



REPORT TO: East Lothian Integration Joint Board

MEETING DATE: 27 June 2024

BY: Chief Officer

SUBJECT: IJB Publication Scheme

1 PURPOSE

- 1.1 To present the updated IJB Publication Scheme (Guide to Information through the Model Publication Scheme 2024) to the IJB for approval.

2 RECOMMENDATIONS

- 2.1 The IJB is asked to:
- i. Review and approve the appended IJB Publication Scheme (Guide to Information through the Model Publication Scheme 2024).

3 BACKGROUND

- 3.1 The Freedom of Information (Scotland) Act 2002 (the Act) requires Scottish public authorities to adopt and maintain a publication scheme which has the approval of the Scottish Information Commissioner and publish information in accordance with that scheme. The publication scheme must:
- Publish the classes of information that the authority makes routinely available.
 - Tell the public how to access the information and whether information is available free of charge or on payment.
- 3.2 East Lothian IJB has adopted the Model Publication Scheme (MPS) 2018 (updated March 2021) which has been produced and approved by the Scottish Information Commissioner. The MPS and associated IJB Publication Scheme (Guide to Information through the Model Publication Scheme) had not been updated since 2017.
- 3.3 An internal audit of the IJB Publication Scheme took place during March 2024 and a number of recommendations were made in relation to updating and improving the existing Publication Scheme. These can be found in the audit report at Appendix 1.

An updated IJB Publication Scheme has now been developed reflecting the recommendations contained in the Audit report and can be viewed at Appendix 2.

4 ENGAGEMENT

4.1 Not applicable

5 POLICY IMPLICATIONS

5.1 Not applicable

6 INTEGRATED IMPACT ASSESSMENT

6.1 The subject of this report does not affect the wellbeing of the community or have a significant impact on equality, the environment or economy.

7 DIRECTIONS

7.1 Not applicable

8 RESOURCE IMPLICATIONS

8.1 Financial – None

8.2 Personnel – None

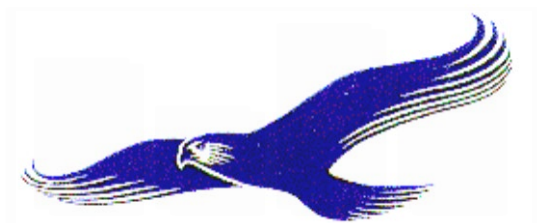
8.3 Other – None

9 BACKGROUND PAPERS

9.1 Appendix 1 - Audit final report March 2024

9.2 Appendix 2 - IJB Publication Scheme - (Guide to Information through the Model Publication Scheme 2024).

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DATE	10 June 2024



East Lothian IJB Publication Scheme March 2024

Conclusion

Limited Assurance

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1 Executive Summary:

Conclusion: Limited Assurance

The East Lothian IJB has adopted the Model Publication Scheme (MPS) and made a significant amount of information available to view online. Information has in the main been appropriately classified in the MPS and the associated Guide to Information also adheres to the six MPS Principles. The East Lothian IJB MPS has not been updated since 2017 and significant improvement opportunities have been identified relating to the review of the MPS and the information available, alongside a self-assessment exercise and training requirements.

Background

In July 2015 East Lothian IJB (ELIJB) took on duties in the East Lothian Council area for development of integrated planning and delivery of health and social care. The Freedom of Information (Scotland) Act 2002 (FOISA) places a duty on Scottish public authorities to publish information proactively. Authorities must have regard to the public interest in the information they hold and make information available so it can be accessed without having to make a request for it under section 1 of FOISA. The duty to publish is in addition to the obligation to respond to requests for information.

In addition, the Environmental Information (Scotland) Regulations (2004) (the EIRs) require authorities to publish environmental information proactively, particularly information they hold in electronic formats.

The Scottish Information Commissioner has developed a Model Publication Scheme (MPS) to support Scottish public authorities to meet their publication scheme duties under both FOISA and the EIRs.

By adopting the MPS, authorities commit to publishing, as a minimum, specified types of information, through their own Guide to Information.

Summary of findings & recommendations

The following key findings and recommendations are highlighted, which have all been **agreed by the General Manager, Planning and Performance - East Lothian Health and Social Care Partnership, Project Support Manager - East Lothian Health & Social Care Partnership and the Performance & Improvement Manager - East Lothian Community Health Partnership:**

- While it is noted that the Board has a documented MPS and Guide to Information, this is out of date and requires to be reviewed and presented to the Board for approval, before notifying the Scottish Information Commissioner. *Management have agreed to complete this in full by July 2024.*
- While the Board has made a significant amount of information available online, work is required to reestablish links to web pages elsewhere and ensure that information is correctly classified within the MPS. *Management will following review of the MPS reestablish all appropriate links by July 2024.*
- While the MPS has noted that the Board intends to develop records management and retention policies this has not yet been done. Also, there are several documents online that are now out-of-date or superseded. *Management have agreed to develop a records management policy by August 2024.*
- The current MPS has not explicitly stated that information can be made available in alternative formats, in line with the requirements of the Equality Act 2010. It was also noted that telephone contact numbers should be consistent. *Management have agreed to put this in place by May 2024.*
- Current activity and practice has not been assessed using the Scottish Information Commissioners self-assessment checklist. *Management have agreed to complete this assessment and develop an action plan from the assessment by September 2024.*

Recommendations Grade	High	Medium	Low	Total
Current Report	-	4	1	
Prior report	N/A	N/A	N/A	N/A

Materiality

There are no reported resource implications from the 2022-25 Strategic Workforce Development Plan. Training and other related costs are likely to be covered within the current budget. Additionally, no further staffing is required, with the intention to address gaps using current workforce.

2 Headlines

Objectives	Conclusion	Comment
1. The IJB has made a corporate decision to adopt the MPS without amendment, with the Scottish Information Commissioner notified of this	Limited	While the current MPS is dated 29 May 2017, review of Board Papers from around this time could not confirm that the Board had approved/signed-off the ELIJB MPS without amendment. Furthermore, no review of the MPS had been carried out since then. Also, While an East Lothian IJB Model Publications Scheme Notification Form had been completed, this is also dated from 31 May 2017 and contains information that is incomplete or now out-of-date.
2. The IJB has identified its information that is covered by the MPS and any additional information in which there is a public interest in publication.	Limited	The IJB has identified within the documented MPS the classes of information that is to be held and made available for the public to view. However, this review has noted some observations requiring attention, including re-establishing electronic links to information and the appropriate classification of information.
3. The IJB has produced and published a Guide to Information, ensuring that the arrangements for publication meet the six MPS Principles.	Reasonable	The East Lothian IJB's Guide to Information has been incorporated into its MPS. Review of this against the six MPS Principals has noted that the Guide to Information has not included the provision of information under the Equality Act 2010 and where requests for information in alternative formats may be received, alongside the inclusion of accurate contact information. The required development of a records management and retention policy incorporating a comprehensive review of the information currently available through the IJB website has also been noted.
4. Arrangements are in place to maintain and update the IJB's Guide to Information or in response to any future changes to the MPS. The IJB has completed the Scottish	Reasonable	As the Guide to Information features as part of the Board's MPS, future review and update of the MPS should include the content of the Guide to Information.
5. Information Commissioners Self-assessment Toolkit to capture its publication activity and assess performance against publication standards.	Limited	While most of the Self-assessment Toolkit is centred around responding to Freedom of Information Requests (which are the responsibility of NHS Lothian and East Lothian Council), Module 4 of the Toolkit focuses on helping authorities to meet their duty to actively publish information. the Board has not considered the Module questions and assessed its publication activities to record evidence, strengths and areas for improvement.
6. Training is provided to relevant staff to ensure that the IJB publishes only information that is relevant and appropriate	Limited	A training needs analysis has not been carried out to identify any training requirements required by staff. However, it is noted that the self-assessment exercise includes this and training requirements will be addressed following completion of the self-assessment.

3 Areas where expected controls are met/good practice.

No.	Areas of Positive Assurance
1.	The Board has placed a significant amount of information on the HSCP website, including its Strategic Plan, meeting papers, annual accounts, registers of members interests and annual performance reports.
2.	The MPS has clearly stated the classes of information that is available to view, the Board has also through its MPS imposed the six principles which govern the way it makes its information available through the Guide to Information.

4 Detailed Recommendations

Documented Model Publication Scheme

Objective: 1	The IJB has made a corporate decision to adopt the MPS without amendment, with the Scottish Information Commissioner notified of this	Grade	Recommendation
<p>The East Lothian IJB Model Publication Scheme (MPS) was obtained and reviewed. While the current Publication Scheme is dated 29 May 2017, review of Board Papers from around this time could not confirm that the Board had approved/signed-off the ELIJB Publication Scheme without amendment. Furthermore, no review of the MPS had been carried out since then.</p> <p>While an East Lothian IJB Model Publications Scheme Notification Form had been completed, this is also dated from 31 May 2017 and contains information that is incomplete or now out-of-date, for example:</p> <ul style="list-style-type: none"> • The Form has not recorded the website address to the IJB’s Guide to Information • Contact details are included for the Chief Officer in place in 2017, and not the current Chief Officer. • The details recorded of the ELIJB Communication Officer with responsibility for FOI request in the Notification Form are noted as out-of-date. <p>The documented MPS has also made reference to the South Lanarkshire Integration Joint Board. Most likely the result of using the template of the South Lanarkshire IJB MPS as a guide for the East Lothian IJB.</p> <p>While the current MPS is available through the ELIJB website as follows, It is not accessible through website home page and is instead listed under the ‘IJB Documents’ section.</p> <p>Without an up-to-date publication scheme, there is a risk that the East Lothian IJB cannot be considered to have properly adopted the Commissioner’s MPS and may be failing in its duty to adopt and maintain a publication scheme in line with section 23(1) of FOISA.</p>		Medium	<p>1.1 Management should arrange for the review and update of the East Lothian IJB’s Model Publication Scheme. Including a schedule agreed for its ongoing review</p> <p>Thereafter the MPS should be presented to the Board for approval and notification sent to the Scottish Information Commissioner.</p> <p>Once done, the Model Publication Scheme should be positioned on the IJB website’s home page.</p>

Management response	Responsible officer & target date
<p>1.1 Agreed – A full review and update of the Model Publication Scheme will take place to bring this up to current date and a schedule for annual review included. The MPS will be presented to the IJB for approval, thereafter an updated notification form sent to the Scottish Information Commissioner. The updated MPS will be made available in a prominent place on the IJB web pages of the ELC website.</p>	<p>General Manager - Planning & Performance MPS update – May 2024 IJB approval – June 2024 Scottish Information Commissioner notification – July 2024 IJB website publication – July 2024</p>

4 Detailed Recommendations

Content of the MPS and access to information

Objective 2	The IJB has Identified its information that is covered by the MPS and any additional information in which there is a public interest in publication	Grade	Recommendation
	<p>The IJB has identified within the documented MPS the classes of information that is to be held and made available for the public to view. Testing was carried out to review the MPS and compare this against the minimum advised by the Commissioner, alongside confirming that the information is readily available for the public to view. Some observations requiring attention are listed below:</p> <ul style="list-style-type: none"> • The Freedom of Information section of the IJB website includes links to East Lothian Council and NHS Lothian Freedom of Information pages, however NHS Lothian link does not work (page cannot be found). • Under the Governance Section of the IJB website there is a link to the Board’s Integration Scheme. However, clicking on the link takes the viewer to its Freedom of Information page. • The documented MPS has not included the relevant links to the documents /information that is available online, despite the document noting that they are to be accessible via the web. • The documented MPS has made reference to Freedom of Interest under Class 1 (About the authority) and 2 (How it delivers its functions and services). • IJB Meetings are referenced under both Class 1 and 3 (How it takes decisions and what is decided) in the documented MPS. • The IJB’s Financial Plans are not available through its website. Also, the documented MPS makes reference to the Financial Plan 2016/17. • There is no information available through the East Lothian IJB website to advise the public of subject access requests, which are made through either East Lothian Council or NHS Lothian. Despite this being included within the MPS. <p>There is a risk that reduced accessibility to information will result in the IJB not making as much information available as possible, including access to specific advice and guidance</p>	Medium	<p>2.1 The recommended review and update of the MPS should include ensuring that all links included in the IJB website are operational and correct.</p> <p>Management should also identify the most appropriate classes to assign information to and ensure that this is reflected in the MPS.</p> <p>Management should ensure that under Class 4 (What they spend and how they spend it), the most up-to-date ELIJB Financial Plan is available.</p> <p>Clear guidance around the submission of subject access requests should be available through the IJB website.</p>

Management response	Responsible officer & target date
<p>2.1 – Agreed. All recommendations will be carried out as part of the review and update to the MPS. This will include a review of external links and broken links, appropriate assignment of information to classes, publication of the most up to date IJB financial plan, and clear instruction on how to make a subject access request for personal information.</p>	<p>General Manager - Planning & Performance MPS update – May 2024 IJB Financial Plan – June 2024 Subject Access Request – July 2024</p>

4 Detailed Recommendations

Review of Information

Objective 3	The IJB has produced and published a Guide to Information, ensuring that the arrangements for publication meet the six MPS Principles	Grade	Recommendation
	<p>Information categorised under Class 5 of the MPS is related to how the Board manages its human, physical and information resources. This Class is related also to the 6th MPS Principle, which seeks to ensure that the Board has in place a process for reviewing its published information.</p> <p>While the documented MPS has made reference and provided a link to East Lothian Council’s Schedule for the Retention and Destruction of Records, the link to this does not work. Also, there is no similar link included to the NHS Lothian Record Management Policy.</p> <p>Furthermore, The Guide to Information within the documented MPS had noted that ‘it will over the coming months develop records management and retention policies which will be applied to the management of information held by the Board’. However, to date this has not been developed.</p> <p>Also, there is no routine review of the Board’s published information to ensure that superseded, out-of-date or no longer relevant information has been removed. For example, the annual accounts from financial Year 2016/17 to 2022/23</p> <p>There is a risk that without routine review of the Board’s Guide to Information and the information available online that it becomes out-of-date and no longer relevant, or that the volume of information held is confusing to the viewer.</p>	Medium	<p>3.1 Management should progress with the development of the IJB’s records management and retention policies. Once done they should be approved by the appropriate Board/Committee and published.</p> <p>Thereafter a comprehensive review of the information held online by the IJB should be reviewed and indexed. Information that is no longer relevant should be removed.</p>

Management response

3.1 Agreed. Development of the IJB Records Management Policy will be completed and a draft submitted to the IJB for approval, thereafter, links to the ELC and NHSL Schedule / Policy made available through the IJB web pages.

Carry out a review of the information available on the website following approval and information removed that is no longer required. A schedule will be established for routine maintenance of the information available online.

Responsible officer & target date

**General Manager - Planning & Performance
Records Management policy – August 2024**

**Senior Communications Advisor
Website review – September 2024**

4 Detailed Recommendations

Accessibility and Contact

Objective 3	The IJB has produced and published a Guide to Information, ensuring that the arrangements for publication meet the six MPS Principles	Grade	Recommendation
	<p>Similar to the Board’s classification of information within the MPS, work was carried out to assess the Board’s Guide to Information, and how this meets all six MPS Principles.</p> <p>Under Principle 1 (Availability and formats). arrangements are in place for people who cannot reasonably access the information online or by inspection at the premises. However, it is noted that the Guide to Information has not included the provision of information under the Equality Act 2010 and where requests for information in alternative formats may be received. Although staff have advised that in these instances the appropriate partner communications teams will be contacted to assist.</p> <p>Also, Principle 5 (Advice and assistance) requires the Board to include contact details for enquiries about any aspect of the MPS or Guide to Information. While the postal and email addresses are correct. There are two different telephone numbers recorded within the Guide/MPS and IJB website. While the guide has included the telephone number 01620 827755, a second number has also been provided through the website (01875 824309). While 01620 number is for the HSCP Communications Team and therefore correct, the 01875 number takes the caller to East Lothian Council’s contact centre.</p> <p>There is a risk that members of the public that require information in alternative formats are unaware this this is available and they are unable to access information.</p> <p>There is also a risk that incorrect contact details may prevent enquiries from reaching the appropriate person or team.</p>	Low	<p>3.3 Management should ensure that the Guide to Information contained within the Model Publication Scheme clearly states that information can be provide in alternative formats that comply with the Equality Act 2010.</p> <p>Staff should also ensure that there is consistency around the contact details recorded within the documented MPS and online.</p>

Management response	Responsible officer & target date
<p>4.1 Agreed. All recommendation will be carried out as part of the review and update to the MPS</p>	<p>General Manager - Planning & Performance MPS update – May 2024</p>

4 Detailed Recommendations

Self-assessment and Training

Objective 5	The IJB has completed the Scottish Information Commissioners Self-Assessment Toolkit to capture its publication activity and assess performance against publication standards	Grade	Recommendation
	<p>The Scottish Information Commissioners Self-Assessment Toolkit has been developed to help authorities to:</p> <ul style="list-style-type: none"> • Capture current activity and practice. • Assess how well they are performing against a set of standards. • Improve their FOI practices, procedures and administrative arrangements. <p>While most of the Toolkit is centred around responding to Freedom of Information Requests (which are the responsibility of NHS Lothian and East Lothian Council), Module 4 of the Toolkit focuses on helping authorities to meet their duty to actively publish information. This allows the public to find out easily what information they can access without having to make requests for it. Active publication supports better relationships with stakeholders and demonstrates openness and transparency.</p> <p>However, it is noted from this review that the Board has not considered the Module questions and assessed its publication activities to record evidence, strengths and areas for improvement. This includes identifying any training requirements necessary to ensure that staff are adequately informed of their responsibilities in publishing information that is relevant, easily accessible and complies with the Scottish Information Commissioner's guidance around the publication of information.</p> <p>There is a risk that without proper assessment of the Board's publishing requirements and activities information is either not routinely available that should be, or that staff are unaware of their duties and responsibilities in publishing data.</p>	Medium	<p>5.1 Management should complete the Module 4 of the Scottish Information Commissioner's Toolkit (Assessment Questions and Evidence Grid).</p> <p>Where necessary, an action plan should be developed to address any gaps identified by the assessment.</p> <p>Any training requirements identified from the exercise should also be taken forward.</p>

Management response	Responsible officer & target date
<p>5.1 Agreed. Module 4 of the Scottish Information Commissioner's Toolkit will be completed, and any action plan developed, including staff training where required.</p>	<p>General Manager - Planning & Performance Toolkit & training– September 2024</p>

A Recommendation Grading/Overall opinion definitions

Recommendation	Definition
High	Recommendations relating to factors fundamental to the success of the control objectives of the system. The weaknesses may give rise to significant financial loss/misstatement or failure of business processes.
Medium	Recommendations which will improve the efficiency and effectiveness of the existing controls.
Low	Recommendations concerning minor issues that are not critical, but which may prevent attainment of best practice and/or operational efficiency.

Levels of Assurance	Definition
Substantial Assurance	A sound system of governance, risk management and control exists, with internal controls operating effectively and being consistently applied to support the achievement of objectives in the area audited.
Reasonable Assurance	There is a generally sound system of governance, risk management and control in place. Some issues, non-compliance or scope for improvement were identified which may put at risk the achievement of objectives in the area audited.
Limited Assurance	Significant gaps, weaknesses or non-compliance were identified. Improvement is required to the system of governance, risk management and control to effectively manage risks to the achievement of objectives in the area audited
No Assurance	Immediate action is required to address fundamental gaps, weaknesses or non-compliance identified. The system of governance, risk management and control is inadequate to effectively manage risks to the achievement of objectives in the area audited.

B Resource, acknowledgements & distribution list

Internal audit	
Service Manager, Internal Audit: Duncan Stainbank	Principal Auditor: Russell Richmond-McIntosh
Review Dates	Completed By /Date
Internal Audit Draft Report Submission	30 January 2024
Management Review Completion	28 February 2024
Final Report Issue	4 March 2024
Report distribution	
Audit & Risk Committee	Project Support Manager– East Lothian HSCP
Chief Officer – East Lothian IJB	General Manager, Planning & Performance - East Lothian HSCP
Audit Scotland	Performance & Improvement Manager – East Lothian HSCP

Acknowledgements.

The weaknesses identified during the course of our audit have been brought to the attention of Management. The weaknesses outlined are those, which have come to our attention during the course of our normal audit work and are not necessarily all of the weaknesses, which may exist.

Although we include a number of specific recommendations, it is the responsibility of Management to determine the extent of the internal control systems appropriate to the East Lothian IJB Publications Scheme.

The content of this report has been discussed with the General Manager, Planning and Performance and Performance & improvement Manager - East Lothian HSCP to confirm factual accuracy. The assistance and cooperation received during the course of our audit is gratefully acknowledged.

East Lothian Integration Joint Board

APPENDIX 2

GUIDE TO INFORMATION AVAILABLE THROUGH THE MODEL PUBLICATION SCHEME 2024

Contents

SECTION 1:	Introduction to the Integration Joint Board - Guide to Information
SECTION 2:	About East Lothian Integration Joint Board
SECTION 3:	Accessing information under the Guide
SECTION 4:	Information that we may withhold
SECTION 5:	Our Charging Policy
SECTION 6:	Our Copyright Policy
SECTION 7:	Records Management Policy
SECTION 8:	Contact details for enquiries, feedback and complaints
SECTION 9:	How to access information which is not available in the Guide to Information
SECTION 10:	Classes of Information

	Classes of Information	Description
1	About the authority	Information about the authority, who we are, where to find us, how to contact us, how we are managed and our external relations
2	How we deliver our functions and services	Information about our work, our strategies and policies for delivering functions and services and information for our service users
3	How we take decisions and what we have decided	Information about the decisions we take, how we make decisions and how we involve others
4	What we spend and how we spend it	Information about our strategy for, and management of, financial resources (in sufficient detail to explain how we plan to spend public money and what has actually been spent)
5	How we manage our human, physical and information resources	Information about how we manage the human, physical and information resources of the authority.
6	How we procure goods and services from external providers	Information about how we procure goods and services and our contracts with external providers
7	How we are performing	Information about how we perform as an organisation and how well we deliver our functions and services
8	Our commercial publications	Information packaged and made available for sale on a commercial basis and sold at market value through a retail outlet e.g., bookshop, museum or research journal.
9	Open data	Open data is non-personal and non-commercially sensitive. Open data is easily discoverable, accessible to anyone and able to be freely used, re-used and redistributed by anyone. Open Data is data made available, via the internet, in an electronic format which supports its ready re-use, and with open licensing which allows its reuse.

Document control sheet

Document information

Document control sheet Document Information

Full name of current version: Class, Title, Version No and Status. E.g. C5 Key Documents Handbook v01 CURRENT ISSUE	C2 Model Publication Scheme v03 CURRENT ISSUE
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Corrections / Unplanned or Ad hoc reviews (see Summary of changes below for details)	
Date of last update	May 2024

Section 1: Introduction

The Freedom of Information (Scotland) Act 2002 (the Act) requires Scottish public authorities to adopt and maintain a publication scheme which has the approval of the Scottish Information Commissioner, and publish information in accordance with that scheme. The publication scheme must:

- publish the classes of information that the authority makes routinely available
- tell the public how to access the information and whether information is available free of charge or on payment.

East Lothian Integration Joint Board has adopted the **Model Publication Scheme 2018 (updated March 2021)** which has been produced and approved by the Scottish Information Commissioner. It is approved until [*date to be added following approval by the Scottish Information Commissioner*].

You can see this scheme on our website at

https://www.eastlothian.gov.uk/downloads/file/27210/east_lothian_ijb_model_publication_scheme

You can also contact us at the address below if you prefer a copy of the Model Publication Scheme, or this Guide to Information, to be provided in a different format.

Communications

John Muir House

Brewery Park

Haddington EH41 3HA

Email – elhscp@eastlothian.gov.uk

Phone – 01875 824309

The purpose of the Guide to Information is to:

- allow you to see what information is available (and what is not available) for the East Lothian Integration Joint Board in relation to each class in the Model Publication Scheme
- state what charges may be applied
- explain how to find the information easily

- provide contact details for enquiries and to get help with accessing the information
- explain how to request information that has not been published.

Alongside the Act, the Environmental Information (Scotland) Regulations 2004 (the EIRs) provide a separate right of access to the environmental information that we hold. This guide to information also contains details of the environmental information that we routinely make available.

Section 2: About East Lothian Integration Joint Board

The Integration Joint Board was established on 1st July 2015 as a corporate body under the terms of the Public Bodies (Joint Working) (Scotland) Act 2014. It is one of 31 Integration Boards each created covering one or more areas coterminous with that of local authorities. The function of the Integrated Board which contains representatives of East Lothian Council, NHS Lothian and a number of professional and stakeholder representatives, is to provide arrangements for the development of the integration of health and social care. This integration will improve the outcomes for patients, service users, carers and their families. The Integration Joint Board has delegated to it in terms of the Act and an Integration Scheme approved by Parliament, strategic responsibility for certain functions and resources to be delivered on an operational basis by East Lothian Council and NHS Lothian.

The Integration Joint Board is the governing body and directs the East Lothian Health and Care Partnership (ELHSCP) to deliver delegated health and social care services on its behalf. The ELHSCP draws staff from East Lothian Council and NHS Lothian.

Introducing the East Lothian Integration Joint Board

The East Lothian Integration Joint Board has its principal offices at:

John Muir House
Brewery Park
Haddington EH41 3HA

Telephone – 01875 824309

e-mail – elhscp@eastlothian.gov.uk

The Chief Officer of the Board is Fiona Wilson, Director of Health and Social Care, - NHS Lothian.

We cover the area of East Lothian Council.

We work in co-operation with other Integrated Joint Boards, NHS Lothian and East Lothian Council and other agencies in planning and commissioning health and social care services.

The governing Body is the Integration Joint Board, which comprises 8 voting members – 4 members appointed from Councillors of East Lothian Council; 4 members from the Non-Executives of NHS Lothian. Additionally, there are non-voting stakeholder members and professional members. For more information on the Board see [Section 10 – Classes of information – Class 1](#).

Section 3: Accessing Information under the Scheme Availability and formats

The information published through this Guide to Information is, wherever possible, available on our website. We offer alternative arrangements for people who do not want to, or cannot, access the information online or by inspection at our premises. For example, we can usually arrange to send information to you in paper copy (although there may be a charge for this – see [Section 5: Our Charging Policy](#)).

Information in our Guide to Information will normally be available through the routes described below. [Section 10 – Classes of Information](#) provides more details on the information available under the Guide, along with additional guidance on how the information falling within each class may be accessed.

Information can be provided in alternative formats that comply with the Equality Act 2010.

Online:

Most information listed in our Guide to Information is available to download from our website. In many cases a link within [Section 10: Classes of Information](#) will direct you to the relevant page or document. If you are having trouble finding any document listed in our guide, then for further assistance please contact:

ELHSCP Communications

Telephone – 01875 824309

e-mail – elhscp@eastlothian.gov.uk

Information not on website

By email:

If the information you seek is listed in our Guide to Information but is not published on our website, we can send it to you by email, wherever possible. When requesting information from us, please provide a telephone number so that we can telephone you to clarify details, if necessary.

By phone:

All information in the guide will be available in hard copy form for example, paper copies. Hard copies of information can be requested from us over the telephone. Please call us to request information available under this scheme.

By post:

You can also request hard copies of any information in the Guide by post. Please address your request to:
East Lothian Health & Social Care Partnership
Communications Team
John Muir House
Brewery Park
Haddington EH41 3HA

When writing to us to request information, please include your name and address, full details of the information or documents you would like to receive, and any fee applicable (see [Section 5: Our Charging Policy](#) for further information on fees). Please also include a telephone number so we can telephone you to clarify any details, if necessary.

Personal visits:

If you prefer to visit us to inspect the information you may do so during our normal office hours of 9.00am to 5.00pm Monday to Thursday and to 4.00pm on a Friday (lunch is 1-2pm each day). It may avoid delay if you notify us in advance that you intend to visit. In a limited number of cases you may be required to make an appointment to view the information. In such cases, this will be set out within Section 10 – Classes of Information, and contact details are provided within the relevant class.

Advice and assistance:

If you have any difficulty identifying the information you want to access, then please contact us to help you.

Exempt information

We will publish all the information we hold that falls within the classes of information in the Model Publication Scheme. We publish this information in Section 10 of this guide. If a document contains information that is exempt under Scotland's freedom of information laws (for example personal information or a trade secret), we will remove or redact (black out) the information before publication but we will explain why.

Section 4: Information that we may withhold

All information covered by our Guide to Information can either be accessed through our website or will be provided promptly following our receipt of your request. Our aim in adopting the Commissioner's Model Publication Scheme and in maintaining this Guide to Information is to be as open as possible. You should note, however, that there may be limited circumstances where information will be withheld from one of the classes of information listed in [Section 10 – Classes of Information](#). Information will only be withheld, however, where the Act (or, in the case of environmental information, the EIRs) expressly permits it. Information may be withheld, for example, where its disclosure would breach the law of confidentiality, harm an organisation's commercial interests, or endanger the protection of the environment.

Information may also be withheld if it is another person's personal information, and its release would breach data protection legislation.

Whenever information is withheld we will inform you of this, and will set out why that information cannot be released. Even where information is withheld it will, in many cases, be possible to provide copies with the withheld information redacted (black out). If you wish to complain about any information which has been withheld from you, please refer to [Section 8 – Contact details for enquiries, feedback and complaints](#).

Section 5: Our Charging Policy

This section explains when we may make a charge for our publications and how any charge will be calculated. There is no charge to view information on our website, at our premises (except where there is a statutory fee, for example to access registers), or where it can be sent to you electronically by email.

We may charge you for providing information to you, for example photocopying and postage, but we will charge you no more than it actually costs us to do so. We will always tell you what the cost is before providing the information to you.

Our photocopying charges per sheet of paper are shown in the table below: Size of paper/alternative format	Black and White Pence per sheet	Colour Pence per sheet
A4	60p	90p
A3	70p	£1.00

- Information provided on a Computer Storage Device (8GB memory stick) will be charged at £8.30 per memory stick.
- We will recharge postage costs at the rate we paid to send the information to you. Our charge is based on sending information by Royal Mail First Class.
- When providing copies of pre-printed publications, we will charge you no more than the cost per copy of the total print run. We do not pass on any other costs to you in relation to our published information.
- Details of any individual charges which differ from the above charging policy are provided within [Section 10 – Classes of information](#).

Section 6: Copyright

East Lothian Integration Joint Board holds the copyright for the vast majority of information in this Publication Scheme. All of this information can be copied or reproduced without our formal permission, provided it is copied or reproduced accurately, is not used in a misleading context, is not used for profit, and provided that the source of the material is acknowledged.

Providing access to information does not mean that copyright has been waived, nor does it give the recipient the right to re-use information for commercial purposes. If you intend to re-use information obtained from the Scheme, and you are unsure whether you have the right to do so, please make a request to re-use the information to:

East Lothian Health and Social Care Partnership
Communications Team
John Muir House
Brewery Park
Haddington EH41 3HA

Telephone – 01875 824309

e-mail – elhscp@eastlothian.gov.uk

Your request will be considered under the Re-use of Public Sector Information Regulations 2005, which may provide the right to impose a charge. In the event that a charge is payable you will be advised what this is and how it is calculated. If you require more information on the re-use of information, go to www.oqps.gov.uk or contact the Communications Team.

The Publication Scheme may contain information where the copyright holder is not the Integration Joint Board. In most cases, the copyright holder will be obvious from the documents. In cases where the copyright is unclear it is the responsibility of the person accessing the information to locate and seek the permission of the copyright holder before reproducing the material or in any other way breaching the rights of the copyright holder. This includes, for example, Ordnance Survey Maps, which are Crown Copyright.

Section 7: Records Management Policy

East Lothian Integration Joint Board regards its records as a major asset of the organisation. It confirms that its records are one of the essential resources, which support management in the efficient and effective fulfilment of its governance, business and legal responsibilities. You can see the Records Management Plan on our website at –

https://www.eastlothian.gov.uk/downloads/download/12855/integration_joint_board_ijb_guide_to_information

Section 8: Contact details for enquiries, feedback and complaints

As we have adopted the Model Publication Scheme, this means we will review our Guide to Information from time to time. As a result, we welcome feedback on how we can develop our guide further. If you would like to comment on any aspect of this Guide to Information, or comment or complain that information is not included then please contact us via:

East Lothian Health and Social Care Partnership
Communications Team
John Muir House
Brewery Park
Haddington EH41 3HA

Telephone – 01875 824309

e-mail – elhscp@eastlothian.gov.uk

Website: www.eastlothian.gov.uk/elhscp - Feedback and complaints - East Lothian IJB

You may, for example wish to tell us about:

- other information that you would like to see included in the guide
- whether you found the guide easy to use
- whether you found the guide to information useful
- whether our staff were helpful
- other ways in which our guide to information can be improved.

Our aim is to make our Guide to Information as user-friendly as possible, and we hope that you can access all the information we publish with ease. If you do wish to complain about any aspect of the guide, then please contact us and we will try and resolve your complaint as quickly as possible.

Any complaint will be acknowledged within three working days of receipt, and we will respond in full within 20 working days.

You have legal rights to access information under the Model Publication Scheme (as described in this Guide to Information) and a right of appeal to the Scottish Information Commissioner if you are dissatisfied with our response. These rights apply only to information requests made in writing or another recordable format. If you are unhappy with our response to your request you can ask us to review it and if you are still unhappy, you can make an appeal to the Scottish Information Commissioner.

You must make your appeal to the Commissioner within 6 months of when you received your review response. Full details of how to make an appeal and the process followed can be found on their website - <https://www.itspublicknowledge.info/appeal>

The Commissioner's office can be contacted as follows:

Scottish Information Commissioner

Kinburn Castle

Doubledykes Road

St Andrews

FIFE

KY16 9DS

Tel: 01334 464610

Email: enquiries@itspublicknowledge.info

Section 9: How to Access Information which is not available in the Guide to Information

If the information you are seeking is not available through the Model Publication Scheme (as described in this Guide) then you may wish to request it under the Freedom of Information Act. The Act provides you with a right of access to the information we hold, subject to certain exemptions. The EIRs separately provide a right of access to the environmental information we hold, while the Data Protection Act 2018 (DPA) provides a right of access to any personal information about you that we hold.

Again, these rights are subject to certain exceptions or exemptions. Should you wish to request a copy of any information that we hold that is not available under the Model Publication Scheme 2021 (and described in this guide), please write to:

For requests under Freedom of Information and the EIRs please contact:

East Lothian Health and Social Care Partnership
Communications Team
John Muir House
Brewery Park
Haddington EH41 3HA

Telephone – 01875 824309

e-mail – elhscp@eastlothian.gov.uk

Website: www.eastlothian.gov.uk/elhscp - Freedom of Information Requests

For requests under the Data Protection Act please contact:

East Lothian Health and Social Care Partnership
Communications Team
John Muir House
Brewery Park
Haddington EH41 3HA

Telephone – 01875 824309

e-mail – elhscp@eastlothian.gov.uk

Your requests will be forwarded to East Lothian Council or NHS Lothian Freedom of Information and Data Protection Officers.

Charges for information that is not available under the scheme:

The charges for information that is available under this Guide to Information are set out under [Section 5 – Our Charging Policy](#). If you submit a request to us for information that is not available in this guide the charges will be based on the following calculations:

General information requests:

- There will be no charge for information requests that cost us £100 or less to process.
- Where information costs between £100 and £600 to provide you may be asked to pay 10% of the cost in excess of £100. That is, if you were to ask for information that cost us £600 to provide, you would be asked to pay £50 calculated on the basis of a waiver for the first £100 and 10% of the remaining £500 being chargeable.
- We are not obliged to provide information in response to requests which will cost us over £600 to process.
- In calculating any fee, staff time will be calculated at actual cost per staff member hourly salary rate to a maximum of £15 per person per hour.
- We do not charge for the time to determine whether we hold the information requested, or for the time it takes to decide whether the information can be released. Charges may be made for locating, retrieving and providing information to you.
- In the event that we decide to impose a charge we will issue you with notification of the charge (a fees notice) and how it has been calculated. You will have three months from the date of issue of the fees notice in which to decide whether to pay the charge. The information will be provided to you on payment of the charge. If you decide not to proceed with the request there will be no charge to you.

Charges for environmental information:

Environmental information is provided under the EIRs rather than the Act. The rules for charging for environmental information are slightly different. We do not charge for the time to determine whether we hold the environmental information requested, or deciding whether the information can be released. Charges may be made for locating, retrieving and providing information to you, for example photocopying and postage. In the event that we decide to impose a charge we will issue you with notification of the charge and how it has been calculated. The information will be provided to you on payment of the charge. If you decide not to proceed with the request there will be no charge to you.

Charges are calculated on the basis of the actual cost to the IJB of providing the information.

- Photocopying is charged at 60p per A4 sheet for black and white copying, 70p per A4 sheet for colour copying.

- Postage is charged at actual rate for Royal Mail First Class.
- Staff time is calculated at actual cost per staff member hourly salary rate to a maximum of £15 per person per hour.

The first £100 worth of information will be provided to you without charge.

Where information costs between £100 and £600 to provide, you will be asked to pay 10% of the cost. That is, if you were to ask for information that cost us £600 to provide, you would be asked to pay £50, calculated on the basis of a waiver for the first £100 and 10% of the remaining £500.

Where it would cost more than £600 to provide the information to you, however, we will ask you to pay the full cost of providing the information, with no waiver for any portion of the cost.

Charge for request for your own personal data:

Under the UK General Data Protection Regulation there is no fee associated with a request for your own personal data.

Section 10 – Classes of Information	Description
CLASS 1: ABOUT EAST LoTHIAN INTEGRATION JOINT BOARD	Information about the authority, who we are, where to find us, how to contact us, how we are managed and our external relations.
1.1 Who we are	The East Lothian Integration Joint Board (IJB) is a corporate body established under the Public Bodies (Joint Working) Scotland Act 2014 and covers the area of East Lothian Council. The background as to how and why the IJB was established is provided in the Social Care and Health web pages which can be accessed through the East Lothian Council web site - www.eastlothian.gov.uk/elhscp
1.2 Where and how to contact the Board	If you would like more information about East Lothian health and social care integration this information can be accessed through the East Lothian Council web site - www.eastlothian.gov.uk/elhscp . You can also share your thoughts with us via the website or alternatively contact us at: East Lothian Health and Social Care Partnership

	<p>John Muir House, Brewery Park Haddington, EH41 3HA Email – elhscp@eastlothian.gov.uk Phone – 01875 824309</p>
1.3 How the Board are managed and the Board's external relations.	<p>The East Lothian Integration Joint Board (IJB) is managed by membership prescribed by the Scottish Government in terms of numbers and the organisations that they represent. The IJB comprises of 8 voting members – 4 members appointed from Councillors of East Lothian Council; 4 members from the Non-Executives of NHS Lothian. Additionally, there are non-voting stakeholder members and professional members. Membership of the IJB can be found on the East Lothian Council web site - www.eastlothian.gov.uk/elhscp together with the Register of interests for all members.</p>
CLASS 2: HOW WE DELIVER OUR FUNCTIONS AND SERVICES	<p>Information about our work, our strategy and policies for delivering functions and services and information for our service users.</p>
2.1 Our strategies and policies	<p>The Integration Joint Board (IJB) Strategic Plan for 2023-25 and relevant policies are accessible through the East Lothian Council web site - www.eastlothian.gov.uk/elhscp</p>
2.2 Information for service users	<p>Information for our service users can be found on the East Lothian Council web site - www.eastlothian.gov.uk/elhscp as well as on our partner websites.</p>
CLASS 3: HOW WE TAKE DECISIONS AND WHAT WE HAVE DECIDED	<p>Information about decisions we have taken, how we make decisions and how we involve others.</p>
3.1 Decision Making	<p>How we make decisions are set out in the standing orders of the integration scheme and included in the recordings and minutes of the Integration Joint Board (IJB) meetings accessible through the East Lothian Council web site -</p>

	www.eastlothian.gov.uk/elhscp
CLASS 4: WHAT WE SPEND AND HOW WE SPEND IT	<p>The Integration Joint Board (IJB) has a statutory duty to provide an Annual Report and Accounts both of which are accessible through the East Lothian Council Web site - www.eastlothian.gov.uk/elhscp</p> <p>Financial reports are provided to the Integration Joint Board (IJB) on a regular basis throughout the year at meetings and are available through the East Lothian Council Website - www.eastlothian.gov.uk/elhscp</p>
CLASS 5: HOW WE MANAGE OUR HUMAN, PHYSICAL AND INFORMATION RESOURCES	<p>The Integration Board does not employ staff directly. Staff are employed by East Lothian Council or NHS Lothian. For relevant Human Resources Policies refer to these bodies web sites. Information on staff terms and conditions can be found on the websites of East Lothian Council and NHS Lothian.</p>
5.1 Information Resources	<p>Information on Records Management, Freedom of Information, Data Protection, Information Governance, Information Security and Subject Access Request are held by East Lothian Council and NHS Lothian and can be found on their websites. A small number of procedures and policies have been agreed by the Integration Joint Board.</p> <p>East Lothian Council - East Lothian Council Homepage</p> <p>NHS Lothian - NHS Lothian – NHS Lothian</p>
5.2 Physical Resources	<p>Physical resources used by those who provide services that the Integration Joint Board (IJB) has commissioned will be owned by the East Lothian Council or the NHS who each follow their own procedures and relevant East Lothian Council and NHS Lothian information is available online.</p>

	<p>East Lothian Council - East Lothian Council Homepage</p> <p>NHS Lothian - NHS Lothian – NHS Lothian</p>
CLASS 6: HOW WE PROCURE GOODS AND SERVICES FROM EXTERNAL PROVIDERS	Procurement arrangements for the goods and services we procure are made by East Lothian Council and NHS Lothian and information on the contracts which have gone through formal tendering can be found on the Public Contracts Scotland Portal
CLASS 7: HOW WE ARE PERFORMING	Key performance reports and audit reports are updated regularly and accessible through the East Lothian Council Web site - www.eastlothian.gov.uk/elhscp
CLASS 8: COMMERCIAL PUBLICATIONS	The Integration Joint Board (IJB) do not publish any information in this class.
Class 9: OPEN DATA	The Integration Joint Board (IJB) do not publish any information in this class.