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Agenda Item: 14

Integration Joint Board

Date of Meeting: 10 December 2025.

Subject: Freedom of Information Policy and Publication Scheme.

1. Purpose

1.1. To present the Freedom of Information Policy and Publication Scheme for consideration.

2. Recommendations

It is recommended:

2.1. That the Freedom of Information Policy and the Publication Scheme, attached as Appendices 1 and 2 respectively to this report, be approved.

3. Background

3.1. The Freedom of Information (Scotland) Act 2002 (the Act) requires public bodies in Scotland to make information publicly available.

3.2. The Act aims to increase openness and accountability in government and across the public sector by making sure that people have the right to access information held by Scottish public authorities. This includes environmental information which is covered by the Environmental Information (Scotland) Regulations 2004 (known as the EIRs). Freedom of Information (FOI) and the EIRs, therefore, apply to all recorded information held by the Integration Joint Board (except for personal information).

3.3. The Integration Joint Board is a Scottish public authority for the purposes of FOI legislation and is therefore required to respond to information requests.

3.4. If a FOI request is received, where the information is held by the Integration Joint Board 'on behalf of' either NHS Orkney or Orkney Islands Council, then the request can be dealt with by either party under existing policy that Members are likely already familiar with. However, where the Integration Joint Board holds information such as minutes of meetings, reports, plans and policies for example, FOI requests can be made directly to the Integration Joint Board.

3.5. Guidance indicates that if a request is made in circumstances described at section 3.4 above, Integration Joint Boards are expected to have their own FOI Policy.

3.6. In addition, the Act requires all Scottish public authorities to produce, and maintain, a Guide to Information, also known as a Publication Scheme.

3.7. The Publication Scheme is intended to:

- Allow the public to see what information is available and what is not available in relation to each class.
- State what charges may be applied. For most information, there is no charge.
- Explain how to find the information easily.
- Provide contact details for enquiries and to get help with access to the information.
- Explain how to request information that has not been published.

4. FOI Policy and Publication Scheme Changes

4.1. The previous iteration of the FOI Policy and associated Publication Scheme was approved in November 2022, with a review date set for no later than November 2025.

4.2. Officers have reviewed the previous iteration of the FOI Policy and Publication Scheme and have sought input from the Council's Information Governance Officer. Both documents, attached as Appendices 1 and 2, were considered relevant and fit-for-purpose, within the context of current legislation. As such, no changes, beyond the dates, have been made to the documents.

5. Contribution to quality

Please indicate which of the Orkney Community Plan 2025 to 2030 values are supported in this report adding Yes or No to the relevant area(s):

Resilience: To support and promote our strong communities.	No.
Enterprise: To tackle crosscutting issues such as digital connectivity, transport, housing, and fuel poverty.	No.
Equality: To encourage services to provide equal opportunities for everyone.	Yes.
Fairness: To make sure socio-economic and social factors are balanced.	Yes.
Innovation: To overcome issues more effectively through partnership working.	No.
Leadership: To involve partners such as community councils, community groups, voluntary groups, and individuals in the process.	No.
Sustainability: To make sure economic and environmental factors are balanced.	No.

6. Resource and financial implications

6.1. There are no direct resource or financial implications arising from this report, although a staff member is identified to deal with any FOI requests addressed directly to the Integration Joint Board, ensuring it is addressed within the statutory timescales.

6.2. The Integration Joint Board is also required to monitor FOI requests and respond to the Information Commissioner, when necessary, with statistical requests.

6.3. There are very few FOI requests which require to be dealt with directly by the Integration Joint Board, as most requests normally relate to information held by either NHS Orkney or Orkney Islands Council. During the calendar year 2024, seven FOI requests were received. In 2025 to date, nine FOI requests have been received.

7. Risk, equality, and climate change implications

7.1. There are both legal and reputational risks to the Integration Joint Board if policies and procedures are not in place, as required by the Regulations, Statutory Guidance and, ultimately the Legislation.

7.2. There is further reputational risk if there is a failure to properly comply with FOI requests. In serious cases the Information Commissioner can impose penalties on the Integration Joint Board for failure to comply.

7.3. These risks can be mitigated by implementing an agreed policy, with associated procedures, to deal with FOI requests in line with statutory guidance and codes of practice.

7.4. An Equality Impact Assessment has been undertaken and is attached at Appendix 3.

7.5. An Island Communities Impact Assessment has been undertaken and is attached at Appendix 4.

8. Direction required

Please indicate if this report requires a direction to be passed to:

NHS Orkney.	No.
Orkney Islands Council.	No.

9. Escalation required

Please indicate if this report requires escalated to:

NHS Orkney.	No.
Orkney Islands Council.	No.

10. Authors and contact information

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10.2. Shaun Hourston-Wells (Policy and Performance Manager), Orkney Health and Social Care Partnership. Email: shaun.hourston-wells@orkney.gov.uk, telephone: 01856873535 extension 2414.

11. Supporting documents

11.1. Appendix 1: Freedom of Information Policy, November 2025.

11.2. Appendix 2: Publication Scheme, November 2025.

11.3. Appendix 3: Equality Impact Assessment.

11.4. Appendix 4: Island Communities Impact Assessment.



Integration Joint Board

Freedom of Information Policy

Version.	Freedom of Information Policy.
Lead Manager.	Stephen Brown.
Approved By.	Integration Joint Board.
Date Approved.	November 2025.
Date of Review.	November 2028.

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Purpose of the Policy

The Freedom of Information (Scotland) Act 2002 (usually known as FOISA or FOI) aims to increase openness and accountability in government and across the public sector by making sure that people have the right to access information held by Scottish public authorities. This includes environmental information which is covered by the Environmental Information (Scotland) Regulations 2004 (known as the EIRs). FOI and the EIRs therefore apply to all recorded information held by the Integration Joint Board for Orkney, with the exception of personal information.

The Integration Joint Board is a Scottish Public Authority for the purposes of FOI legislation.

This Policy provides advice and guidance to staff who are responsible for handling FOI requests but is also aimed at members of the public who want to understand their rights and know what to expect, under the Integration Joint Board's policy.

In light of the Integration Joint Board having delegated responsibility for the delivery of a wide range of services within Adult and Children's Social Care and Health Services, a FOI request may be more appropriately dealt with through either NHS Orkney or Orkney Islands Council's FOI policies, unless it is a request concerned directly with information held by the Integration Joint Board.

The Act is overseen by the Scottish Information Commissioner, who has the power to issue enforcement notices and, if needs be, initiate court proceedings to ensure compliance.

Further advice and information can be found on the Scottish Information Commissioner's [website](#).

And you can read more about Scottish Law concerning Freedom of Information [here](#).

Our Commitment to Effective Governance

The Integration Joint Board is committed to transparency and will favour disclosure of information whenever possible. This policy will demonstrate commitment to work within the spirit of FOISA and its related Regulations and Codes of Practice. This policy should be interpreted in conjunction with the Records Management and Information Sharing policies, and the Publication Scheme that, together, provide the framework for governing recorded information. The Integration Joint Board commits to:

- Ensure that, where appropriate, information will be published through its publication scheme and on its website.
- Handle all requests promptly and within the legal timeframe.
- Fairly apply the public interest test in cases where a qualified exemption applies.
- Make its members aware that it is an offence to prevent disclosure by altering, defacing, blocking, erasing, destroying or concealing any record.
- Where valid exemptions apply to a FOISA i.e. Data Protection, confidentiality, protection of commercial interests, stating the reasons why it has withheld all or part of the information.

Roles and Responsibilities

Overall responsibility and accountability for compliance with information legislation lies with the Chief Officer of the Integration Joint Board, reporting to the Board Members. Board Members may also be involved in considering complex information requests.

Given the narrow breadth of information ‘controlled’ by the Integration Joint Board, (see publication scheme), it is likely, in many cases, that an initial FOI request may actually be more appropriately dealt with by either NHS Orkney or Orkney Islands Council as ‘data controllers’ under their own FOI Policies.

In practice, FOI requests are submitted to officers of NHS Orkney or the Council, who decide to which body the request should be submitted. The request is then forwarded to the appointed FOI Officer.

Information Governance Officer

The Information Governance Officer (IGO) within Orkney Islands Council reports to the Service Manager (Governance). The IGO will provide expert advice, guidance, training, and support on all areas of information governance to members of the Integration Joint Board in partnership with the FOI Officer representing NHS Orkney.

Freedom of Information Officer

The IJB's Freedom of Information Officer (FOI Officer) will administer all requests once received from the Information Governance Officer or NHS Orkney FOI Officer.

Chief Finance Officer

The Chief Finance Officer for the Integration Joint Board has been nominated to oversee the independent review process, should the applicant be dissatisfied with the initial response provided by the FOI Officer.

All Staff

Members of staff within Orkney Islands Council, NHS Orkney or other third party organisations who are asked to provide information in support of a FOI request should forward any relevant information they hold to the FOI Officer immediately, in order to assist with the compliance of the 20-day rule. If a member of staff is contacted by the FOI Officer but does not hold the information necessary, they must inform the FOI Officer immediately. Where a service contact does not respond to the FOI Officer within the set timeframe given, the relevant Director/Head of Service/Manager will be copied into a reminder for the information requested.

It is a **criminal offence** to destroy information that is subject to an FOI request.

Handling Requests for Recorded Information

Anyone can make a request for information held by the Integration Joint Board and, unless there are specific exemptions which apply to the information, this information should normally be provided **within 20-working days**. The 20-working day period starts when the Integration Joint Board first receives the request, not when it reaches the correct personnel.

A request for information must be made in a permanent format, for example in writing or via email or video recording. The request must include the applicant's name with an address or email address to which a response can be sent and should include a description of the information they are seeking.

It is not always the case that the applicant refers to FOISA within the terms of their request and they are not obliged to inform the Integration Joint Board why they want the information. They can also state a preference for how they wish the response to be sent.

It is up to the Information Governance Officer or NHS Orkney FOI Officer, on behalf of the Integration Joint Board, to determine if the request for information falls under FOISA legislation.

If an applicant requests information that is not held by the Integration Joint Board and it is likely that the information is held by another public authority, the FOI Officer should signpost the applicant to that other authority.

A request must be sent to:

**Freedom of Information Officer
Orkney Health and Social Care Partnership
School Place
Kirkwall
Orkney
KW15 1NY**

Or by email to: FOI@orkney.gov.uk.

An applicant will receive a written acknowledgement of their request (via email or post) detailing the deadline to which they should expect a response. A response should be issued as soon as possible and always **within the 20-working day rule**.

Where a request has been received but more information is required from the applicant to identify and locate the relevant information the FOI Officer should approach the applicant for clarification as soon as possible.

As per sections 1(3) and 10(1)(b) of the Act the statutory 20 working days deadline will not start until sufficient clarification has been received from the applicant to allow the FOI Officer to identify and locate the requested information.

If no clarification is received from the applicant **within 60-working days**, the request shall be closed. See the Scottish Ministers' Code of Practice on the Discharge of Functions by Scottish Public Authorities under the Freedom of Information (Scotland) Act 2002 and the Environmental Information (Scotland) Regulations 2004 (the Code) [here](#) for further information.

Once a written response has been received by the applicant, if they are unhappy with the response, they have the right to challenge the information provided and ask the FOI Officer to review their response. **The Chief Finance Officer** is responsible for undertaking the review in liaison with relevant FOI Service Contacts and Caldecott Guardian where necessary (NHS Orkney), which will be followed by a second and independent response being sent to the applicant.

If after further correspondence, the applicant continues to be dissatisfied, they then have the right to appeal to the Scottish Information Commissioner who will decide if further investigation is necessary. The website address for the Scottish Information Commissioner can be found in the earlier section of this document.

What isn't a FOI request?

- Telephone requests are not subject to FOISA, unless they are capable of being used for subsequent reference, such as audio or video tapes, or a digital recording.
- A request for a service, such as for care at home services or frozen meal delivery, is not dealt with under FOISA. Instead, these requests will be passed to the relevant service area, either within NHS Orkney or Orkney Islands Council to be dealt with through normal operations.
- Requests for personal information either about themselves or about another individual (and they can prove they are acting as that person's representative) should be handled under Subject Access Request legislation (**Data Protection Act 2018**). Subject Access Requests would fall within the policies of either Orkney Islands Council or NHS Orkney, as the **Integration Joint Board does not hold personal data**.
- **The Access to Health Records Act 1990** grants rights to certain individuals to see what has been written about a deceased person in a hospital and other health records. Access is available to the deceased patient's personal representative or to any person having a claim arising out of a patient's death.

Responding to a FOI Request – 20 Days

As already noted, the statutory timescale for responding to a FOI request is 20 working days. Working days are defined as Monday to Friday, 09:00 to 17:00, excluding public holidays and weekends. All FOI requests must be responded to within the statutory period, regardless of staff absence or working patterns.

The 20-day period commences when the request is first received and must be date stamped by the receiving Integration Joint Board. The FOI Request will be recorded in order to support formal reporting to the Information Commissioner. Suitable arrangements will be made to respond to FOI requests in the absence of the FOI Officer and relevant mailboxes monitored daily. The 20-day period is 'stopped' when:

- The information is sent to the applicant.
- A fees Notification/refusal notice is issued.
- Further clarification is required from the applicant to inform the response.

Publication Scheme

FOISA requires all public authorities to produce and maintain a publication scheme. A publication scheme sets out the following:

- The classes of information already available to the public.
- Details of how the information can be obtained.
- Its location.
- Whether there is a charge for providing the information.

The Publication Scheme for the Integration Joint Board can be found [here](#).

Charges

The Integration Joint Board may charge an appropriate fee for dealing with a specific request.

The Integration Joint Board can charge direct and indirect costs incurred in locating, retrieving, and providing information.

Charging for time spent determining whether the information is held cannot be charged for, **nor can a charge be levied for providing information in a particular format.**

If costs exceed £600, the Integration Joint Board does not have to comply (section 12 of the Act) with the request.

Staff time can be charged for up to a maximum of £15 per hour. The fees regulations limit the chargeable amounts as follows:

- Up to £100 – no charge can be made.
- £100 to £600 – first £100 deducted, the Integration Joint Board can charge 10% of this cost.
- Over £600 – no obligation to provide information.

The cost for responding to a request should be calculated before the request is answered and within the 20-working day deadline. **A fee notice will be issued and the applicant's request only needs to be answered on payment of the fee.** The payment must be received within 3 months.

Where a fee notice is issued or as per the information below, a refusal notice is issued, the Integration Joint Board will advise applicants on how to narrow their request for information, thus lowering the cost of responding.

Exemptions and refusal to respond

The Integration Joint Board does not have to comply with information requests if the information is exempt under the provisions made in Sections 25 to 41 of the Act.

Exemptions will be applied on a case by case basis rather than applying on a blanket basis, (see Appendix 1 for a full listing of exemptions).

Exemptions may be applied to an entire request or part of a request. The FOI Officer or their deputy shall apply exemptions to responses as applicable. If necessary, the application of exemptions will be discussed with the Information Governance Officer. There are two types of exemptions and these are outlined below.

Non - Absolute Exemptions

The ‘public interest’ test applies to determine if the public interest in disclosing the information outweighs the public interest in maintaining confidentiality. This includes commercial interests and personal information of third parties.

Absolute Exemptions

If an absolute exemption applies the Integration Joint Board will not release the information. Absolute exemptions include confidential material and information published elsewhere amongst others. The ‘public interest’ test does not need to be considered.

The Integration Joint Board will favour disclosure wherever possible. If applying an exemption, it will inform the applicant and provide information on why the request has been refused.

If a request or part of a request is subject to an exemption, and is therefore being refused, the response will include a **refusal notice**. The refusal notice will include notice that the Integration Joint Board does or does not hold the required information, details of the exemption being claimed, including the appropriate section of the Act and an explanation of why the exemption applies. The notice will also include information about how to request a review or make an appeal to the Scottish Information Commissioner.

The Integration Joint Board is not obliged to comply with a request deemed to be vexatious or repeated (section 14 of the Act). The request log can be used to identify repeated or vexatious requests.

When applying the ‘public interest’ test, the Integration Joint Board will explain the reason(s) for claiming the public interest if applying the exemption outweighs the public interest in disclosure.

How the Integration Joint Board will respond

The Equality Act 2010 places a duty on public authorities to be sensitive to the requirements of applicants. For example, where reasonable, information should be provided in a format requested such as in large print, Braille, audio or recording or other languages.

A standard template will be used to provide the response from the FOI Officer of the Integration Joint Board.

Where information is being used in the response that concerns either Orkney Islands Council, NHS Orkney or both, the FOI Officer will first seek approval from both bodies prior to issuing the response from the Integration Joint Board in partnership with the relevant FOI Service Contacts and will issue a copy of the response to the relevant body.

Requesting a Review

If the applicant is dissatisfied with the way a request has been dealt with or is unhappy with the decision, they may request a review to be undertaken under FOISA.

The request for a review must also be in writing or in a permanent form, for example, email. The request for a review must be made no later than **40-working days** following receipt of the response to the original request.

The applicant must explain what issue they are dissatisfied with, for example:

- The application of exemptions.
- The handling of the request.
- The fact that no response was received to the original request within the prescribed deadline of 20 working days.

The request should state the name of the applicant and an address (which can be an email address).

The Integration Joint Board does not have to conduct a review if the review request or the original request is deemed to be vexatious. However, it will explain this to the applicant and include information on their rights of appeal to the Scottish Information Commissioner.

The Integration Joint Board has **20-working days** within which to conduct and respond to the request for a review, from the date it was first received. The Chief Finance Officer of the Integration Joint Board will contact the applicant acknowledging their request for a review.

The Chief Finance Officer may work with the Chair of the Integration Joint Board and consult with any staff involved in the original request. If required, the Chief Finance Officer will obtain advice from the Information Governance Officer.

The review process will be:

- Fair and impartial.
- Able to reach a different decision if appropriate.
- Straightforward and capable of reaching an outcome promptly.
- As per paragraph 66 of the Scottish Ministers Code of Practice, handled by staff who were not involved in the original decision, where this is reasonably practicable.

The applicant can expect the following outcomes following a review:

- Confirmation of the original decision.
- The release of all or part of the information initially withheld.
- A finding that the Integration Joint Board did not follow the correct procedures for dealing with the request for information.

The Scottish Ministers' Code of Practice, under Section 60, provides valuable guidance and advice on dealing with review requests.

Following receipt of the outcome, applicants who continue to be dissatisfied with the Integration Joint Board's decision, or the way in which their request was handled, can appeal to the Scottish Information Commissioner. Applicants can **appeal within six months** from the date on which they received a response to their request for a review.

Requests for an independent review should be made in writing to the Scottish Information Commissioner.

Details on how to contact the Commissioner or submit an appeal are available [here](#).

Records Management and Monitoring

The Integration Joint Board will maintain a register of all requests made for information under the Act. Details of the applicant, important dates, staff involved and exemptions applied will be collected, along with other useful details.

A log shall also be kept of all review requests and appeals. Details of important dates, deadlines and staff involvement will be collected.

The Chief Officer will make arrangements to ensure that the requirement to submit quarterly statistics to the Scottish Information Commissioner is fulfilled.

Records created under FOISA are retained in accordance with relevant Records Retention and Disposal Schedule. After the end of the relevant retention period, the records are destroyed.

Contact Us.

For further advice or guidance on this document please contact:

Orkney Health and Social Care Partnership
School Place
Kirkwall
Orkney
KW15 1NY

Or by email to: foi@orkney.gov.uk.

Telephone: 01856873535.

Appendix 1 – Summary of FOISA Exemptions

Exemption	Absolute	Public Interest	Substantial Prejudice	Section of FOISA
Information otherwise accessible.	Yes.			25.
Prohibition on disclosure by other legislation.	Yes.			26.
Confidential information obtained from a third person.	Yes.			36(2).
Court Records.	Yes.			37.
Access to personal data about themselves.	Yes.			38.
Information intended for future publication (within 12 weeks).		Yes.		27.
Relations within the United Kingdom.		Yes.	Yes.	28.
Formulation of Scottish administrative policy.		Yes.		29.
Prejudice to the effect conduct of public affairs.		Yes.	Yes.	30.
National security and defence.		Yes.		31.
International relations.		Yes.	Yes.	32.
Commercial interest and the economy.		Yes.	Yes.	33.
Investigations by Scottish public authorities.		Yes.		34.
Law enforcement.		Yes.	Yes.	35.
Confidentiality of communication in legal proceedings (legal privilege).		Yes.		36(1).
Personal information about a third party.		Yes.		38.
Health, safety and the environment.		Yes.		39.
Audit functions.		Yes.	Yes.	40.
Communications with the Royal household and the granting of honours.		Yes.		41.



Integration Joint Board

Publication Scheme

Version.	Publication Scheme.
Lead Manager.	Stephen Brown.
Approved By.	Integration Joint Board.
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Date of Review.	November 2028.

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Introduction

Individuals can make a request to the Integration Joint Board (the Board) to provide any information that it holds and, if it is both legal and practical to do so, this will be shared. In addition, the Freedom of Information (Scotland) Act 2002 (the Act) requires all Scottish public authorities, which includes Integration Joint Boards, to produce and maintain a Guide to Information, also known as a Publication Scheme.

Guide to Information

The purpose of this guide to information is to:

- Allow the public to see what information is available and what is not available in relation to each class.
- State what charges may be applied. (For most information, there is no charge).
- Explain how to find the information easily.
- Provide contact details for enquiries and to get help with access to the information.
- Explain how to request information that has not been published.

The Guidance is split into the following six sections:

- Availability and formats.
- Exempt information.
- Copyright.
- Charges.
- Contact details.
- The classes of information that we publish.

Availability and formats

Much of the information is available on the Board webpages, which can be found on the Orkney Islands Council and NHS Orkney websites. The addresses for these pages are given at the end of this document. The Board offers alternative arrangements for people who do not wish to, or who cannot, access the information, either online or by inspection at the Board's premises. For example, the Board can usually arrange to send out information in paper copy (although there may be a charge for this).

Exempt information

The Board will publish the information held that falls within the classes of information below. If a document contains information that is exempt under Scotland's Freedom of Information laws (for example sensitive personal data or a trade secret), the Board will remove or redact the information before publication and explain why.

Copyright

Where the Board holds the copyright in its published information, the information may be copied or reproduced without formal permission, provided that:

- It is copied or reproduced accurately.
- It is not used in a misleading context.
- The source of the material is identified.

Where the Board does not hold the copyright in information that is published, this will be made clear.

Charges

For photocopying, there will be a charge at a standard rate of 10p per A4 side of paper (black and white copy) and 30p per A4 side of paper (colour copy).

Information provided on a USB stick will be charged at £2.00 per device.

Postage costs will be recharged at the rate paid to send the information to you.

If providing copies of any pre-printed publications, we will charge no more than the cost per copy of the total print run.

The Board does not pass any other costs on to you in relation to information that is published.

Charges for Information Not Published Under the Publication Scheme

There will be no charge for information requests which cost the Board £100 or less to produce.

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

The Board is not obliged to respond to requests for non-environmental information which will cost over £600 to process.

Where environmental information costs over £600 to provide to you, there may be an additional charge to cover the full amount. For example, if you were to ask for information that costs £800 to provide, you may be asked to pay £250. This fee would be calculated on the basis of a waiver for the first £100 costs of providing the information, 10% of the next £500 costs, and full cost recovery for cost over £600 (in this example, £200).

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.

The Board does not charge for the time to determine whether the information requested is held, nor 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.

If the Board decides to impose a charge, you will be notified 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.

Contact details and how to request information not included in this guide

You can contact the Board for assistance with any aspect of this information guide and if you want to ask the Board for information that is not included in the guide:

Freedom of Information
Integration Joint Board
Orkney Health and Social Care Partnership
School Place
Kirkwall
Orkney
KW15 1NY

Telephone: 01856873535.

Email: foi@orkney.gov.uk.

The Board will also advise you how to ask for information that the Board does not publish, or how to complain if you are dissatisfied with any aspect of the Publication Scheme. If you wish to make a request for information not contained in the Publication Scheme, please contact foi@orkney.gov.uk.

The Classes of Information

The Board publishes information that is held within the classes detailed below. Once information is published under a class, the Board will continue to make it available in accordance with the current retention schedule.

Where information has been updated or superseded, only the current version will be available. If you would like to see previous versions, you may make a request to us for that information.

The classes are:

- Class 1: About the Board.
- Class 2: How functions and services are delivered.
- Class 3: How the Board takes decisions and what it has decided.
- Class 4: What the Board spends and how it spends it.
- Class 5: How the Board manages its human, physical and information services.
- Class 6: How the Board procures goods and services from external providers.
- Class 7: How the Board is performing.
- Class 8: The Board's commercial publications – we do not hold or publish any information under this class.

The Classes of Information – The Integration Joint Board

	Class.	Description.
1.	About the IJB.	
1.1.	Who the Board are.	The background as to how and why the Board was established can be found here .
1.2.	Where and how to contact the Board.	If you would like more information about health and social care integration, or you would like to share your thoughts with us, then please contact us at: By email: ohacfeedback@orkney.gov.uk . By telephone: 01856 873535. Address: Orkney Health and Social Care Partnership, School Place, Kirkwall, Orkney, KW15 1NY.
1.3.	How the Board is managed and the Board's external relations.	The Board became legally responsible for the effective planning and delivery of a large range of services within health and social care, in February 2016. Membership of the Board is largely prescribed by the Scottish Government in terms of numbers and the organisations that they represent. The following are the six voting members who make up the Board: <ul style="list-style-type: none"> • Chair of the IJB, Joanna Kenny. • Vice-Chair of the IJB, Councillor Rachael King. • Issy Grieve. • Rona Gold. • Councillor Lindsay Hall. • Councillor Jean Stevenson. Additional non-voting members are appointed and can be found here .
2.	How the Board deliver their functions and services.	How the IJB operates is set out in the Integration Scheme. The Integration Scheme has been submitted and approved by Scottish Government and can be found in the Related Downloads section here .
2.1.	The Board's strategies and policies.	The 2025 – 2028 Strategic Plan can be found in the Related Downloads section here .
2.2.	Information for service users.	Information can be found on services here .
3.	How the Board take decisions and what has been decided.	The process for decision making is set out in the Integration Scheme, as above. The Board's decisions, including Minutes of Board Meetings, are published here .

	Class.	Description.
4.	What the Board spend and how the Board spend it.	Details of the Board's spending are regularly reported to the Board and these reports can be viewed as part of the Board papers here . You can also read more about the Board's spending on the IJB finance pages, here .
5.	How the Board manage human, physical and information resources.	
5.1.	The Board's human resources.	The staff who provide the services are employed by either NHS Orkney or Orkney Islands Council. The Board has no employees, although the Chief Officer and the Chief Finance Officer are seconded to provide service and support to the Board.
5.2.	The Board's information resources.	<p>The majority of the services commissioned by the Board are delivered by NHS Orkney and Orkney Islands Council, with some services delivered by third sector and private organisations.</p> <p>Details of NHS Orkney's Records Management, Data Protection and Freedom of Information policies are available in the Health Board's Health Board's Freedom of Information Policy, available here.</p> <p>The Council has policies and procedures for Records Management, Data Protection and Freedom of Information. Freedom of Information requests for services delivered by the Council specifically for the Board can be sent via the Council using the contact details on the Council website.</p> <p>Details of the Council's Records Management, Data Protection and Freedom of Information policies are available in the Council's Publication Scheme available here.</p> <p>The IJB Records Management Policy is available here.</p>
5.3.	The Board's physical resources.	<p>The physical resources used by those providing the services which are commissioned are owned directly by NHS Orkney and Orkney Islands Council, who follow their own procedures.</p> <p>NHS Orkney. Orkney Islands Council.</p>
6.	How the Board procure goods and services from external providers.	The Board will follow the NHS Orkney or Orkney Islands Council's procedures for procurement and tendering, as appropriate to the nature of the procured service. NHS Orkney Procurement Strategy 2020-2025 . Orkney Islands Council Procurement .
7.	How the Board are performing.	Details of performance are reported to the Board regularly and an Annual Report is published. All Performance Reports can be found here .

	Class.	Description.
8.	The Board commercial publications.	The Board does not have any published commercial publications.
9.	Plan to Publish Open Data.	The Board does not produce any data. Any data that it processes is created by NHS Orkney or Orkney Islands Council. Details of the NHS Orkney and Orkney Islands Council Publication Schemes are given above.



Equality Impact Assessment

The purpose of an Equality Impact Assessment (EqIA) is to improve the work of the Integration Joint Board (Orkney Health and Social Care Partnership) by making sure it promotes equality and does not discriminate. This assessment records the likely impact of any changes to a function, policy, or plan by anticipating the consequences, and making sure that any negative impacts are eliminated, or minimised, and positive impacts are maximised.

1. Identification of Function, Policy or Plan	
Name of function / policy / plan to be assessed.	Freedom of Information Policy and Publication Scheme.
Service / service area responsible.	All services.
Name of person carrying out the assessment and contact details.	Shaun Hourston-Wells, telephone: 01856873535 extension 2414.
Date of assessment.	21 October 2025.
Is the function / policy / plan new or existing? (Please indicate also if the service is to be deleted, reduced, or changed significantly).	<p>The Freedom of Information (Scotland) Act 2002 requires public bodies to make information publicly available.</p> <p>Guidance associated with the Act indicates that public bodies should maintain a Freedom of Information Policy, along with the associated Publication Scheme.</p> <p>This is the fourth iteration of both documents.</p>

2. Initial Screening	
What are the intended outcomes of the function / policy / plan?	The Freedom of Information Policy and associated Publication Scheme articulate the Integration Joint Board's commitments and procedures that support any Freedom of Information requests, as well as informing the public as to what information may be held by the Integration Joint Board.
State who is, or may be affected by this function /	Any member of the public.

policy / plan, and how.	
Is the function / policy / plan strategically important?	No.
How have stakeholders been involved in the development of this function / policy / plan?	<p>Both the Freedom of Information Policy and the associated Publication Scheme are intended to provide information to the public and, as such, consultation and engagement with the public during the updating of these documents was not appropriate.</p> <p>However, should subsequent enquiries reveal that any aspect of the published documents is unclear, changes to the documents will be considered.</p>
Is there any existing data and / or research relating to equalities issues in this policy area? Please summarise. E.g. consultations, national surveys, performance data, complaints, service user feedback, academic / consultants' reports, benchmarking (see equalities resources on OIC information portal).	No.
Is there any existing evidence relating to socio-economic disadvantage and inequalities of outcome in this policy area? Please summarise. E.g. For people living in poverty or for people of low income. See The Fairer Scotland Duty Interim Guidance for Public Bodies for further information.	No.
Could the function / policy have a differential impact on any of the following equality strands?	(Please provide any evidence – positive impacts / benefits, negative impacts, and reasons).
1. Race: this includes ethnic or national groups, colour and nationality.	No
2. Sex: a man or a woman.	No.
3. Sexual Orientation: whether a person's sexual attraction is	No.

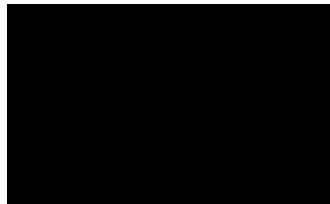
towards their own sex, the opposite sex or to both sexes.	
4. Gender Reassignment: the process of transitioning from one gender to another.	No.
5. Pregnancy and maternity.	No.
6. Age: people of different ages.	No.
7. Religion or beliefs or none (atheists).	No.
8. Caring responsibilities.	No.
9. Care experienced.	No.
10. Marriage and Civil Partnerships.	No.
11. Disability: people with disabilities (whether registered or not).	No.
12. Socio-economic disadvantage.	No.

3. Impact Assessment	
Does the analysis above identify any differential impacts which need to be addressed?	No.
How could you minimise or remove any potential negative impacts?	No negative differential impacts have been identified.
Do you have enough information to make a judgement? If no, what information do you require?	Yes.

4. Conclusions and Planned Action	
Is further work required?	No.
What action is to be taken?	Not applicable.
Who will undertake it?	Not applicable.
When will it be done?	Not applicable.

How will it be monitored? (e.g. through service plans).	Not applicable.
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Signature:



Date: 21 October 2025.

Name: Shaun Hourston-Wells.



Island Communities Impact Assessment

The purpose of an Island Communities Impact Assessment (ICIA) is to improve the work of the Integration Joint Board by making sure it considers whether the impact of any policy, strategy or service on an island community is likely to be significantly differently from its effect on other communities (including other island communities).

PRELIMINARY CONSIDERATIONS	Responses
Please provide a brief description or summary of the policy, strategy, or service under review for the purposes of this assessment.	This is a review of the Freedom of Information Policy and Publication Scheme.
STEP 1 - Develop a clear understanding of your objectives	Responses
What are the objectives of the policy, strategy, or service?	It is a requirement of the IJB to publish a Freedom of Information Policy and a Publication Scheme, which should be reviewed periodically.
Do you need to consult?	No.
How are islands identified for the purpose of the policy, strategy, or service?	The totality of Orkney and its islands.
What are the intended impacts/outcomes and how do these potentially differ in the islands?	<p>The Freedom of Information (Scotland) Act 2002 (the Act) requires public bodies in Scotland to make information publicly available.</p> <p>The Act aims to increase openness and accountability in government and across the public sector by making sure that people have the right to access information held by Scottish public authorities.</p> <p>There are no anticipated impacts or outcomes that differ across Orkney.</p>
Is the policy, strategy, or service new?	No. This is the fourth iteration of both documents.
STEP 2 - Gather your data and identify your stakeholders	Responses
What data is available about the current situation in the islands?	There is no data available specific to the islands.

Do you need to consult?	No.
How does any existing data differ between islands?	N/A.
Are there any existing design features or mitigations in place?	No. There are no anticipated impacts or outcomes that differ across Orkney.
STEP 3 - Consultation	Responses
Who do you need to consult with?	N/A.
How will you carry out your consultation and in what timescales?	N/A.
What questions will you ask when considering how to address island realities?	N/A.
What information has already been gathered through consultations and what concerns have been raised previously by island communities?	N/A.
Is your consultation robust and meaningful and sufficient to comply with the Section 7 duty?	N/A.
STEP 4 – Assessment	Responses
Does your assessment identify any unique impacts on island communities?	No.
Does your assessment identify any potential barriers or wider impacts?	No.
How will you address these?	N/A.

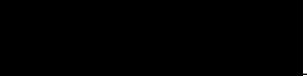
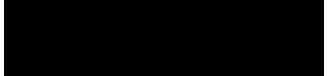
You must now determine whether, in your opinion your policy, strategy, or service is likely to have an effect on an island community that is significantly different from its effect on other communities (including other island communities).

If your answer is **NO** to the above question, a full ICIA will NOT be required, and [you can proceed to Step SIX](#). If the answer is **YES**, an ICIA must be prepared, and [you should proceed to Step FIVE](#).

To form your opinion, the following questions should be considered:

- Does the evidence show different circumstances or different expectations or needs, or different experiences or outcomes (such as different levels of satisfaction, or different rates of participation)?
- Are these different effects likely?
- Are these effects significantly different?
- Could the effect amount to a disadvantage for an island community when compared to other islands in Orkney (especially the Mainland)?

STEP 5 – Preparing your ICIA	Responses
In Step Five, you should describe the likely significantly different effect of the policy, strategy, or service:	
Assess the extent to which you consider that the policy, strategy, or service can be developed or delivered in such a manner as to improve or mitigate, for island communities, the outcomes resulting from it.	
Consider alternative delivery mechanisms and whether further consultation is required.	
Describe how these alternative delivery mechanisms will improve or mitigate outcomes for island communities.	
Identify resources required to improve or mitigate outcomes for island communities.	
STEP 6 - Making adjustments to your work	Responses
Should delivery mechanisms/mitigations vary in different communities?	No.
Do you need to consult with island communities in respect of mechanisms or mitigations?	No.
Have island circumstances been factored into the evaluation process?	No. There are no anticipated impacts or outcomes that differ across Orkney.
Have any island-specific indicators/targets been identified that require monitoring?	No.
How will outcomes be measured on the islands?	N/A.
How has the policy, strategy, or service affected island communities?	There are no anticipated impacts or outcomes that differ across Orkney.
How will lessons learned in this ICIA inform future policy making and service delivery?	There are no explicit lessons learned in respect of this Policy.
STEP 7 - Publishing your ICIA	Responses
Have you presented your ICIA in Easy-Read Format?	No.
Does your ICIA need to be prepared in Gaelic, or any other language?	No.

Where will you publish your ICIA, and will relevant stakeholders be able to easily access it?	The ICIA will be published alongside the relevant IJB report.
ICIA completed by:	Shaun Hourston-Wells.
Position:	Policy and Performance Manager.
Signature:	
Date complete:	21 October 2025.
Who will sign-off your final ICIA and why?	Stephen Brown. Chief Officer has responsibility for all delegated health and social care services.
Signature:	
Date approved:	10 November 2025.