



NOTTINGHAMSHIRE  
**POLICE**  
PROUD TO SERVE

## PRORITY PLAN PUBLICATION STRATEGY

### Introduction

The Freedom of Information Act, Section 22, exempts information requested by an applicant if it is intended for future publication.

### The Law:

Section 22 - Information intended for future publication:

- (1) Information is exempt information if;
  - (a) The information is held by the public authority with a view to its publication, by the authority or any other person, at some future date (whether determined or not),
  - (b) The information was already held with a view to such publication at the time when the request for information was made, and
  - (c) It is reasonable in all the circumstances that the information should be withheld from disclosure until the date referred to in paragraph (a).
- (2) The duty to confirm or deny does not arise if, or to the extent that, compliance with section 1(1)(a) would involve the disclosure of any information (whether or not already recorded) which falls within subsection (1).

### Key points:

- Section 22 can only apply if a public authority has decided, before the request is received, to publish the information concerned at a future time.
- Section 22 may apply even if the specific date for publication has not yet been determined but the proposed publication timetable must be reasonable in all the circumstances;
- Section 22 is subject to a public interest test. i.e. whether in any particular case it serves the interests of the public better to withhold or to disclose information

Therefore, a publication strategy needs to evidence why it believes that the public interest in the maintenance of the exemption outweighs the public interest in disclosure. Each related FOI needs to be considered against the strategy case by case. From the starting point of disclosure to avoid bias:

- They should list all the points in favour of disclosure
- They should then list all the points against disclosure
- They should then say where the overall balance lies and give reasons as to why.

## **So what would it look like? A 'Priority Plan' Publication Strategy**

### **Background**

Nottinghamshire Police is undertaking a pan-organisational transformational change programme to:

- Improve performance.
- Configure the organisations structures and business processes to deliver quality services.
- Prepare plans for the Force to deliver the above within the significant constraints of the austerity programme and its impact on Police budgets.
- Ensure that identified areas for improvement are addressed within the single change programme.

This Programme of activity involves every operational and support business area of the Force under the governance and 'brand' of 'Priority Plan'.

The Programme commenced in April 2017, which will initiate a continuous improvement review programme that will use Annual Departmental Assessment baseline reviews to identify potential opportunities that may be subject to Priority Plan 'deep dive' reviews, with constituent Reviews/Projects implemented on a rolling basis.

### **Aim of Strategy**

The following sets out the process with regard to how information relating to the Priority Plan Programme and its constituent reviews/projects will be proactively published and the timescales involved.

The document is a live document and is subject to version control. This document will be placed on the Nottinghamshire Police website and the Force's intranet site where it can be accessed by staff, the media, partners and the wider public.

### **Freedom of Information Approach**

It is important that each request is dealt with on a case-by-case basis.

Any Freedom of Information requests with regard to the Force Review should be referred to the Nottinghamshire Freedom of Information Officer – [freedomofinformation@nottinghamshire.pnn.police.uk](mailto:freedomofinformation@nottinghamshire.pnn.police.uk) – for consideration of disclosure of the requested information.

Any Freedom of Information requests with regard to the HMIC Inspection and report areas for improvement should be referred to the Nottinghamshire Freedom of Information Officer for consideration of disclosure of the requested information or referral onto HMIC.

The below publication strategy will inform decision making, when appropriate, to apply the exemption relating to information intended for future publication (Section 22 FOIA).

Where a decision is taken not to apply the exemption under Section 22 for an FOI request related to Priority Plan, the usual wider FOI considerations regarding whether to provide some / all of the requested information, whether some of the material should have redactions, etc will apply as with any other FOI request.

## Rationale

The Priority Plan Programme is a pan-organisational transformational change programme that is intended to deliver benefits to performance including crime levels, victim satisfaction, quality of service, plans for budget reductions and critically public confidence.

Work pre-implementation will involve identification and assessment of a number of options for each review area. Publication of material while work is in the design stage (i.e. before implementation) carries a very high risk of inaccurate understanding / portrayal, inaccurate understanding that potential ideas are proposals, etc. Overall, the consequence of the risk is inappropriate representation and negative publicity impacting on Force reputation and public confidence, none of which is in the public interest nor the interests of Nottinghamshire Police and what it seeks to achieve for the communities it serves.

It is therefore judged appropriate that a Publication Strategy that sets out the planned publication dates for outcomes from the Priority Plan best serves the public interest.

Category	Information	Publication Strategy
Communication	Formal correspondence with staff associations, partners and victim groups.	<p>Subject to relevant exemptions under the Freedom of Information Act 2000 at that time, all listed information will be assessed for publication on the Nottinghamshire Police website at six-monthly intervals in April and September each year.</p> <p>The assessment will consider Priority Plan Reviews/Projects that have been implemented in the preceding six-months.</p>
Decision Making	<ul style="list-style-type: none"> <li>• Minutes of:               <ul style="list-style-type: none"> <li>○ Priority Plan Programme Board,</li> <li>○ Priority Plan Review/Project and Consultation meetings,</li> <li>○ Discussions regarding Priority Plan review activity in other corporate meetings</li> </ul> </li> <li>• Priority Plan Programme and Project documentation</li> </ul>	
Finance	Costs and/or savings as a result of the Priority Plan Programme and its constituent Reviews/Projects.	
Strategy and Policy	Programme SRO, Strategic Lead and Review/Project Lead policy.	
Staffing	Number of officers/staff conducting the review.	
Good Practice / Reviews	De-brief report	