



Veritau Group

Information Access Policy

Contents

Policy Statement	2
Purpose and Obligations	2
Scope	3
Responding to a Request for Information	3
Complaints	3
Charges	4
Publication Scheme	4
Public Task	4
Compliance and Codes of Conduct	5
Review and Revision	5
Key Messages	5

Veritau Group

Information Access Policy

POLICY STATEMENT

- 1 This policy sets out how the Group will fulfil its duty to disclose information to enquirers under the
 - General Data Protection Regulation (UK GDPR) and Data Protection Act 2018 (DPA),
 - Freedom of Information Act 2000 (FOI)
 - Environmental Information Regulations 2004 (EIR) and
 - Re-use of Public Sector Information Regulations 2015 (RoPSI)
- 2 In addition this policy includes the Group's Statement of Public Task.

PURPOSE AND OBLIGATIONS

- 3 The Group holds information and data in its own right (including financial, performance and staff related information). It also holds information and data on behalf of its client organisations to support the delivery of its services. Some information may be held by reason of its Public Task.
- 4 The legislation above provides certain rights of access to information held by the Group, as follows:

	Information within scope	Request may be made by	Style of request
GDPR	Personal data of the enquirer	the data subject (or his/her representative) only	Can be verbal as well as written.
EIR	Environmental information	anyone	Can be verbal as well as written
FOI	Information not falling in either of the above categories	anyone	Must be in writing
RoPSI	Information held under the Group's Public Task	anyone	Must be in writing

- 5 Personal data and environmental information are defined in the relevant legislation. 'Anyone' includes members of the public, whether in a private or professional capacity, and organisations of any type. E-mail, text messages and tweets qualify as written requests. SIRO and IAO are as defined in the Group's Information Governance Policy.
- 6 The aim of this policy is to ensure that:
 - the Group complies with its obligations under the above legislation ;
 - financial, legal or reputational risks to the Group are minimised;
 - consequential risks to the Group's clients are also minimised.

Veritau Limited

Information Access Policy

SCOPE

- 7 The companies comprising the Veritau Group are:
 - Veritau Ltd
 - Veritau North Yorkshire
 - Veritau Tees Valley
- 8 This policy applies to all employees, contractors and agents of the Group with any form of access to Group's information and information systems.
- 9 The right of access under UK GDPR/DPA applies to all personal data which relates to the requester and which is held by the Group unless an exemption applies.
- 10 This policy applies to all recorded information held by the Group. In particular information 'owned' by another party, or in which the copyright or intellectual property of another person lies, must still be disclosed unless exempt.

RESPONDING TO A REQUEST FOR INFORMATION

- 11 The Information Access team will manage and coordinate requests made to the Group. Requests received anywhere in the Group should be forwarded to that team for action. The team will log the request and provide a reference number.
- 12 Information Asset Owners (IAOs) are responsible for responding to any information request concerning any of their information assets. Each IAO is responsible for:
 - Deciding whether the information requested is held;
 - Locating, retrieving or extracting the information;
 - Consulting with third party data subjects, copyright holders or organisations which might be affected by disclosure;
 - Considering whether any exemptions might apply, and the balance of the public interest test, taking account of the advice of the Information Access team
 - Preparing the material for disclosure and drafting the response.
- 13 The Information Access team will review each draft reply for completeness, compliance with relevant guidance, and the proper application of exemptions. The draft may also be forwarded to the SIRO, if necessary, for further comment or approval.
- 14 Once approved by the Information Access team, the IAO will be responsible for sending the response to the requester. However if an information request relates to information which is held across a number of teams, the Information Access team will coordinate and prepare a consolidated reply.

COMPLAINTS

- 15 Complaints about an information request should be notified to the relevant Information Governance Manager, who will arrange a review. It will be conducted

Veritau Limited

Information Access Policy

by a person who, as far as possible, was not involved in earlier decisions, and will consider:

- compliance with relevant codes of practice and other guidance;
- whether exemptions have been properly applied; and
- whether the public interest test has been correctly applied.

- 16 The relevant IAO will assist the Information Governance Manager in this. The Information Governance Manager will take account of the IAO's views, as well as advice from other relevant sources.
- 17 Although the DPA has no provision for complaint, the above procedure will still apply if an enquirer complains about a subject access request, in order to reduce the risk of complaint to the ICO.
- 18 The Information Governance Manager, in consultation with the SIRO, will respond to any complaints made to the ICO.

CHARGES

- 19 For FOI requests completed within the appropriate limit, a charge will be made to cover the costs of disbursements for reproducing the documents (at 10p per A4 page plus the actual cost of postage). Charges may be waived by the SIRO if in his opinion the enquirer's circumstances are such that his or her rights would be unfairly curtailed.
- 20 If the cost limit will be exceeded, the SIRO will decide whether to go ahead, charge, or refuse the request.
- 21 The Group will charge for locating information in respect of EIR requests (at a rate of £25 per hour) and for any associated disbursements (at 10p per A4 page plus the actual cost of postage).

PUBLICATION SCHEME

- 22 The FOI Act requires every public authority to have a Publication Scheme, approved by the Information Commissioner's Office (ICO). The scheme sets out the Group's commitment to make certain classes of information routinely available, such as policies and procedures, minutes of meetings, annual reports and financial information.
- 23 No charge may be made for any information listed in the Publication Scheme, unless the charge is also detailed in the Publication Scheme.
- 24 The Information Governance Manager will from time to time review and re-publish the Publication Scheme on the Group's website: www.veritau.co.uk

PUBLIC TASK

- 25 The companies comprising the group are public authorities because their ownership fulfils the definition in FoI. Under RoPSI a public authority must identify what its public task is because the Regulations apply only to information produced for that task.

Information Access Policy

- 26 The only public task of any of the Group's companies is to respond to FoI requests.

COMPLIANCE AND CODES OF CONDUCT

- 27 All employees, contractors and agents by the AD Information Governance are required to comply with this policy. Failure to do so may result in disciplinary action being taken against the individual concerned.

REVIEW AND REVISION

- 28 This policy will be reviewed by the AD Information Governance when legal or other circumstances make it necessary..

KEY MESSAGES

- 29 IAOs are responsible for managing the information within their business area. This includes responding to any information requests.
- 30 Copies of all information requests received should be provided to the Information Governance Manager who will log the request and support the IAO in responding to the request.
- 31 The Information Governance Manager will from time to time review and re-publish the Group's Publication Scheme.
- 32 Complaints about an information request should be notified to the Information Governance Manager, who will arrange an internal review. Any complaints to the ICO will be addressed by the Information Governance Manager, in consultation with the SIRO.