

Warwickshire Police

Freedom of Information audit report

January 2024

Executive summary



Audit Methodology

The Information Commissioner is responsible for enforcing and promoting compliance with data protection legislation, as well as the Freedom of Information Act 2000 (FOIA) and Environmental Information Regulations (EIR). Section 47 of the FOIA provides provision for the Commissioner to assess whether a public authority is following good practice, including compliance with the requirements of this Act and the provisions of the codes of practice under sections 45 and 46. The ICO sees auditing as a constructive process with real benefits for controllers and so aims to establish a participative approach.

The purpose of the audit is to provide the Information Commissioner and Warwickshire Police (WP) with an independent assurance of the extent to which the information handling practices of WP, within the scope of this agreed audit, conform with the codes of practice under sections 45 and 46 of the FOIA.

WP agreed to a consensual audit by the ICO of its compliance with the FOIA. An introductory telephone meeting was held on 06 September 2023 with representatives of WP to discuss the scope of the audit.

It was agreed that the audit would focus on the following area:

Scope area	Description
Freedom of Information (FOI)	The extent to which FOI/EIR accountability, policies and procedures, performance measurement controls, and reporting mechanisms to monitor compliance are in place and in operation throughout the organisation.

Audits are conducted following the Information Commissioner’s audit methodology. The key elements of this are a desk-based review of selected policies and procedures, remote interviews with selected staff, and a virtual review of evidential documentation.

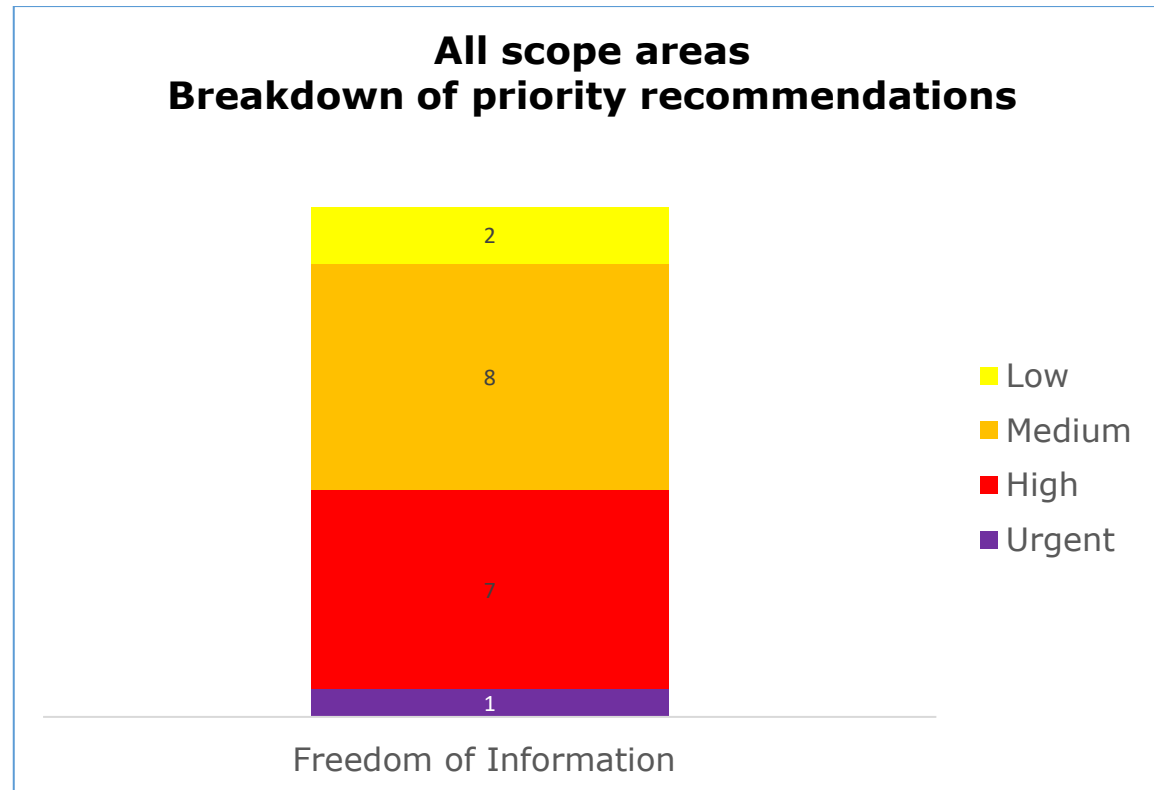
Where weaknesses were identified recommendations have been made, primarily around enhancing existing processes to facilitate compliance with freedom of information legislation. In order to assist WP in implementing the recommendations each has been assigned a priority rating based upon the risks that they are intended to address. The ratings are assigned based upon the ICO’s assessment of the risks involved. WP’s priorities and risk appetite may vary and, therefore, they should undertake their own assessments of the risks identified.

Audit Summary

Audit Scope area	Assurance Rating	Overall Opinion
Freedom of Information (FOI)	REASONABLE	There is a reasonable level of assurance that processes and procedures are in place and are delivering data protection compliance. The audit has identified some scope for improvement in existing arrangements to reduce the risk of non-compliance with data protection legislation.

*The assurance ratings above are reflective of the remote audit methodology deployed and the rating may not necessarily represent a comprehensive assessment of compliance.

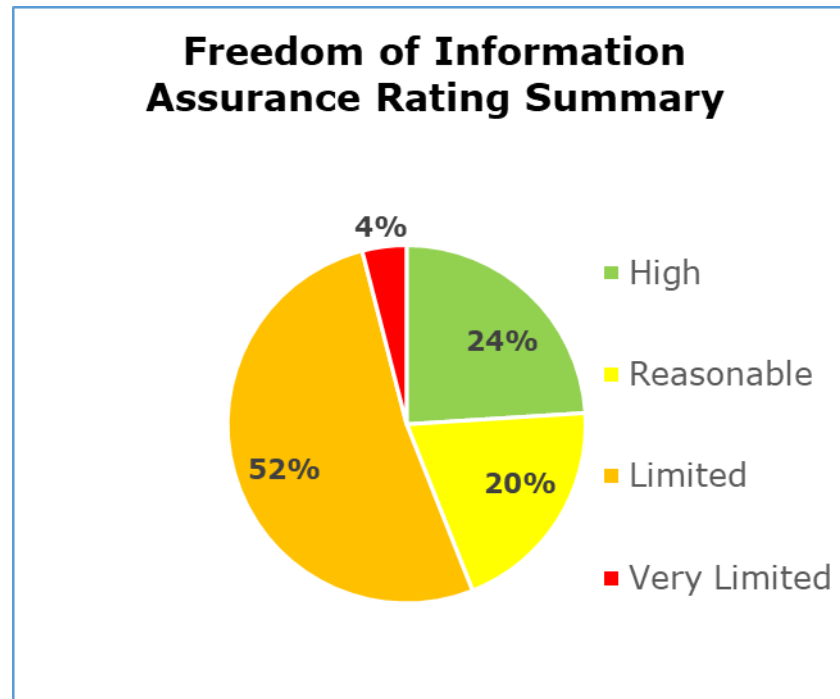
Priority Recommendations



The bar chart above shows a breakdown of the priorities assigned to our recommendations made:

- There were **1** urgent, **7** high, **8** medium and **2** low priority recommendations.

Graphs and Charts



The pie chart above shows a summary of the assurance ratings awarded. **24%** high assurance, **20%** reasonable assurance, **52%** limited assurance, **4%** very limited assurance.

Areas for Improvement

- The completion rate of FOI requests within statutory timelines is below the required standard, and the persistent backlog of requests needs to be addressed as a priority.
- The publication scheme needs improvement to align with ICO guidance, including more frequent and scheduled releases within the relevant information classes.
- FOI/EIR policies and procedures need to be comprehensive and should include provisions for the treatment of personal information. Regular reviews of these policies and procedures are necessary to ensure they remain current and compliant with relevant legislation.
- There is need for further documentation of procedures within the FOI team. These are essential to prevent knowledge loss and ensure capability continuity when experienced staff members are unavailable or when staff are temporarily reassigned to support FOI handling.
- Quality assurance procedures should be documented. Routine and documented dip sampling of completed responses should be undertaken.

Disclaimer

The matters arising in this report are only those that came to our attention during the course of the audit and are not necessarily a comprehensive statement of all the areas requiring improvement.

The responsibility for ensuring that there are adequate risk management, governance and internal control arrangements in place rest with the management of Warwickshire Police.

We take all reasonable care to ensure that our audit report is fair and accurate but cannot accept any liability to any person or organisation, including any third party, for any loss or damage suffered or costs incurred by it arising out of, or in connection with, the use of this report, however such loss or damage is caused. We cannot accept liability for loss occasioned to any person or organisation, including any third party, acting or refraining from acting as a result of any information contained in this report.

This report is an exception report and is solely for the use of Warwickshire Police. The scope areas and controls covered by the audit have been tailored to Warwickshire Police and, as a result, the audit report is not intended to be used in comparison with other ICO audit reports.