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JAMES AND MARINA GALLAGHER RESPONSE (VIA E-MAIL)

I am responding to your consultation launched by Mr. Maude.

There is an assertion that this is about reducing the administrative burden. However, there is no assessment in this document of whether the proposals would reduce or increase the burden and no financial assessment.

In my opinion, the current FOI obligations are an onerous burden on public bodies. I work in the NHS and frequently get FOI requests, via our FOI lead, asking for information. The work is a distraction from the job for which I am employed. There is a naive view in this document that better data means less data - where is the evidence for this generalization?. There is naivety that a new generation of IT systems will be a pain free solution. It is hard enough to get the IT systems to deliver what we need - and the experience of the NHS care records (about which the NAO recently reported) is a timely reminder of how difficult and expensive it can be to introduce new systems. NHS needs systems need improvement but to meet FOI needs should not be a priority.

A healthcare organisation designs information systems to meet its needs. Most FOI requests can not be answered directly from the data but require some further analysis. It would be a waste of public money for us to try and capture more data electronically unless that capture can be economically justified. We shouldn't have to use our limited running costs budget, which the government is asking us to cut, to develop systems that have no relevance to the need of the organization and our patients.

At a time of financial stringency, it is not sensible to increase the 18 hours FOI time limit. Indeed, I suggest that for any request requiring above one hour, there should be a standard hourly charge. It goes against all basic economic principles to provide such a free good as it leads to the diversion of resources from the front line NHS.

I would also encourage a full economic appraisal by the NAO of any proposed changes.

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