

ISD Protocol for Handling Information Requests

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SLPG – Short Life Protocol Group
SMT – Senior Management Team
SEHD – ASD – Scottish Government Health Department – Analytical Services Division
SAG – Statistical Advisory Group

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1. Introduction

- 1.1 A primary role of the Information Services Division of NHS National Services Scotland (ISD) is to collate, analyse, interpret and publish information about health and health care in Scotland on behalf of the Scottish Government and NHS Scotland.
- 1.2 In performing this broad information service role, ISD publishes 'official' statistics through topic based pages on its websites under National Statistics arrangements, and makes available data through a range of other media in support of planning, performance management, policy development and resource allocation. ISD also offers an Information Request Service which provides bespoke analyses of the information it holds in databases, at the request of a wide range of information users, subject to resource constraints and a prioritisation process.
- 1.3 This protocol sets out, for information users and ISD staff, the principles that ISD follows in response to information requests (IRs).
- 1.4 An Information Request (IR) is a request for information from ISD. It may include data from, or reference to, other sources of information, e.g. GRO population data. A typical example is a data analysis that provides more detailed information than is published on ISD's website. The definition includes FOI requests and information that is supplied on a routine or regular basis to the SG, NHS Boards, or other customers, unless it is part of a planned project or Programme of work (see below).

The following are not classified as Information Requests. However if teams wish to keep a record of requests of the types listed below they can be logged in IRS as an "Internal/Routine" requests. This option is found within the "Type of Request" field.

- Providing information from ISD's website, assisting a customer to find information on the website, or giving an explanation of information which is on the website.
- Discussion with customers about what information is available, but which results in no analysis being undertaken, and/or recommendations about other data sources and/or advice on methods of analysis.
- Work done for ISD colleagues, unless the colleague is asking for this work on behalf of an external customer, or it is part of a larger information request for an external customer. In this situation the person co-ordinating the IR should ensure it is logged on the IRS and inform all ISD colleagues involved of the IRS number.
- Work undertaken as part of a planned project or Programme of work where ISD have agreed to provide analytical support. This includes analysis requested by external customers such as the SG and NHS Boards provided it is for this type of project.
- Quality assurance analysis, undertaken either on behalf of data suppliers, or of data users, prior to, or at the time of, the publication of data.
- Coding information supplied by the Clinical Coding Team.

2. Information Request Service

- 2.1 In line with agreed principles and public expectations regarding access to statistical information, under which Government statistical organisations operate, bespoke information analyses may be requested by anyone. ISD therefore provides information, analyses, guidance and advice on the use of health statistics to a variety of bodies, organisations and individuals.
- 2.2 ISD will provide a bespoke analysis in response to an IR subject to a resource and priority assessment, and any overarching rules relating to ISD's statistical governance, provided:
 - The user is able to justify that other information already published or held as unpublished analysis by ISD is not suitable;
 - The user has stated clearly what they want to find out and if possible why, to enable ISD analysts to understand the request;
- 2.3 For the purpose of this document the core users of ISD services are defined as the Scottish Government (SG), NHS Scotland, partner organisations such as Local Authorities and drug agencies, Audit Scotland and independent contractors (dentists, GPs, opticians and pharmacists).
- 2.4 All other users of health statistics are non-core, be they bodies or individuals, and include; NHS staff undertaking research; professional organisations for staff; private companies, political parties; politicians and their researchers or the Scottish Parliament Information Centre (SPICe); the media; charities; campaign groups covering a variety of concerns; and the general public. Note in particular that non-Scottish NHS or Government bodies should also be regarded as non-core.
- 2.5 The subject matter of most of the analyses provided by ISD relates to activity within NHS Scotland and the health profile of people in Scotland. For this reason NHS Scotland bodies, and the SG at national level, may have an interest in, and a need to know in advance of publication of, any analysis undertaken by ISD for other organisations and individuals.
- 2.6 ISD's general aim is to answer IRs within 20 working days or in a timescale to suit the user. However resources are limited for this service. IRs estimated to need more than 2 days work may need some negotiation to reach agreement on the deadline and/or funding.
- 2.7 All IRs from non-core users, or requests from core users that require more than 5 person days effort, may require special funding or cost recovery in order that ISD can fund this service. Non-core and Core users are defined in Paragraphs 2.3/2.4.

3. Protocol for Handling Information Requests

3.1 The protocol below shows how ISD staff should act when approached by a customer for information (see also the flow chart attached + checklist – Appendix 1).

3.2 Generally ISD staff will take the following approach while mindful that PQ and FOI requests for data are also subject to their own Standard Operating Procedures:

3.2.1 Step one:

Obtain details of the request from the customer, including their requested deadline for receiving the information. If the analysis requested, or a close fit, is on the ISD web site a 'link' will be provided if acceptable to the customer. Otherwise no firm commitment will be given at this stage, particularly with regard to timescales.

The steps below should be followed for all requests from the media:

Media request direct to analyst: The analyst should email the ISD Media Spokespeople email group asking the Customer Support Desk to log the request in their system (Assyst). This email should also include details of how the analyst plans to proceed with this request, by either:

- referring journalist to website;
- informing journalist that information is not centrally available;
- providing unpublished information (information request – follow procedure below).

Media request to CSD: CSD log the request in their system (Assyst) and then email ISD Media Spokespeople email group with the details. The relevant ISD analyst should pick up this request by replying to all the ISD Media Spokespeople email group explaining how they plan to proceed with this request, by either:

- referring journalist to website;
- informing journalist that information is not centrally available;
- providing unpublished information (information request – follow procedure below).

Either way only if unpublished information is to be provided does this become an Information Request and the procedure below followed. Unpublished information is any information that has not previously been released to the public. For example, information released to the SG or a NHS Board as part of an IR should be regarded as unpublished.

3.2.2 Step two:

The request details should be entered into the ISD Information Request System (IRS) before the work to provide the information to the user is commenced. This is important and should include completion of the SG contact field if applicable under 3.2.4 below.

3.2.3 Step three:

The request should be discussed with a Principal Statistician or Programme Manager (this role can be delegated further to a Senior Analyst). The responsible 'Senior Person' will decide when the work can be scheduled taking into account:

- the type of request;
- an estimate of the size of the job;

- current outstanding priority work;
- the customers requested timescale;
- any preview period (see 3.2.6);
- confidentiality.

Responsibility for the decision on how to process the request will lie with the Senior Person, advised by the analyst. If resource, priority or sensitivity (confidentiality, political or otherwise) is an issue, this Senior Person will, in all cases, seek advice from his/her line manager. Major issues will be referred to one of the following: Head of Group/Head of Programme, or if he/she is unavailable, the Head of Statistics, Deputy Director, Medical Director or the Director in order to decide how to respond to the customer.

Points to note:

- a) *The other overarching rules that guide ISD's statistical governance, including National Statistics protocols, Data Protection and the handling of small numbers in tables, and the Freedom of Information Scotland Act must be considered.*
- b) *Where data quality issues affect the fitness for the specific purpose intended – an example of this is where the customers want to know the 'longest time waited' from the A & E Waiting Times Survey - a decision may be taken not to carry out the analysis requested. Why? - because ISD cannot guarantee the accuracy of every patient record provided by hospitals and therefore do not in general analyse and present as meaningful such statistics about the extremes of distributions.*
- c) *If the request is for research or audit; or is for a body or individual outwith the NHS; if it suggests a need to release data at a level that could threaten patient privacy; or if record linkage is involved, the Privacy Advisory Committee may need to be consulted – in this case seek advice of the Caldicott Guardian.*

3.2.4 Step four :

Once agreement is reached between ISD and the customer on how to proceed, the Senior Person will determine whether it is necessary to inform a contact within the SG that ISD is dealing with the request (this only applies to IRs from non core customers). This contact should be the Analytical Services Division and your normal policy contact. If the sensitivity of the IR topic area is uncertain the senior person should err on the side of caution and inform the SG. If it is decided to inform the SG the SG contact field on the IRS should be completed with "SG". Once contact has been made "SG" should be replaced with the name of the person contacted. A standard email format should be used when contacting the SG (Appendix 2).

Points to note:

- a) *An example of a request that may not need to be copied to the SG would be one that concerns a relatively non-contentious issue, e.g. an analysis of births by age of mother and gestation period or an analysis of patients admitted to hospitals in Scotland by deprivation category.*
- b) *IRs that you should inform the SG about are those that are likely to make it into the media or Parliament.*
- c) *Frequently requests for information are made at short notice. However the steps outlined above should apply.*

3.2.5 Step five :

All outputs should be assessed for disclosure issues and appropriate measures taken to reduce any risk of disclosure. Please see [Statistical Disclosure Control Protocol](#).

For core customers there will be occasions when we need to provide information which contains small numbers, for example providing a Board with their own data. However it is our duty as the provider of this output to highlight any potential disclosure issues. Therefore any such outputs should contain the standard note provided in ISD's [Statistical Disclosure Control Protocol](#).

3.2.6 Step six:

Once the analysis is complete, where applicable, the Senior Person must ensure preview copies are distributed a minimum of two days before release to the user. In exceptional cases the preview period may be foreshortened by force of circumstances, for example unforeseen difficulties in producing the analysis requested.

Preview copies to NHS Boards: NHS Boards should be sent preview copies of all non core customer and Local Authority requests where sub-Scotland analysis, which affects their board, is provided. The analyst should email the following information to the "NSS.isd-HBInfoPreview@nhs.net" mailbox:

- the NHS Board or NHS Boards who are to receive a preview copy;
- details of the information requested;
- who has requested this information;
- a copy of the information being provided.
(please note: if the output is too large to email explain this, state briefly what it contains and who to contact should they wish to see the output).

The ISD Executive Office manage the Health Board Information Preview mailbox and will distribute the preview copy to relevant Board(s).

Preview copies to the SG: If in Step four (3.2.4) it was agreed to inform the SG of a particular Information Request from a non core customer then they should be sent a preview copy of the output using the email template in Appendix 2.

3.2.7 Step seven:

The ISD Executive Office should email all preview copies to the contacts at the relevant Board(s) (as advised by analyst) using the template provided in Appendix 3 (with copy to analyst who provided output). Contacts at each Board are held in the contacts group "CE and Communication Leads" within the "Health Board Information Preview" mailbox. The preview copy should be distributed as soon as it is received by the ISD Executive Office.

3.2.8 Step eight:

If no preview copies are required to be distributed the analyst should pass the requested output to the customer. The analyst should update and close the IRS record.

Where preview copies have been distributed the output should be sent on the agreed date.

4. Prioritising Information Requests

4.1 Standard Requests

These are requests from the core users of data held by ISD: the Scottish Government (SG); NHS Boards and other NHS Scotland bodies; Local Authorities and other partner organisations. These should be handled, subject to resource constraints, as quickly as required by customers in terms of priority. Contractors (eg consultancy firms) hired by core customers may be treated as 'standard' provided email confirmation of the contract is sent by the core customer.

Other points to note are as follows:

4.1.1 Scottish Government

The SG will frequently require information at NHS Board, hospital or Community Health Partnerships (CHP) level but there is no general requirement that NHS Boards need to be told, although in certain cases the SG might ask that ISD inform the Boards concerned.

Some requests may be related to Ministerial business, for example information to include in responses to enquiries from the media, organisations or individuals such as constituents. These may require more urgent attention than the norm.

4.1.2 NHS Boards and other NHS bodies

Requests received from staff working for local or national NHS bodies¹, acting on behalf of the organisation concerned and not as individual researchers, should also be handled as 'standard'. No special handling should be necessary even where an NHS Board asks for data that refers to another NHS Board provided no confidential data is requested. On occasion ISD may decide to share analyses with other Boards where this is thought to be useful.

4.1.3 Request from Local Authorities

ISD holds a wide range of information that may be of value to local authorities in the performance of their day-to-day functions. This includes information such as delayed discharges, older people services and drugs and alcohol. But it also extends to a much wider range spanning ISD's main health service data that may be useful for joint planning and working with CHPs.

Requests from local authorities that refer to the work of the NHS should be copied to the relevant NHS Board(s), and perhaps the SG, for information. Where the person dealing with the request is unclear whether this is necessary they should consult the appropriate ISD Senior Manager (see 3.2.6).

4.2 Parliamentary Questions (PQs)

These requests for information by MSPs are accorded a high priority and are handled according to the ISD [Standard Operating Procedures \(SOP\) for PQs](#).

¹ Includes territorial NHS Boards (e.g. NHS Lothian); NHS Quality Improvement Scotland and other special Boards including other parts of NSS.

4.3 Requests from or on behalf of MSPs

Such IRs may reach ISD in two main ways:

- a) The Scottish Parliament Information Centre (SPICe) provides a service to the MSPs and Parliamentary Committees. They contact ISD on behalf of MSPs where information is required.
- b) IRs are made direct to ISD from or on behalf of MSPs and their staff.

The following principles apply to such IRs:

4.3.1 Requests should be accorded a lesser priority than 'standard' requests (see above) but greater than 'all other' requests (see below).

4.3.2 ISD will endeavour to provide an answer within 20 working days for any requests estimated to require less than 2 person days effort.

4.4 Freedom of Information (FOI) Requests

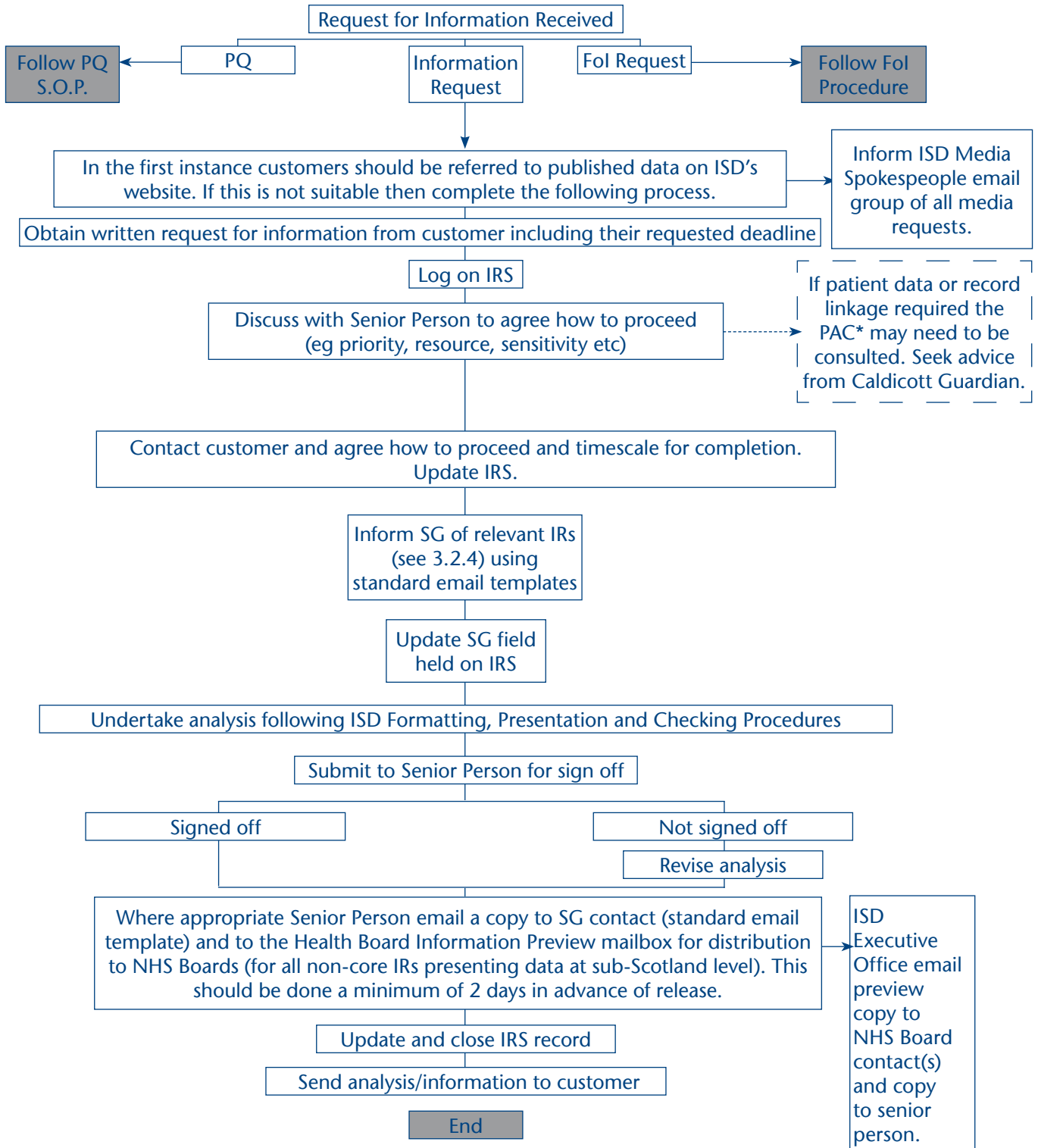
These requests also require to be managed with priority and within the timescales laid down by the Freedom of Information Scotland Act. Sections 3 and 4 of this document still apply, including sending preview copies to the SG and NHS Boards where appropriate. However additional steps should be followed in corresponding with the applicant according to the flowchart for FOI requests (see Appendix 4). An [FOI form](#) should be completed by the analysts for all FOI requests received. Further information on FOI is available in the [NSS FOI policy on geNSS](#).

4.5 All Other Requests

For all other non-core customers, examples of which are given earlier (paragraph 2.4), their IRs will have lesser priority than 'standard' and the categories mentioned above (paragraphs 4.2 – 4.4). ISD will however, aim to provide the level of service per Section 2 above.

Appendix 1 Flowchart and Checklist

ISD Process for Information Requests



* Privacy Advisory Committee

Information Request Protocol Checklist

Complete this form as you progress through the Information Request process. It is intended to be an aide-memoire, helping ensure all strands of the IR process are considered. It will not be used for any auditing purpose. Specific details relating to each section of the form below are available in the relevant ISD documents listed below.

Completed	Completed
1. ADMINISTRATION – ON INITIATION ○ Change the IR lead to the appropriate person on IRS	<input type="checkbox"/>
2. Consider if charging is appropriate – see IR Protocol section 2.7 ○ For non-core requests or those requiring more than 5 person-days’ resource; charging the customer should be considered.	<input type="checkbox"/>
3. NOTIFICATION & PREVIEW ACCESS – see IR Protocol section 4.2.3 et seq ○ For non-core requests determine whether the SG should be notified (at initiation) and given 2 days’ preview access (on completion) ○ For non-core, PQ and FOI requests presented at sub-Scotland geography the relevant Boards should be given 2 days’ preview access or copy of PQ answer.	<input type="checkbox"/> <input type="checkbox"/>
4. CONFIDENTIALITY AND DISCLOSURE – see 3.2.5, Disclosure Protocol and Confidentiality Rules (see links below) ○ Consider the need for a confidentiality statement or Privacy Advisory Committee (PAC) approval ○ Assess the risk of disclosure and apply appropriate measures to minimise the risk ○ For core requests where small numbers are to be released, apply the standard disclaimer note to all outputs	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
5. CHECKING – see Analyst Checking Procedures (see links below) ○ Check the final output	<input type="checkbox"/>
6. TRANSIT – see ISD’s Confidentiality Rules (see links below) ○ For hard copy or electronic media posting use recorded delivery mail ○ For sensitive or potentially disclosive releases, encrypt all electronic files	<input type="checkbox"/> <input type="checkbox"/>
7. ADMINISTRATION – ON COMPLETION ○ Close the request on IRS ○ Delete working files and zip the IR folder (e.g. on cl-out)	<input type="checkbox"/> <input type="checkbox"/>

Useful Documents and Links:

Disclosure Protocol	http://genss.nss.scot.nhs.uk/portal/page?_pageid=514,1563324,514_1856310&_dad=portal&_schema=PORTAL
Confidentiality Rules for ISD Staff, including transit instructions	http://genss.nss.scot.nhs.uk/portal/page?_pageid=514,1017013,514_1062868&_dad=portal&_schema=PORTAL
ISD Analyst Checking Procedures	http://genss.nss.scot.nhs.uk/portal/page?_pageid=514,1073415,514_1090450&_dad=portal&_schema=PORTAL&_mode=16

Appendix 2 Standard E-Mail Format for SG

Email format for informing Analytical Services Division and relevant policy contact:

Email 1: when the decision to proceed has been given by a Senior Manager and prior to the work commencing.

-----Original Message-----

To: [HDanalyticalservices@scotland.gsi.gov.uk; [relevant policy contact](#)]
Sent: 21st September 2005
From: [ISD Analyst]
Subject: Non Core Information Request : IRS [insert number]

Please see below a description of a Non Core Information Request which is to be carried out by ISD.

[Insert description]

[Insert ISD Analyst Name and Contact Details]

Email 2: Once the analysis is complete, the SG are sent a preview copy.

To: [HDanalyticalservices@scotland.gsi.gov.uk; [relevant policy contact](#)]
Sent: 22nd September 2005
From: [ISD Analyst]
Subject: Non Core Information Request : IRS [insert number]

Please see attached a copy of the analysis produced in response to the Non Core Information Request detailed in the email below.

This will be sent to the customer at 9am on [Insert date].

[Insert copy of the response and attach tables]

[Insert ISD Analyst Name and Contact Details]

Appendix 3 Standard Email Format for NHS Board Contacts

The email templates should be used by the ISD Executive Office for distributing copies of IRs, FoI requests and PQs to NHS Boards.

-----Original Message-----

To: Insert relevant Board contacts from insert name mailing list

Sent: Today's date

From: Susan Burney

Subject: Copy of information being released by ISD

For IRs and FoI requests:

ISD received the following Information Request/Freedom of Information Request and will be releasing the attached response to the customer at 9 am on [insert date].

[attach copy of output]

For PQs:

ISD has released to the Scottish Government the attached draft answer in relation to a recent PQ. Further editing of this answer may occur when considered by civil servants and agreed with the Health Secretary.

[attach copy of PQ]

Appendix 4 NSS Process for Freedom of Information requests

The NSS FOI process detailed below should be followed in addition to the protocols set out in sections 4 and 5 of this document. For example, although not detailed in the flowchart below, FOI requests should be logged on IRS, discussed with a senior person for scheduling and highlighted to SG if sensitive and NHS Boards if providing sub-Scotland analysis.

