



## The Development and Maintenance Initiative (DMI)

### Central Government Circular

#### Circular 1

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Central Government Workshop (3)

(London 02\_04\_07)

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#### 1.1 Information culture in central government

Some Departments have had very few requests for copies of their publication schemes. For example, of the two requests received by one Department in the last year, one was from an auditor.

Centralised handling is seen as key to ensuring consistency and efficiency within request handling. In Departments where a centralised system already operates, it will be easier to achieve a workable scheme.

There was acknowledgement of the need for schemes to reflect the move away from print orientated mediums. For example, by the time schemes are produced in hard copy they may already be out of date.

It may be necessary to embrace progressive means of developing schemes. Authorities shouldn't be afraid of moving away from the way things have been traditionally done.

The lack of framework for the development of schemes within this sector has meant that they have often been created in the image of the individual with responsibility for them. This has caused problems when the responsibility is passed to other staff members at a later date. Prescriptive guidance from the Information Commissioner's Office (ICO) should help to avoid a repeat of this.

Departments have focussed upon different elements, leading to differently construed schemes. For example, some Departments have fixed upon hard copies of the scheme as the primary vehicle for delivery. As before, more prescriptive advice and guidance from the ICO should help avoid this.

Disclosure logs are often a more popular way of accessing information. It would be helpful if the ICO could provide a steer on this and perhaps include disclosure logs as an optional or best practice class. The Department for

Constitutional Affairs published some best practice guidance on [disclosure logs](#) in December 2005.

If schemes are to be successful it will be important to link the various information outgoings:

- The procedures/ 'policing' of information management
- The responsibility for management
- The outputs to, and feedback from, the public

As with many authorities, the extent and rate of change within this sector can impact upon the consistency and relevance of schemes. There needs to be mechanisms to ensure they can be readily updated.

There was call for the ICO to address issues of non-compliance robustly. This would help move the importance of schemes up the information management agenda. The ICO needs to ensure buy in at a senior level – this may involve key note speeches and directly targeted letters.

As with many other authorities, government departments may need to qualify the timeframe of information provided within a scheme. This will help to prevent schemes becoming onerous and containing an unmanageable amount of information.

## **1.2 Use of websites and information taxonomies**

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The relationship with the web team will be key to the maintenance of schemes. It may be difficult to update pages containing information within a scheme if staff members are reluctant to take responsibility for page/information ownership.

Some of the Departments represented at the workshop have information management systems which are built upon databases linking the library catalogue to an asset management system.

ISSN cataloguing numbers were suggested as a possible tool for the organisation and retrieval of data. It was noted that too much emphasis on maintenance may detract from the development of schemes.

It was noted that some Departments may benefit from a move away from cyclical updating methods. A streamlined, linear method of updating information and the websites by which they are delivered would be helpful.

Welsh indexing terms are problematic as it can be difficult to ensure accuracy and consistency. It would be helpful if the ICO could allude to the requirements of translation into Welsh as part of any guidance. Brief guidance

on translations is provided in the ICO's [Awareness Guidance 29 – Means of Communication](#)

Any move towards web based schemes must take into account the accessibility requirements of those who do not have internet access. Care must be taken to ensure certain user groups are not disadvantaged.

In many Departments, the free text search function is the most popular way of accessing information contained on a website. Care should be taken to ensure that search engines return the correct information.

### **1.3 Charging for information**

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A clear distinction between 'fees' ([Section 9](#)) under the general rights of access and charges within a publication scheme must be made, as confusion still exists.

In general there are three reasons for legitimately charging for information within a scheme:

- A charge can be made under statute
- The authority needs to recover the cost of producing the information e.g. a colour, glossy or hard-backed document
- A cost is charged to recover the costs associated with the manner in which the information was provided e.g. provision of multiple hard copies.

Clear and practical advice from the ICO on both 'fees' and charges within a publication scheme would be welcomed. If possible, it would be helpful if this could include advice on the provision of multiple copies, and how to deal with discretionary charges.

As is the case in many authorities, the cost of raising an invoice often outweighs the actual charge. As such many Departments provide information to the public without charge. This does not negate the fact that authorities would like to retain the right to charge where appropriate.

Information within schemes may need to be restricted to certain time frames in order to prevent an unreasonable burden in terms of the retrieval of archived information.

### **1.4 Model schemes and mandatory classes**

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It will be necessary to include standard paragraphs on exempt information in order to manage the public's expectation of what will be provided.

The ICO will be prescriptive as to how it will monitor or 'audit' compliance with Section 19. It would be prudent to build in the principles of the [Section 46 Code of Practice](#) into any such monitoring tools and associated guidance.

The ICO will strive to create schemes that are self policing as far as it is possible to do so. In essence, schemes will need to be up-to-date in order to maintain relevance, and authorities should consider this as part of their information management systems.

Some authorities have websites which allow automatic audit functions to be built into the information contained within them. For example, some Departments have pages which trigger reminders to review when a page nears expiry. Audit trails will be integral to the effective management of schemes and the information within them.

As discussed in other workshops, the following high level classes were put forward as a starting point for the creation of mandatory classes:

**- Organisation and Structure**

- Who we are, what we do

**- Financial Information**

- How we spend your money

**- Strategies and Performance**

- How we achieve our functions
- How we measure up
- Operational policies and procedures

**- Communications and publications**

- Media releases
- Consultations
- Leaflets and booklets

**- Services Provided**

- The services we offer/core functions

**- Legal Frameworks**

- Statutory requirements
- Links with sponsoring departments etc

## - Lists and Registers

- Registers required by statute
- Asset list
- Disclosure log

The ICO would welcome feedback on the draft high level classes above. At present they are initial outlines and very much a work in progress.

### **1.5 Further Input**

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If you have any comments on this circular or anything you would like to contribute to the initiative, please contact Paul Damerill at [paul.damerill@ico.gsi.gov.uk](mailto:paul.damerill@ico.gsi.gov.uk)

The next central government workshop will be held as follows:

- London : Date to be confirmed.