ISD Protocol for Handling Information Requests

Version 3.5
ISD Protocol for Handling Information Requests

© NHS National Services Scotland/Crown Copyright 2006

Brief extracts from this publication may be reproduced provided the source is fully acknowledged. Proposals for reproduction of large extracts should be addressed to:

ISD Scotland Publications
Information Services
NHS National Services Scotland
Gyle Square
1 South Gyle Crescent
Edinburgh EH12 9EB

Tel: +44 (0)131-275-6233

Designed and typeset by:
ISD Scotland Publications

<table>
<thead>
<tr>
<th>Version</th>
<th>Date</th>
<th>Comment</th>
<th>Author</th>
<th>QA</th>
</tr>
</thead>
<tbody>
<tr>
<td>V1.0</td>
<td>06/05/05</td>
<td>1st version</td>
<td>Peter Knight</td>
<td>SMT</td>
</tr>
<tr>
<td>V2.0</td>
<td>31/03/06</td>
<td>2nd version</td>
<td>Graham Mitchell</td>
<td>SMT SLPG</td>
</tr>
<tr>
<td>V2.1</td>
<td>28/04/06</td>
<td>Incorporates amendments from QA</td>
<td>Graham Mitchell</td>
<td>SEHD-ASD</td>
</tr>
<tr>
<td>V2.2</td>
<td>05/06/06</td>
<td>Amendments from SG ASD</td>
<td>Graham Mitchell</td>
<td>SLPG SEHD-ASD</td>
</tr>
<tr>
<td>V2.3</td>
<td>13/06/06</td>
<td>Amendments from QA</td>
<td>Graham Mitchell</td>
<td>SEHD-ASD</td>
</tr>
<tr>
<td>V2.4</td>
<td>11/07/06</td>
<td>Amendments from SEHD-ASD + QA</td>
<td>Graham Mitchell</td>
<td>SEHD-ASD SLPG</td>
</tr>
<tr>
<td>V2.5</td>
<td>15/12/06</td>
<td>Amendments from SLPG</td>
<td>Graham Mitchell</td>
<td></td>
</tr>
<tr>
<td>V2.6</td>
<td>20/04/07</td>
<td>Amendments from SG ASD SAG</td>
<td>Graham Mitchell</td>
<td>SAG/SMT</td>
</tr>
<tr>
<td>V2.7</td>
<td>01/11/07</td>
<td>Addition of PSD PQs</td>
<td>Jane James</td>
<td>Graham Mitchell</td>
</tr>
<tr>
<td>V2.8</td>
<td>19/11/07</td>
<td>Addition of NHS Board preview</td>
<td>Jane James</td>
<td>Graham Mitchell/SAG/HOGs</td>
</tr>
<tr>
<td>V2.9</td>
<td></td>
<td>Amendments from SAG</td>
<td>Jane James</td>
<td>Duncan Buchanan/Philip Johnston</td>
</tr>
<tr>
<td>V3.0</td>
<td>01/01/09</td>
<td>Minor amendments</td>
<td>Jane James</td>
<td></td>
</tr>
<tr>
<td>V3.1</td>
<td>01/06/09</td>
<td>Minor amendments</td>
<td>Jane James</td>
<td></td>
</tr>
<tr>
<td>V3.2</td>
<td>30/05/12</td>
<td>Update following ISD reorganisation, inclusion of guidance on FoI, charging, IRS and IR Feedback Survey</td>
<td>Jane James</td>
<td>Philip Johnston</td>
</tr>
<tr>
<td>V3.3</td>
<td>16/11/12</td>
<td>Update to accommodate SHIP and eDRIS processes</td>
<td>Nicola Fleming</td>
<td></td>
</tr>
<tr>
<td>V3.4</td>
<td>18/12/12</td>
<td>Updated following comments from eDRIS CPT</td>
<td>Nicola Fleming</td>
<td>CPT</td>
</tr>
<tr>
<td>V3.5</td>
<td>01/08/13</td>
<td>Amended to bring Freedom of Information and Information Request processes into line</td>
<td>Nicola Rigglesford</td>
<td>N&amp;I analysts</td>
</tr>
</tbody>
</table>

SLPG – Short Life Working Group
SMT – ISD Senior Management Team
SEHD ASD – Scottish Government Health Dept Analytical Services Division
SAG – Statistical Advisory Group
Contents

1. Introduction .................................................................................................................. 5
2. eData, Research and Innovation Service (eDRIS) –
a one stop shop for health informatics research .................................................... 7
3. Information Request Service ...................................................................................... 8
4. Procedure for Handling Information Requests ..................................................... 11
5. Prioritising Information Requests ........................................................................... 19

Appendix 1 Guidance on Implementing ISD IR Charging Policy .................. 21
Appendix 2 Information Request System Fields ...................................................... 22
Appendix 3 Women and Children’s Health Information Team Guide .......... 25
Appendix 4 ISD IR Flowchart ...................................................................................... 26
Appendix 5 SG E-mail Format ...................................................................................... 27
Appendix 6 NHS Board Email Format ...................................................................... 28
Appendix 7 IR Feedback Survey and Standard Text ............................................. 29
1. **Introduction**

1.1. A primary role of the Information Services Division (ISD) of NHS National Services Scotland (NSS) is to collate, analyse, interpret and publish information about health and healthcare in Scotland for and on behalf of the Scottish Government (SG) and NHS Scotland.

1.2. In performing this broad information service role, ISD publishes ‘official statistics’ and non official statistics through topic based pages on its websites under Official 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 bespoke analyses of the information it holds in databases, at the request of a wide range of information users. These requests can enter ISD through a number of routes including the eData Research and Innovation Service, the Customer Support Desk or through direct contact with customers or stakeholders.

1.3. From January 2013, ISD offers the eData Research and Innovation Service – a one stop shop of health informatics research to specific information users including academic researchers and commercial companies. This service is designed for users wishing to access ISD data either via bespoke analyses or access to limited data in a controlled environment. The service is aimed at facilitating complex requests and research projects.

Further details of this service are detailed in Section 2.

1.4. ISD also offers an Information Request Service to all other information users. This Information Request Service is subject to resource constraints, prioritisation and potentially a charge.

1.5. This protocol sets out, for information users and ISD staff, the principles that ISD follow in response to Information Requests (IRs), Freedom of Information Requests (FoIs) and the guidelines by which requests are directed between the eData, Research and Innovation Service and the IR process. A separate ISD protocol exists for Parliamentary Questions.

1.6. 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. NRS population data. A typical example is a data analysis that provides more detailed information than is published on ISD’s website. The definition includes 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).
1.7. The following are not classified as IRs. However if ISD teams wish to keep a record of requests of the types listed below they can be logged in the Information Request System (IRS) as an ‘Internal/Routine’ request. This option is found within the “Type of Request” field.

a) Providing information from ISD’s website, assisting customers to find information on the website, or giving an explanation of information which is on the website.

b) 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.

c) 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 IR for an external customer. In this situation the person co-ordinating the IR should ensure it is logged on the IRS and should notify all ISD colleagues involved of the IRS number.

d) 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.

e) 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.

f) Coding information supplied by the Terminology Services.
2. **eData, Research and Innovation Service (eDRIS) – a one stop shop for health informatics research**

2.1. From January 2013, ISD has operated the eData, Research and Innovation Service (eDRIS) - a one stop shop for health informatics research. This facility provides expert services for specific research, complex and commercial customer requests.

2.2. All requests received by any ISD Service Area from customers falling into the categories below should be forwarded to the eDRIS inbox at nss.eDRIS@nhs.net. Customers who make initial contact with ISD via telephone should be directed to either the eDRIS Helpdesk on 0131 275 7333 or to e-mail nss.eDRIS@nhs.net.

Requests to be triaged to eDRIS:

All requests expected to take more than 2 days to complete that are received ‘in year’, sponsored by a non-core customer including:

- A university
- Pharma industry
- any other commercial organisation

And/or any work which is likely to:

- involve a linkage of datasets
- involve data not held in ISD
- cross discipline interpretation/intelligence
- innovative ground breaking projects

2.3. eDRIS requests will be co-ordinated by a dedicated Information Consultant or Research Co-ordinator who will liaise with the customers, other ISD staff and external organisations as appropriate. The Information Consultant or Research Co-ordinator will manage the project from initial discussions, through scoping of the project, sourcing the data, analysis of data and production of the final report.

2.4. All requests for information from ISD, whether as an Information Request or under the eDRIS banner, will be handled according to the regulatory framework outlined in Sections 3.5 and 3.6 below.

2.5. Charging for eDRIS requests will be discussed with customers on an individual basis and is the responsibility of ISD’s Bespoke Specialist Services team.
3. **Information Request Service**

3.1. In line with legislation, agreed principles and public expectations regarding access to statistical information under which public bodies 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.

3.2. ISD will provide a bespoke analysis in response to an IR, subject to resource, priority assessment and potentially a charge, provided that:

- 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;
- ISD’s statistical governance rules are met – see 3.5 and 3.6 for further details.

3.3. The Freedom of Information (Scotland) Act 2002 was introduced to ensure that people have the right to access information held by Scottish public authorities. The Act entitles people to obtain information held by a public authority, subject to certain exemptions such as protection of personal data and commercial interests, or national security. It came into force on 1 January 2005. As a public authority, NSS has obligations under the Act. The NSS Freedom of Information Policy & Review Procedure provides a framework within which NSS will ensure compliance with the requirements of the Act and this protocol builds on that.

3.4. ISD will treat all written information requests, whether they are stated as Freedom of Information or not, in a consistent manner that meets the legislative requirements and also allows ISD to continue providing a high standard of service and access to information for all our customers.

3.5. All outputs provided in response to an IR are subject to ISD’s overarching rules regarding statistical governance. This includes data protection, statistical disclosure control and Code of Practice for Official Statistics obligations.

3.6. ISD will not provide information in response to an IR where to do so would breach rules on early access to Official Statistics. Where the data requested are part of an Official Statistics publication series, where the headline data have yet to be published then the data will not be released in response to the IR. Exceptions to this are where data is made available for the following purposes:

- In compliance with Pre-Release Access legislation on Official Statistics;
- Early Access for Quality Assurance;
- Early Access for Management Information.
These purposes will generally involve ‘core’ customers (see Section 3.7). The ISD Publications Protocol contains more information on early access to data prior to first official publication.

The handling of non official statistics is generally the same as official statistics however information on differences is contained in the ISD Publications Protocol.

3.7. 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 treatment agencies, Audit Scotland and independent contractors to the NHS (dentists, GPs, opticians and pharmacists).

3.8. 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; the Scottish Parliament Information Centre (SPICe); the media; charities; campaign groups and the general public. Note in particular that non Scottish NHS or Government bodies should also be regarded as non-core. However in certain cases, for example, contributions to European Commission collections, there may be associated regulations with which ISD would wish to comply.

Requests received from customers described in Section 2.2 are also considered to be non-core. All non-core requests that are expected to take more than 2 days to complete are expected to be handled and responded to primarily by the eDRIS team although some may be passed to non-eDRIS analysts for completion.

3.9. 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 Scottish Government at national level, may have an interest in, and a need to know in advance of publication, of analysis undertaken by ISD for other organisations and individuals.

3.10. ISD’s general aim is to answer IRs within a maximum of 20 working days from the point where a specification is agreed with the customer, or in a timescale to suit the user. Note that this is not a standard response period and ISD will aim to supply information as quickly as possible, subject to other priorities. 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.

3.11. All IRs from non-core users, whether the customer refers to the Freedom of Information Act or not, are subject to a charge. ISD’s IR Charging Policy details the principles regarding charging for work undertaken as part of the Information Request Service. Appendix 1 provides guidance on implementing this policy in relation to non core customers and details the current daily/hourly charging rates.

3.12. Organisations that are NOT routinely charged include the NHS Information Centre when they are co-ordinating responses to a UK or international publication that ISD wishes to contribute to (e-mails usually arrive from ‘GROUP – International Statistics Team’), and SPICe.
3.13. Charging for eDRIS requests will be discussed individually with customers as appropriate.

3.14. All Information Requests must be recorded on the IRS. Access and log in details for the IRS can be obtained from the Customer Support Desk. For guidance on completing the fields within the IRS please see Appendix 2.
4. Procedure for Handling Information Requests

4.1. The procedure below sets out guidelines to be followed when approached by a customer for an Information Request. Although there are some minor differences in recording requirements for requests that reference the Freedom of Information Act, ALL requests should follow the same guidelines. See also the flow chart in Appendix 4.

Please note the additional steps required for all enquiries from the media (see Section 4.2.1 onwards).

Step by Step Procedure for Information Requests

Note that requests as detailed in Section 2.2 should be referred to the eDRIS Helpdesk (0131 275 7333 email nss.eDRIS@nhs.net). The steps in this procedure only apply to non-eDRIS requests.

4.1.1. Step One: (Analyst)

Check and assess the specification of the information request. Communication with the customer is encouraged in order to clarify the request, gain an understanding of the most appropriate output for the customer’s requirements and understand their requested deadline.

When clarifying the request, the analyst should consider:

a) Is the Information available on the ISD website? Where possible, refer customers to published data.

b) Is the information scheduled for publication in the next 12 weeks? Information due for publication within this time period should not be released. Customers should be referred to most recent published data and/or advised of the upcoming publication date.

c) Is the output likely to breach disclosure controls? Explain the implications to the customer and suggest greater/different aggregation or alternate outputs if possible.

d) Is the output likely to be commercially sensitive (i.e. to harm the business interests of a commercial company? Speak to the Information Governance Co-ordinator for advice.

e) Is the request repeated/vexatious – has the same customer asked numerous similar queries? Speak to the Information Governance Co-ordinator for advice.
f) Is the customer core or non-core? See para. 3.7 and 3.8 for guidance on customer types.

Customers should be informed of ISD’s standards of service for Information Requests (e.g. aim for 20-day maximum turnaround time). In addition, non-core customers should be made aware of ISD’s IR Charging Policy.

In terms of recording the time taken to respond to a request, the ‘clock’ starts once the specification has been confirmed with the customer. If the original e-mail required no further clarification then the clock starts when the e-mail was received.

If the customer specifically references the Freedom of Information (Scotland) Act (FoISA), the IR should also be logged with the Customer Support Desk and PHI Director PA for FoI reporting purposes and they should be kept up to date with responses to the customer.

4.1.2. Step Two: ownership/specification decision

(Analyst/Senior Person)

The Service Manager or Principal Information Analyst is responsible for the handling of Information Requests within their team. On a day-to-day basis the operational role may be delegated further to a Senior Information Analyst or Information Analyst.

This ‘Senior Person’, in discussion with the analyst, should consider the following and is responsible for deciding what analysis can be undertaken and whether or not the request should be referred to eDRIS:

- the customer type;
- an estimate of the size of the job;
- requirements for input from other teams across ISD e.g. data management, Terminology Services;
- current outstanding priority work;
- the customer’s requested timescale;
- any preview period;
- any sensitivities around data;
- any confidentiality and disclosure issues;
- whether or not charging is applicable;
- any data quality and fitness for purpose issues;
- any ‘early access to unpublished information’ issues;
- which category the request falls into.
ISD Protocol for Handling Information Requests

**Category 1 (refer to eDRIS):**

- Is commercially sensitive
- Requires non-ISD data (e.g. education, housing)
- Requires linkage work
- Is complex/inter-disciplinary
- Is a non-core customer AND requires more than 2 days work to complete.

**Category 2 (retain within NI&I/DM/SBD):**

- Core customers whose request does not fall into category 1.
- All other requests, including – all non-core customers where the request will take 2 days work or less to complete.

**Points to note:**

a) The overarching roles that guide ISD’s statistical governance, including The Code of Practice for Official Statistics, data protection, statistical disclosure control 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 customer wants to know the 'longest time waited' from A&E Waiting Times data – 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) Where the data requested are part of an Official Statistics publication series where the headline data have yet to be published then the underlying data should not be released, see 3.4 for further information.

d) If resource or priority is an issue, the Senior Person should seek advice from their line manager. Resource and priority decisions will be made in line with ISD organisational policy within team, Service Area, Head of Service division or NI&I as appropriate.

e) If sensitivity (confidentiality, political or reputational risk) is an issue the Senior Person will, in all cases, seek advice from their line manager. Major issues will be referred onto eDRIS and considered by the Approvals Group.

**4.1.3. Step Three: Administration (Analyst)**

If the request is to be retained within NI&I, DM or SBD enter details of the request into the ISD Information Request System (IRS) before any work starts. See Appendix 2 for completion guidance for the IRS.

If the request is to be passed to eDRIS all communication and background should be forwarded to nss.edris@nhs.net.
The Terminology Services helpdesk should be informed at an early stage of any requirement for clinical coding advice/input and timescales agreed.

When passing requests to other teams, or requesting input, the IRS number should be entered into the ‘Subject’ line of the e-mail for ease of tracking.

4.1.4. Step Four: Freedom of Information exemptions (Analyst)

If the request falls into any of the categories in Section 4.1.1 a) - e) and it has not been possible to reframe the request in discussion with the customer, the request should be refused under the terms of the Freedom of Information (Scotland) Act using the appropriate exemptions and templates. Advice should be sought from ISD’s Information Governance Co-ordinator to ensure appropriate terminology is used. CSD PHI Director PA should be notified of reason for refusal (exemption) under FoI.

4.1.5 Step Five: Advising Customer and Charging (Analyst)

If the request has not been referred to eDRIS, consideration should be given to whether or not the request can be completed within current resources or should be referred into the ‘New Work Approval’ process. Requests that are sensitive and/or risky, or large, should be referred into this process.

If the request is to be completed within NI&I, DM or SBD contact the customer to inform them of the decision regarding the content and timescale of their request. This communication should include:

- exactly what is to be provided;
- details of the timescale for completion;
- the charge, if applicable;¹
- how they should respond;²
- links to the IR and Charging policies on the ISD website.

Notes

1 Charging calculations should be carried out in accordance with ISD’s Charging Policy (see Appendix 1) for all NI&I, DM or SBD requests, based on whether the customer is ‘core’ or ‘non-core’. The Analyst should contact their local Admin team to proceed with the Charging paperwork/invoicing etc.

2 It may assist teams with planning work and resources, and to ensure the IRS is kept up to date and requests are not left open, to advise the customer that this request is valid for a set time period and if they do not reply within this time period you will close off their request. If teams do wish to include a time period, template letters detailing this are available within the Women and Children’s Health Information team’s guide (accessible via Appendix 3). (Teams should agree their own time period).
4.1.6 Step Six: Notify eDRIS (Analyst)

For ALL non-core requests undertaken by NI&I/DM/SBD, eDRIS should be sent notification of the IRS number and details of the query (nss.edris@nhs.net). This ensures that the Approvals Group is aware of ongoing work for non-core customers. If the Senior Person in Step 4.1.2 has deemed the request to be sensitive (political, reputational risk etc) then this should be flagged in the e-mail to eDRIS.

4.1.7 Step Seven: Customer Wishes to Proceed (Analyst)

If the Senior Person has indicated that the request is chargeable, written acceptance of this charge should be obtained from the customer. Details of the IRS number and an indication of the charge to complete the request should be mailed to the Admin Team for invoicing. Work should not commence until a Purchase Order number (or payment) is received from the customer and the clock stops while awaiting this.

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 SG policy contact. If, for any IR, the Senior Person is uncertain whether the SG should be informed, caution should be applied and the SG informed. If it is decided to inform the SG, the SG contact field in 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 (see Appendix 5).

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 the SG should be informed 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 IR protocol should be followed, including guidance on work prioritisation.

All outputs should be assessed for potential statistical disclosure issues and appropriate measures taken to reduce any unacceptable level of risk of disclosure. Please see ISD’s Statistical Disclosure Control Protocol.
For core customers there will be occasions when we need to provide information which contains small numbers, for example providing an NHS 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 be labelled “Management Information Only, not for onward distribution” and the standard disclosure control note (provided in Annex A of ISD’s Statistical Disclosure Control Protocol) should be attached to each table.

ANALYSIS COMPLETED.

4.1.8 Step Eight: Sending Preview Copies

(Admin Services/Analyst)

If the SG and/or NHS Boards have been notified of the request in Step 4.1.7, on completion of the analysis preview copies need to be distributed to them. This should be done a minimum of two days before release to the customer. In exceptional cases the preview period may be foreshortened by force of circumstances, for example unforeseen difficulties in producing the analysis requested.

The guidance below details when a preview copy should be distributed:

Admin Services send preview copies to NHS boards: NHS Boards should be sent preview copies of all requests from non core customers and partner organisations such as Local Authorities and drug treatment agencies where sub-Scotland analysis, which affects their board, is provided. The analyst should email the following information to ISD Administration Services Team using the NSS.isd-HBInfoPreview@nhs.net mailbox:

- The NHS board(s) who are to receive a preview copy;
- Details of the information request;
- Type of customer e.g. journalist, Local Authority, general public, etc.;
- A copy of the information being provided (please note: if the output is too large to email please explain this and state briefly what it contains and who to contact should they wish to see the output).

Analysts send preview copies to SG: If in Step Seven (4.1.7) it was agreed to inform the SG of a particular information request from a non core customer then the SG should be sent a preview copy of the output using the email template in Appendix 5. Please note that you should not include identifying details of the customer in this email but should include the type of customer e.g. journalist, local authority, general public, etc.
4.1.9 Step Nine: Administration Services distribution of preview copies

The ISD Administration Services Team should email all preview copies to the contacts at the relevant NHS boards (as advised by the analyst) using the template provided in Appendix 6 (with copy to analyst who provided output). Contacts at each NHS 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 Administration Services Team.

4.1.10 Step Ten: Sending request to the customer (Analyst)

Immediately following any preview period, the output should be distributed to the customer. Included with this should be a link to the IR Feedback Survey and standard text. Please see Appendix 7 for further information on the IR Feedback Survey, the standard text and link.

4.1.11 Step Eleven: Freedom of Information Request closure (Analyst)

If CSD and PHI Director PA were notified of the request under FoI in Step 4.1.1, they should be notified of the completion of the request and the response that was sent to the customer, including any exemptions used to refuse the release of information under the FoI (Scotland) Act.

4.1.12 Step Twelve: Close IRS Record (Analyst)

Update and close the IRS Record as quickly as possible.

4.2. All Media Requests: For all requests from the media the following action should be taken:

4.2.1. Media contacts analyst direct:

Analyst emails the ‘ISDMediaQueries’ (nss.isdMediaQueries@nhs.net) email group asking the NSS Customer Support Desk (CSD) 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 (as an Information Request – follow procedure below from 4.1.1)
4.2.2. Media contacts NSS Customer Support Desk (CSD) with request:

CSD log the request in their system (Assyst).

CSD email ‘ISDMediaQueries’ (nss.isdMediaQueries@nhs.net) email group with the details of the request.

The relevant ISD analyst should pick up this request, where necessary contact the journalist for clarification and ‘reply to all’ the ‘ISDMediaQueries’ (nss.isdMediaQueries@nhs.net) email group explaining how they plan to proceed, by either:

- Referring journalist to website
- Informing journalist that information is not centrally available
- Providing unpublished information (as an Information Request – follow procedure below from 4.1.1)

4.2.3. In either situation described above, 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.
5. Prioritising Information Requests

5.1. Standard Requests

These are requests from the core users of data held by ISD: the Scottish Government (SG); NHS Scotland partner organisations such as Local Authorities and drug treatment agencies, Audit Scotland and independent NHS contractors providing NHS services (dentists, GPs, opticians and pharmacists). These should be handled, subject to resource constraints, as quickly as required by customers in terms of priority. Contractors (e.g. 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:

5.1.1. 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.

5.1.2. NHS Boards and other NHS bodies

Requests received from staff working for local or national NHS bodies, 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 (or potentially disclosive) data is requested. For further guidance on this please see the ISD Statistical Disclosure control Protocol). On occasion ISD may decide to share analyses with other Boards where this is thought to be useful.
5.1.3. Requests from Partner Organisations - Local Authorities and Drug Treatment Agencies

ISD holds a wide range of information that may be of value to local authorities and drug treatment agencies 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 4.1.2).

5.2. 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.

5.3. Requests from or on behalf of MSPs

These IRs are separate from PQs (see 5.2) and 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

- Requests should be accorded a lesser priority than ‘standard’ requests (see above) but greater than ‘all other’ requests (see below).
- ISD will endeavour to provide an answer within 20 working days for any requests estimated to require less than 2 person days effort.

5.4. All Other Requests

For all non-core customers, examples of which are given earlier (paragraph 3.6), whose request is not being answered via eDRIS their IRs will have lesser priority than ‘standard’ and the categories mentioned above (paragraphs 5.2 – 5.3). ISD will however, aim to provide the level of service detailed in Section 3.
Appendix 1  Guidance on Implementing ISD IR Charging Policy

Calculation of charges for non-eDRIS information requests (carried out by NI&I/SBD/DM) is the responsibility of the Senior Person for the analytical team completing the request, implementing the ISD IR Charging Policy, published on the Analyst Information Area of GeNSS and on ISD’s website.

For requests that are referred back to NI&I/SBD/DM from eDRIS, the ISD IR Charging Policy should also be used.

Admin Teams will carry out invoicing for all requests described above.
## Appendix 2  Information Request System Fields

### Summary Screen

<table>
<thead>
<tr>
<th>Field</th>
<th>Mandatory/ Optional</th>
<th>Options</th>
<th>Guidance</th>
</tr>
</thead>
<tbody>
<tr>
<td>Request No.</td>
<td>Mandatory</td>
<td>System Generated</td>
<td></td>
</tr>
<tr>
<td>Request Type</td>
<td>Mandatory</td>
<td>Information Request (Non ISD)</td>
<td>For External Customer IRs.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Internal or Routine</td>
<td>Work undertaken for ISD colleagues, not part of an external IR request.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Project</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Funded project work.</td>
</tr>
<tr>
<td>Date Received</td>
<td>Mandatory</td>
<td>Click on date box</td>
<td>This should be the date the customer first contacts ISD regarding this request.</td>
</tr>
<tr>
<td>Deadline Date</td>
<td>Mandatory</td>
<td>Click on date box</td>
<td>This should be the date agreed with the customer that you will supply the IR.</td>
</tr>
<tr>
<td>Brief Description</td>
<td>Free text</td>
<td></td>
<td>Enter a brief description of the request, detailing key words that would be used for searching for such types of requests. Also if this is an FoI request please state this in this field. You should not enter any patient identifiable information into this field or in any field in the IRS.</td>
</tr>
<tr>
<td>PQ</td>
<td>Optional</td>
<td>Tick box</td>
<td>Tick if this is a PQ</td>
</tr>
<tr>
<td>Field</td>
<td>Mandatory/Optional</td>
<td>Options</td>
<td>Guidance</td>
</tr>
<tr>
<td>-------------------------------</td>
<td>--------------------</td>
<td>------------------------</td>
<td>--------------------------------------------------------------------------</td>
</tr>
<tr>
<td>PQ Number</td>
<td>Mandatory if PQ Flag ticked</td>
<td>Free Text</td>
<td>Enter PQ Number</td>
</tr>
<tr>
<td>PQ Answered</td>
<td>Mandatory if PQ Flag Tick</td>
<td>Answered fully or almost fully Answered in part Answer not available</td>
<td>Select if fully or almost fully answered. Select if only part of the information request was supplied. Select if ISD were unable to answer the question/supply any data.</td>
</tr>
<tr>
<td>Confidential</td>
<td>Mandatory</td>
<td>Yes/No</td>
<td>Default to ‘no’. Select ‘yes’ if confidential data is to be supplied.</td>
</tr>
<tr>
<td>SE Contact</td>
<td></td>
<td>Free Text</td>
<td>If you plan to inform the SG of this request enter SG in this field.</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Once you have informed the SG of this request enter the name of the person you contacted.</td>
</tr>
<tr>
<td>Estimated Time</td>
<td>Mandatory</td>
<td>Free text</td>
<td>Enter the number of hours you estimate this piece of work to take.</td>
</tr>
<tr>
<td>Name of Customer</td>
<td>Mandatory</td>
<td>Free text</td>
<td>Insert full name of customer.</td>
</tr>
<tr>
<td>Organisation Group</td>
<td>Mandatory</td>
<td>List of Options</td>
<td>Select appropriate organisation.</td>
</tr>
<tr>
<td>Organisation</td>
<td>Mandatory</td>
<td>List of Options</td>
<td>Select appropriate organisation.</td>
</tr>
<tr>
<td>If ‘Unlisted’ please specify</td>
<td>Mandatory</td>
<td>Free Text</td>
<td>Enter full name of organisation.</td>
</tr>
<tr>
<td>Charge</td>
<td>Mandatory</td>
<td>Yes/No</td>
<td>Select ‘yes’ if you plan to charge the customer for part or all of this IR.</td>
</tr>
<tr>
<td>Charge</td>
<td>Optional</td>
<td>Free text</td>
<td>Enter the amount you are planning to charge</td>
</tr>
<tr>
<td>Completion Date</td>
<td>Mandatory</td>
<td>Click on date box</td>
<td>This should be entered as soon as possible after the IR is completed.</td>
</tr>
<tr>
<td>Not Taken Forward</td>
<td>Optional</td>
<td>Tick box</td>
<td>This box should be selected if the customer has decided not to progress with the IR.</td>
</tr>
</tbody>
</table>
# Customer Screen

<table>
<thead>
<tr>
<th>Field</th>
<th>Mandatory/Optional</th>
<th>Options:</th>
<th>Guidance</th>
</tr>
</thead>
<tbody>
<tr>
<td>Customer Address</td>
<td>Mandatory</td>
<td>Free text</td>
<td>At least one of these fields must be completed.</td>
</tr>
<tr>
<td>Customer Telephone</td>
<td>Mandatory</td>
<td>Free text</td>
<td></td>
</tr>
<tr>
<td>Customer Fax</td>
<td>Mandatory</td>
<td>Free text</td>
<td></td>
</tr>
<tr>
<td>Customer Email</td>
<td>Mandatory</td>
<td>Free text</td>
<td></td>
</tr>
</tbody>
</table>

# Time Log Screen – use this screen to enter individuals involved in answering IR

<table>
<thead>
<tr>
<th>Field</th>
<th>Mandatory/Optional</th>
<th>Options:</th>
<th>Guidance</th>
</tr>
</thead>
<tbody>
<tr>
<td>Information Request Roles</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>History</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

# Projects Screen – not applicable to Information Requests (only complete if Projects is selected as “Request Type”)

# Confidentiality Screen – only applicable when “yes” is selected for “Confidential”

<table>
<thead>
<tr>
<th>Field</th>
<th>Mandatory/Optional</th>
<th>Options:</th>
<th>Guidance</th>
</tr>
</thead>
<tbody>
<tr>
<td>Confidentiality Statement</td>
<td>Optional</td>
<td>Tick box</td>
<td>Tick if required</td>
</tr>
<tr>
<td>Confidentiality Statement Received</td>
<td>Optional</td>
<td>Yes/No</td>
<td>Complete as appropriate</td>
</tr>
<tr>
<td>PAC Agreement</td>
<td>Optional</td>
<td>Tick box</td>
<td>Tick if required</td>
</tr>
<tr>
<td>PAC Agreement Received</td>
<td>Optional</td>
<td>Yes/No</td>
<td>Complete as appropriate</td>
</tr>
</tbody>
</table>
Appendix 3  Women and Children’s Health Information Team Guide

The Women and Children’s Health Information Team (WCHIT) have developed a Standard Operating Procedure (SOP) which details the procedure that should be followed, by the WCHIT, when replying to/sending an IR. This SOP supports the procedure outlined in this protocol, providing more detail for some tasks, and templates for use when liaising with customers. The SOP consists of two documents, published on geNSS, available via the links below. It is thought that other teams within ISD may find it useful to adopt this practice.

http://genss.nss.scot.nhs.uk/portal/page?_pageid=515,2965568&_dad=portal&_schema=PORTAL
Appendix 5  SG E-mail Format

Following the guidance given in Sections 3.3.5 and 3.37 please use the email format below to inform the Health Directorate Analytical Services of the Information Request. Where you have a contact within policy you may also wish to include them. Also, where appropriate, Analytical Services within the Justice Directorate could be included.

Email 1: Use the format below following the decision to proceed and prior to the work commencing.

To:    [HDanalyticalservices@scotland.gsi.gov.uk; relevant policy contact]
Sent:  [Day Month Year]
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 of request ]

[ Insert type of customer e.g. journalist, general public, etc. ]

[ Insert ISD Analyst Name and Contact Details ]

Email 2: Use the format below once the analysis is complete and you are sending the SG a preview copy.

To:   [HDanalyticalservices@scotland.gsi.gov.uk; relevant policy contact]
Sent:  [Day Month Year]
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 9 am on [ insert date ].

[ Insert copy of the response and attach tables ]

[ Insert ISD Analyst Name and Contact Details ]
Appendix 6  NHS Board Email Format

The email format below should be used by the ISD Administrative Services for distributing copies of IRs, FoI requests and PQs to NHS Boards as detailed in 3.38

To: [Insert relevant Board contact(s) from 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 [if known, Insert type of customer e.g. journalist, general public, etc.] at 9 am on [insert date].

[attach a copy of the 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 Ministers.

[attach a copy of the output]
Appendix 7  IR Feedback Survey and Standard Text

It is important that ISD seeks regular feedback from its customers on its performance in order to improve and enhance our services. The IR Feedback Survey provides a method of obtaining this feedback.

A link to the IR Feedback Survey should be sent out with every Information Request answer and not in a separate e-mail. The standard text, detailed below, should be included in your response to the customer. Under Data Protection legislation, customers should be able to opt out of future surveys so it’s important that we make this clear in our request.

Previously each ISD team had its own survey, however now there is only one survey for all ISD which can be accessed via the link below:

**ISD Information Request Customer Feedback Survey**

The survey should not be sent out with PQ answers, internal ISD requests and Freedom of Information requests. Freedom of Information Requests have a legal framework surrounding them, which gives customers a right to review and so these customers should not be sent the IR Feedback Survey.

--------------------------------------------------------------------------------------------------------------

**Standard Text to include in IR response with the IR Feedback Survey link**

ISD are constantly looking to improve our customer service. In order to help us achieve this we would be grateful if you could spare a few minutes to answer 5 questions about the information you have just received and how the data will be used.

**ISD Information Request Customer Feedback Survey**

The survey is optional, and anonymous, and your personal details will not be requested or stored by ISD. If you would prefer not to be asked for your feedback, please mention this each time you make future information requests and we will ensure the survey link is not sent out.

Thank you for your time.

--------------------------------------------------------------------------------------------------------------