

Scottish Information Commissioner

Monitoring Model Publication Schemes

May 2016

Lead author: Chris Thornton, Director, Craigforth



CONTENTS

1	INTRODUCTION	1
	Background.....	1
	Approach and sampling.....	1
2	THE PUBLICATION SCHEME AND GUIDE TO INFORMATION.....	3
	Availability online	3
	Accessing the Guide.....	4
	Alternative formats, contact details for enquiries	7
3	CLASSES OF INFORMATION: PROCUREMENT	9
	Availability online	9
	Accessing procurement information	11
	Timeliness, alternative formats.....	14
4	CLASSES OF INFORMATION: EXPENDITURE	15
	Availability online	15
	Accessing expenses information	17
	Timeliness, alternative formats.....	21
5	ADVICE AND ASSISTANCE	22
	Response to email queries	23
	Response to telephone enquiries.....	23

1 INTRODUCTION

Background

- 1.1 This report sets out key findings from the recent audit exercise commissioned by the Scottish Information Commissioner (SIC) to monitor Scottish public authorities' implementation of the model publication scheme.
- 1.2 SIC is a public official responsible for enforcing and promoting Scotland's freedom of information (FOI) laws. This includes promotion of FOI laws to the public and other users, and supporting best practice amongst Scottish public authorities.
- 1.3 A key aspect of SIC's work with public authorities has been the production of a model publication scheme to support authorities' in meeting their statutory obligations under the Freedom of Information (Scotland) Act 2002 (FOISA). The 'publication scheme' duty as set out in FOISA provides the public with a right to receive the information held by Scottish public authorities, and requires authorities to publish information proactively. Correct application of the SIC's model publication scheme by an authority ensures that these statutory obligations are met.
- 1.4 The study assessed how well whether authorities are meeting their statutory publication duties by examining whether and what they are publishing through their Guide to Information, a central element of the model publication scheme.

Approach and sampling

- 1.5 The core elements of the study were conducted from mid-February to the end of March, and comprised:
 - i. A web-based audit of publication schemes for 70 public authorities. This exercise assessed the accessibility of each authority's Guide to Information, and two specific classes of information published under the publication scheme (Procurement and Expenditure); and
 - ii. Follow-up telephone or email contact with 44 of these 70 authorities. This exercise assessed authorities' provision of advice or assistance to members of the public seeking information made available through the publication scheme.
- 1.6 Together, these two strands of the study sought to provide a rounded picture of public authorities' implementation of the model publication scheme.

- 1.7 The selection of public authorities for inclusion in the study was a key element in ensuring this rounded picture. A total of 70 authorities were selected from the c250 public authorities and publicly-owned companies which contribute data to the SIC's statistics portal. This selection sought to broadly reflect the profile of public authorities which includes a number of distinct sectors, but also ensured that each sector was adequately represented as to provide an indication of any variation in performance across sectors. This meant that for sectors with a relatively small number of authorities (e.g. central government, culture and leisure trusts) all authorities were included in the exercise, while for others a random sampling approach was used.
- 1.8 Figure 1 below provides an overview of the authorities included in the study.

Figure 1: Profile of authorities included in the audit

Sector	Main web audit	Additional email & telephone contact
ALL AUTHORITIES	70	44
Central Government	5	2
Culture and Leisure Trusts	5	5
Educational Institutions	12	7
Local Government	16	10
National Health Service	10	6
NDPBs	14	12
Police Service of Scotland	1	-
Publicly owned companies	6	2
Scottish Parliament	1	-

2 THE PUBLICATION SCHEME AND GUIDE TO INFORMATION

- 2.1 This section presents audit findings in relation to accessing authorities' Publication Scheme and Guide to Information. This includes an assessment of the availability of the Guide to Information, experience of accessing the Guide, availability of the Guide in alternative formats, and provision of contact details to handle queries regarding the Publication Scheme and Guide to Information.

Key Findings: Guide to Information

The great majority of the authorities included in the audit make their Guide to Information available online (66 of 70).

The Guide to Information is rated as easy to access for a large majority of authorities (56 of 70, 80%). These include the Scottish Parliament, Police Service of Scotland, all NHS authorities, and a large majority of other central government authorities. The Guide to Information is generally rated as more difficult to access for NDPBs and educational institutions.

Availability online

- 2.2 ***The great majority of the authorities included in the audit make their Guide to Information available online***; 66 of 70 (94%). As shown at Figure 2 below, the four authorities for whom the Guide to Information was not available online at the time of the audit, included local or regional organisations across the following sectors: a culture and leisure trust, educational institution, local government and publicly owned company.
- 2.3 Most Guides to Information are made available as a document to download (51 of 66), with the remainder presented as webpage(s) to browse. As is considered later in this report in relation to procurement and expenses information, around half of Guides to Information include direct links to specific classes of information – this includes those presented as a document or a webpage.

Figure 2: Guide to Information available online?

Sector	Yes	No	ALL
ALL AUTHORITIES	66	4	70
	94%	6%	100%
Central Government	5		5
Culture and Leisure Trusts	4	1	5
Educational Institutions	11	1	12
Local Government	15	1	16
National Health Service	10		10
NDPBs	14		14
Police Service of Scotland	1		1
Publicly owned companies	5	1	6
Scottish Parliament	1		1

Accessing the Guide

- 2.4 The audit sought to gauge the experience that members of the public are likely to have in accessing the Guide to Information for each authority. This included a focus on key “barriers” that members of the public may experience in trying to access the Guide such as whether there is a clear link to the Publication Scheme or Guide from the authority’s homepage, and how many clicks are required from the homepage to get to the Guide (as an indicator of the perseverance required).
- 2.5 ***Around three quarters of authorities include a link to the Publication Scheme or Guide to Information on their homepage*** (52 of 70). There is some variation across sectors here, with websites for educational institutions, culture and leisure trusts, and publicly owned companies least likely to provide a link to the Guide to Information. It is notable that the majority of educational institutions did not provide such a link.
- 2.6 Most web links are described on the homepage as ‘Freedom of Information’, and link to a general page on access to information which includes the Publication Scheme or Guide. This suggests that members of the public are likely to be able to access the Guide to Information with relative ease for most authorities. However, the audit suggests that even for these authorities there is scope to improve ease of accessing the Guide to Information:

Learning points...

Terminology used in links to Publication Schemes or Guides can have a significant impact on ease of access.

Direct links which use terminology likely to be familiar to members of the public (such as ‘Freedom of Information’) were found to be most effective – although the frequent placement of these links in the footer of a webpage may affect their visibility.

Use of drop-down menus, often under more oblique terms such as ‘corporate’ or ‘about’, were found to impair access.

- For a number of these websites the link is placed in a ‘drop-down menu’, which is not apparent until the user hovers over or clicks on the relevant subheading. This may mean that the relevant link more difficult to find for members of the public. This is particularly the case given the range of subheadings under which the link is placed – these include ‘about us’, ‘contact’, ‘corporate’ and ‘publications’.
- Authorities also use a range of terms in the links to the Guide to Information, and this may add confusion or difficulty to individuals’ experience of finding the Guide. Specific terminology used here include ‘access to information’, ‘information requests’, ‘openness’ and ‘governance documents’.

2.7 ***The remaining 18 authorities without a link to the Publication Scheme or Guide includes 4 who do not provide a copy of the Guide to Information online, and 14 for whom the website’s search function is required to access the Guide to Information.*** In terms of ease of navigating the search function, it is notable that the Guide appears on the first page of search results for the great majority of these 14 authorities. However, this is dependent on members of the public searching for “Publication Scheme” or “Guide to Information”. For example, individuals’ experience may be more challenging where they search for specific types of information.

Figure 3: Guide to Information linked from homepage?

Sector	Yes	No	ALL
ALL AUTHORITIES	52	18	70
	74%	26%	100%
Central Government	5		5
Culture and Leisure Trusts	3	2	5
Educational Institutions	5	7	12
Local Government	12	4	16
National Health Service	9	1	10
NDPBs	12	2	14
Police Service of Scotland	1		1
Publicly owned companies	4	2	6
Scottish Parliament	1		1

2.8 Findings in relation to the number of clicks required to access the Guide to Information also suggest that ***for most authorities, accessing the Guide should be relatively easy for members of the public.*** The Guide can be accessed within 3 clicks for the great majority of authorities (56 of 70. 80%), and for most this can be accessed with 1 or 2 clicks.

2.9 There remain 10 of the 70 authorities where more significant input and time is required to access the Guide to Information (4 clicks or more). This includes four NDPB, three local government, two NHS and one central government site.

Figure 4: Number of clicks from homepage to access Guide to Information

Sector	1/2	3	4+	N/A	ALL
ALL AUTHORITIES	39	17	10	4	70
	56%	24%	14%	6%	100%
Central Government	2	2	1		5
Culture and Leisure Trusts	2	2		1	5
Educational Institutions	6	5		1	12
Local Government	10	2	3	1	16
National Health Service	7	1	2		10
NDPBs	7	3	4		14
Police Service of Scotland	1				1
Publicly owned companies	4	1		1	6
Scottish Parliament		1			1

2.10 Reflecting experience in relation to availability of a web link, and the number of clicks required to access, *the Guide to Information is rated as easy to access for a large majority of authorities* (56 of 70, 80%). These include the Scottish Parliament, Police Service of Scotland, all NHS authorities, and a large majority of other central government authorities. By contrast, NDPBs and educational institutions are generally rated as more difficult to access than other sectors.

Figure 5: Ease of accessing Guide to Information

Sector	Very/Fairly easy	Neither/ Nor	Very/Fairly difficult	N/A	ALL
ALL AUTHORITIES	56	3	7	4	70
	80%	4%	10%	6%	100%
Central Government	4	1	0	0	5
Culture and Leisure Trusts	4	0	0	1	5
Educational Institutions	8	2	1	1	12
Local Government	13	0	2	1	16
National Health Service	10	0	0	0	10
NDPBs	10	0	4	0	14
Police Service of Scotland	1	0	0	0	1
Publicly owned companies	5	0	0	1	6
Scottish Parliament	1	0	0	0	1

Alternative formats, contact details for enquiries

2.11 Finally in relation to the Guide to Information, the audit considered the likely experience of members of the public in accessing the Guide in alternative formats, and in raising other enquiries regarding the Guide.

2.12 **The great majority of authorities offer the Guide to Information in alternative formats** (65 of 70, 93%). The remaining 5 authorities include 4 which do not make the Guide available online, and a NDPB where the Guide did not specifically include an offer of information in alternative formats.

2.13 The great majority of Guides to Information include a general statement adapted from the Scottish Information Commissioner's Model Publication Scheme, referring to options for members of the public to see published information (including the Guide) in person, or to request information in hard copy. However, a small number of authorities provide more fine-grained information on availability in other formats, for example by detailing the range of formats in which each class of information is available. For example, the Scottish Parliament's Guide to Information highlights specific types of information available in CD ROM format, as a video and/or by inspection in person.

Learning points...

The great majority of authorities make clear that information can be requested in alternative formats, but there is significant variation in the extent to which authorities actively promote specific alternative formats.

A small number of authorities provide more fine-grained information on the specific formats in which information can be made available. This includes the Scottish Parliament's Guide to Information which uses visual icons to indicate the range of formats in which specific classes of information are available.

Figure 6: Guide to information available in other formats?

Sector	Yes	No	N/A	ALL
ALL AUTHORITIES	65	1	4	70
	93%	1%	6%	100%
Central Government	5			5
Culture and Leisure Trusts	4		1	5
Educational Institutions	11		1	12
Local Government	15		1	16
National Health Service	10			10
NDPBs	13	1		14
Police Service of Scotland	1			1
Publicly owned companies	5		1	6
Scottish Parliament	1			1

- 2.14 **The great majority of authorities provide contact details for enquiries regarding the Publication Scheme, Guide to Information, and/or specific classes of information** (65 of 70, 93%). Only two authorities do not include clearly marked contact details for enquiries – one NHS and one NDPB authority.
- 2.15 Most of those providing contact details include multiple options for members of the public wishing to make further enquiries, and 54 authorities include all three options listed in the Model Publication (postal address, telephone number and email). It is also notable that 24 authorities also include a named contact for enquiries.

Figure 7: Contact details provided for queries?

Sector	Yes	No	N/A	ALL
ALL AUTHORITIES	65	2	3	70
	93%	3%	4%	100%
Central Government	5			5
Culture and Leisure Trusts	4		1	5
Educational Institutions	12			12
Local Government	15		1	16
National Health Service	9	1		10
NDPBs	13	1		14
Police Service of Scotland	1			1
Publicly owned companies	5		1	6
Scottish Parliament	1			1

3 CLASSES OF INFORMATION: PROCUREMENT

- 3.1 This section presents findings in relation to the first of the two specific classes of information included in the audit: procurement. This includes an assessment of the availability of a procurement policy/strategy and detailed of tendered contracts, the ease of accessing procurement information, the timeliness of available information, and availability of documents and data in alternative formats.

Key Findings: Procurement

29 of the 70 authorities provide procurement policy and tendered contracts information online. Most educational institutions provide this information, while relatively few culture and leisure trusts, publicly owned companies and NDPBs do so.

Around two thirds of authorities make their procurement policy and/or procurement procedures available online, but this falls to less than half of authorities providing information on tendered contracts.

Overall, procurement information is rated as easy to access for most authorities providing this information online (34 of 47) although this equates to only around half of all authorities.

Availability online

- 3.2 The audit checked the availability of authorities' procurement policy or procedures (Figure 8 below), and of information on tendered contracts (Figure 9).
- 3.3 ***Around two thirds of authorities make their procurement policy and/or procurement procedures available online*** (45 of 70, 64%). However, there is some variation across sectors in the extent to which this information is available. For example, the Scottish Parliament and the great majority of central government, local government, and educational institutions provide this procurement information online. Culture and leisure trusts and NDPBs are the least likely to provide this information online – most of these authorities included in the audit do not do so.

Figure 8: Procurement policy/procedures online?

Sector	Yes, wholly	Yes, in part	No	ALL
ALL AUTHORITIES	39	6	25	70
	56%	9%	36%	100%
Central Government	4		1	5
Culture and Leisure Trusts	2		3	5
Educational Institutions	7	3	2	12
Local Government	11	2	3	16
National Health Service	6		4	10
NDPBs	6		8	14
Police Service of Scotland			1	1
Publicly owned companies	2	1	3	6
Scottish Parliament	1			1

3.1 ***Around half of authorities provide information online in relation to tendered contracts*** (36 of 70, 51%). Most of these authorities provide this information in the form of a register of contracts or similar information set via the authority's website, while 9 of the 36 provide a link to their profile on the Public Contracts tendering website. In terms of the level of detail included, most of those providing information on tendered contracts included the contract title and contract period (24 of 36 include this). Authorities were somewhat less likely to include the supplier name (20 provide this) or contract value (19 provide this).

3.2 There was some notable variation across sectors in the availability of information on tendered contracts. The Scottish Parliament provide this information, as do a large majority of educational institutions and NHS authorities. Consistent with findings in relation to procurement policy, relatively few NDPBs or culture and leisure trusts provide information online in relation to tendered contracts.

Learning points...

There is significant variation in the availability of information on tendered contracts, and the detail provided.

A number of authorities do make available through their website fully detailed information on tendered contracts. This includes some sites which maintain a fully up-to-date list of tendered contracts with detail such as contract value and supplier name.

A minority of authorities meet their requirement to make this information available via links to the Public Contracts Scotland (PCS) website. This is a website primarily focused on facilitating public sector organisations to tender contracts, and as such members of the public may find it a daunting task to find details of specific contracts where authorities do not provide a link to their specific PCS profile page.

Figure 9: Details of tendered contracts online?

Sector	Yes, via website	Yes, via Public Contracts	No	TOTAL
ALL AUTHORITIES	27	9	34	70
	39%	13%	49%	100%
Central Government	1	3	1	5
Culture and Leisure Trusts			5	5
Educational Institutions	9	2	1	12
Local Government	5	2	9	16
National Health Service	7		3	10
NDPBs	3	1	10	14
Police Service of Scotland		1		1
Publicly owned companies	1		5	6
Scottish Parliament	1			1

Accessing procurement information

- 3.3 As was the case in relation to the Guide to Information, the audit focused on a number of potential 'barriers' to members of the public accessing procurement information. These focused primarily on whether there is a web link to procurement information from the Guide to Information, and how many clicks are required to get to procurement information from the homepage.
- 3.4 **Half of authorities include a link to procurement information from the Guide to Information** (35 of 70, 50%). There is some variation across sectors in the extent to which authorities provide direct links to this information. The Scottish Parliament and the majority of educational institutions, central government and NHS authorities provide direct links to procurement information, while only 1 of 5 culture and leisure trusts do so.

Figure 10: Procurement information – web link from Guide to Information?

Sector	Yes	No	N/A	ALL
ALL AUTHORITIES	35	31	4	70
	50%	44%	6%	100%
Central Government	3	2		5
Culture and Leisure Trusts	1	3	1	5
Educational Institutions	8	3	1	12
Local Government	7	8	1	16
National Health Service	6	4		10
NDPBs	7	7		14
Police Service of Scotland		1		1
Publicly owned companies	2	3	1	6
Scottish Parliament	1			1

- 3.1 Experience in relation to the number of clicks required to access procurement information was somewhat mixed. ***For around half of authorities who provide procurement information, this can be accessed within 3 clicks*** (23 of 45). However, there remains 21 authorities, across most sectors, which require more time and effort of members of the public. This includes some where information on tendered contracts in particular requires relatively significant time to access, and for example where this information was only found through more time-consuming browsing of webpages as more 'linear' searching had not been successful.

Figure 11: Procurement information – number of clicks from homepage

Sector	1/2	3	4+	N/A	ALL
ALL AUTHORITIES	4	19	21	26	70
	6%	27%	30%	37%	100%
Central Government	1	1	2	1	5
Culture and Leisure Trusts		1	1	3	5
Educational Institutions		4	6	2	12
Local Government		7	6	3	16
National Health Service		3	3	4	10
NDPBs	3	2	1	8	14
Police Service of Scotland				1	1
Publicly owned companies		1	1	4	6
Scottish Parliament			1		1

- 3.1 **Overall, procurement information is rated as easy to access for most authorities providing this information online** (34 of 47, 80%). These include the Scottish Parliament, and the majority of local government and NHS authorities. Only 5 authorities are rated as making it difficult for members of the public to access procurement information.
- 3.2 In terms of types of procurement information, procurement policy and procedure is generally easier to locate than information on tendered contracts. For 36 of the 45 authorities providing procurement policy online, this is rated as easy to access (80%), compared to 21 of 33 authorities providing information on tendered contracts (64%).

Figure 12: Ease of accessing procurement information - overall

Sector	Very/Fairly easy	Neither/Nor	Very/Fairly difficult	N/A	TOTAL
ALL AUTHORITIES	34	8	5	23	70
	49%	11%	7%	33%	100%
Central Government	2	1	1	1	5
Culture and Leisure Trusts	1		1	3	5
Educational Institutions	6	4		2	12
Local Government	10	1	2	3	16
National Health Service	6			4	10
NDPBs	6			8	14
Police Service of Scotland				1	1
Publicly owned companies	2	2	1	1	6
Scottish Parliament	1				1

Figure 13: Ease of accessing procurement information - policy and procedure

Sector	Very/Fairly easy	Neither/Nor	Very/Fairly difficult	N/A	TOTAL
ALL AUTHORITIES	36	4	5	25	70
	51%	6%	7%	36%	100%
Central Government	3	0	1	1	5
Culture and Leisure Trusts	1	0	1	3	5
Educational Institutions	6	4	0	2	12
Local Government	10	0	3	3	16
National Health Service	6	0	0	4	10
NDPBs	6	0	0	8	14
Police Service of Scotland	0	0	0	1	1
Publicly owned companies	3	0	0	3	6
Scottish Parliament	1	0	0	0	1

Figure 14: Ease of accessing procurement information – tendered contracts

Sector	Very/Fairly easy	Neither/ Nor	Very/Fairly difficult	N/A	TOTAL
ALL AUTHORITIES	21	7	5	37	70
	30%	10%	7%	53%	100%
Central Government	1	0	2	2	5
Culture and Leisure Trusts	0	0	0	5	5
Educational Institutions	4	5	1	2	12
Local Government	6	0	1	9	16
National Health Service	6	1	0	3	10
NDPBs	4	0	0	10	14
Police Service of Scotland	0	0	0	1	1
Publicly owned companies	0	1	0	5	6
Scottish Parliament	0	0	1	0	1

Timeliness, alternative formats

- 3.3 Finally in relation to procurement information, the audit assessed the timeliness of the information provided and the extent to which procurement information is offered in alternative formats.
- 3.4 The timeliness of procurement information relates primarily to information on tendered contracts; indeed, much of the procurement policy or procedure information collated by the audit did not include clear information on most recent date of revision. ***In relation to the timeliness of information on tendered contracts, audit findings are very positive.*** Of the 32 authorities making information on tendered contracts available online, 27 included information for the most recent 2015/16 financial year. This includes the Scottish Parliament, and the majority of educational institutions and NHS authorities.
- 3.5 The websites of 25 authorities include reference to the availability of procurement information in other formats, around a third of those assessed. The Scottish Parliament, educational institutions and publicly owned companies are most likely to offer this. However, as is noted in relation to the Guide to Information (at section 2 of this report), the great majority of authorities include more general reference to the availability of information in other formats – and details on how to request this.

4 CLASSES OF INFORMATION: EXPENDITURE

- 4.1 This section presents findings in relation to the second of the specific classes of information included in the audit: expenditure. The audit focused on three specific types of information which authorities are required to publish under the Public Services Reform (Scotland) Act 2010; (i) spending on items of £25,000 or more; (ii) employees with remuneration of £150,000 or more; and (iii) spending on overseas travel, hospitality, external consultants, public relations. Consistent with the approach to procurement information, the audit assessed the availability of this information online, the ease of access, the timeliness of available information, and availability in alternative formats.

Key Findings: Expenditure

32 of the 70 authorities provide all three types of expenditure information online. Most NHS and NDPB authorities provide this information, while relatively few culture and leisure trusts, publicly owned companies and local government authorities do so.

Availability of this information varies dependent on the specific type of expenditure - more than two thirds provide information on employees with remuneration of £150,000 or more, but this falls to a little more than half on spending of £25,000 or more or in relation to travel, hospitality, consultant and PR expenses.

Overall, expenditure information is rated as easy to access for most authorities providing the information online, although this only equates to around half of all authorities (36 of 70).

Availability online

- 4.2 The audit checked the availability of the three specific types of expenditure information, and results are presented at Figure 14 over the page.
- 4.3 **Availability of expenses information varies dependent on the specific type of expenditure.** More than two thirds of authorities (50 of 70) provide information online in relation to employees with remuneration of £150,000 or more – although for many authorities this is a simple statement that no employee remuneration exceeds this level. This falls to a little more than half of authorities who provide information on spending of £25,000 or more (38 of 70) or in relation to travel, hospitality, consultant and PR expenses (38 of 70). Moreover, in relation to this latter information on travel and other expenses, only half of those providing this information include all four expense categories.
- 4.4 The audit also identified some variation across sectors in the extent to which expenditure information is available online. This shows that the Scottish Parliament, Police Service, NHS and NDPB authorities are generally strongest with regards to publishing expenditure information - the great majority of these authorities provided one or more of the three types of expenditure information. By contrast, none of the 5 culture and leisure trusts included in the audit provided this information online.

Figure 15: Expenditure information online?

Items of £25,000 or more	Yes, wholly	Yes, in part	No	ALL
ALL AUTHORITIES	34	4	32	70
	49%	6%	46%	100%
Central Government	4		1	5
Culture and Leisure Trusts			5	5
Educational Institutions	7	3	2	12
Local Government	2		14	16
National Health Service	8	1	1	10
NDPBs	11		3	14
Police Service of Scotland			1	1
Publicly owned companies	1		5	6
Scottish Parliament	1			1
Employees with remuneration of £150,000 or more	Yes, wholly	Yes, in part	No	ALL
ALL AUTHORITIES	45	5	20	70
	64%	7%	29%	100%
Central Government	4		1	5
Culture and Leisure Trusts			5	5
Educational Institutions	7	3	2	12
Local Government	11	2	3	16
National Health Service	7		3	10
NDPBs	13		1	14
Police Service of Scotland	1			1
Publicly owned companies	1		5	6
Scottish Parliament	1			1
Spending on overseas travel, hospitality, external consultants, public relations	Yes, wholly	Yes, in part	No	ALL
ALL AUTHORITIES	19	19	32	70
	27%	27%	46%	100%
Central Government	2	1	2	5
Culture and Leisure Trusts			5	5
Educational Institutions		7	5	12
Local Government		3	13	16
National Health Service	7	2	1	10
NDPBs	9	4	1	14
Police Service of Scotland		1		1
Publicly owned companies	1		5	6
Scottish Parliament		1		1

Accessing expenses information

- 4.5 The audit focused on a number of potential ‘barriers’ to members of the public accessing expenditure information, including whether there is a web link to expenditure information from the Guide to Information, and how many clicks are required to get to expenditure information from the homepage.
- 4.6 **More than half of authorities include a link to expenditure information from the Guide to Information** (39 of 70, 56%). There is some variation across sectors in the extent to which authorities provide this. The Scottish Parliament, Police Service, and the majority of central government and NHS authorities provide direct links to expenditure information. By contrast, this information is not linked from the Guide for any of the 5 culture and leisure trusts, nor for most local government or publicly owned companies.

Figure 16: Expenditure information - web link from Guide to Information?

Sector	Yes	No	N/A	ALL
ALL AUTHORITIES	39	27	4	70
	56%	39%	6%	100%
Central Government	4	1		5
Culture and Leisure Trusts		4	1	5
Educational Institutions	7	4	1	12
Local Government	5	10	1	16
National Health Service	9	1		10
NDPBs	10	4		14
Police Service of Scotland	1			1
Publicly owned companies	2	3	1	6
Scottish Parliament	1			1

- 4.7 Experience in relation to the number of clicks required to access expenditure information was somewhat mixed. **For nearly half of authorities who provide expenditure information, this can be accessed within 3 clicks** (22 of 50). However, there remains 27 authorities which require more effort to access this information. The audit suggests that members of the public are likely to have to spend longer finding expenditure information for the Scottish Parliament, Police Scotland and NDPBs, than for other sectors.

Learning points...

The audit found some difficulty in accessing information on specific items of expenditure, beyond the small number of authorities providing a direct link from their Guide.

This was most difficult where authorities did not provide a specific link to expenditure, or where this link navigated only to a page of annual accounts or reports. Use of terms unlikely to be familiar to members of the public (such as ‘Public Service Reform’ or ‘PSRA’) added to this.

- 4.8 This audit also suggests that, over and above the time required to access expenditure information, members of the public may experience difficulties finding this information via authorities' websites. This is particularly the case for information on travel, hospitality, consultants and public relations expenses. This information was typically more difficult to locate than other expenditure information, and in some cases was found as an unclearly labelled link alongside annual accounts information. This also reflects the difficulty in using free-text search – a number of authorities list this as 'Public Service Reform' or 'PSRA' reporting, neither terms which members of the public are likely to use.

Figure 17: Expenditure information – number of clicks from homepage

Sector	1/2	3	4+	N/A	ALL
ALL AUTHORITIES	5	18	27	20	70
	7%	26%	39%	29%	100%
Central Government	1	1	2	1	5
Culture and Leisure Trusts				5	5
Educational Institutions	1	3	4	4	12
Local Government		6	7	3	16
National Health Service		6	3	1	10
NDPBs	2	2	9	1	14
Police Service of Scotland			1		1
Publicly owned companies	1			5	6
Scottish Parliament			1		1

- 4.1 **Overall, expenditure information is rated as easy to access for most authorities providing this information online**, but this equates to only around half of all authorities (36 of 70). These include the Scottish Parliament, and a large majority of central government and NHS authorities. There remain 11 authorities rated as making it difficult for members of the public to access expenditure information including educational establishments, NDPBs, local government and publicly owned companies. In terms of types of expenditure information, spending of £25,000 or more and employee remuneration of £150,000 or more are generally easier to locate than more detailed information on travel, hospitality, consultants and PR expenses.

Figure 18: Ease of accessing expenses information – overall

Sector	Very/Fairly easy	Neither/ Nor	Very/Fairly difficult	N/A	TOTAL
ALL AUTHORITIES	36	9	11	14	70
	51%	13%	16%	20%	100%
Central Government	4	0	0	1	5
Culture and Leisure Trusts	0	0	0	5	5
Educational Institutions	2	3	4	3	12
Local Government	10	1	2	3	16
National Health Service	8	1	0	1	10
NDPBs	10	0	4	0	14
Police Service of Scotland	0	1	0	0	1
Publicly owned companies	1	3	1	1	6
Scottish Parliament	1	0	0	0	1

Figure 19: Ease of accessing expenses information – specific types of information

Items of £25,000 or more	Very/Fairly easy	Neither/ Nor	Very/Fairly difficult	N/A	TOTAL
ALL AUTHORITIES	29	3	6	32	70
	41%	4%	9%	46%	100%
Central Government	3	1	0	1	5
Culture and Leisure Trusts	0	0	0	5	5
Educational Institutions	6	1	3	2	12
Local Government	2	0	0	14	16
National Health Service	8	1	0	1	10
NDPBs	8	0	3	3	14
Police Service of Scotland	0	0	0	1	1
Publicly owned companies	1	0	0	5	6
Scottish Parliament	1	0	0	0	1
Employees with remuneration of £150,000 or more	Very/Fairly easy	Neither/ Nor	Very/Fairly difficult	N/A	TOTAL
ALL AUTHORITIES	39	4	8	19	70
	56%	6%	11%	27%	100%
Central Government	4	0	0	1	5
Culture and Leisure Trusts	0	0	0	5	5
Educational Institutions	6	1	2	3	12
Local Government	10	1	2	3	16
National Health Service	6	2	1	1	10
NDPBs	10	0	3	1	14
Police Service of Scotland	1	0	0	0	1
Publicly owned companies	1	0	0	5	6
Scottish Parliament	1	0	0	0	1
Spending on overseas travel, hospitality, external consultants, public relations	Very/Fairly easy	Neither/ Nor	Very/Fairly difficult	N/A	TOTAL
ALL AUTHORITIES	23	6	9	32	70
	33%	9%	13%	46%	100%
Central Government	3	0	0	2	5
Culture and Leisure Trusts	0	0	0	5	5
Educational Institutions	0	4	3	5	12
Local Government	3	0	0	13	16
National Health Service	6	2	1	1	10
NDPBs	9	0	4	1	14
Police Service of Scotland	0	0	1	0	1
Publicly owned companies	1	0	0	5	6
Scottish Parliament	1	0	0	0	1

Timeliness, alternative formats

- 4.2 Finally in relation to expenditure information, the audit assessed the timeliness of the information provided and the extent to which expenditure information is offered in alternative formats.
- 4.3 The timeliness of information is broadly similar across the three types of expenditure information assessed by the audit, with **most of those providing expenditure information including information up to at least the 2014/15 financial year**. Around two thirds of the authorities providing each of the three types of expenditure information met this standard. Educational institutions, and to a lesser extent central government and NHS authorities were most likely to include information for the most recent 2015/16 year.
- 4.4 The websites of relatively few authorities include reference to the availability of expenditure information in other formats – only 12 include this. This includes authorities across most sectors. However, as is noted in relation to the Guide to Information (at section 2 of this report), the great majority of authorities include more general reference to the availability of information in other formats – and details on how to request this.

5 ADVICE AND ASSISTANCE

- 5.1 This section presents findings in relation to authorities' response to requests for assistance in relation to information made available under their Publication Scheme.
- 5.2 As is set out in section 1 of this report, the study incorporated an additional "mystery shopper" element to gauge the quality of assistance provided by authorities. This involved email and telephone requests for information being issued to a total of 44 authorities, a subset of the 70 authorities included in the main audit work. The selection of authorities was informed by audit findings in relation to the Guide to Information and availability of procurement and expenses information, to include a mix of authorities where issues were identified, and others which met required standards. The selection of authorities also sought to ensure a cross section of authority types.
- 5.3 The email and telephone requests focused on a mix of procurement and expenses information, including:
- 27 enquiries requesting information on expenditure in relation to one or more of the following – items of spending of £25,000 or more, employee remuneration of £150,000 or more, and/or spending on overseas travel, hospitality, external consultants, public relations;
 - 17 enquiries requesting a copy of the authority's procurement policy/strategy and information on tendered contracts.
- 5.4 Our assessment of authorities' response to these enquiries is provided over the following pages.

Key Findings: Advice and Assistance

A response was received in relation to 20 of the 25 email enquiries (around 4 in 5). The timeliness of email responses varied significantly – around 1 in 3 were received within 1 week, but around 1 in 5 were received more than 20 working days after the initial request. All 20 of the responses received answered the enquiry to some degree, but there was some variation in the quality and depth of response. More than half of responses treated the enquiry as a Freedom of Information request.

Of the 19 telephone queries made, 15 were answered (around 4 in 5) and the member of staff answering was able to provide a response in 11 of these cases. In terms of the quality of response, the enquiry was answered in 12 cases (around 2 in 3 of all enquiries). Staff manner was rated positively across all 12 of these cases, but the exercise did identify some variation in the quality and depth of information provided. To some extent this appeared to reflect significant variation in staff awareness of the Publication Scheme and the specific classes of information requested.

Response to email queries

- 5.5 A total of 25 email enquiries were made to authorities, including a mix of requests for procurement and expenditure information.
- 5.6 ***A response was received in relation to 20 of the 25 email enquiries.*** The five emails where no response was received included two where an acknowledgement stated that the email was being treated as a Freedom of Information request, but where no subsequent response was received within the four-week period. For the remaining three email enquiries, no response of any kind was received.
- 5.7 ***The timeliness of email responses varied significantly.*** Around a third of the responses received (6 of 20) were made within a week of the initial email enquiry – this included a mix of local government and NDPB authorities. A further 10 responses were received within 4 weeks of the initial email enquiry, while 4 responses arrived more than 4 weeks after the initial enquiry (two educational institutions and two NDPBs).
- 5.8 ***All 20 of the responses received answered the enquiry to some degree, but there was some variation in the quality and depth of response.*** 13 of the 20 responses fully answered the enquiry, with all providing a copy of and/or link to the requested information. It should be noted that this included a number of smaller organisations where the response merely stated for example that no contracts had been tendered, or listed the only item of spending of more than £25,000.
- 5.9 Most of the 7 email responses which provided only a partial response included a link to or copy of some of the information requested, but did not provide all of the requested detail information or did not provide a link to the specific information requested. This included for example providing a link to the Public Contracts Scotland homepage but not including an explanation of how to find details of the authority's tendered contracts, or providing a link to Council committee papers where a member of the public would be required to click through each committee in turn to piece together information on tendered contracts.
- 5.10 Finally in relation to email enquiries, it is notable that responses to ***more than half of responses treated the enquiry as a Freedom of Information request.***

Response to telephone enquiries

- 5.11 A total of 19 telephone enquiries were made to authorities, including a mix of requests for procurement or expenditure information.
- 5.12 ***Of the 19 telephone queries made, 15 were answered.*** The four calls which were not answered included one call to an NHS authority which went direct to voicemail, and a further three which were not answered after three attempts (two educational institutions, and one culture and leisure trust).

- 5.13 ***Of the 15 answered calls, the member of staff answering was able to provide a response to the query in 11 cases.*** In a further two cases the call was passed on to a member of staff who was able to provide a response. A message was left in the remaining two cases, but no return call was received within the study timescale.
- 5.14 ***In terms of the quality of response, the enquiry was answered in 12 cases*** – equivalent to around 4 in 5 answered calls, but only around 2 in 3 of all calls. The three answered calls where the enquiry was not resolved included two where a promised return call was not received, and one where the member of staff simply re-stated that the requested information was available despite our mystery shopper making clear that this had not been found.
- 5.15 The 12 enquiries which received a response included one case where the authority advised that it had no spending items which met the specified criteria, and 11 where our mystery shopper was advised of where to find or how to request the required information. None of the calls received an offer to send the information directly to the caller. While all 11 of these calls included specific detail on how to make and information request, only 3 of these offered information in a non-electronic format – and two of these were prompted by our mystery shopper.
- 5.16 ***Across all 12 calls, staff manner was rated positively but the exercise did identify some variation in the quality and depth of information provided.*** To some extent this appeared to reflect significant variation in staff awareness of the Publication Scheme and the specific classes of information requested. For example, in a number of cases the member of staff answering the call needed to check procedures with colleagues before advising of how to request the information. While these were positive experiences in terms of the quality of service provided, they nevertheless illustrated some lack of experience in handling requests under the Publication Scheme.
- 5.17 This lack of experience also appeared to result in some authorities providing incorrect advice. For example, 5 authorities advised our mystery shopper to make a Freedom of Information request. This included one call where the member of staff specifically advised that information could only be provided in response to an FOI request.

Learning points...

The experience of telephone enquiries for information under the Publication Scheme was generally positive.

This quality of experience was dependent less on the knowledgeability of staff (although some were able to provide an immediate answer) but on the willingness of staff to take time to engage with callers to clarify the information being sought. This recognises that the terms used by members of the public may not match with those under which authorities publish information.

Staff willingness to assist was also evident in the time taken by some to confirm how best to request the required information. This included cases where a lack of experience in dealing with Publication Scheme requests meant that staff were unclear on how to make a request, but took the time to clarify this.