

# Assessment Report



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Scottish public authority: University of the Highlands and Islands  
 Dates of on-site assessment: 21 and 22 February 2012  
 Assessors from OSIC: Alistair Rennie, Elaine Moffat and Euan McCulloch  
 Date of issue: 7 June 2012

## Appendix 1: Action plan for University of the Highland Islands

Recommendation	Action	Status	Due	Owner
<p>1. That UHI writes to each of the requesters from the academic year 2010/11 who have never received a response to their request, asking in the first instance if they wish to pursue their request. Where UHI receives notification from a requester that they wish to pursue their request, UHI should then respond in full and in line with the requirements of FOISA/the EIRs.</p> <p>UHI should provide an interim update one month from the date of this report, confirming initial contact has been made or explaining why not.</p>	<p>Corporate Governance Officer emailed 38 requestors to enquire if they wished to pursue their requests.</p> <p>Interim update provided to Alistair Rennie – Corporate Governance Officer to provide further update as required.</p>	<p>Completed 28/3/12.</p> <p>5 requested information. Data provided and request closed. 4 undeliverable. 6 no longer want data. 23 have not responded.</p> <p>Due</p>	<p>Last response provided 16/4/12.</p> <p>25/06/2012</p>	<p><b>Secretary</b></p>
<p>2. That UHI reviews its internal FOI audit action plan to ensure that revised timescales for completion are set. Each action point should also be revisited to ensure that responsibility for completion has been allocated to the most appropriate member of staff.</p>	<p>Secretary and Corporate Governance Officer to agree revised timescales for each management action.</p> <p>Audit Committee to be advised accordingly.</p>	<p>Ongoing – majority of actions now due 31 May 2012.</p> <p>Refer to revised schedule of FOI audit</p>	<p>Revised timescales agreed 27/04/2012.</p> <p>Report to Audit</p>	<p><b>Secretary</b></p>



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		action plan.	Committee on 13/06/2012	
<p>3. That UHI formalises its administrative arrangements for dealing with FOI requests, and in particular the definition and allocation of key FOI roles and responsibilities within the organisation.</p> <p>UHI should provide an interim update one month from the date of this report, detailing the progress that has been made in relation to this specific recommendation.</p>	<p>Primary responsibility for handling FOI requests to be passed to Corporate Governance Officer with support and cover from Intranet and Records Officer.</p> <p>Both officers to attend appropriate training courses. – Act Now Introductory FOISA Training Course attended 29/3/12 Edinburgh</p> <p>Further training to be identified.</p> <p>Corporate Governance Officer to provide interim update.</p>	<p>Ongoing – Actions are broadly complete but opportunity exists to enhance further (see7 below).</p> <p>Responsibility transferred to Corporate Governance Officer 7/3/2012. Job description formally amended.</p> <p>foi mailbox permissions changed. Formal logging of requests enhanced.</p> <p>Due</p>	<p>31/05/2012</p> <p>25/06/2012</p>	<p><b>Secretary</b></p>
<p>4. That UHI reviews and updates its standard template letter for responding to requests to reflect the changes to its FOI arrangements.</p>	<p>Corporate Governance Officer to amend standard templates for responses and e-signature from foi mailbox accordingly.</p>	<p>Completed - but opportunity exists to enhance further.</p>	<p>31/05/2012</p>	<p><b>Secretary</b></p>
<p>5. That UHI puts in place robust logging, tracking and monitoring systems to deal with the FOI requests, with an effective system for the retention of all documentation relating</p>	<p>Corporate Governance Officer to introduce sequential logging on protected database.</p>	<p>Completed</p> <p>NB – Corporate</p>	<p>31/05/2012</p>	<p><b>Secretary</b></p>



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<p>to individual cases (enabling the identification of final versions of any communications issued by UHI).</p> <p>UHI should provide an interim update one month from the date of this report, detailing the progress that has been made in relation to this specific recommendation.</p>	<p>All requests to be acknowledged and responded to via <a href="mailto:uhi@foi.ac.uk">uhi@foi.ac.uk</a></p> <p>Separate folder created for each request with cross reference to FOISA database log. Attachments also saved in t drive with corresponding folder number.</p> <p>SMG to receive regular reports of FOI activity.</p> <p>Corporate Governance Officer to provide interim update.</p>	<p>Governance Officer to look at enhancing logging further with use of Access or other database to enhance monitoring.</p> <p>Process initiated April 2012</p> <p>Due</p>	<p>25/06/2012</p>	
<p>6. That UHI review its current standard contract clause in relation to FOI, in line with paragraph 63 of this report.</p>	<p>Corporate Governance Officer to review as per note to recommendation 4 above.</p>	<p>Ongoing</p>	<p>31/05/2012</p>	<p><b>Secretary</b></p>
<p>7. That UHI identifies a member of staff who will be primarily responsible for the conduct of reviews, along with suitable cover to ensure that the review process is not impeded should that member of staff be unavailable or experience a conflict of interest.</p> <p>That appropriate training is given to all designated reviewers and substitutes, to ensure that they can conduct a robust and independent review in line with the requirements of the legislation and Section 60 Code of Practice.</p> <p>That UHI develops a documented review procedure, with a robust and effective logging, tracking and monitoring system to ensure that it can manage and report on reviews</p>	<p>Director of Marketing, Communications and Planning to be primarily responsible for reviews. Cover to be provided by the Head of Human Resources.</p> <p>Corporate Governance officer to identify appropriate training for above staff.</p> <p>Corporate Governance Officer to document appropriate UHI review procedures.</p>	<p>Complete</p> <p>Ongoing</p> <p>Ongoing</p>	<p>31/05/2012</p> <p>31/05/2012</p>	<p><b>Secretary</b></p>



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<p>effectively.</p> <p>That UHI develops a standard response template for reviews, which details all the relevant rights afforded to requesters under the legislation.</p> <p>UHI should provide an interim update one month from the date of this report, outlining who will be responsible for the conduct of reviews, an overview of what will be included within the review procedures, who will be responsible for their development and implementation and the anticipated timescale for that development and implementation.</p>	<p>Corporate Governance Officer to produce template response for reviews.</p> <p>Corporate Governance Officer to provide interim update.</p>	<p>Ongoing</p> <p>Due</p>	<p>31/05/2012</p> <p>25/06/2012</p>	
<p>8. That UHI fulfills all the recommendations contained within the internal audit action plan within six months from the date of this report.</p>	<p>Relates to item 2 above.</p> <p>NB Recommendation 9.4.1 - Annual report for Court is not due for completion until 31/12/2012. Annual report for Court to be prepared by Corporate Governance officer with regular interim updates to SMG</p>	<p>Ongoing</p>	<p>02/09/2012</p>	<p><b>Secretary</b></p>
<p>9. That UHI conducts FOI awareness training for all staff within the organisation, to ensure that they can both identify requests and pass them on to the appropriate individual to deal with. This training should also provide an overview of both FOISA and the EIRs, and additionally an update on the changes to FOI practice being implemented by the University.</p> <p>In-depth training should be provided to the Corporate Governance Officer and Intranet and Records Officer, as the members of staff with key responsibility for dealing with FOI requests on a day-to-day basis, to impart a working knowledge of the EIRs as well as a more comprehensive understanding of FOISA.</p>	<p>Corporate Governance Officer to produce guidance notes for all staff to be circulated via internal newsletter and for upload to intranet.</p> <p>Corporate Governance Officer to attend Induction sessions to provide new staff with overview and awareness of FOI responsibilities and procedures in place.</p> <p>Corporate Governance Officer and Intranet and Records Officer attended introductory</p>	<p>Ongoing</p>	<p>31/05/2012</p>	<p><b>Secretary</b></p>



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<p>UHI should provide an interim update on progress with this recommendation, one month from the date of this report. This should demonstrate how UHI intends to implement the required training, and in particular should provide an overview of what training will be undertaken, who will receive the training, who will deliver the training and the timescales involved.</p>	<p>training course in Edinburgh on 29/3/12. Further training to be pursued.</p> <p>Corporate Governance officer to attend Scottish Higher Education Information Practitioners Group (SHEIP) meetings beginning 16<sup>th</sup> May 2012.</p> <p>Corporate Governance Officer to provide interim update – to include training for reviewers.</p>	Due	25/06/2012	
<p>10. That UHI develops a robust FOI policy and supporting procedures, which should take into consideration all the recommendations made in its internal audit report and this report. The procedures should provide for dealing with requests for environmental information and should clearly identify the chain of responsibility for dealing with FOI at all stages within the process.</p> <p>UHI should provide an interim update one month from the date of this report, with an overview of the content of the policy and procedures, who will be responsible for their development and implementation, the anticipated timescale for that development and implementation and how they will be disseminated across the organisation.</p>	<p>Corporate Governance Officer to develop comprehensive FOI procedures manual.</p> <p>Corporate Governance Officer to provide interim update.</p>	Ongoing  Due	31/05/2012  25/06/2012	<b>Secretary</b>
<p>11. That UHI puts in place, as a minimum, adequate organisational arrangements for records management, a full and robust records management policy, and current and</p>	<p>Intranet and Records Officer appointed. Currently working with Communications and External Relations Manager to develop</p>	Ongoing	31/10/2012	<b>Director of Marketing, Communications and Planning</b>



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relevant retention schedules.	robust policies and procedures.  Records management policy and retention schedule developed.			
12. That UHI undertakes a thorough review of its publication scheme. In the light of that review, UHI should revise its scheme to ensure consistency with the Universities Scotland Model Publication Scheme that it has adopted. The revised scheme should be submitted to the Head of Policy and Information for verification that all outstanding issues have been addressed.	SMG to agree accountable people for each category of the publication scheme. Accountable people to review and update data to ensure compliance with MPS.  Secretary to seek regular assurances that the publication scheme is being kept maintained and kept up to date with accurate information.  Liaison with OSIC P & I team ongoing.	Ongoing	31/05/2012	<b>Secretary</b>
13. That UHI instigates improved liaison on FOI matters with its academic partners, both to allow active knowledge sharing and to ensure that a common approach is taken to requests which require redirection as highlighted above (with written agreement on the latter point).	Corporate Governance Officer will begin attending Scottish Higher Education Information Practitioners Group (SHEIP) meetings from 16th May 2012. Liaison with APs to follow.	Ongoing	30/06/2012	<b>Corporate Governance Officer</b>