

4 Functional Requirements

FUNCTIONAL OVERVIEW

Figure 2: FoI / EIR / DPA Management System - Context

- 4.1 The purpose of the above diagram is to provide the reader with a pictorial view of the context in which a system(s) to manage RFIs operates, indicating the major external entities (people, organisations and systems) that it must operate with.
- 4.2 The diagram illustrates the main functional categories associated with the system, including:
- **Logging requests & appeals**; requirements associated with the capture of information about applicants, RFIs and appeals. This also includes the effective handling of the RFI including searching for requests by the same applicant, categorising the request against subject lists / taxonomy; searching the public authorities own disclosure log to determine if the information has already been released; and searching for similar requests.
 - **Workflow / Process Support**; requirements to assist the public authority in following its own processes for handling RFIs including assignment of requests, notification alerts, tracking and approval. This also includes the ability to cater for RFIs that have been sent to the public authority but they do not hold the required information; including the ability to accept RFI transfers from and create RFI transfers to other public authorities and the National Archives.
 - **Fees**; requirements associated with the calculation and recording of fees associated with RFIs.
 - **Enquiries**; requirements that enable the public authority to not only locate RFIs & appeals that are held in the system but to also monitor performance using a number of different views.
 - **Correspondence**; requirements to automatically generate correspondence with the applicant at key stages in the handling process.
 - **Appeals**; requirements to assist the public authority in managing each stage of the appeal process including internal review, appeals to the Information Commissioner and appeals to the Information Tribunal.
 - **Central Monitoring**; requirements for those central government departments covered by the central monitoring regime as specified by the Department for Constitutional Affairs.
 - **Reporting**; requirements associated with assisting the public authority in monitoring its own performance using predefined reports, ad-hoc reports and the ability to export information.
 - **Interfaces**; requirements that need to be considered by public authorities in respect of possible interfaces with existing systems.
 - **Online Access**; requirements to enable applicants to make RFIs directly to the public authority, track the progress of their request, pay fees and view released information online.
 - **Administration**; requirements to enable authorised users to maintain access to the system, update business rules, maintain correspondence templates. This category also

includes requirements associated with archiving of data.

- 4.3 It must be reiterated that this specification is not prescriptive about a particular single system being used to deliver the functionality contained within this section, as the most appropriate solution will be entirely dependant upon the situation of each public authority.

DETAILED REQUIREMENTS

Logging Applicants

ID	Description	Priority
F-LA-01	The user shall be provided with a search facility to determine if the applicant already exists in the system. If the applicant already exists the user may need to update his or her details.	HD
F-LA-02	The system shall allow details of any new applicant making an RFI to be captured. <i>(See Appendix A for recommendations on information that should be recorded)</i>	E

Logging Requests

ID	Description	Priority
F-LR-01	The system shall allow the following types of requests to be logged: <ul style="list-style-type: none"> ▪ Fol ▪ EIR <p>However, it shall not be required to distinguish between Fol and EIR requests unless an exemption is being applied, time limit being extended or fee being charged.</p> <i>(See Appendix B for recommendations on information that should be recorded)</i>	E
F-LR-02	The system shall allow the following types of requests to be logged: <ul style="list-style-type: none"> ▪ DPA <p><i>Public authorities may choose to process requests under the Data Protection Act using a separate system/process, to address any concerns about access to personal data.</i></p> <i>(See Appendix B for recommendations on information that should be recorded)</i>	D
F-LR-03	The Unique Identifier for an RFI should be automatically generated <i>(This cannot be changed by any user)</i>	E
F-LR-04	The system shall provide the user with assistance in determining which regime the RFI falls under (i.e. Fol, EIR, DPA). <i>This may be achieved via help text and/or user training.</i>	D
F-LR-05	The Target Due Date shall automatically be calculated as follows: <ul style="list-style-type: none"> ▪ Fol: Date Received plus 20 Working Days * ▪ EIR: Date Received plus 20 Working Days * ** ▪ DPA: Date Received plus 39 Calendar Days * <p>* To comply with the 20 days from receipt deadline specified in the Fol and EIR or the 40 days from receipt deadline specified in the DPA ** The deadline can be extended for complex EIR requests (refer to</p>	E

ID	Description	Priority
	requirement L-PR-17)	
F-LR-06	The system shall be able to derive the majority of the applicant's Address by using the Post Code (<i>for UK-based applicants only</i>)	D
F-LR-07	The user shall be provided with an automatic search facility to locate any RFIs made by the same applicant	HD
F-LR-08	The user shall be able to categorise the RFI (<i>RFI Subjects</i>), by making multiple selections from a predefined list of functions and subjects (and identifying the relevant section / action officers who the RFI should be allocated to)	HD
F-LR-09	The user shall be able to search the public authority's own disclosure log to check for information released in response to previous RFIs, which shall be categorised using a predefined list of subjects/taxonomy i.e. to check if the information is already in the public domain	HD
F-LR-10	The user shall be able to search the public authority's own Publication Scheme disclosure log to check if the information is already in the public domain	HD
F-LR-11	The user shall be able to search for any other RFIs (both open ones and completed ones) that relate to similar subjects as the one they are logging e.g. discover requests that the public authority has already responded to where the previous research and decision making can be made use of). It shall be possible for the user to formally "link" these related RFIs to the one they are creating/logging.	HD
F-LR-12	The user shall be able to search a log of information such as that identifying information covered by exemption or Ministerial Certificate. It shall be categorised using a predefined list of subjects/taxonomy and to discover cases where the authority has already dealt with such a case and previous research and decision making can be made use of.	D
F-LR-13	It shall be possible for a user to "part-create" an RFI and then able to return to it later to complete entering details. Only a full complete RFI can be allocated / assigned to an action officer / researcher.	D
F-LR-14	The system shall support the creation of "supplementary RFIs" that are produced as a result of the information released in a previous RFI. "supplementary RFIs" should be handled through workflow / the review process independently, but it should possible for a user to build up a "communication thread" with the applicant by relating RFIs where appropriate.	D

Logging Appeals

ID	Description	Priority
F-LP-01	The system shall allow the following types of appeal to be logged: <ul style="list-style-type: none"> ▪ Internal Reviews ▪ Information Commissioner ▪ Information Tribunal <p><i>Public authorities may choose to process appeals using a separate system/process i.e. to restrict access to a limited set of users (if this isn't supported by the FoI/EIR Management System).</i></p> <p><i>(See Appendix B for recommendations on information that should be recorded)</i></p>	E
F-LP-02	The Unique Identifier for an appeal should be automatically generated	E

ID	Description	Priority								
F-LP-03	The system shall allow the user to record whether an appeal to the Information Tribunal was lodged by the applicant or by the public authority.	HD								
F-LP-04	The system shall allow the user to record whether an appeal from the decision of the Information Tribunal was lodged by the applicant or by the public authority.	HD								
F-LP-05	<p>The user shall be able to relate an appeal to an existing RFI <u>or</u> to an appeal as follows:</p> <table border="0"> <tr> <td><u>Original Decision</u></td> <td><u>Appeal Type</u></td> </tr> <tr> <td>RFI</td> <td>Internal Review</td> </tr> <tr> <td>Internal Review</td> <td>Information Commissioner</td> </tr> <tr> <td>Information Commissioner</td> <td>Information Tribunal</td> </tr> </table> <p>The system shall only allow one of each type of appeal to be created for an RFI. Authorised users shall be able to allow an Information Tribunal appeal to be related to an internal review.</p> <p>If applicable, it shall be possible to copy across information onto the appeal from the relevant RFI (to minimise re-keying).</p>	<u>Original Decision</u>	<u>Appeal Type</u>	RFI	Internal Review	Internal Review	Information Commissioner	Information Commissioner	Information Tribunal	E
<u>Original Decision</u>	<u>Appeal Type</u>									
RFI	Internal Review									
Internal Review	Information Commissioner									
Information Commissioner	Information Tribunal									
F-LP-06	<p>The system shall enforce the order in which the appeals process can take place for an RFI (i.e. Internal Review → Information Commissioner → Information Tribunal).</p> <p>Authorised users shall be able to override this sequence to allow internal review to be escalated straight to Information Tribunal, for example where Section 24 certificates are being applied.</p> <p>It will not be possible to create the next stage until the previous stage has been closed.</p>	E								
F-LP-07	It shall be obvious to a user when viewing an RFI that an appeal (for all 3 types) is in progress / has been completed.	E								
F-LP-08	<p>It shall be possible for a user to “part-create” an appeal and then able to return to it later to complete entering details.</p> <p>Only a fully complete RFI can be allocated / assigned to an action officer / researcher.</p>	D								

Audit Trail

ID	Description	Priority
F-AU-01	<p>The system shall automatically create an audit trail of all changes made to an RFI or appeal through the review process</p> <p>The audit trail should include details of:</p> <ul style="list-style-type: none"> ▪ What information was changed ▪ Who changed the RFI / appeal ▪ When the change occurred (Date & Time) <p><i>This could be achieved by keeping previous “versions” of the RFI / appeal each time it is changed.</i></p>	E
F-AU-02	<p>The system shall provide easy navigation for users to access the audit trail for the RFI or appeal they are viewing.</p> <p>It shall not be possible to change details held within the audit trail.</p>	E

Contact History

ID	Description	Priority
F-CH-01	<p>The system shall capture contact history information for all RFIs & appeals – these details cannot be changed retrospectively.</p> <p><i>This information could alternatively be recorded in an external system, such as correspondence management system or an electronic records management system although this would require some form of interface (either electronically linked or via a manual reference)</i></p> <p><i>(See Appendix D for details of information that needs to be recorded)</i></p>	E

Workflow / Process Support

- 4.4 One of the key aspects of a system to manage RFIs is its ability to support public authorities through the various stages of the process in order to respond to an applicant within the prescribed time limits.
- 4.5 The following diagram provides a simplified view of the stages in the process for handling an RFI. It should not be seen as authoritative both in terms of all the decision steps required and any specifics that will relate to a particular public authority (e.g. the way in which RFIs are allocated to action officers / researchers).
- 4.6 However, the diagram does highlight key aspects such as the points in the process at which the 20 working day timer starts, is suspended, resumes and stops. This section covers those functions that are either essential or should at least be considered to aid this process.

[Figure 3: FoI/EIR Requests for Information - Simplified Process](#)

ID	Description	Priority
F-PR-01	<p>The system shall support the transfer of an RFI to another public authority, where the information covered by the RFI is not held. This shall include:</p> <ul style="list-style-type: none"> ▪ Approval by the applicant ▪ Provision of information to the public authority (<i>only if approved by applicant</i>) ▪ Closure of the RFI <p><i>(This could either be achieved by production of a hardcopy report or electronic file in a standardised format, to provide the necessary information to the correct public authority). This shall be recorded in the audit trail.</i></p> <p><i>The public authority is not obliged to transfer an RFI, although they must inform the applicant that is the responsibility of another department.</i></p>	HD
F-PR-02	<p>The system shall support the transfer of an RFI to The National Archives where the information covered by the RFI has been transferred. This shall include:</p> <ul style="list-style-type: none"> ▪ Provision of information to The National Archives ▪ Closure of the RFI <p><i>(This could either be achieved by production of a hardcopy report or electronic file in a standardised format, to provide the necessary information to the correct public authority).</i></p> <p><i>This shall be recorded in the audit trail</i></p>	D
F-PR-03	<p>The system shall allow authorised staff to re-allocate RFIs to an action officer / researcher</p> <p><i>It is recommended that a supporting process is put in place to prevent an RFI being repeatedly re-allocated i.e. a courtesy call to the proposed individual prior to re-allocation. This shall be recorded in the audit trail</i></p>	E
F-PR-04	<p>The system shall allow an action officer / researcher to reject an RFI. The rejected RFI should nominally be allocated to either a system administrator or central team for it to be formally re-allocated.</p> <p><i>This shall be recorded in the audit trail</i></p>	HD
F-PR-05	<p>It will be possible to create a “hybrid-request” from a single RFI i.e. one that is made up of elements covered by the FoI, EIR and/or DPA</p> <p>Each element of the “hybrid-request” can have a separate workflow to enable different action officers/researchers to process them independently.</p> <p>However it shall be possible to enquire on the different elements as a single RFI i.e. if the applicant contacted the public authority to determine the state of progress.</p> <p>It shall not be required to distinguish between FoI and EIR requests unless an exemption is being applied, time limit being extended or fee being charged.</p>	E
F-PR-06	<p>The system shall automatically set the acknowledgement sent date when an acknowledgement correspondence has been sent to the applicant.</p> <p><i>This shall be recorded in the audit trail</i></p>	D
F-PR-07	<p>The relevant action officer / researcher should be notified when an RFI has been allocated to them.</p> <p><i>Public authorities may wish to notify more than one individual to ensure there are no bottlenecks due to holidays / sickness.</i></p> <p><i>This could be achieved either via email or through a workflow support of the process</i></p>	HD

ID	Description	Priority
F-PR-08	<p>The system shall be able to log when the authority has notified the applicant that it reasonably requires further information in order to identify and locate the information requested.</p> <p>The clock shall stop until the applicant has provided this information (<i>See also F-PR-17</i>)</p>	HD
F-PR-09	<p>The system shall automatically set the date when advice and assistance on the RFI has been sought from the applicant.</p> <p><i>This shall be recorded in the audit trail</i></p>	D
F-PR-10	<p>The system shall allow the action officer / researcher to record an estimate of the effort (i.e. works associated) in creating a response to the RFI.</p> <p><i>Estimated Effort may be used to automatically calculate fees – see below.</i></p>	HD
F-PR-11	<p>The relevant action officer / researcher should be notified when the applicant has paid outstanding fees i.e. they can proceed with processing the RFI</p> <p><i>Public authorities may wish to notify more than one individual to ensure there a no bottlenecks due to holidays / sickness.</i></p> <p><i>This could be achieved either via email, workflow support of the process or manual processes.</i></p>	D
F-PR-12	<p>The relevant action officer / researcher should be notified when the applicant has failed to respond to a request to supply further information for the public authority to identify and locate the information requested, over an agreed time period (the exact duration would be determined by business rules).</p> <p>The action officer / researcher can then chose to either contact the applicant again or close the RFI.</p> <p><i>Public authorities may wish to notify more than one individual to ensure there a no bottlenecks due to holidays / sickness.</i></p> <p><i>This could be achieved either via email, workflow support of the process or manual processes.</i></p>	D
F-PR-13	<p>The relevant action officer / researcher should be notified when the applicant has failed to respond to a fees notice for over an agreed time period (The FoI Act stipulates 3 months and this could be applied as a business rule).</p> <p>The action officer / researcher can then chose to either contact the applicant again or close the RFI.</p> <p><i>Public authorities may wish to notify more than one individual to ensure there a no bottlenecks due to holidays / sickness. This could be achieved either via email, workflow support of the process or manual processes.</i></p>	D
F-PR-14	<p>The system shall support an escalation path of notification alerts as an RFI nears / reaches / exceeds target dates – this might include:</p> <ol style="list-style-type: none"> (1) Action officer / researcher (2) Department / line manager of action officer / researcher (3) Central correspondence/coordinating unit <p><i>This could be achieved either via email, workflow support of the process or manual processes</i></p>	HD

ID	Description	Priority
F-PR-15	The system shall provide a calendar-based timer (based on working days for FoI / EIR RFIs and calendar days for DPA RFIs)	HD
F-PR-16	<p>The system shall start, suspend, restart and stop the calendar-based timer on business rules that include:</p> <ul style="list-style-type: none"> ▪ Suspend time when fees notice sent to the applicant (FoI only) ▪ Restart timer when outstanding fees are paid by applicant (FoI only) <p>Where the calendar-based timer is restarted, the target due date should be automatically recalculated. (See also F-PR-08)</p> <p><i>This shall be recorded in the audit trail</i></p>	E
F-PR-17	<p>The system shall support an extension of the target due date for FoI requests to cater for complex consideration of the public interest in respect of the disclosure of the requested information.</p> <p>This will result in correspondence being produced to inform the applicant of the revised estimated target date.</p> <p><i>This shall be recorded in the audit trail</i></p>	HD
F-PR-18	<p>If the EIR is deemed to be sufficiently complex, the target due date shall be extended to 40 Working Days</p> <p><i>This shall be recorded in the audit trail</i></p>	HD
F-PR-19	<p>The system shall either automatically produce or prompt users to produce correspondence with applicants where the deadline for an RFI has been exceeded. The triggers for these will be controlled via business rules.</p> <p><i>The public authority may consider that the production of these “ongoing communications” with the applicant may be iterative.</i></p>	HD
F-PR-20	<p>The system shall validate the status of an RFI i.e. using business rules to enforce the agreed sequence of events</p>	E
F-PR-21	<p>The system shall validate the approval to proceed to the next stage in the process, based on the user’s permissions (which are derived from the user roles / groups they belong to).</p> <p><i>The system shall use the audit trail to record the progress of the RFI through the process.</i></p>	E
F-PR-22	<p>The system shall provide a list of exemptions that could apply to an RFI (i.e. for FoI or EIR), to assist the action officer / researcher.</p> <p><i>The system shall also enable users to link to the decision note correspondence issued to the applicant which will include details of how the public interest test was applied (where relevant).</i></p>	HD
F-PR-23	<p>The system shall allow users to record any exemption(s) that apply to an RFI</p> <p><i>Public authorities may wish to also record why particular exemption(s) apply to the RFI, for audit purposes.</i></p>	E
F-PR-24	<p>The system shall also allow users to record against each section that is removed from the document:</p> <ul style="list-style-type: none"> ▪ Which exemption applies and ▪ Why the exemption applies. <p><i>Public authorities may wish to use 3rd party systems to support redaction or alternatively use manual processes.</i></p>	HD

ID	Description	Priority
F-PR-25	Where a Ministerial Certificate has been issued under section 23(2) or section 24(3) in respect of a specific RFI, the system shall allow for this information to be recorded.	D
F-PR-26	Where a Ministerial Certificate has been issued under section 23(2) or section 24(3) in respect of a specific RFI and this is being judicially reviewed, the system shall allow the outcome of the judicial review to be recorded.	D
F-PR-27	The system shall allow the level of final signoff to be established for an RFI, and then enforce that the suitably authorised user has given final clearance. <i>Level of final signoff will be in line with the public authority's own policy / guidance on clearance for release of information.</i>	D
F-PR-28	When an RFI is being Closed, the system shall: <ul style="list-style-type: none"> ▪ Set the actual completion date ▪ Prompt the user to record <ul style="list-style-type: none"> • The actual (research/exemptions) effort expended • If the actual completion date exceeds the target completion date, the reason for not achieving the target • The outcome • Any exemptions that applied • The reason why each exemption was applied • Whether information was neither confirmed / nor denied • Whether a summary was made available • Whether the information was released or not 	D
F-PR-29	When an RFI is Closed, the system shall ensure that no further changes can be made to it	E
F-PR-30	The system shall support maintenance of the public authority's own disclosure log to record all items of information that have been released as a result of an FoI/EIR RFI. The disclosure log shall be categorised using a predefined list of subjects/taxonomy. <i>This may also be used to update the public authority's Publication Scheme.</i>	D

Fees

Whilst some public authorities have already formulated their policy in respect of fees for requests made under FoI & EIR, it should be noted that finalised regulations in this area are still being developed.

ID	Description	Priority
F-FE-01	<p>The system shall enable users to capture the prescribed costs associated with an FoI RFI.</p> <p><i>Public authorities may wish to automatically calculate prescribed costs based on pre-defined business rules. Under the current draft regulations the calculation would be derived as follows:</i></p> <p><i>((Estimated Effort – Free Research Effort) x Hourly Staff Rate) x % of Marginal Costs</i></p> <p><i>The calculation may be further enhanced to factor in a refined list of applicant categories e.g. so low-income groups are not charged at all or pay a reduced amount.</i></p> <p><i>If fees are not to be automatically calculated, the public authority should consider recording how the fee was arrived at, in case the applicant appeals e.g. by possibly adding another field against the request.</i></p> <p><i>It is understood that some public authorities are considering not charging fees at all.</i></p>	E
F-FE-02	<p>The system shall enable users to capture the non-commercial fees associated with an EIR RFI.</p> <p><i>Public authorities may also wish to automatically calculate non-commercial Fees based on pre-defined business rules. It is assumed that EIR commercial fees are <u>not</u> included in the scope of the system.</i></p>	E
F-FE-03	<p>The system shall enable users to capture disbursement costs associated with an FoI RFI.</p> <p><i>Public authorities may also wish to consider whether they want to:</i></p> <ul style="list-style-type: none"> • <i>Hold separate cost categories (e.g. postage / photocopying / CDs etc.)</i> • <i>Automatically calculate disbursement values <u>or</u></i> • <i>Charge for disbursements at all</i> <p><i>If fees are not to be automatically calculated, the public authority should consider recording how the fee was arrived at, in case the applicant appeals e.g. by possibly adding another field against the request.</i></p>	E
F-FE-04	<p>The system shall support fees associated with DPA Subject Access requests</p>	D
F-FE-05	<p>The system shall enable users to decide on a case by case basis whether they will charge the applicant.</p> <p><i>This may represent the user overriding an automatically calculated fee rate with a lower value or no value.</i></p>	D
F-FE-06	<p>The system shall notify the user if the fees for an FoI RFI exceed a pre-defined fee limit.</p> <p>The user can override the warning, if the applicant is prepared to pay the full amount over the fee limit (currently £600) and/or the public authority is in agreement to process the request.</p>	HD
F-FE-07	<p>The system shall automatically set the fee notice sent date when a fee notice has been sent to the applicant.</p>	D

ID	Description	Priority
F-FE-08	The system shall automatically set the fee paid date when the amount is received from the applicant.	D
F-FE-09	The system shall support an auditable process for the handling of fees paid by applicants. <i>This requirement may be addressed by the public authorities finance system – through a manual / automatic interface.</i>	HD

Enquiries

ID	Description	Priority
F-EN-01	<p>The system shall enable users to search for applicants using multiple search criteria including:</p> <ul style="list-style-type: none"> ▪ applicant surname ▪ applicant first name ▪ applicant post code ▪ organisation name <p>The user will be able to select an applicant from the search results and view their details, and all their RFIs (and their associated contact history). Only authorised users will be able to make changes to the RFI.</p> <p>If the search finds more than one applicant that matches the criteria, then the system will enable the user to select from the list of applicants.</p> <p><i>Some public authorities may also wish to restrict what RFIs some system users can view (i.e. only those handled by their own organisational unit / department)</i></p>	HD
F-EN-02	<p>The system shall enable users to search for RFIs using multiple search criteria including:</p> <ul style="list-style-type: none"> ▪ unique identifier ▪ date received ▪ keyword function / subject / taxonomy ▪ organisational unit / department responsible for the function of subject ▪ action officer / researcher ▪ type (e.g. FoI, EIR, appeal) ▪ status (e.g. fees received, formatting etc.) ▪ outcome ▪ proximity to deadlines ▪ related RFIs (e.g. supplementary requests from the same applicant / requests from different applicants on the same subject / elements of a hybrid request). ▪ exemption / exception <p>The user will be able to select an RFI from the search results and view its details, contact history and associated applicant. It shall also be possible for the user to view related RFIs. Only authorised users will be able to make changes to the RFI.</p> <p><i>Some public authorities may also wish to restrict what RFIs some system users can view (i.e. only those handled by their own organisational unit / department)</i></p>	HD

ID	Description	Priority
F-EN-03	<p>Where a user has selected to view RFIs by organisational unit / department, the system shall enable the user to “drill down” the organisation’s hierarchy until it reaches action officer / researcher.</p> <p>This is to enable areas experiencing difficulty to be identified.</p>	D
F-EN-04	<p>The system shall enable users to sort the order of search results for RFIs based on:</p> <ul style="list-style-type: none">▪ date received▪ keyword function / subject / taxonomy▪ organisational unit / department responsible for the function or subject▪ action officer / researcher▪ type (e.g. Fol, EIR, appeal)▪ status (e.g. fees received, format requester would prefer to receive information in etc.)▪ outcome▪ proximity to deadlines	D
F-EN-05	<p>The system shall provide action officers / researchers with a view of the RFIs which are open and that have been allocated to them.</p> <p>RFIs should be ordered in decreasing proximity to deadlines.</p> <p>This view will act as a to do list, enabling the user to view & update the details for each RFI along with its contact history and associated applicant details.</p>	HD

Correspondence

ID	Description	Priority
F-CR-01	<p>The system shall automatically allocate a unique reference for all correspondence generated for the RFI</p> <p><i>The unique reference for the correspondence could be derived from unique identifier for the RFI, followed by a sequential number.</i></p>	HD
F-CR-02	<p>The system shall automatically populate the “header” information for all correspondence including:</p> <ul style="list-style-type: none"> ▪ Applicant name & address ▪ Correspondence unique reference ▪ Date 	HD
F-CR-03	<p>The system shall automatically produce “simple correspondence” to communicate with the applicant – this includes:</p> <ul style="list-style-type: none"> ▪ Acknowledgements ** ▪ Fees Notices * ▪ Request to Transfer RFI to another public authority ▪ Request has been transferred to The National Archives ▪ Extended Deadline (Public Interest consideration for FoI / Complex EIR) ▪ Don’t Hold Requested Information * ** ▪ Neither Confirm Nor Deny Holding Information * ▪ RFI Refused – Exceeds Fee Limit * <p>Automated correspondence may be via production of a letter (interface with word processing software) or via email (interface with email software) – this will be determined by how the applicant initiated the RFI.</p> <p>* Correspondence templates should include a statement informing them of their right to appeal and how to appeal.</p> <p>** Correspondence should include any advice to the applicant on any other public authorities that may hold information referred to in the RFI.</p> <p><i>The degree of automation of that can be applied to correspondence production will depend upon the solution adopted by the public authority and the amount of business benefit it delivers i.e. in reducing administration overheads where there are large volumes of RFIs to process.</i></p>	HD
F-CR-04	<p>The system shall automatically produce “complex correspondence” to communicate with the applicant – this includes:</p> <ul style="list-style-type: none"> ▪ All correspondence for “hybrid requests” ▪ Notify applicant that public authority reasonably requires further information to identify and locate the information requested ▪ Information Not Found (initially public authority believed it did hold) ** ▪ Request has exceeded deadline ▪ RFIs where Exemptions apply * ▪ RFI Refused – Vexatious Request * ▪ RFI Refused – Repeated Request * ▪ Information provided in relation to an RFI * ** 	D

ID	Description	Priority
	<p>* All correspondence templates should include a statement informing them of their right to appeal and how they should do so.</p> <p>** Correspondence should include any advice to the applicant that another public authority may hold information referred to in the RFI.</p>	
F-CR-05	<p>The system shall take account of the following, when producing and formatting correspondence:</p> <ul style="list-style-type: none"> ▪ Applicant's accessibility requirements (<i>see Appendix A</i>) ▪ RFI's required response format (<i>see Appendix B</i>) 	D

Reporting (Central Monitoring)

Central government has reported to Parliament on its performance in responding to requests for information made under the Code of Practice on Access to Government Information since its introduction. This will continue under the Freedom of Information Act, and the performance monitoring regime that government departments have agreed can be found in Appendix E.

Appendix F contains a list of organisations that are included in the coverage of monitoring of access to information in central government. It is recommended that even public authorities that are not included in this list should still assess the suitability of the central monitoring requirements in enabling them to measure their own RFI handling performance.

Reporting (Internal)

Whilst the requirements in this section are complementary to the central monitoring requirements referred to above, they should not be seen as exhaustive as public authorities are likely to have their own specific measures for reporting performance in respect of RFI handling.

All reports can be scheduled to be produced on a regular or requested on an ad-hoc basis (the latter requiring the user to enter a date range to report on) unless otherwise stated.

ID	Description	Priority
F-IR-01	The system shall provide periodic reports on the status of RFIs / appeals based on the organisational unit / department responsible – the report should include both open and completed RFIs.	HD
F-IR-02	The system shall provide periodic reports on the status of RFIs / appeals based on the keyword subject / taxonomy – the report should include both open and completed RFIs.	HD
F-IR-03	The system shall provide periodic reports on RFIs / appeals based on their status .	HD
F-IR-04	The system shall provide periodic reports on the status of RFIs / appeals based on the proximity to deadlines – the report should only include open RFIs.	HD
F-IR-05	The system shall provide periodic reports on the status of RFIs / appeals that compares estimated effort vs. actual effort – the report should only include completed RFIs.	HD
F-IR-06	The system shall provide periodic reports on the status of RFIs / appeals based on the format of RFI (e.g. Letter, Email, Phone etc.) – the report should include both open and completed RFIs.	D
F-IR-07	The system shall provide periodic reports on the status of RFIs / appeals based on the applicant country (i.e. to assess how many appeals are being received from overseas, as well as the UK.) – the report should include both open and completed RFIs.	D

ID	Description	Priority
F-IR-08	The system shall provide periodic reports on the amount of outstanding fees – the report should only include open RFIs. The report should include a total amount outstanding for all the transactions contained in the report.	HD
F-IR-09	The system shall provide periodic reports on the amount of paid fees received for a specific date or date range – the report should include both open and completed RFIs. The report should include a Total Amount Paid for all the transactions contained in the report.	HD
F-IR-10	The system shall provide periodic reports on RFIs / appeals based on the outcome (see Appendices B & C respectively) by organisation unit / department – the report should only include completed RFIs & appeals.	HD
F-IR-11	<p>The system shall produce an audit report of changes made to RFIs / appeals:</p> <p>The report should include the following:</p> <ul style="list-style-type: none"> ▪ Unique identifier ▪ What information was changed ▪ Who changed the RFI / appeal ▪ When the change occurred (Date & Time) <p><i>This report is only produced on an ad-hoc basis when requested by a user.</i></p>	HD
F-IR-12	<p>The system shall produce an RFI appeal report that should provide the Information Commissioner and/or Information Tribunal with the information the public authority considers it should have available when assessing the appeal.</p> <p><i>This report is only produced on an ad-hoc basis when requested by a user.</i></p>	HD
F-IR-13	The system shall produce “ temporally-based ” reports that allow results to be summarised at a user-defined interval (e.g. by year / quarterly / monthly / weekly) – to assist in establishing trends.	D
F-IR-14	The system shall enable reports (both “standard” and “user-defined”) to be scheduled to run at user-defined intervals.	D
F-IR-15	<p>The system should provide authorised users with a facility to define, produce and save ad-hoc reports.</p> <p>It shall also be possible for users to:</p> <ul style="list-style-type: none"> ▪ save ad-hoc reports ▪ copy ad-hoc reports (i.e. to base new reports on existing ones) 	E
F-IR-16	<p>The system shall provide the facility to export reports (standard or ad-hoc) into standard formats, that may include:</p> <ul style="list-style-type: none"> ▪ Microsoft Word ▪ Microsoft Excel ▪ Business Objects ▪ XML <p><i>A facility to export of RFI / appeal information may also be used to consolidate information when public authorities re-structure with the combination of organisational units from different sources.</i></p>	E

Appeals Handling

It should be noted that when the term “appeal” is used in this document, it refers to internal reviews, complaints to the Information Commissioner and appeals to the Information Tribunal (made by any permitted party).

ID	Description	Priority
F-AP-01	<p>The system shall notify the central team with overall responsibility for FoI & EIR, if a request for an appeal (Internal Review / Information Commissioner / Information Tribunal) has been logged against an RFI.</p> <p><i>Public authorities may wish to notify more than one individual to ensure there are no bottlenecks due to holidays / sickness.</i></p> <p><i>This could be achieved either via email, workflow support of the process or manual processes</i></p>	HD
F-AP-02	<p>The relevant action officer / researcher should be notified when an appeal has been allocated to them.</p> <p><i>Public authorities may wish to notify more than one individual to ensure there are no bottlenecks due to holidays / sickness.</i></p> <p><i>This could be achieved either via email or through a workflow support of the process</i></p>	HD
F-AP-03	<p>The system shall allow authorised staff to re-allocate appeals to an action officer.</p> <p><i>It is recommended that a supporting process is put in place to prevent an RFI being repeatedly re-allocated e.g. a courtesy call to the proposed individual prior to re-allocation. This shall be recorded in the audit trail.</i></p>	D
F-AP-04	<p>The system shall start and stop the calendar-based timer on business rules.</p> <p><i>This shall be recorded in the audit trail</i></p>	HD
F-AP-05	<p>The system shall support an escalation path of notification alerts as an appeal nears / reaches / exceeds target dates – this might include:</p> <ul style="list-style-type: none"> (1) Action officer / researcher (2) Department / line manager of action officer / researcher (3) Central correspondence/coordinating unit <p><i>This could be achieved either via email, workflow support of the process or manual processes</i></p>	HD
F-AP-06	<p>The system shall automatically set the acknowledgement sent date when an acknowledgement correspondence is sent to the applicant (for internal reviews)</p>	D
F-AP-07	<p>The system shall validate the status of an appeal i.e. using business rules to enforce the agreed sequence of events</p>	E
F-AP-08	<p>The system shall validate the approval to proceed to the next stage in the process, based on the user’s permissions (which are derived from the user roles / groups they belong to)</p> <p><i>The system shall use the audit trail to record the progress of the appeal through the process.</i></p>	E
F-AP-09	<p>The system shall enable users to record details of the outcome of internal reviews</p>	E
F-AP-10	<p>The system shall enable users to record when information has been supplied to the Information Commissioner or Information Tribunal</p>	E

ID	Description	Priority
F-AP-11	The system shall enable users to record details of the decision made by the Information Commissioner	E
F-AP-12	The system shall enable users to record details of the decision made by the Information Tribunal	E
F-AP-13	When a decision has been reached on an appeal, the system shall: <ul style="list-style-type: none"> ▪ Prompt the user to record <ul style="list-style-type: none"> • The outcome (dependent upon the type of appeal) • Details of any steps required to comply with the decision (<i>if any</i>) • Decision to be complied by date (<i>if applicable</i>) 	HD
F-AP-14	The system shall notify the action officer/researcher as the date nears / exceeds the decision to be complied by date (frequency of alerts to be determined by business rules)	HD
F-AP-15	When an appeal is being Closed, the system shall: <ul style="list-style-type: none"> ▪ Set the actual completion date ▪ Prompt the user to record <ul style="list-style-type: none"> • If the actual completion date exceeds the target completion date, the reason for not achieving the target • Whether the information was released or not (updating the original RFI) 	D
F-AP-16	The system shall allow users to record whether a ministerial veto has been issued	HD
F-AP-16	The system shall allow users to record whether a ministerial veto has undergone judicial review	HD
F-AP-18	When an appeal is Closed, the system shall ensure that no further changes can be made to it.	E

Interfaces

The applicability and complexity of interfaces will vary considerably between public authorities, as it will be dependent upon the scope of the system that is implemented to manage RFIs and any 3rd party systems that need to be interfaced with.

The following table illustrates the likely types of interface that may be required for each category of the functional requirements:

Category	Possible Interfaces
Recording Requests & Appeals	<ul style="list-style-type: none"> ▪ Correspondence System(s) ▪ Customer Relationship Management ▪ Email ▪ Electronic Record Management ▪ Manual File System(s) ▪ Post Code databases
Decision Support	<ul style="list-style-type: none"> ▪ Knowledge Bases ▪ Disclosure Log
Tracking / Contact Logs	<ul style="list-style-type: none"> ▪ Correspondence Systems ▪ Customer Relationship Management ▪ Email
Fees	<ul style="list-style-type: none"> ▪ Finance System
Correspondence Production	<ul style="list-style-type: none"> ▪ Correspondence System(s) ▪ Word Processing ▪ Email ▪ Translation Facilities
Enquiries	<ul style="list-style-type: none"> ▪ Correspondence System(s) ▪ Customer Relationship Management ▪ Email ▪ Electronic Record Management ▪ Manual File Systems
Reporting	<ul style="list-style-type: none"> ▪ 3rd Party Reporting Tool
Delivery (Intranet / Internet)	<ul style="list-style-type: none"> ▪ User Interface / Frequently Asked Questions / Publication Scheme ▪ Content Management System

ID	Description	Priority
F-IF-01	<p>The system shall facilitate the logging of RFIs that have been received via email, by providing an interface with the public authorities email system.</p> <p><i>This may be as simple as establishing a central mailbox that can be processed by a central correspondence team (or equivalent), although RFIs received in any inbox will still be valid RFIs.</i></p>	HD
F-IF-02	<p>The system shall interface with the public authority's Intranet / Internet sites.</p> <p><i>The Internet interface would be used to deliver the requirements outlined in the online access section of this document.</i></p> <p><i>The Intranet interface would provide the user with straightforward access to the public authorities resources including:</i></p> <ul style="list-style-type: none"> ▪ <i>Knowledge Bases (i.e. information sources)</i> ▪ <i>Disclosure Log</i> ▪ <i>Publication Scheme</i> 	HD
F-IF-03	<p>The system shall provide a two-way interface with the public authority's finance system to enable:</p> <ul style="list-style-type: none"> ▪ The system to transfer fees information across to the finance system, so that the latter can raise fees notices (and track payments) and ▪ The finance system to inform the RFI system that payment of outstanding fees has been received from the applicant <p><i>This may be achieved by direct links between the two systems or a process that requires some manual intervention</i></p>	D
F-IF-04	<p>The system shall provide the user with straightforward access from the RFI to any associated:</p> <ul style="list-style-type: none"> ▪ Correspondence (Letters / Faxes) ▪ Emails <p><i>This should either be achieved via links directly into an electronic records management system and/or email system and/or holding file number(s) to locate information held on manual file system(s)</i></p>	HD
F-IF-05	<p>The system shall provide the user with straightforward access from the appeal to any associated:</p> <ul style="list-style-type: none"> ▪ Correspondence (Letters / Faxes) ▪ Emails <p><i>This should either be achieved via links directly into an electronic records management system and/or email system and/or holding file number(s) to locate information held on manual file system(s)</i></p>	HD
F-IF-06	<p>The system shall provide the user with straightforward access from the contact log for an RFI/appeal to any associated:</p> <ul style="list-style-type: none"> ▪ Correspondence (Letters / Faxes) ▪ Emails <p><i>This should either be achieved via links directly into an electronic records management system and/or email system and/or holding File Number(s) to locate information held on manual file system(s)</i></p>	HD

ID	Description	Priority
F-IF-07	<p>The system shall provide the user with straightforward access to the Contact Log for an RFI (if it is being managed by a 3rd party system)</p> <p><i>This should either be achieved via links directly into a customer relationship management system and/or correspondence system and/or holding file number(s) to locate information held on manual file system(s)</i></p>	HD
F-IF-08	<p>The system shall provide the user with a straightforward interface to the public authority's word processing software and/or email system to enable automated generation of correspondence and/or correspondence system to log details of the communication.</p>	HD
F-IF-09	<p>The system shall provide an interface to translation facilities to cater for:</p> <ul style="list-style-type: none"> • RFIs that are received in a language other than English • Correspondence that needs to be published in a language other than English <p><i>See Non-Functional Requirements.</i></p>	D
F-IF-10	<p>The system shall integrate with commercially available UK Post Code databases, to enable automatic population of applicants' addresses.</p> <p><i>It should also be straightforward to load upgrades to the Post Code database.</i></p>	D
F-IF-11	<p>The system should enable commercially available 3rd party report writing tools to run over the underlying database, to enable users to produce ad-hoc reports.</p>	HD

Online Access

ID	Description	Priority
F-OL-01	<p>The system shall allow an applicant to create an account online, in order to assist them with online access:</p> <ul style="list-style-type: none"> ▪ Secure access ▪ Record applicant details to repeat on all RFIs ▪ View status of all RFIs they have raised 	D
F-OL-02	<p>The system shall allow applicants to create RFIs online; these RFIs will be forwarded to a central point, for assigning them to the appropriate part of the organisation.</p> <p><i>This could be achieved via a web form on the public authority's organisation or via email.</i></p>	D
F-OL-03	<p>The system shall allow the applicant to track their RFI online through the review process.</p> <p><i>This could be via a simplified view of the public authority's review process – as per Figure 2 (see above)</i></p>	D
F-OL-04	<p>The system shall allow the applicant to receive notification (possibly via email) when key events occur. These could include:</p> <ul style="list-style-type: none"> ▪ Formal acknowledgement of receipt of RFI ▪ Applicant response to public authority notification that it reasonably requires further information to identify and locate the information requested ▪ Applicant response to request for advice & assistance ▪ Fee notice ▪ Decision on RFI 	D
F-OL-05	<p>The system shall allow the applicant to make online payments in respect of any fee notice raised in respect of their RFI.</p>	D
F-OL-06	<p>The system shall allow the applicant to view any information online that has been released in respect of their RFI.</p> <p><i>To improve the overall online process, consideration should be given to developing an "online guide" that walks potential applicants through the following steps:</i></p> <ol style="list-style-type: none"> 1. <i>Check if information required is already available from the Publication Scheme, if not....</i> 2. <i>Check if information required is already available from the public authorities own disclosure log, if not....</i> 3. <i>Raise new RFI</i> 	D

Administration

ID	Description	Priority
F-AD-01	<p>The system shall provide user administration facilities to authorised users – including determining associated security permissions.</p> <p><i>Some public authorities may wish to consider using some method of devolved user administration to prevent bottlenecks / over-reliance on a central function.</i></p>	HD
F-AD-02	<p>The system shall enable authorised users to maintain fees business rules (Fol & EIR) to support automated calculation:</p> <ul style="list-style-type: none"> ▪ Maximum Fee Limit (i.e. maximum amount) ▪ Prescribed Costs (Marginal) <ul style="list-style-type: none"> • Free Research Effort (i.e. the number of hours not charged) • Hour Staff Rate (£) • Percentage of Marginal Costs (0% - 10%) ▪ Disbursements <ul style="list-style-type: none"> • Photocopying cost per page (£) • Postage Rates (£) • CD cost (£) ▪ Alert / Notification Time Periods (e.g. duration for no response to fee notice) ▪ Archiving / Deletion Retention Periods <p><i>Public authorities may wish to automatically calculate disbursement costs using unit costs by categories. Alternatively, they may just require a user to manually enter a value for each RFI, on a case by case basis. However it is likely that a record of how the fee was calculated will be needed to justify any fee.</i></p>	D
F-AD-03	<p>The system shall enable authorised users to maintain fees business rules (DPA) to support automated calculation.</p>	D
F-AD-04	<p>Authorised users shall be able to maintain the organisational structure within the system, in order to support assigning RFIs to the correct individuals/teams.</p> <p><i>This will be related to the public authority's file plans established for their Electronic Records Management System(s).</i></p> <p>The system shall also be able to cater for ongoing changes to organisational structure to ensure that RFIs are allocated to the correct individuals/teams.</p> <p><i>This would also be used to support the escalation of notification warnings when deadlines are nearing / have been exceeded</i></p>	HD
F-AD-05	<p>Authorised users shall able to maintain a pre-defined list (or taxonomy) of function and subject keywords and the corresponding organisational units/division and/or action officers</p> <p><i>Public authorities may already have developed some form of standard "taxonomy" that they can adapt to this use e.g. file plans established for their Electronic Records Management System(s).</i></p>	HD
F-AD-06	<p>Authorised users shall be able to maintain valid values associated with the list fields outlined in appendices A, B and C.</p> <p><i>Some restrictions on maintenance may be necessary, where system processing is dependent upon specific values.</i></p>	D

ID	Description	Priority
F-AD-07	<p>Authorised users shall be able to update the workflow definition in the system to reflect changes in the business processes.</p> <p><i>Ideally this would be via some form of graphical user interface. Public authorities should consider how the system should handle changes in the workflow e.g. if a stage is removed from the workflow, they should define what happens to any RFIs or appeals that are currently at that stage.</i></p>	D
F-AD-08	<p>Authorised users shall be able to maintain a log of information that has been covered by exemption, Ministerial Certificate, commercial licensing / confidentiality agreement.</p> <p>This log shall be categorised by public authorities pre-defined list (or taxonomy) of function and subject keywords, as well as file references.</p>	D
F-AD-09	<p>Authorised users shall be able to maintain a system calendar for working days – as defined in FoI Section 10(6)</p> <p>Saturdays and Sundays should default to non-working days.</p> <p><i>It should be noted that civil service “Privilege Days” are not counted as Bank Holidays.</i></p>	HD
F-AD-10	<p>The system shall allow authorised users to update details of exemptions that apply to different RFI types.</p>	HD
F-AD-11	<p>Where the system includes automated correspondence production facilities, it shall provide authorised users with a straightforward facility to maintain templates for automatic correspondence.</p>	E
F-AD-12	<p>The system shall provide an automated archiving facility based on business rules to ensure that system performance is maintained and DPA obligations are met.</p> <p>A straightforward facility to “reinstate” archived records shall also be provided, should the need arise.</p> <p><i>Public authorities may wish to retain a rolling-period (e.g. 1 year) of RFIs on the system and archive the remainder. If the public authority wishes to retain the availability of RFIs for a longer period, the system could “strip-out” elements of RFI (mainly the applicant details) in line with their Data Protection policy. Maintaining information about previous requests and decisions might be particularly useful.</i></p> <p><i>In some cases a higher degree of manual intervention may be beneficial, allowing authorised users to review RFIs prior to archive in case they are still deemed to be of current interest and should be retained for the time-being.</i></p>	HD