures.
 - Lists and Registers.
 - Services we offer.

We aim to publish as much information as possible about our work through the scheme, except where it would not be in the public interest to do so, for example, because it might prejudice law enforcement or the health and safety of our staff, or our ability to secure best value from local policing because information is commercially sensitive.

4.6 Force Website Traffic:

The numbers below are for 2020 and represent only the page itself, not other pages that come under the 'umbrella' of those sections, which is why they may look lower than those reported in 2019.

Website area	Number of page views (2020)
Your area	72,996
News and Appeals	News: 771,915 Appeals: 27,697
Advice	17,545
Contact	96,356
Careers	148,544
About	9,656
Information	9,670
Data Protection	1,847
Freedom of Information	1,363

Appendix C shows an analysis of the themes of requests received via Freedom of Information in 2020. This shows that, by far, the majority of Freedom of Information requests received in 2020 remains as information pertaining to crime statistics. The next most popular category of request related to 'Organisation & Resources'.

4.7 Improvements made & planned since last year's report:

- We have restarted the routine publication of FOI responses that was temporarily suspended in 2018 due to demand and available resources. We started with the publication of the most recent responses and have almost completed the upload of the rest of the 2020 responses; we will continue to publish 2019 responses to ensure that 2 years' worth are available.
- We continue to work with Information Asset Owners to identify any information which is regularly requested and could be routinely published on the internet or if published elsewhere, relevant links updated on website

- We are working with Corporate Development to ensure that once the resources are available relevant Policy and procedure documents can be updated as a matter of routine and latest versions published to website
- We continue to work with Corporate Communications to ensure that any out of date links or documents are routinely removed from the website.

5 Financial Implications and Budget Provision

5.1 None

6 Human Resources Implications

6.1 None

7 Equality Implications

7.1 None

8 Risk Management

8.1 None

9 Policy Implications and links to the Police and Crime Plan Priorities

9.1 None

10 Changes in Legislation or other Legal Considerations

10.1 None

11 Details of outcome of consultation

11.7 No consultation took place when preparing this report

12. Appendices

12.1 **Appendix A:** ICO Publication Scheme – Definition document for Police Forces.

12.2 **Appendix B:** shows the local position in compliance with the ICO definition document

12.3 **Appendix C:** FOI requests received by theme 2020

13. Background Papers (relevant for Police and Crime Panel Only)

13. None

NB See guidance on public access to meetings and information about meetings for guidance on non-public information and confidential information.

Freedom of Information Act 2000

Definition document for Police Authorities and the Northern Ireland Policing Board

This guidance gives examples of the kinds of information that we would expect Police Authorities and the Northern Ireland Policing Board to provide in order to meet their commitments under the model publication scheme.

We would expect these bodies to make the information in this definition document available unless:

- they do not hold the information;
- the information is exempt under one of the FOIA exemptions or Environmental Information Regulations (EIR) exceptions, or its release is prohibited under another statute;
- the information is readily and publicly available from an external website; such information may have been provided either by the Police Authority/Board or on its behalf. The Police Authority/Board must provide a direct link to that information;
- the information is archived, out of date or otherwise inaccessible; or,
- it would be impractical or resource-intensive to prepare the material for routine release.

The guidance is not meant to give an exhaustive list of everything that should be covered in a publication scheme. The legal commitment is to the model publication scheme, and public authorities should look to provide as much information as possible on a routine basis.

Publishing datasets for re-use

Public authorities must publish under their publication scheme any dataset they hold that has been requested, together with any updated versions, unless they are satisfied that it is not appropriate to do so. So far as reasonably practicable, they must publish it in an electronic form that is capable of re-use.

If the dataset or any part of it is a relevant copyright work and the public authority is the only owner, the public authority must make it available for re-use under the terms of a specified licence. Datasets in which the Crown owns the copyright or the database rights are not relevant copyright works.

The Datasets Code of Practice recommends that public authorities make datasets available for re-use under the [Open Government Licence](#).

The term 'dataset' is defined in section 11(5) of FOIA. The terms 'relevant copyright work' and 'specified licence' are defined in section 19(8) of FOIA. The ICO has published [guidance](#) on the dataset provisions in FOIA. This explains what is meant by "not appropriate" and "capable of re-use".

Who we are and what we do

Organisational information, structures, locations and contacts.

We would normally expect information in this class to be for the current year only

- **Structure of the Authority or Board**

Names of members of the Police Authority or Board and any council or other body represented. Any sub-committee structure.

- **Staff structure of the Authority or Board**

Basic staff structure or other details indicating the Police Authority's or Board's administrative support.

- **Contact information**

Police Authority or Board contact details, preferably by reference to name.

- **Geographical area of operation**
- **General outline of responsibilities**
- **Appointment of independent custody visitors**
- **In Northern Ireland the appointment and role of**

Independent Community Observers

- **In Northern Ireland the role of the Board in relation to Policing and Community Safety Partnerships**
- **Relationships with other bodies**

Collaboration agreements, or other joint arrangements, with statutory and non-statutory partners.

What we spend and how we spend it

Financial information relating to projected and actual income and expenditure, procurement, contracts and financial audit.

We would expect as a minimum that financial information for the current and previous two financial years should be available.

- **Summary of revenue budget estimates of the Authority or Board itself**
- **Annual statement of the Authority's or Board's accounts**
- **Budget set for the Police Force or Police Service**
- **Policing precept and/or information on other sources of income, including grants**
- **Annual investment strategy or other details of resource expenditure**
- **Expenditure**

Details of items of expenditure over £500, including costs, supplier and transaction information (monthly).

- **Details of contracts currently being tendered**
- **Contracts**

We would normally only expect the Police Authority or Board to publish contracts and invitations to tender that exceed £10,000. A list of contracts under £10,000 should also be published.

- **Expenses and allowances paid to or incurred by Authority or Board members and senior employed staff**

Details of the allowances and expenses that can be claimed or incurred. It should include the total of the allowances and expenses incurred by or paid to individual senior staff and authority or board members by reference to categories. These categories should be produced in line with the public authority's policies, practices and procedures and will be under headings like travel, subsistence and accommodation. For the purpose of this document, "senior staff" means staff whose basic actual salary is at least £58,200 per

annum.

- **Pay and grading structure**

This may be provided as part of the Police Authority or Board structure and should, as a minimum, include senior staff salaries. The salaries should be stated in bands of £5,000. For those earning less than £58,200 per annum, levels of pay should be identified by salary range.

The 'pay multiple' – the ratio between the highest paid salary and the median average salary of the whole of the workforce.

- **Annual audit letter**
- **Financial audit reports**
- **Internal financial regulations and delegated authority**

What our priorities are and how we are doing

Strategies and plans, performance indicators, audits, inspections and reviews.

We would expect information in this class to be available at least for the current and previous two years.

- **Annual report**
- **Strategic plan or local policing objectives set for the Police Force or Police Service**
- **Reports presented to the Police Authority or Board indicating service provision, performance assessments, operational assessments**
- **Reports by external inspectors**
- **Information on the performance of the Police Authority or Board**
- **Statistical information provided to the Police Authority or Board**

How we make decisions

Decision making processes and records of decisions.

We would expect information in this class to be available at least for the current and previous two years.

- **Schedule of meetings open to the public**
- **Agendas and approved minutes of the Authority (Board) and Authority (Board) sub-committees**
- **Background papers for meetings open to the public**
- **Records of important decisions**

- **Procedures, facts and analyses of facts used for decision making**
- **Public consultations**

Details of consultation exercises, with access to the consultation papers. The results and outcomes of public policing consultation exercises and surveys.

Our policies and procedures

Current written protocols, policies and procedures for delivering our services and responsibilities.

We would normally expect information in this class to be for the current year only.

- **Policies and procedures for the conduct of the Police Authority's or Board's business**

Standing Orders, delegated powers, corporate governance, code of conduct, memoranda of understanding and similar information.

- **Policies and procedures for the provision of services**

This will include any policies and procedures for handling requests for information.

- **Policies and procedures about the employment of staff**

Where the public authority employs its own staff, details of the policies in place, or where staff are employed through another body, reference to the policies of that body. If vacancies are advertised as part of recruitment policies, details of current vacancies will be readily available.

N.B. Where public authorities have written policies and procedures falling within the above three categories, there should be ready access to them. A number of policies, for example equality and diversity, health and safety and conduct, will cover both the provision of services and the employment of staff. If an authority has an Equality Scheme, this should be made available. A policy for outside business interests of senior employees and staff would be both a policy for the conduct of business and an employment policy.

Where procedures are developed in combination with other public authorities, these should also be available.

- **Customer service**

Standards for providing services to the authority's customers, including complaints procedures. This will include procedures for handling/overseeing complaints against the police force or service as well as complaints against the police authority or board. Complaints procedures will include those covering requests for information and operating the publication scheme.

- **Records management and personal data policies**

This will include information security policies, records retention, destruction and archive policies, fileplans (or any other Business Classification Scheme used for the management of information) and data protection (including data sharing) policies.

- **Charging regimes and policies**

Details of any statutory charging regimes should be provided. Charging policies should include charges made for information routinely published. They should clearly state what costs are to be recovered, the basis on which they are made, and how they are calculated.

If the public authority charges a fee for licensing the re-use of datasets, it should state in its guide to information how this is calculated and whether the charge is made under the Re-use Fees Regulations or under other legislation. It cannot charge a re-use fee if it makes the datasets available for re-use under the Open Government Licence.

Lists and registers

We expect this to be information contained only in currently maintained lists and registers.

- **Any information we are legally required to hold in publicly available registers**
- **Asset register**

We would not expect a public authority to publish all details from all asset registers. We would, however, expect the location of public land and building assets and key attribute information that is normally recorded on an asset register to be available along with some other information from capital asset registers.

- **Information asset register**

If a public authority has prepared an information asset register, it should publish the contents.

- **Register of members' interests**
- **Register of gifts and hospitality provided to members and senior personnel**

This should include details of gifts, given or received, and details of any hospitality afforded and by which organisation. Gifts and hospitality declined should also be included.

- **Disclosure log**

Where an information disclosure log is produced indicating the information that has been provided in response to FOI requests it should be readily available. Disclosure logs are themselves recommended as good practice.

The services we offer

Information about the services we offer, including leaflets, guidance and newsletters.

- **Information about the provision of the Authority's or Board's services**
- **Leaflets and explanatory booklets**
- **Media releases**
- **Services for which the authority is entitled to recover a fee, together with those fees**

NOTTINGHAMSHIRE POLICE – LOCAL COMPLIANCE POSITION IN RELATION TO THE ICO DEFINITION DOCUMENT – JAN 2021

Who we are and what we do: Organisational information, structures, locations and contacts			
Requirement	Published	Responsible Department	Comments / Actions
Force structure	YES	People Services	New Force structure published as a news article and is still available online; it will be built into the core website content.
Profiles of COT team	YES	Chief Officer Team	CC/DCC/ACC profiles published
Identities of senior staff	TO BE PUBLISHED	Heads of Departments	Not currently published – details of relevant senior staff will be published in due course
Locations and contact details of police stations and opening hours	YES	Estates	Published on the Police Stations web page
Arrangements for Special Constables and civilian volunteers	YES		Published under the 'Careers' section
Relationships with other authorities	YES		Published under 'Our Partners' section
Sponsorship with Businesses	YES	Finance	Published under 'Doing business with us'
What we spend and how we spend it: Financial information relating to projected and actual income and expenditure, procurement, contracts and financial audit			
Annual statement of accounts	YES	OPCC	Published under 'What we spend'
Force budget (as agreed by PCC or Police Board)	TO BE LINKED TO PCC WEBSITE	OPCC	Budget report available on PCC website
Expenditure	YES	Finance	Published under 'What we spend' and 'Access to Information – Finance'
Details of contracts: Expectation that the force will publish contracts and invitations to tender that exceed £10,000. A list of contracts under £10,000 should also be published to include value, identity of the parties and purpose of the contract.	YES	MINT/ Finance	Published under 'Doing business with us' - Contracts over £25,000 - current contracts awarded for Nottinghamshire Police are available to view by accessing the online Blue Light Procurement database
Expenses paid to or incurred by the Chief Officer, Deputy and Assistant Chief Constables or Commissioners	YES	Finance	Included in 'What we spend'
Pay and grading structure	TO BE PUBLISHED	Finance / Payroll	Not currently published – relevant details will be published in due course
Evaluation of police use of resources	YES		Audits and Inspection reports are published
Support for the provision of Community Support Officers	YES		Details on PCSO role published under 'Careers'
What our priorities are and how we are doing -Strategies and plans, performance indicators, audits, inspections and reviews.			

NOTTINGHAMSHIRE POLICE – LOCAL COMPLIANCE POSITION IN RELATION TO THE ICO DEFINITION DOCUMENT – JAN 2021

*ICO expects as a minimum that information for the current and previous two financial years should be available.			
Strategic plans	YES		Our Priority plan
Annual Policing plans	YES	OPCC	Police & Crime Plan 2018 - 2021
Area Policing plans	YES	Neighbourhood Policing	Although not an area plan – relevant information is available via the ‘Your area’ section
Chief Officers Annual Report	YES	OPCC	Annual Reports available via PCC website
Police Performance Assessments	YES	Corporate Services	Audits and Inspection reports are published
Police Force statistics -This will include crime statistics published on the www.police.uk website.	YES	Corporate Services	Published under ‘Find out how we are performing’ Also signpost to police.uk on each neighbourhood page
Neighbourhood Policing arrangements	YES	Neighbourhood Policing	Your area covers local neighbourhood inspector details, police station and contact details as well as access to social media comments from local team
How we make decisions - Decision making processes and records of decisions.			
Agenda and minutes for the senior decision making committee	YES		Relevant Strategic Meetings with Force representation are published on the PCC website.
Feedback from public consultation and surveys	TO BE LINKED TO PCC WEBSITE		To be reviewed and linked to what is currently available on the OPCC website
Our policies and procedures -Current written protocols, policies and procedures for delivering our services and responsibilities			
Policies and procedures for the conduct of police force business	YES	Corporate Services	Available under ‘Library’ – some documents require review and updating
Policies and procedures for the provision of policing services	YES	Corporate Services	Available under ‘Library’ – some documents require review and updating
Policies and procedures about the recruitment and employment of staff	YES	People Services	Available under ‘Library’ – some documents require review and updating
Records management and personal data policies	YES	Corporate Services	Available under ‘Library’ – some documents require review and updating
Fileplans (or any other Business Classification Scheme used for the management of information)	YES	Corporate Services	Available under ‘Library’ – some documents require review and updating
Customer service standards and complaint procedure	YES	Professional Standards	Published under ‘Contact us’
Charging regimes and policies	YES	Finance	List of Financial charges published
Lists and Registers			

NOTTINGHAMSHIRE POLICE – LOCAL COMPLIANCE POSITION IN RELATION TO THE ICO DEFINITION DOCUMENT – JAN 2021

Information held in registers required by statute	YES		Access to information – registers includes use of force, COT contact with the media, Gifts, gratuities and hospitality, business interests
Asset registers	NOT FOR EXTERNAL PUBLICATION		Not for external publication – contains sensitive operational/tactical data
Information asset register	NOT FOR EXTERNAL PUBLICATION		Not for external publication – contains sensitive operational/tactical data
CCTV - locations of any overt CCTV surveillance cameras operated by the police force	YES	Camera Safety Partnership	Mobile Speed Camera Positions published
Registers of interests	YES	Professional Standards	Published under ‘Access to Information’
Register of gifts and hospitality (senior personnel)	YES	Professional Standards	Published under ‘Access to Information’
FOI disclosure log	YES	Corporate Services	Published under ‘Access to Information’
Services provided by the police force - Information about the services provided by the police force, including leaflets, guidance and newsletters produced for the public and businesses			
Advice and guidance for the general public	YES		Available via Advice Centre
Firearms and explosives licensing, firearms dealers licensing, abnormal load escort, keyholder services	YES		All available via search facility
Police college or learning centre	YES		Links to Regional EMCHRS and National College of Policing
Ceremonial duties	NOT APPLICABLE		Not applicable
Museum	NOT APPLICABLE		Not applicable
Local campaigns	YES	Neighbourhood Policing	Published under ‘Your area’ and highlighted on news section and Advice Centre, as appropriate
Media releases	YES	Corporate Communications	Published under ‘News & Appeals’
Details of the services for which the police force is entitled to recover a fee together with those fees	YES	Finance	List of charges published – based on national list

Appendix B: FOI requests received by theme 2020

