

## Stage 1 – Receive, Identify & Log

### Request Received (days 1-

2) Pass to DCE, whom failing, HM who will Log details, validate request, ID Legislation & send acknowledgement

Pass the Request to the Deputy Chief Executive. If he/she is on annual leave of five or more days, then pass it to the Housing Manager. This applies to all stages below. They will:

- Evaluate the request and identify which legislation it will be processed under. Is it:
  - Freedom of Information (Scotland) Act (FOISA)
  - Environmental Information Regulations (EIRs)
  - Data Protection Act (DPA)
- Log the request in the FIO Tracking Spreadsheet
- If the request is a complex/controversial case, take advice from the Association's Independent Data Protection Officer (DPO).
- Send an acknowledgement letter confirming receipt of the request, and the legislation under which it will be processed or proceed to Stage 2.

## Stage 2 – Clarify

### Clarify Request (days 1-2)

DCE to contact requester if necessary to seek further clarification

The Deputy Chief Executive (DCE) will ensure that the request is clear regarding what information is being asked for. If the request is unclear clarification will be sought.

## Stage 3 - Assess

### Assess Request (days 3-5)

DCE to decide if we hold the information & if it is already accessible

The DCE will assess if we hold the information and if it is already accessible:

- If we do not hold the information a letter will be sent to the requestor informing them the information is not held.
- If the information is held but is already published then a Section 25 exemption letter will be sent to the requestor informing them of where to find this information.
- If the information is held and has not been published then the request process will proceed to stage 4.

#### **Stage 4 - Assign Request to Site/Section - Inform & Consult**

**Assign/Inform/Consult (days 3-5)** ICS contact site/section

The DCE will send request to appropriate department to request information held.

Relevant department will respond to the DCE when information has been collected or to inform DCE that department does not hold information.

Consult with DCE to determine if fees are applicable. DCE will advise on applying fees based on advice sought from the External DPO.

#### **Stage 5 - Locate & Consider Information to be Disclosed**

**Locate Information (days 3-5)** Appropriate department collate information. DCE will assist, support & advise

Appropriate department and DCE will consider if the information can be supplied or whether any exemptions apply.

DPO will advise and assist in applying exemptions.

Appropriate department obtains information from all sources and collates.

Appropriate department completes information request documents as appropriate.

#### **Stage 6 - Consider Response**

**Consider Response (days 6-10)** DCE review & draft response

DCE will review documents and prepare response letter

#### **Stage 7 - Clearing Response**

**Clearing Response (days 11-15)** Navigator Law review response prior to issue

In cases of complex/controversial requests DCE will seek clearance and consult with the DPO as necessary.

#### **Stage 8 - Issue Response**

**Issue Response (days 16-20)** DCE issue response

DCE quality checks and issues information requested, stating any exemption as appropriate.