



Derby City Council

## Derby City Council

### FOI & EIR Compliance Action Plan - September 2026 Review

| Category                  | Requirement                                                                 | Current Status                                                                                                                                                 | Planned Actions                                                                                                                                                            | Action Owner | Status                  | Target date |
|---------------------------|-----------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------|-------------------------|-------------|
| Compliance – New Requests | >90% of information requests are responded to within 20 working days.       | Additional IG team capacity has been secured and there are dedicated resources focused on managing new requests. Compliance is improving and expected to rise. | Continuous monitoring of open and incoming requests to ensure deadlines are met.<br><br>Further staff have been recruited and are due to start by the end of October 2026. | DPO / DDPO   | In progress             | Nov 2026    |
|                           | Internal review requests are responded to promptly and without undue delay. | There are existing, well-established processes for managing internal reviews. Additional team capacity secured.                                                | Continuous monitoring of open and incoming requests to ensure these requests are actioned and responded to.                                                                | DDPO/ PIGO   | Implemented and ongoing | n/a         |
|                           | All new information requests are logged and allocated promptly.             | Processes put in place to ensure new requests are logged, validated and allocated to a service within 2 working days of receipt.                               | Continual routine monitoring of inboxes and case management system.                                                                                                        | DDPO         | Implemented and ongoing | n/a         |



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| Category             | Requirement                                                                                                         | Current Status                                                                                                                                                                                                                 | Planned Actions                                                                                                                                                                                   | Action Owner                   | Status                  | Target date |
|----------------------|---------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------|-------------------------|-------------|
|                      | Services responding to information requests are aware of due dates and regularly reminded to provide information.   | <p>The case management system automatically tracks due dates and issues reminders.</p> <p>Processes put in place to routinely identify open cases with approaching due dates and pursue information retrieval and signoff.</p> | n/a                                                                                                                                                                                               | DDPO                           | Implemented and ongoing | n/a         |
|                      | Requests approaching their due date which require information or sign-off are escalated promptly and appropriately. | Processes in place to identify cases with approaching due dates and escalate as required.                                                                                                                                      | <p>DDPO coordinates weekly planning meetings to identify compliance opportunities and deadlines which are approaching.</p> <p>Monthly review of compliance &amp; any overdue requests at CLT.</p> | DDPO                           | Implemented and ongoing | n/a         |
| Compliance – Backlog | The Council is aware of all overdue information requests.                                                           | All information requests received within the past 12 months have been logged on the case management system.                                                                                                                    | Monthly review of compliance & any overdue requests at CLT.                                                                                                                                       | DPO / DDPO / Service Directors | Implemented and ongoing | n/a         |



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|----------|-------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------|-------------------------|----------------|
|          |                                                                   | Reports on outstanding cases are issued to departmental Directors every two weeks.                                                                                      |                                                                                                                                                                                                                                          |              |                         |                |
|          | All requests received before 31 July 2026 have been responded to. | Dedicated resources have been allocated to reviewing and closing out overdue requests.<br><br>Lead officers and directors have been made aware of outstanding requests. | Additional resources have been recruited and an additional number are due to start in the coming months.<br><br>Regular updates will be provided to directors.<br><br>Targeted work will take place with areas with the highest backlog. | DPO / DDPO   | In progress             | Dec 2026       |
|          | Clear Policies & Procedures are in place.                         | The corporate FOI & EIR Policy is reviewed every two years.<br><br>Detailed procedures and guidance on handling                                                         | Continue regular staff communications on the importance of compliance with FOI & EIR legislation.                                                                                                                                        | DPO / DDPO   | Implemented and ongoing | September 2026 |



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| Category | Requirement                                                                                      | Current Status                                                                                                                                                                                        | Planned Actions                                                                                                                                                                                                        | Action Owner  | Status                  | Target date   |
|----------|--------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|-------------------------|---------------|
|          |                                                                                                  | information requests are available on the staff intranet.                                                                                                                                             |                                                                                                                                                                                                                        |               |                         |               |
|          | There are clear routes for applicants to request information or internal reviews.                | Information requests can be submitted directly by email or through an online form.                                                                                                                    | Explore automated processes for logging email requests for information & reviews.                                                                                                                                      | DDPO          | Not started             | February 2027 |
|          | Requesters are always provided with advice and assistance to clarify their request, if required. | Requesters are routinely asked for clarification where appropriate.<br>The need to review and clarify requests is included in training for new Information Governance Officers handling FOI requests. | DDPO to continue to issue regular reminders to IG Officers to review new requests and identify areas that require clarification.                                                                                       | DDPO          | Implemented and ongoing | n/a           |
|          | Open data & transparency                                                                         | Services are encouraged to identify opportunities for proactive publication and have been asked to review recurring request themes to identify information that could be routinely made available.    | Undertake periodic reviews of recurring FOI and EIR request themes and work with services to implement targeted proactive publication measures where appropriate. Progress and opportunities will be monitored through | DDPO/<br>PIGO | ongoing                 | February 2027 |



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|----------------------|---------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------|--------------|-------------------|---------------|
|                      |                                                               |                                                                                                                                                                          | established governance and reporting arrangements                                                           |              |                   |               |
|                      | Procedures are regularly reviewed to reflect lessons learned. | Procedures are updated regularly, and at least annually.<br><br>The DDPO coordinates feedback from IG Officers and learning from previous cases through weekly meetings. | Review the FOI & EIR Procedure every six months for the next 12 months, before moving to an two year cycle. | DDPO         | Ongoing           | January 2027  |
| Training & Awareness | All staff receive appropriate FOI training.                   | All staff undertake mandatory annual Data Protection and Cybersecurity training.<br><br>All staff must read the corporate FOI & EIR Policy during induction.             | Continue regular staff communications & training monitoring.                                                | DDPO         | Complete for 2026 |               |
|                      | All staff receive ad-hoc updates and refresher training.      | Existing guidance and policy materials are published and promoted.                                                                                                       | The IG Team will offer drop-in training sessions on FOI & EIR procedures for all staff.                     | DDPO         | Ongoing           | December 2026 |



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|------------------------|-----------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------|-------------------|-------------------------|---------------|
|                        | Training and guidance documents are regularly reviewed and updated.                                 | Annual review                                                                                                                                                   | n/a                                                                         | DDPO              | Ongoing                 | December 2026 |
|                        | There is a planned approach to covering for absence of FOI staff.                                   | One additional permanent FTE and four interim FTEs will be onboarded.                                                                                           | n/a                                                                         | DPO / DDPO        | Implemented and ongoing | November 2026 |
|                        | Tracking and monitoring systems enable the Council to keep track of deadlines and respond promptly. | There is a dedicated case management system for information requests. Enhanced processes put in place to identify and prioritise cases with upcoming deadlines. | Continual review and refinement of case management and reporting processes. | DPO / DDPO / SIRO | Implemented and ongoing | n/a           |
| Assurance & Monitoring | Complaints to the ICO are logged, tracked and monitored.                                            | All open ICO complaints are routinely tracked, with progress incorporated into monthly IG Board reports.                                                        | n/a                                                                         | DPO / DDPO        | Implemented and ongoing | n/a           |
|                        | Information request performance is routinely monitored and reported on to senior leadership.        | Performance on information requests is reported monthly to senior leadership at IG Board meetings & CLT.                                                        | n/a                                                                         | DPO / DDPO        | Implemented and ongoing | n/a           |



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|----------|-------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------|-------------------------|----------------|
|          | There is clear management oversight within the Information Governance team of compliance with information requests.           | The DDPO continually monitors compliance and provides regular updates to the DPO. An enhanced compliance report has been developed and is shared monthly with the DPO and Head of Service. |                                                                                                                                                  | DPO / DDPO                             | Implemented and ongoing | n/a            |
|          | Robust governance arrangements are in place to ensure FOI & EIR compliance.                                                   | Compliance is reported to and overseen by the Information Governance (IG) Board and Corporate Leadership Team (CLT). IG risks are included in the Corporate Strategic Risk Register.       | Continued oversight through established governance arrangements, supported by monthly updates on backlog reduction and ongoing compliance rates. | SIRO / Head of Legal & Insurance / DPO | Ongoing                 | September 2026 |
|          | There is a clear framework of responsibility for managing and responding to information requests that all staff are aware of. | The corporate FOI & EIR policy sets out roles and responsibilities.                                                                                                                        | Regular staff communications to remind colleagues about internal policy requirements.                                                            | DDPO                                   | Implemented and ongoing | n/a            |
|          | FOI & EIR compliance is a key consideration in risk and governance systems.                                                   | FOI & EIR compliance is maintained as a corporate risk on the Council's                                                                                                                    | n/a                                                                                                                                              | SIRO / Head of Legal &                 | Implemented and ongoing | n/a            |



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|----------|-------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------|-----------------|---------|---------------------|
|          |                                                                         | Corporate Risk Registers. Progress against the improvement programme, compliance performance and associated risks are regularly monitored through established governance arrangements and reported to senior leadership to support sustained compliance and continuous improvement. |                                                                                                                                | Insurance / DPO |         |                     |
|          | Monthly oversight on compliance at each departmental management meeting | Monthly reports on ongoing compliance and backlog reduction to be provided to CLT by Service Directors.                                                                                                                                                                             | CLT to maintain oversight on departmental compliance, including the effectiveness of arrangements to address historic backlogs | DPO / SIRO/ CLT | Ongoing | From September 2026 |



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|----------|-------------|----------------|-----------------|--------------|--------|-------------|
|          |             |                |                 |              |        |             |