Better case management of FOI and SARs
Research findings

Martin Wright, Louise Crow, Gareth Rees

Introduction

This document describes research conducted by mySociety in partnership with Hackney Council, Cornwall Council, Suffolk County Council, Stevenage Borough Council and East Herts District Council in early 2019, as part of the 'Better case management of FOI and SAR requests' project, funded by the [Local Digital Fund](). This is a discovery and alpha project looking at the user journey for council staff who handle information requests to determine if there are improvements to be made by a new digital tool. This document is an interim summary of the findings from the initial research before prototyping. It briefly summarises what we've done, and then describes our findings.

In a previous partnership with Hackney, we worked with their information management team to understand their processes in handling FOI requests and SARs, the nature of requests they receive (see our [research report]() for more information) and to improve the customer front-end of their FOI process (see our [prototyping and testing report]()).

In this project we set out to find means of increasing efficiency and ease of use across multiple councils, and thus better meeting the needs of citizens, from usability of service, quality of response and response time perspectives, in such a way that supports reuse by other councils.

Specifically we wanted to find out:

- How much variation there is in how authorities handle FOI and SAR requests and to what extent a digital product could effectively support the different processes and contexts in authorities.
- To what extent unmet needs identified in discovery processes at Hackney are shared by other authorities, and how an open source solution and/or open data standards could meet them.
- Where a digital product could support efficiency savings in handling FOI requests.
- What performance metrics are used or would be useful across councils to assess the performance of a digital request handling service against its objectives
- Whether it makes sense to support the handling of FOI and SAR requests in a single product — so to what extent there are common workflows in the two processes and whether both tend to be handled by one member of staff using similar methods.

Approach

Our approach for the discovery phase of the project was as follows:

Literature review

We reviewed existing research in the field, from Hackney's original discovery projects as well as papers in progress from the mySociety research team, to discover where those findings can be applied to this project.

Process documentation

We asked all partners to provide copies of their own internal documentation for handling SARs and FOI requests, and reviewed them to prepare for staff interviews. We also asked for statistics: headcount, the number of FOI and SAR requests per month, and compliance rate (the number of requests responded to within the statutory time limit of 20 days for FOI requests, or one calendar month for SARs).

User research interviews

We talked to representatives from each council, asking them a series of questions to understand how the process works from their point of view, what they thinks works well, or poorly, and find out how they feel about their FOI/SAR work. We asked to our partners to volunteer members of staff who had involvement in the FOI and SAR process from various departments, either in their central information management teams or from service areas where the information is held.

We spoke to staff members from Hackney in person and conducted remote interviews for the other partner councils. We recorded and transcribed all of the interviews. Our interview guide and interview statistics are available as an appendix to this document (Appendix 1).

User observations

We directly observed six members of staff at Hackney, holding various roles, while they worked . The aim was to see the process in action from their point of view, while asking questions as necessary. We spent 45 minutes to an hour with each staff member, as they walked us through the tasks involved in the process of an information request.

Findings

The wider scope around FOI requests and SARs

One of our research questions was to what extent SARs and FOI/EIR requests are handled by the same people, processes and systems, and therefore to what extent it would make sense for a new digital service to encompass both. We know from previous research and our kickoff workshop that although the case management aspect of handling FOI requests and SARs may be similar, the

process of collecting the information is quite different. With SARs the issues faced are less in the process of logging, allocating and chasing and more in communication, assembling, redacting and communicating. These processes are very time-consuming and require almost a bespoke approach for each request. SARs vary more in the nature and amount of information to be returned. We are aware that this project considers only the case management aspects of SARs and that there could be significant efficiency gains produced by reducing the time spent in assembling and redacting SAR responses, particularly around social care histories. An initial discovery question for that work would be the extent to which a new digital system could tackle these issues at all, given their case by case nature and frequently historical focus.

Similarly, for FOI requests and EIRs, an element of the process that we do not cover in detail here is the work an information holder goes through to actually assemble the information for the request. Again, the amount and nature of work here varies by request and by the source systems information is held in and so is less amenable to a single, widely applicable technical approach. We will discuss the possible contribution of reporting and performance metrics to understanding the relative time cost of these elements of the process.

The elements of an FOI/SAR service

To enable us to better understand FOI/SAR services, and compare and contrast the various partner councils and information from wider research, we created a simple framework based on three distinct areas: People, Process, and Technology; and two significant factors external to the FOI service – council complexity, and volume and nature of requests.

Council complexity

The first factor external to the FOI service is the local authority's size and complexity. These are reflected in the number of staff, level of responsibilities (eg unitary vs borough), physical location of staff (eg in multi-campus authorities), whether or not hot desking is in operation, and organisational stability (eg frequent restructuring and management changes). A small authority with many requests will rely on staff members' tacit knowledge, coupled with lightweight tools and simple processes and see good results. A complex council, where one or two people cannot hold all the knowledge will need better tools to help with the request lifecycle.

Increasing complexity increases the challenge in:

- understanding who is responsible for what, and where information is held
- knowing how many requests there are in progress, where in the request lifecycle requests are, and whether targets are likely to be met
- using past performance to predict future behaviour and anticipate needs: for example, where more staff are needed to cope with volume spikes, or where resources need to be moved around due to holiday or staff sickness

- Understanding compliance with the law: for example, whether exemptions are applied correctly, deadlines met, and internal reviews need to be conducted

Volume and nature of requests

The second external factor is the volume and complexity of FOI requests and SARs received. We know from our wider research that there is wide variation in the volume of FOI requests received by councils. Additionally, FOI requests and particularly SARs vary in their complexity and the amount of work needed to respond to them.

Anecdotally, we found instances in several councils where FOI or SAR requests had been used by a member of the public as methods of last resort to talk to the council. Where frustrated members of the public, having tried to raise the council through other means and aware of the statutory implications of the FOI or SAR process using it for general contact. In another example, knowing the potential cost and work involved, an individual submitted an SAR for malicious ends (eg "just to show you how annoyed I am, here's a request for all of the personal information you hold on me").

Such usage is useful to know about, as information management teams could begin to bear the brunt of a citizenry dissatisfied or disgruntled by their council, and this could have knock-on effects on performance. This could be used as an early-warning method of deteriorating conditions or under-performing services elsewhere at the council.

People

The people in an organisation are the core of the FOI service and in any authority will be the variable that affects FOI performance the most.

To understand the *people* element of a council we looked for the following:

Supported staff Are staff given the support they need to do their jobs?

Training What level of training are people given? Is it mandatory, software focused, and/or a certified qualification?

Rewards & incentives Are staff given any recognition, awards, or incentives to take part in the FOI and SAR processes?

Is FOI formally part of people's jobs? For staff who aren't dedicated information managers, is any part of the FOI/SAR tasks recorded formally in job descriptions, and is FOI/SAR performance discussed as part of job performance reviews (annual reviews etc)?

Tacit knowledge How much knowledge of the organisation, the information stored and the places it can be found is stored in individual staff members' heads (or private notes)?

Process

Process is the formalisation of the FOI/SAR service, where organisations have made structured, organised changes to their working processes to accommodate FOI/SAR laws, made resources available to meet obligations, and where some have made transparency central to their working culture. We looked for:

Documentation Are there written processes and procedures that staff are able to find and follow?

Management oversight Service area managers in most authorities are responsible for the FOI/SAR performance of their service area. How involved are they in ensuring FOI/SAR compliance? How do FOI act obligations affect service delivery?

Transparency culture Is transparency factored into all operating areas of the service? Is data released proactively, and are internal systems configured with information retrieval in mind?

Performance measurement The measured performance of the organisation in terms of their responsiveness to FOI/SAR requests. How is an authority benchmarking itself? Are they actively monitoring and expressing interest in performance?

Self reflection The ability to change based on new information: eg, if performance improves in one area, being able to recognise why and apply those learnings across the organisation.

Technology

Technology supports councils in the provision of their FOI/SAR service in many ways. Critically, technology provides automation to alleviate workload, and adds structure to the service. With business rules and statutory requirements built into technology there is less need for staff to be highly-trained experts in the area.

Systems that support FOI What is the technical infrastructure in place to support FOI? For example, case management systems or parts of line of business systems that have been configured to meet the needs of FOI/SAR.

Collaboration and communication What email, document management, workflow, and other methods does the council use to enable the kinds of communication and collaboration an FOI service will need.

Automation To what extent does software protect from human error, fill gaps in knowledge and training, and automate repeatable tasks?

Literature review

We found the following relevant points which provide useful context about the situation across the sector.

Volume and nature of requests

- Around [467,000 FOI requests](#) were made to principal local authorities in the UK in 2017. This is almost double the Constitution Unit's 2010 estimate of the number of FOI requests sent to local government.
- Complex requests can be made up of multiple 'questions' in one request and/or requests that will require information from more than one service area, or that will require 'double handling' (additional sign off by senior or specialist staff, or two persons conducting redaction duties). A significant proportion of requests are complex — 38% of FOI requests required information from multiple parts of the organisation, and 23% of FOI requests required 'double handing'.

Council complexity

- It's often not clear which service a given request should be allocated to in a complex authority, for example where there are a number of different finance departments, it may not be immediately obvious which one might deal with any given finance-related request.

People

- FOI teams tend to be embedded in larger teams, with few staff solely working on FOI. Staff responsible for the administration of FOI in local government tend to hold FOI as one responsibility among several. As such, FOI administration rarely appears as a specific budget item.
- Staffing levels devoted to FOI appear to increase in correlation with an increase in the volume of FOI requests received, so cost can be expected to rise with volume.
- A minority (around 27.2%) of FOI officers hold a professional qualification in FOI.

Process

- 63.5% of principal local authorities say they use the 'Champions' methodology in which 'FOI champions' are situated in general departments throughout the organisation to assist in the administration of FOI responses.
- Although a small number of requests (1.4%) resulted in an internal review, approximately 40-50% of internal reviews in local government result in a change to the original outcome, indicating that handling of requests is not completely consistent within councils and that internal review statistics may be an important indicator of where to focus improvements.

- There is a reasonable level of compliance with the statutory deadline for FOI requests (according to our research, 80% of councils are above 80%, although the ICO expect a compliance rate of at least 90%).
- Councils have relatively universal records on the number of requests received, and time taken to reply — but have fewer records on the volume of information disclosed, or on the status of appeals.
- Differing standards of disclosure make cross-comparison of numbers difficult.

Technology

- A majority of councils (66%) use some form of case management or CRM software, however no specific case management software is in wide use (iCasework is the most widely used, at 7% of councils). 34% of local authorities use no case management or CRM system.
- Perhaps for this reason, most councils (64%) do not publish a disclosure log.
- Councils that receive higher numbers of FOI requests are more likely to publish a log, but there was no evidence that publishing a disclosure log in itself reduced the number of FOI requests, although we do have evidence, discussed in our business case, that there can be an effect when information from a disclosure log is introduced directly into the requesting process.

Interviews and process documentation

From talking with various councils before undertaking this research we were aware of the 'champion model' FOI process , whereby a small central team liaises with the service areas' information holders via named representatives known as champions. We found that t all of our partner councils were operating the champion model, or a process of the same kind but by a different name, even if they didn't explicitly recognise that this was the case. The champion model is relatively informal — through our research we could find no written definition of the model, no process descriptions, nor instruction manuals associated with it. The process model below represents the model used in all our partner councils, with some minor variation.
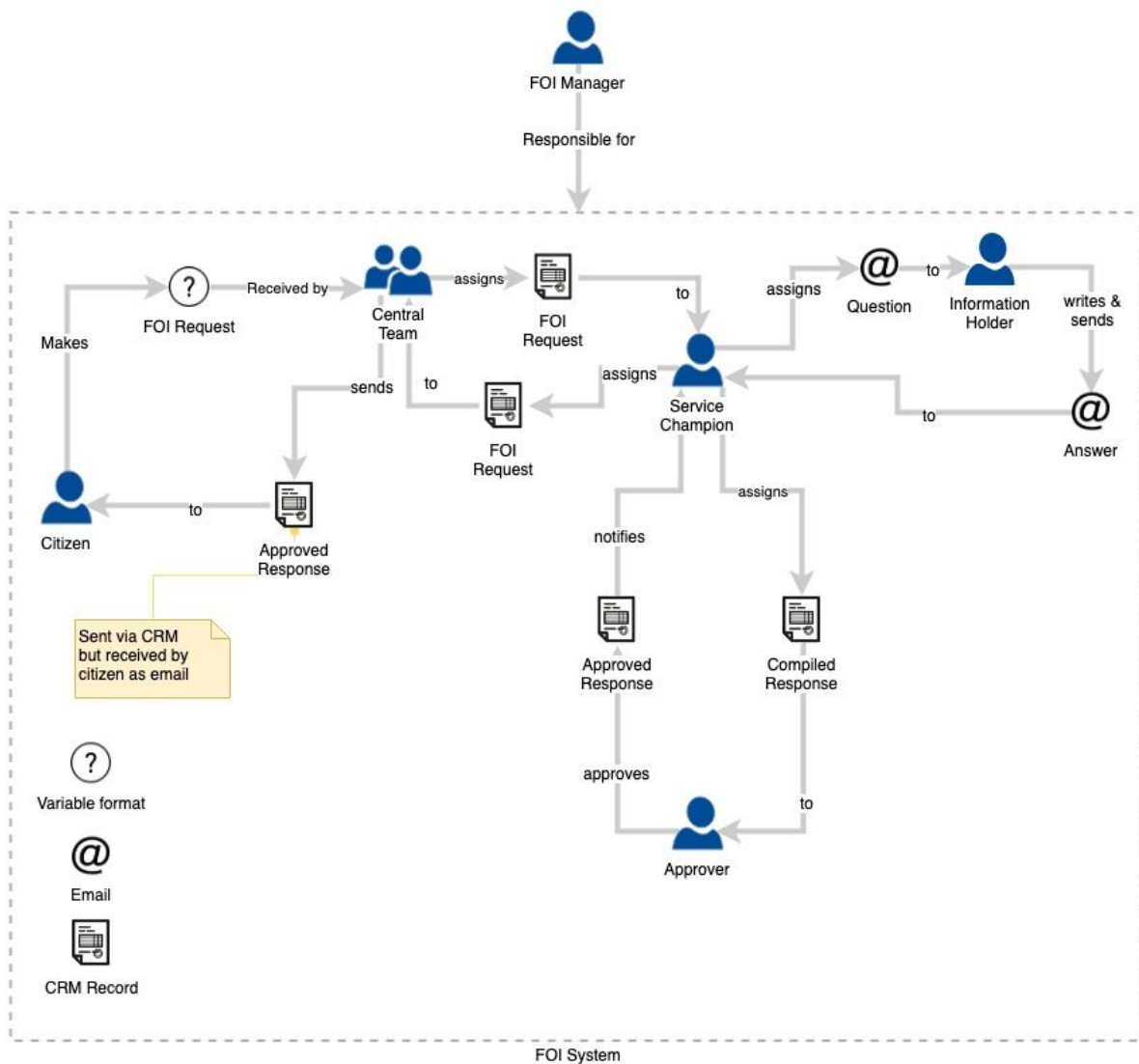
Diagram 1: FOI request handling process

Roles shown in the process diagram

FOI manager Responsible for FOI act compliance across the organisation.

Central team Responsible for triaging requests and allocating to the correct Service Champion.

Approver Person who can assess the organisational impact and public benefit of the information release.

Service Champion Responsible for triaging requests, allocating to the correct Information Holder, and getting approval of the response.

Information holder Person with access to the places where information is held within a service.

Framework for comparison

Despite the similarities in overall process in our partner councils, our process analysis and interviews led us to the conclusion that their context, approaches and emphasis vary significantly, and that this has a significant impact on the unmet user needs in evidence, and the value of a digital solution to them. In order to explore and summarise this variation amongst councils, we created a simple rating system within each element of our service framework, with a rating of 1 to 5 for each element; 1 being the most basic level, and 5 being the most advanced.

People

1. There is no training
2. There is short, software focused training
3. All staff have training on internal FOI processes
4. All staff have training on the FOI Act
5. All those in FOI roles have a qualification in FOI

Process

1. All word of mouth — nothing written down
2. Light processes on top of FOI Act
3. Comprehensive written process and managed compliance rates; management are not proactive in overseeing the FOI process but get involved when problems arise
4. Regular reviews and proactive management of process to achieve compliance; system of recognition for good performance
5. Transparency culture in all working areas of council: proactive publication, disclosure log, publication scheme, high compliance rate
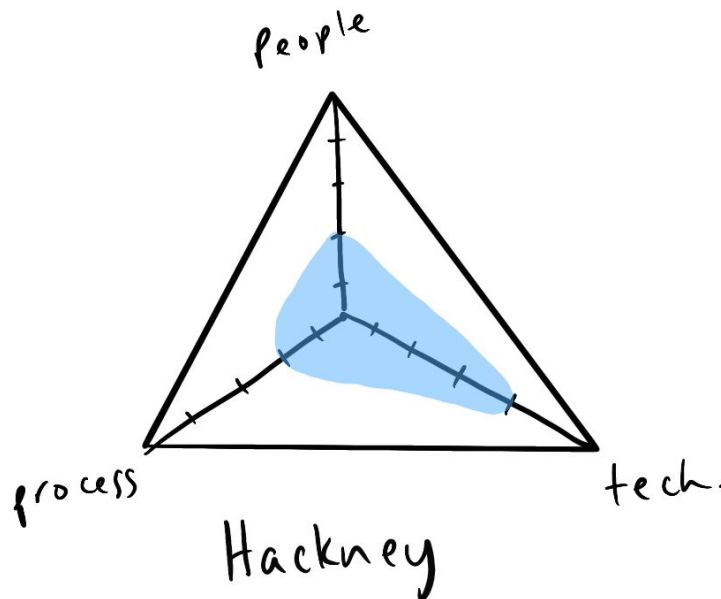
Technology

1. Off the shelf email and document management, eg Gmail & Google Docs, or Outlook and Office 365; shared inboxes
2. CRM: team-based email
3. Case management : eg a repurposed complaints system
4. FOI module of a complaints/case management system – eg Infreemation
5. FOI-specific software: knowledge management systems with possible integration into FOI case management

The context and focus at each council

Hackney

Hackney is a large and complex London borough, the biggest of our partner councils. They operate an explicit implementation of the champion model, with a central team of four staff working with champions distributed amongst the various service areas. Many of the problems they are facing are due to the size and complexity of the council.

Technology

In the past two years there has been a focus on technology at Hackney, with extensive work undertaken to improve the customer-facing front end, and the procurement of Infreemation, their FOI-enabled case management system.

Infreemation is a fairly capable system but it is by no means perfect. Hackney have had issues relating to reporting, which is a time-consuming manual process, and the workflow surrounding internal reviews. They currently handle SAR and FOI case management using the same module, and significant complexity is introduced into reporting by not being able to separate the two easily in automated reporting outputs.

Process

The investment in technology could be an attempt to overcome an inherent problem: the central information management team does not have direct oversight over the champions in the organisation and has little power to make training mandatory.

This is working evidence of light process, which can lead to a more nimble workflow, but can also have the opposite effect in the wrong conditions. For example, we saw evidence of empowered, organised champions operating independently and with great success, but also saw the opposite, where for various reasons performance had suffered due to lack of resources/support, and no widespread culture of transparency.

Due to the complexity of the organisation time-to-allocate is a risk and can cause problems in the workflow, with information holders not receiving requests until just a few days before (or even after) the due date.

People

Staff members in champion roles are informally recognised but there is no official reward or incentive for doing a good job in this aspect of people's work; furthermore the central information management team has little involvement with the champions, and no means to help improve performance as one would expect if there were some managerial responsibility.

Despite the focus on technology, one missing factor is that most of the operating knowledge of the authority rests with people. Staff know who is responsible for a system, or where information sits and we didn't see evidence of this being formally recorded or built into the technology. This creates a risk, and performance will likely depend on whether the people in the champion roles are engaged, organised and motivated by senior staff.

In this situation technology can provide oversight, control and a reduction in the reliance on expert staff — but without process to support the system, problems can arise.

Cornwall

Cornwall Council are the second largest council taking part in the research. They operate the champion model, though they don't refer to it as such. They have a central team operating in an oversight role, with champions (known as 'FOI reps') in the service areas. At Cornwall the responsibility for responding to requests within statutory time periods rests primarily with the service areas, although the central team monitor compliance, stepping in where performance issues are identified. This allows the central team to operate at a more strategic level, providing the necessary training, development and central information point for complex queries, as well as handling multi service responses.
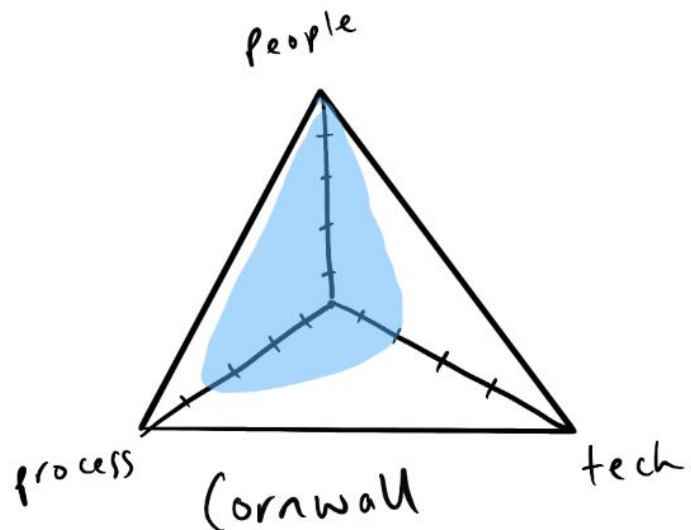
Technology

Cornwall's technology uses a mixture of email, spreadsheets and the corporate CRM (Lagan) which enables the basic management of FOI requests, including logging, case history and outcomes, as well as allowing for automated reminder emails to officers and automated reporting. This Lagan CRM system has been customised to meet the council's FOI needs by their own inhouse development team. Lagan is not used for handling SARs. Combined with a hands-off approach this appears to meet Cornwalls' needs. Fast reporting is a key part of monitoring the process.

Process

Process at Cornwall is extensive, with many processes documented in detail. While this ensures a clear understanding of responsibilities and work flows, a new member of staff who had not yet had any training would encounter heavy amounts of process that could be overwhelming. This is an area technology can help with, by transferring written processes into systems that offer some structure for untrained staff, and/or provide automation for laborious repetitive tasks.

Corporate culture at Cornwall is pro-transparency, and management buy-in is beneficial across the board. Information requests are a priority and resources are available to deal with them within target timescales, reflected in their good response rate.

Cornwall appear to have been resilient through their recent restructures, which can be very disruptive for the FOI/SAR process. We think that this is due to their combination of diligently documented processes and focus on people.

The majority of champions at Cornwall receive professional training in FOI, in the form of a BCS certified qualification. This means that staff are experts, understand the need for transparency and advocate for it within their teams. All members of staff interviewed from Cornwall had a high opinion of transparency and were confident in their ability.

Suffolk

Suffolk operate a champion model, with representatives in each service area responsible for information requests, finding and retrieving information, and formulating responses.

They are a medium sized council, similar to Cornwall in their decentralised, process-enforced approach, but feeling the lack of technical investment in regards to performance and oversight from the central team.
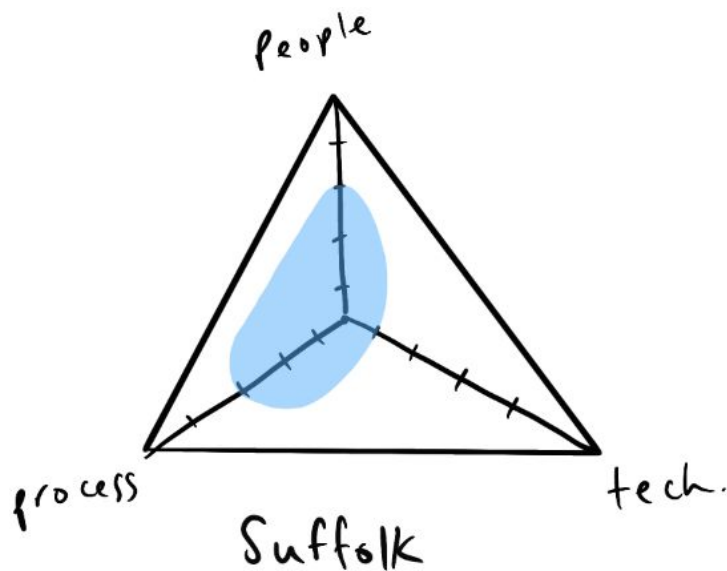
Technology

Suffolk use a mixture of email, document collaboration, and spreadsheets to manage their FOI processes.

The lack of FOI specific technology makes FOI handling more time consuming and difficult to oversee from the central team, resulting in a reliance on manual chasing and following up, and the risk of human error. The central team are going through a restructure and staff we spoke to expect this to impact on the response rate of the council, suggesting a lack of resilience seen elsewhere.

Technology could provide automation to take the manual element out of tasks such as reminders and follow ups, tasks that currently have to be managed and completed by hand. It could also

lower the effort required to update the disclosure log, and prevent unnecessary requests making it through to service areas.

Process

In our research we found that the service areas are largely happy, operating with autonomy and free to work according to their own approach and needs. Process is documented, but often the way that the work is actually conducted is different from the written down procedures. This results in some siloing, and processes can differ between service areas but for the teams on the ground this is not an issue.

However the central team are struggling due to missing an oversight element that software could provide, or sufficient training that could lead to higher levels of trust. This is a known problem and they are actively looking for solutions to this in the procurement of a new technical solution, in the first instance.

People

At Suffolk we found that some roles have formal FOI/SAR responsibility listed as part of job descriptions, and this responsibility is discussed in annual performance reviews. This is an encouraging sign that information requests are perceived as important, and that resources are made available to ensure compliance is met.

Training isn't as much of a focus as at Cornwall — despite the similarities between the councils, as noted above — so there is more opportunity for error when a situation arises that isn't covered by the written processes. This is an area that technology could help with, providing structure and workflow in accordance with legislation.

Stevenage

Stevenage Borough Council is a medium sized council, with investment spread similarly to Suffolk, but with their future plans to address the technology gap well underway. Stevenage operate a shared service with East Hertfordshire District Council; information management is not part of the shared service currently, although IT is.
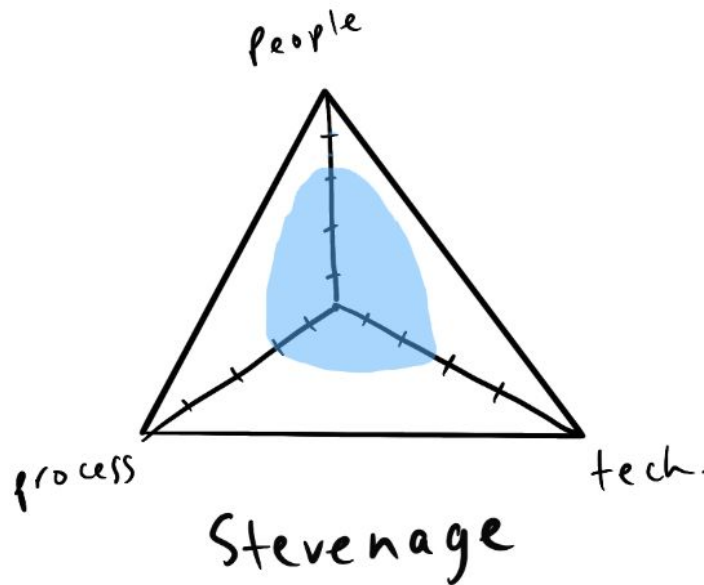
Stevenage

Technology

Stevenage use a bespoke extension of their case management system coupled with email and spreadsheets to manage their information requests. There is an ongoing project to procure a new technical solution to meet the growing demand and complexity of various requests.

There is a low level of automation, so there are multiple instances of copying and pasting, and double keying between systems. Email reminders and notifications are entirely manual and a task that must be undertaken daily by a member of staff.

Process

Stevenage operate a more-centrally focused champion model. It's less formally defined than we have seen at other councils and appears to be appropriate based on the size and complexity of the council.

Documentation at Stevenage is light, with a single page PDF distributed as a 'quick glance summary' supplemented by online training. Support for complex requests and other issues is provided by the information governance team and shared legal service.

Senior management are engaged and are provided with monthly and quarterly reports, and issues in service areas are escalated to them for correction.

In our research we found that the service is managing, but there is desire to improve at all levels, reflected in the current search for a replacement technical solution.

At Stevenage online training is available for all staff, focused on how to use the software, and basics of the FOI Act. New training, more focused on the Act and the technical side of the law, is planned. Despite the operational changes experienced in the specific service team, there is continued strong support provided from the IG Manager & shared legal services for complex FOI requests and any other related issues.

East Hertfordshire

East Herts District Council is the smallest of our partner councils, and operates within a shared service with Stevenage. They are an outlier in terms of size, with an information management team of one, and a low volume of requests.

East Herts' long serving staff member, holding wide FOI expertise and knowledge with which to support teams, reflects the small size and particular services carried out by the council. There is a proposed Shared IG service between East Herts District Council & Stevenage Borough Council being explored to increase shared knowledge and resources in this area, which will benefit both councils greatly.
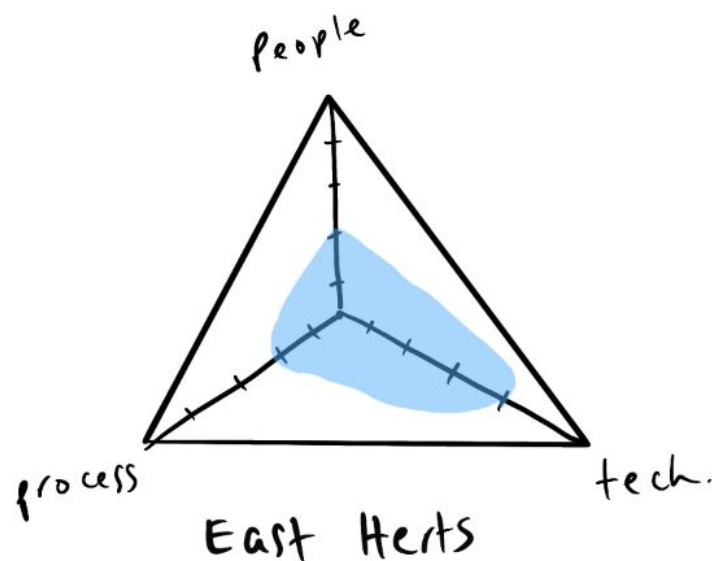
Technology

East Herts use Infreemation, and make extensive use of pre-filled responses, with reports and notifications of due requests being used in service area management meetings to ensure compliance with deadlines.

Process at East Herts is very light, with basic written guides to assist staff should they need it. Multi-service requests are handled through the heads of service; the information is then collated and the request responded to by the FOI officer.

There are training PDFs and guides available, and some informal software based training is planned for the future, but there is no pressure internally to get this moving.

Most of the knowledge of the organisation is housed within the single longserving employee's head, which is working fine for now, but is a risk — should this staff member move on, it could take a long time to rediscover that knowledge.

User needs

We have created a collection of user stories related to FOI and SAR case management in [Trello](#). Here we present the user stories we think represent the key user needs that have the biggest impact on the efficiency and quality of FOI services.

Oversight - the 10,000 ft problem

In our work with our council partners, we found that although they followed broadly the same process, their external context and emphasis on the different elements of an FOI service varied significantly. This means that the best way to improve efficiency in case management may be different for each local authority. The situation at each authority had also changed over time, and is likely to change again in the future, meaning that a repeatable way of assessing the current 'shape' of an FOI service and paths to better performance could be useful.

The Information Commission lays out [clear guidelines](#) on *what* good performance in FOI looks like, but there is less guidance available to people running FOI services in local authorities in *how* to improve from where they are, or to learn from approaches taken in other authorities - this is something authorities do individually, if at all. This user need is expressed in the following story:

> As an **FOI Manager** I need to **know how to operate the FOI service** so that **I can meet the obligations of the FOI Act**.
>
> I know it is done when **I have a clear path for understanding and improving:**
>
> - the **skills** of the people
> - the **processes** that guide them
> - and the **technology** to make tasks easier

in the organisation.

The allocation problem

Through our research we have found that the allocation stage is where significant time is lost, and where the biggest impact could be made to an underperforming process by a technology change. Time saved here allows more time for information retrieval, response approval, and amendments where the workload is less predictable.

Time lost at this stage isn't only due to misallocation, where finding the right person is the challenge, but also to people in the process not acting quickly enough. For example, staff not reading the content of a request in enough detail to judge whether they are the correct person to locate the information requested until long after the request has been allocated to them.

The overarching user story applicable to the allocation problem is:

> As a **Central Team member**, I need to **get the correct information from the Information Holder**, so that I **can respond to the Citizen on time**.
>
> I will know it's done when **I respond with the information within the 20 working day limit**.

In larger and more complex councils, the central team often don't know where the information they need is, and can't rely on tacit knowledge, so they must use an intermediary, a 'service champion' to help assign the request. This means that by proxy the Central Team have to get it to the Champion promptly, and just as importantly, the champion needs to get it to the Information Holder promptly, as described in the user story below:

> As a **Service Champion**, I need to **promptly allocate requests to the correct Information Holder,** so that I **have enough time to receive the information and compile an approved response**.
>
> I will know it's done when
>
> - **I get requests allocated to me within 48 hours**.
> - **I allocate requests to the information holder within 48 hours**

The chunking problem

In almost all cases, FOI is only a small part of an information holder's responsibilities. Through our observations we saw information holders receiving the entire text of complex requests, requiring input from multiple departments. This results in having to read the whole text in detail to find the parts relevant to them, creating extra work for the Information Holder. Error or inefficiency is more

likely, as when the information holder misses one of their questions, or where two information holders answer the same question.

This creates a burden on the Information Holder to work out what they need to do, out of what can be a complex question, or it requires the service area Champion with manually breaking the request up through some means of their own design, as we observed at Hackney.

This problem can be described as:

> As an **Information Holder** I need to **receive well-formed FOI requests** so that **I can get on with my other responsibilities**.
>
> I will know it's done when **I am presented with clear questions that *I* can answer**.

Information holders should still be able to see the full context of the request, as this may be pertinent information, but they should not have to parse out the bit that they need to do each time.

The insight problem

In order to improve the efficiency of an FOI service, there's a need to understand quickly and easily how the process is working at the moment — as a whole and across individual service areas — in terms of speed and also quality of responses. A system that can calculate, apply and notify the user of the statutory timelines for information requests is key to this reporting, in order to alleviate the need to do manual calculations. This problem is expressed in multiple user stories, amongst them:

> As an **FOI manager**, I need to **get reports that reflect statutory deadlines**, so **I don't have to calculate them manually**
>
> As a **service area manager** I want to **understand the performance of my team within the FOI process** so that **I can ensure compliance with the law**

This need for insight into the volume and performance in individual service areas is particularly important. The distribution of requests to service areas is not even — each service area will receive a different typical volume and complexity, with planning, child, and adult services for example generally receiving a high volume and complexity. Central teams and service areas need to work together to ensure that deadlines are met in the face of competing demands on time, particularly in safety critical service areas. The distribution of requests will also change over time in response to external events, such as the Grenfell fire tragedy. The need for faster and better insight through reporting is felt particularly acutely at Hackney.

Digital services

From our [research into FOI in Local Government](#), we know that a majority of authorities use some form of case management system (66%), with a sizeable group (34%) having no case management or Client Relationship Management (CRM) system. However there is no standard or universally adopted software, and the nature and usage of these systems varies significantly between local authorities, with some using generic business software like email, in combination with Microsoft Excel and Access (~6% and 3% of authorities respectively, and two of our partner councils), and some using FOI and SAR-focused or self-customised modules of generic case management software, like iCasework (used in ~7% of local authorities), Lagan (used in 3% of local authorities and one of our partner councils) and Infreemation (used in ~2% of local authorities, including two of our partner authorities).

In this research, we found that in councils using generic business software, there is significantly more manual work required to run the FOI service: it's more time-consuming to send reminders and track progress. In authorities using case management systems, we found that the basic process of case management was handled reasonably well by the systems, but that there were still common areas of friction. This is notable in particular where information has to be duplicated across IT systems, for example in double keying where data about requests comes in from multiple different systems, and in drafting responses collaboratively and then copying them into a case management system, or into an email client to send to a requester.

The areas with greatest unmet needs across all authorities centred around the aspects of the service that are most specific to FOI and SAR — the problems of chunking and allocation that are seen in particular with complex requests; the need for reporting that is aware of statutory timelines and assigns mini-timelines to elements of the process; and the lack of clear separation of internal review cases from other cases.

Initially we just encountered private sector and in-house systems. However, the approach of working in the open on this project led to us being contacted by the Ministry of Justice, who have been developing an [open-source correspondence](#) tool, used for handling their SARs and FOI requests. It has been developed inhouse over the course of two years, with a three person team, and is now in a state of public beta within the Ministry. The development process included a significant amount of user research within the Ministry, and the treatment of some design decisions is significantly different from what we saw and what was described in the private sector case management systems. We included review and testing of this system in our [alpha prototyping phase](#).

Performance metrics

All the councils partnering in this project track the number of requests they receive and the number that are responded to within statutory time limits, and mySociety's wider research indicates that this is fairly universal across principal local authorities. However, whilst these compliance level statistics are useful as a headline figure, there are other metrics that would be good complements in terms of understanding the quality and efficiency of an FOI/SAR service, and how that might improve over time in response to different interventions.

One notable feature of this figure at the moment is that in isolation, it offers a rather perverse incentive to prioritise cases that are still within the statutory time limit over those that are already late. Responding to requests that are already late does not have any positive effect on compliance statistics, whereas responding to requests that were received more recently and are still within the statutory timeline does.

The statutory compliance figure tracks the time elapsed before a request is responded to. In order to understand the efficiency of request handling, it would be useful also to measure the amount of time actually spent on each request. As we will discuss in more detail in the benefits case for this project, a large fraction of the budget of request handling is made up of staff time, so the ability to track staff time spent on requests would help councils understand better the cost/benefit ratio of possible interventions they could make to improve their service. Current assessments of differences in efficiencies that can be attributed to software are limited to largely to qualitative measures, as these kinds of metrics aren't in widespread use.

Time spent is also a metric that can be applied consistently across SARs and FOI requests. We have focused more specifically on FOI than SAR in this research as the case management problems are more central to the bulk of the work in FOI. However, the two kinds of information request are commonly handled by the same central team and champions. A repeated theme in our interviews was the increase in SARs in recent years, which may be attributable to increasing knowledge of personal data rights through the implementation of GDPR in May 2018. SARs are in general more time consuming than FOI requests, but also more variable in the amount of time that they take to respond to - with some requests necessitating responses that run in excess of 10,000 pages which require redaction. Tracking the time spent per request would allow better quantification of the way in which SARs and FOI requests are competing for council resources, and allow councils to better understand the relative benefits cases of relatively difficult or specific interventions like creating time saving efficiencies in SAR collation, review and redaction and in the information gathering from specific systems to respond to FOI requests. Time spent per request would also be a useful metric in understanding the cost in terms of time of internal and ICO reviews conducted on FOI requests.

The number of of requests referred to internal review is a metric that the ICO now recommends that authorities with over 100 Full Time Equivalent (FTE) should track in its FOI Code of Practice. In order to understand the breadth of understanding and good practice in an authority, the percentage of request decisions that are overturned in internal review is also a useful metric. A high proportion of overturned decisions could show that good practice and a good understanding of the law is not widespread within the organisation.

Conclusions

Although all our partner councils handle requests using a similar process model, there is quite a high degree of variation in the context in which they operate and the extent to which the teams emphasise the different elements of the service. This results in a situation where there are some common user needs across partners, but its not clear that an improved case management system would obviously be the most direct route to greater efficiency for all of them – investments in training and process across service areas could also be powerful tools.

A striking difference we observed between Hackney and Cornwall was that while both have very a similar context in terms of headcount and request volume, their emphasis on each element of the service, and their compliance rate, is very different. We later learned that Cornwall has around 15 champions, while Hackney has more than 50. Even where context is similar, emphasis on different elements of the service or specific implementation details may have an impact on performance. Further investigation would be required to uncover the reasons for the variation in compliance rate in detail.

The value put on transparency across the entire local authority is a key determiner of ability to respond to requests efficiently, and the ability to report on service area performance rapidly and accurately is an important contributor to that. However, the other part of the picture is the way that information is handled by service areas — whether it is reviewed as part of weekly management meetings, considered in job appraisals, etc.

The unmet needs around complex FOI requests identified in previous discovery processes at Hackney are also shared by the other partner local authorities, but the extent to which they impact on performance is also influenced by the volume and complexity of requests, the size and complexity of the authority, the volume and complexity of SARs, the training and experience of central teams, champions, and information holders, and the consistency and documentation of process.

Our council partners are typically handling the case management of FOI and SARs in the same central teams, and with champions within service areas, and there is also evidence that changes in volume and complexity in one area will adversely affect the other, so despite the differences in

where the volume of the time is spent, it seems appropriate for the same digital solutions to support both. Additionally, the council staff who would use a case management system are operating in a complex software environment, with lots of applications for different tasks, so there's a benefit to reducing the number of systems they interact with. In some authorities, the same staff and the same system also handle (whether developed in-house or procured) complaints and members' enquiries — there's a question as to whether a case management system would need to handle these as well in order to get widespread adoption.

In general, the benefits case around any interventions in FOI/SAR handling would be easier to quantify if performance metrics tracked included the time spent on each request (or a sample of requests) as well as the time elapsed before a response is sent.

We believe that there is potential for digital solutions to address these needs and to generally increase the efficiency of FOI and SAR handling. There is also an opportunity for digital solutions to help more councils understand where in this variety of approaches and contexts they currently sit, and how they can best improve. We describe approaches to these needs in more detail in our [prototyping and testing report](#).

Appendix 1: Interview statistics and guide

Summary statistics

Council	Number of interviews
Hackney Council	8
Cornwall Council	4
Stevenage Council	4
Suffolk Council	3
East Herts District Council	1*

* East Herts & Stevenage operate as a Shared Service, although their information management services are separate.

Interview guide

Introduction

We're <names> from mySociety, and this user research interview is intended to give us plenty of useful information to improve the way FOI and SAR requests are managed internally. This is an informal interview designed to give us information about systems and processes. It's not a test and anything you say in here won't be used to judge you or your colleagues' performance in any way.

You don't have to answer every question, and you can end the interview at any time. It's not meant to be stressful or taxing in any way. At the end of this process we hope to have a working prototype of a new system and/or process - and we'd love for you to test it.

Interview questions

- Tell us about your role
- (If not directly connected to FOI) How does FOI factor in?
- How do you receive FOI requests or SARs?
- How many requests do you deal with personally in a year? How often?

- What action do you need to take a when a request arrives? Take us through step by step, don't be afraid to go into detail (Ask questions here to ensure we can approach detailed process description)
  - Do you follow a checklist or guide or similar?
  - How do you handle requests with several questions?
  - Check against process docs if available
- Some requests require input from multiple people in multiple departments, tell us about your experience working on those
- How do you communicate with colleagues who are working on the same request?
- (If not directly connected to FOI) How did you get the responsibility of dealing with requests?
- How do you feel when an FOI request arrives?
- (If not directly connected to FOI) What happens If you can't get information together in time, or if the information you replied with is wrong or incomplete?
  - What happens when things don't go to plan or when a request comes back from someone internally?
  - How about externally?
  - Do you have any feedback at all on the requests you handle?
- What works well about your FOI and SAR processes?
- Where are the problems? What are they caused by? (Ask deeper questions here if necessary, people don't like to talk about things that are wrong if they think they might get themselves or anyone else in trouble)
- How do you know when you've done a good job on a request? How about a bad job?
- (if this person is responsible for other staff)
  - How do you know the status of the FOI requests in your team?
  - Do you know how well your team is performing?
  - Where would you make improvements?
  - Where would you go for this information?
- Where do you go for information, clarification and help?

Encourage the interviewee to elaborate

Use questions like -
- You said 'x' - tell us more about that -
- in what way... -
- Can you talk more about how... -
- *silence* (let them fill it)

Ending the session

Thank you for you time and your answers - they will be very useful going forward.

Your responses will be collated with all the other participants and shared with the project team in a report. This report will go on to inform the design of a new process or system that will be used to improve the way FOI works at your organisation.

Do you have any further questions or points? Any feedback on the session itself?

If anything comes to mind here's how to contact us.

Follow up questions

- Have you had any training in software or processes?
- Have you got any relevant qualifications?
  - Eg legal, politics