

ACTION PLAN

Formalising the measures Greater Manchester Police will take to comply with its legal duties under Part 1 of the Freedom of Information Act (FOIA) to respond to information requests in a timely fashion and clearing the backlog of late requests by 31 July 2024

SUMMARY: This Action Plan sets out details of how GMP intends to deliver the two objectives set out in the Information Commissioner's Office (ICO) Enforcement Notice, documenting action required before July 2024 and work already completed since February 2023 after having received the ICO Practice Recommendation.

1. Measures to comply with legal duties under Part 1 of the FOIA to respond to information requests in a timely fashion

GOVERNANCE	RESOURCING	TRAINING	POLICY / PROCEDURE
Publish Senior Information Risk Owner's (SIRO) response to the ICO Enforcement Notice with commitment to improving compliance and adhering to the terms of the Notice. Completed - December 2023	- Appoint a dedicated ICO liaison lead within the Information Access team as single point of contact for complaints from members of the public and enquiries from the ICO. Completed - November 2022 - Submit request to secure additional resource for FOI team. Completed - October 2023	- FOI case officers to undertake National Police Chief Council (NPCC) FOI training. Completed - February 2023 and ongoing - DPO to deliver specialist training to FOI case officers focusing on aggregation, clarification of requests and vexatious requests and Section 12 time limits. Completed - June 2023	- Commence using new Customer Relationship Management (CRM) system for processing incoming requests. Completed - July 2023 - Engage an independent business analyst to review delivery of GMP's FOI function. Completed - July 2023 - Undertake an internal audit review of the FOI function - Completed - November 2023 - Commence process to publish FOI compliance stats on a monthly basis. Completed - December 2023

2. Measures to clear outstanding requests by 31 July 2024

- Establish corporate project team with Gold Command and weekly review meetings. Establish Operation name for Force-wide engagement and accountability - Completed - December 2023 - Establish dedicated FOI review project team and reporting structure for processing outstanding requests. Completed - December 2023 - Communicate with all Heads of District and Branch and IAOs about force-wide Operation and support required. Completed - January 2024	Reallocation of resources within Information Management Branch to focus on the outstanding requests. Completed, January 2024	Review expertise and specialist knowledge of the FOI review team to ensure high-quality response to processing outstanding requests. Completed - December 2023 and ongoing.	Commence using new Customer Relationship Management (CRM) system to process outstanding requests and monitor progress. Completed - July 2023
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WORK IN PROGRESS

TRAINING	POLICY / PROCEDURE
- Review content of mandatory FOI corporate induction for all police staff and officers. Target date - March 2024 - DPO to deliver next stage of FOI specialist training to FOI case officers focusing on vexatious requests. Target date - May 2024	- Review Information Access team's existing internal procedures and processes, with a particular focus on improving internal review response times as per the ICO's Code of Practice. Target date - March 2024 - Review agreements and processes in place with partner organisations and contractors to supply information in response to a request. Target date - March 2024 - Further develop processes in place to detect common trends and recurring themes for requests to analyse repeated and topical requests with the view to proactively publish information where appropriate. Target date - April 2024 - Undertake a review of wider technology tools available to improve FOI reporting. Target date - April 2024 - Review FOI KPIs provided to the appropriate corporate monitoring board chaired by the SIRO, to ensure continued effective escalation of issues and analysis of trends. Target date - April 2024 - Review existing publication scheme. Target date - July 2024 - Review existing FOI policy and standard operating procedures for internal compliance with the view to relaunch the policy within GMP by July 2024. Target date - July 2024