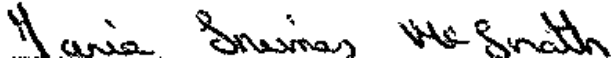





## Freedom of Information Policy

<b>Revision:</b> B	<b>Department:</b> CEO	<b>No:</b> DOCS 028
<b>Prepared by:</b>	 _____ Ms. Marie Grimes McGrath Freedom of Information Officer	<b>Date:</b> 24/5/2021
<b>Approved by:</b>	 _____ Ms. Natalya Jackson Chief Executive Officer (CEO)	<b>Date:</b> 24/5/2021

## Review History

No	Old revision status	New Revision Status	Comment	Date	Prepared By	Approved by
2	A	B	Revised Issue	23/11/20	Marie Grimes McGrath, Freedom of Information Officer	Natalya Jackson, CEO

# DOCS 028 Freedom of Information Policy

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## **1.0 POLICY STATEMENT**

Avista collects personal and sensitive information to effectively carry out our everyday business functions and activities for the individuals that we support. In the course of our work, we are also required to collect and use certain information on current, past and prospective employee, volunteers, families, advocates, suppliers and others with whom employees communicate with regard to continuity of service delivery. In all the work the Service undertakes, we are committed to operating within all required Legislation and the core values of the organisation which underpin our approach in all that we do. Inherent in this policy is the dignity, respect and privacy that we afford to those who avail of services, employees and third parties with regard to the integrity of their personal and non-personal information.

The Freedom of Information Policy sets out how the Service facilitates individuals to exercise their rights to access personal and non-personal records within the scope of the FOI Act 2014. Avista must comply with the Freedom of Information Legislation and seeks to ensure that the appropriate governance structures, systems, policies and practices are in place to fully meet our obligations under the Freedom of Information Acts.

## **2.0 PURPOSE**

The purpose of this policy is to ensure that the Service meets its legal, statutory and regulatory requirements under the Freedom of Information Act when processing all personal and sensitive information.

The Service seeks to have comprehensive and effective governance structures, systems, policies and supporting procedures and guidelines in place to meet these provisions of the Freedom of Information Act 2014.

## **3.0 SCOPE**

This policy applies to all staff within the Service (*meaning permanent, fixed term, and temporary staff, any third-party representatives or sub-contractors, agency workers, volunteers, interns and agents engaged with the Service in Ireland or overseas*). This Policy supplements other Service policies that all employees need to be aware of relating to Freedom of Information and include:

- Avista DOCS 050, Records Management Policy and Records Management Guidelines & Procedures.
- Avista DOCS 027, Policy on Administrative Access to Service User or Service Related Records.
- Avista DOCS 085, Data Protection Policy & Procedures.
- Avista DOCS 044 Information Technology Policy.

## **4.0 FREEDOM OF INFORMATION LEGISLATION**

The Freedom of Information Act 1997 (FOI Act) as amended by the Freedom of Information (Amendment) Act 2003 obliged Government Departments, the Health Service Executive (HSE), Local Authorities and a range of other Public Bodies to publish information on their activities and to make the information that they held, including personal information, available to citizens.

The Freedom of Information Act 2014 came into effect in October 2014 and repealed the 1997 and 2003 Acts. The 2014 Act introduced a number of changes to the Freedom of Information system and widened the range of bodies to which the FOI legislation applies – it now applies to all public bodies, unless they are specifically exempt. It also allows for the Government to prescribe (or designate) other bodies receiving significant public funds, so that the FOI legislation applies to them also.

The Service is a section 38 voluntary organisation, predominately funded by the HSE, and therefore operates under the Freedom of Information Legislation. The old Legislation

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continues to apply to any FOI Request that was made before the 2014 Act came into effect. It also applies to any subsequent review or appeal.

#### **4.1 Why was the Freedom of Information Act introduced?**

The Freedom of Information Act 2014 was introduced:

- To increase openness.
- To improve accountability.
- To increase public appreciation of issues involved in Policy decisions.
- To give stronger public ownership and acceptance of decisions made.
- To permit people to have access to their records and allow them to amend records if incorrect or inaccurate.

The legal rights are subject to exemptions with regard to public interest and the right to privacy. The old legislation continues to apply to any FOI request that was made before the 2014 Act came into effect. It also applies to any subsequent review or appeal.

#### **4.2 Rights under Freedom of Information**

The Freedom of Information Act 2014 provides the following statutory rights:

- A legal right for each person to access information held by public bodies (the Service is seen as a public body).
- A legal right for each person to have official information relating to himself/herself amended where it is incomplete, incorrect or misleading.
- A legal right for each person to obtain reasons for decisions affecting himself/herself.

### **5.0 DEFINITIONS**

#### **What is a Record as defined under Freedom of Information?**

The Freedom of Information Act gives broad definition to the term “Record”. The definition covers all document types and does not distinguish formats, being equally applicable to documents created, maintained and stored manually and/or electronically. The Act includes “...any memorandum, book plan, map drawing, diagram, pictorial or graphic work or other document, any photograph, film or recording (whether of sound or images or both), any form in which data (within the meaning of the Freedom of Information Act 2014) are held, any other form or system in which information is held or stored manually, mechanically or electronically and anything that is part or a copy, in any form, of any of the foregoing or in a combination of two or more of the foregoing...” Examples of Records include Personal Records on Staff, Service Users or Third Parties, HR Records, Financial Records, Tenders, Service related Records. This is not an exhaustive list.

### **6.0 ROLES AND RESPONSIBILITIES**

It is important that the Service has a strong framework in place in relation to delivering on their commitment in meeting our obligations under the Freedom of Information Act 2014.

#### **6.1 Chief Executive Officer**

The Chief Executive Officer has overall responsibility for ensuring that the service is upholding its legal responsibility to comply with the Freedom of Information legislation.

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## **6.2 Director of Governance, Strategy and Planning**

The Director of Governance, Strategy and Planning will be directly responsible for Freedom of Information on the Executive Team. Working with the Freedom of Information Officer, the Director of Governance, Strategy and Planning oversees the set up and operation of required Freedom of Information governance structures, systems, policy and practice that seek to ensure that the Service meets all requirements as set out in the Freedom of Information Legislation.

## **6.3 Freedom of Information Officer**

The Freedom of Information Officer is the first point of contact for the Service with regard to all Freedom of Information issues. The FOI Officer is accountable to the Office of the Information Commissioner (OIC) on all matters FOI related.

### **The FOI Officer is responsible for:**

- In consultation with Senior Management and all stakeholders of the Service, will develop the processes and governance structures to meet our Freedom of Information obligations and to ensure continued compliance with the legal and regulatory requirements of the Freedom of Information Act 2014.
- Seeks to ensure that the rights of individuals with regards to the processing of personal information through data management practices are upheld. This will be undertaken through the development and implementation of the required Freedom of Information governance structures, systems with the supporting Policies and Procedures in place.
- Develops Freedom of Information Policies and Procedures and associated Data Management Guidelines and leads the implementation and roll out of these systems, seeking to ensure that all staff understand and implement such Policies, Procedures and Guidelines.
- Supports business practice, function and process carried out by the Service, to ensure compliance with the Freedom of Information laws and its principles.
- Ensures that personal and non-personal information is only processed where we have verified and met the lawfulness of processing requirements.
- Provide biannual reports to the CEO.
- Ensure that all employees are competent and knowledgeable about their Freedom of Information obligations and are provided with in-depth training in the Freedom of Information Act 2014 and how the Act applies to their specific role and the Service.
- Ensure that Individuals feel secure when providing us with personal information and know that it will be handled in accordance with their rights under the Freedom of Information laws.
- Maintain a continuous program of monitoring, review and compliance with the Freedom of Information laws and to identify gaps and non-compliance before they become a risk, affecting mitigating actions where necessary to maintain compliance.
- Have robust and documented complaint handling process in place for identifying, investigating, reviewing and reporting any complaints with regard to Freedom of Information.
- Have a dedicated audit & monitoring program in place to perform regular checks and assessments on how the personal data we process is obtained, used, stored and shared. The audit program is reviewed against our Freedom of Information policies,

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procedures and the relevant regulations to ensure continued compliance.

- Ensure that Data Retention Schedules are adhered to in accordance with DOCS 050 Records Management Process, legal regulations and statutory regulations.
- Process all requests for information in relation to personal and non-personal information held or used about them, that will be provided in a concise, transparent, intelligible and easily accessible form, using clear and plain language.
- Available to support staff.
- Has a role in supporting the evidence-base for policy-making and should ensure FOI statistics for the Service are collated and made available on a timely basis to the Federation of Voluntary Bodies or the FOI Central Policy Unit at the Department of Public Expenditure and Reform.
- Maintain efficient relationships with the Service Decision Makers, Internal Reviewers to ensure effective processing of FOI requests for information. Be available to provide advice and guidance in line with the FOI Act 2014 to these designated personnel in the Service.
- Will coordinate advice, guidance, support to the FOI Decision Makers and Internal Reviewers on all request process, to include sourcing records, identification of fees where appropriate, provide advice on exemptions that may be applied to the request, prepare schedule of records to be released, draft decision letter.
- In the event of an Appeal of the FOI decision to the OIC, the FOI Officer will be the primary contact for the Service to prepare reports, rationale on decision making and any other information sought by the OIC Office.
- Will engage with the requester if of the opinion the FOI request is not valid or is not related to the Service, and will work with the requester to clarify the request and/or advise that the request will be transferred to the appropriate Service.
- Will develop a strong awareness and knowledge of other access regimes and in particular the Freedom of Information 2014, re-use of Public Sector Information Regulations and EC Access to Information on the Environment Regulations in order to be in a position to advise the requester if there is a possibility of obtaining access to records under alternate mechanisms.
- Will ensure that the Decision Makers and Internal Reviewers have access to Freedom of Information training relevant to their role and responsibility, and are briefed on any changes and developments relating to Freedom of Information.
- Will engage with the requester to ensure requests are appropriately focussed and targeted, are not voluminous, do not give rise to excessive administrative demands on the Service and that there is a clear understanding by both parties on what information is being sought.

**The FOI Officer can be contacted at:**

**Address:** Marie Grimes McGrath  
Freedom of Information Officer  
Avista  
St Anne's Centre  
Sean Ross Abbey  
Roscrea  
Co Tipperary  
E53 VK33

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**Phone:** 086-8189201 / 0505-22046 Ext 297

**Email:** [mgrimesmcgrath@lim-docservice.ie](mailto:mgrimesmcgrath@lim-docservice.ie)

OR

**Email:** [foi@lim-docservice.ie](mailto:foi@lim-docservice.ie)

#### **6.4 Decision Maker**

- Will review all records including electronic records that are relevant to the request and that all staff engaged in the search and retrieval process have a clear understanding of the records required for review.
- In collaboration with the FOI Officer, will prepare a schedule of records for release, and the Decision Letter. Will refer to any exemptions from the Freedom of Information Act 2014 that have been applied to the Freedom of Information request.
- In complex or difficult cases, the Decision Maker will liaise with the FOI Officer to identify relevant precedents relating to similar requests received by the Service, or should consider relevant decisions made by the Information Commissioner.
- Participate in the appropriate training on Freedom of Information relevant to their role and responsibility.

##### **The Service Decision Makers are:**

- Director of Human Resources or designate
- Director of Finance or designate
- FOI Officer

#### **6.5 Internal Reviewer**

- Where an internal review is received, Internal Reviewers should review the decisions made on the request by the FOI Officer and FOI Decision Makers. Following their review, they may affirm, vary, or annul the decision in relation to the matter as he/she deems appropriate.
- The Internal Reviewer must consider each case afresh (de novo) in terms of evaluating the evidence, and in terms of any new arguments put forward by the requester and must adhere to the timeframes as set out within the Act. The review process is completely independent of the original decision.
- The Internal Reviewer should refer queries to the FOI Officer to assist, or for the FOI Officer to raise queries with the Central Policy Unit at the Department of Public Expenditure & Reform when and if required.
- The timeframe for processing an internal review is 3 weeks from the date of the receipt of the letter seeking an internal review.

##### **The Service Internal Reviewers are:**

- Ms. Lorraine Macken, ACEO, Dublin
- Ms. Michelle Doyle, ACEO, Limerick/North Tipperary

#### **6.6 Service Managers / Heads of Department / All Employees**

It is the responsibility of the local Service Manager and Heads of Departments to ensure that this policy is implemented and that all staff in their area of responsibility are made aware of their respective responsibility to safeguard all data in their area of work. They will ensure that all personal information held on computer or manually is accessed only

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on a “need to know” basis. They will also be aware that all records are subject to release under the Freedom of Information Act 2014.

They will also ensure that staff members in their area of responsibility attend Freedom of Information training that is organised internally and facilitated by the FOI Officer, and seek support from the FOI Officer as required.

## 7.0 FREEDOM OF INFORMATION REQUEST PROCEDURE

### 7.1 Introduction

Avista operates a fair and transparent approach in facilitating an individual to access their personal and/or non-personal information. When submitting a Freedom of Information request, it is the Service practice to seek validation of the requester to protect the safety of all personal data. This validation can take the format of Photo ID, e.g. Passport or Driving Licence. If you are seeking the records on behalf of a Third Party, it is expected that the requester will submit evidence of consent of the Third Party to seek the records, and evidence of relationship to the Third Party, be it a family member, advocate or legal representative.

7.1.1 Employees, service users, family members are encouraged to engage with the relevant Manager/Designate in the Service who may be able to respond to the information and records that you are requesting.

7.1.2 If this option does not satisfy your request requirements, you can make a request in writing to Avista Freedom of Information Officer or, alternatively, by verbal request.

### 7.2 How can a request be made to Avista?

You can make a FOI request for information to the FOI Officer, via the following methods:

- A) in writing via letter to the FOI Officer at the address below.
- B) Via email at the email address below or,
- C) Directly by contacting the FOI Officer via phone.

Marie Grimes McGrath  
Freedom of Information Officer  
Avista  
St Anne's Centre  
Sean Ross Abbey  
Roscrea  
Co Tipperary  
E53 VK33

**Phone:** 086-8189201 / 0505-22046 Ext 297

**Email:** [mgrimesmcgrath@lim-docservice.ie](mailto:mgrimesmcgrath@lim-docservice.ie)

OR

**Email:** [foi@lim-docservice.ie](mailto:foi@lim-docservice.ie)

### 7.3 Can I have access to any information that I seek?

You may request access to any information held by the Service. However, exemptions can be applied in certain circumstances dependent on the nature of information requested. This includes:

- Personal information where the information does not relate to the person making the request.
- Information provided to Avista in confidence.
- Information relating to commercial business that is deemed commercially sensitive.

If, for any reason, it is wished that information provided to the organisation should not be disclosed because of its sensitive nature, the person should, when supplying the information, make clear this wish and specify the reasons for the sensitivity of the information. The organisation will consult with any individual or body before making a decision on a Freedom of Information request received that pertains to this condition.

### 7.4 How requests are processed by Avista?

There are strict time-limits to adhere to in processing a request to include:

- The FOI Officer will issue a search and retrieval for the required records to the relevant departments on receipt of an FOI request. It is of paramount importance that the manager/designate provide two copies of the records that they hold pertaining to the request within one working week from date of notification from the FOI Officer. This is to afford the FOI Officer adequate time to process the request, in consultation with the appointed Decision Maker.
- Requests will be acknowledged within two weeks of receipt of a request by the FOI Officer. The letter will include the expected date of the Letter of Decision.
- Requests will be processed within four working weeks of receipt of a request. The four working weeks excludes weekends and public holidays.
- However, the Service may extend the four-week time limit for replying to requests if:
  - The request relates to a large number of records.
  - A large number of requests have been received from different applicants for the same records.

Should any of these situations occur, the requester will receive notification before the end of the four-week period from the FOI Officer, who will provide the requester with the reason for the delay in processing the request, under the Freedom of Information Act 2014. The FOI Officer will also provide the requester with the new date for release of Avista information/records requested.

#### 7.4.1 Request Granted

Where a request is granted, the applicant will be informed in writing by the Decision Maker:

- That the request has been granted.
- The name of the person who granted the request (Decision Maker).
- The day on which the decision was made.
- The format in which the records will be released.
- The fee for searches where applicable.
- A schedule of the records released, relevant to the FOI request.

This is referred to as the Letter of Decision.

#### 7.4.2 Request Part-Granted

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Where a request is part-granted, the applicant will be informed by the Decision Maker in writing:

- That the request has been part-granted.
- The day on which the decision was made.
- The format in which the records will be released.
- The fee for searches where applicable.
- It will outline the schedule of records released, to include those part-granted. The schedule will also indicate the exemption(s) from the FOI Act that has been applied. Part-granted records will be highlighted as *Third Party Access Denied*.

This is referred to as the Letter of Decision.

#### 7.4.3 Request Refused

Where a request is refused, the applicant will be informed in writing by the Decision Maker:

- That the request has been refused and the reasons for the refusal, to include the exemptions applied under the FOI Act 2014.
- It will outline the schedule of records that have been refused.
- Such records are highlighted as *Third Party Access Denied*.
- Details of the rights of review and appeal of the decision to the Avista Internal Reviewer.

This is referred to as the Letter of Decision.

#### 7.5 Internal Review

If you are dissatisfied with the initial decision, you may make an appeal to the organisation's Internal Reviewer (who is independent of the Decision Maker) for an Internal Review.

- A request for an Internal Review should be submitted in writing or by email within four weeks of the initial decision (or on the date the decision was due in the case of non-reply from the Organisation).
- The Internal Reviewer must complete the Internal Review within three weeks and notify the applicant of the outcome in writing.
- The outcome of the Internal Review will be communicated to the requester by the Internal Reviewer. The Internal Reviewer may uphold the original decision, annul the original decision and issue a completely new decision.
- The Letter of Decision will detail the outcome of the Internal Reviewers decision, to include records released/withheld, exemptions applied and the right to appeal to the Office of the Information Commissioner.

**Requests for Internal Review should be sent to:**

Marie Grimes McGrath  
Freedom of Information Officer  
Avista  
St Anne's Centre  
Sean Ross Abbey  
Roscrea  
Co Tipperary  
E53 VK33

**Phone:** 086-8189201 / 0505-22046 Ext 297

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**Email:** [mgrimesmcgrath@lim-docservice.ie](mailto:mgrimesmcgrath@lim-docservice.ie)

OR

**Email:** [foi@lim-docservice.ie](mailto:foi@lim-docservice.ie)

## **7.6 Review/Appeal by the Information Commissioner**

If you are unhappy with the Internal Reviewer's decision, you may appeal directly to the Information Commissioner where an Independent review will be carried out. The Information Commissioner will correspond directly with the applicant.

**Appeals in writing are sent to:**

Office of the Information Commissioner  
18 Lower Leeson Street  
Dublin 2

**Email:** [foi@ombudsman.irlgov.ie](mailto:foi@ombudsman.irlgov.ie)

### **7.6.1 Appeals to the High Court**

A person affected by a decision of the Information Commissioner may appeal to the High Court on a point of Law only.

## **7.7 Fee Structure Under the FOI Act 2014**

7.7.1 There are no fees charged for personal information.

7.7.2 Fees may be charged as follows:

- For non-paying personal information, fees may be charged for the time spent in efficiently locating and copying records. No fee may be levied for the cost of the time involved in considering an application under the Act, once the records are retrieved.
- There is a minimum threshold of €101 below which no search, retrieval and copying fees can be charged. Once the charge reaches €101, full fees apply.
- There is a cap on the amount of search, retrieval and copying fees that can be charged of €500.
- There is a further upper limit on estimated search, retrieval and copying fees at €700, above which the FOI body can refuse to process a request. The requester will be offered the opportunity to refine the request to reduce the fees that could be applied.
- The fee for internal review under Section 21 is now €30 and €10 for those with a medical card and their dependents.
- The fee for appeal to the Information Commissioner under Section 22 is €50 and €15 for those with a medical card and their dependents.

7.7.3 Charges may be waived in the following circumstances:

- Where the administrative cost of collecting the fee exceeds the amount to be charged.
- Where the information requested would be of particular assistance to the understanding of an issue of national importance.

7.7.4 The FOI Officer will engage with the requester as required, in relation to processing the FOI request.

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## 8.0 THE MODEL PUBLICATION SCHEME

Section 8 of the Freedom of Information Act 2014 requires FOI bodies to prepare and publish as much information as possible in an open and accessible manner. A Publication Scheme commits FOI bodies to make information available as part of their normal business activities. Please find below information in accordance with this Scheme. Should you require any further information, please contact Marie Grimes McGrath, FOI Officer, Avista.

<b>Information about the FOI Body</b>	<b>Functions and Services provided or to be provided</b>	<b>Decision Making Procedures</b>
<ul style="list-style-type: none"> <li>• About Avista</li> <li>• Organisational Structure</li> <li>• Vision and Mission Statement</li> <li>• Strategic Plan</li> <li>• Annual Reports</li> <li>• Location and Contact Details</li> <li>• Pay/Grading Structures</li> </ul>	<ul style="list-style-type: none"> <li>• Complaints</li> <li>• Admission / Transfer / Discharge</li> </ul>	<ul style="list-style-type: none"> <li>• Recruitment and Selection Policy</li> <li>• Range of policies which guide our practice. Please contact us if you would like more information.</li> <li>• Day Services</li> <li>• Moving on from Congregated Settings</li> </ul>
<b>Financial Information</b>	<b>Procurement</b>	<b>Information sought routinely and Miscellaneous</b>
<ul style="list-style-type: none"> <li>• Audited Accounts</li> <li>• Purchase Orders in excess of €25K.</li> <li>• Additional Information</li> </ul>	<ul style="list-style-type: none"> <li>• Procurement Policy</li> <li>• eTenders</li> </ul>	<ul style="list-style-type: none"> <li>• FOI Log</li> <li>• Publications</li> <li>• Complaints</li> </ul>

## 9.0 AUDITS & MONITORING

- The FOI Officer has overall responsibility for ensuring the appropriate governance systems are in place on all data management practices in relation to the Freedom of Information Act 2014.
- The FOI Officer will undertake annual audits of the following process:
  - Audits of FOI requests, the process, internal reviews, appeals as appropriate.
  - Quality of data in terms of accuracy, legibility, duplication of records, storage and retention and data minimisation. It is important to note that all records are subject to release upon an FOI request, to include 'Post-It' Notes, emails, draft documents, unsigned reports. Accurate informed records reflect the integrity of Service records, emphasises the Service's expectations on the quality of records produced across all departments.
  - Audit of the Model Publication Scheme to ensure it reflects compliance with FOI, Department of Public Expenditure & Reform and the Service responsibilities therein. The Model Publication Scheme can be the subject of external audit by Department of Public Expenditure & Reform.
  - The FOI Officer will provide reports to departments and feedback on audits to ensure remedial actions are taken where recommended and to provide support to staff.

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## **10.0 PENALTIES**

The Service understands its obligations and responsibilities under the FOI Legislation and recognises the severity of breaching any aspect of the Legislation.

- Such penalties may arise from complaints made to the Service or the OIC, or poor governance systems in place for processing of requests.
- Lack of Service transparency, in the spirit of implementation of the FOI Act 2014.

## **11.0 REFERENCES**

- Freedom of Information Acts 1997, 2003 and 2014.
- Data Protection Act 2014.
- eTenders.
- General Data Protection Regulation [EU Regulation 679 (2016)].
- Department of Public Expenditure and Reform, Central Policy Unit.

## **12.0 REVIEW**

The Freedom of Information Policy DOCS 028 will be reviewed in accordance with changes to Legislation, Regulations and the Freedom of Information Acts.

## **13.0 FURTHER INFORMATION**

Further Information on Freedom of Information can be accessed on the Department of Public Expenditure and Reform at [www.foi.gov.ie](http://www.foi.gov.ie)



**Appendix 1**

Copy to: Decision Maker [ ]      FOI Call Centre [ ]      Application Ref No:

**AVISTA**  
**REQUEST FOR ACCESS TO RECORDS**  
**Freedom of Information Act, 2014**

**1. Details of Requester** (PLEASE USE BLOCK CAPITALS)

Surname :	Maiden Name:	First Name(s):
Address:		
Date of Birth:		
Tel (home):	Tel (business):	Fax:      E-mail:

**2. Personal Information (If request is for non-personal information, go to 3. below)**

(a) Before you are given access to your personal information, you will need to provide proof of your identity. **A copy of the identifying document accompanies this Form:** [ ] Yes [ ] No (*tick one*)

(b) If you are requesting personal information in respect of another person, the consent of that person is also required. **A copy of this consent accompanies this Form:** [ ] Yes [ ] No (*tick one*)

**3. My preferred Form of Access is:** (*please tick one*)

(a) To receive photocopies [ ]      (b) To inspect the original record [ ]

(c) Other format [ ] (*Please specify*):

**4. Application**

I request administrative access to the information/records detailed overleaf: [ ] (*please tick*)

If this is not feasible, I request access under Section 12 of the Freedom of Information Act, 2014: [ ] (*please tick*)

Signed: \_\_\_\_\_ Date: \_\_\_\_\_

**5. For Office Use Only**

	Admin Access	FOI Access	
Date Received			Signed:
Date Acknowledged			Signed:
Identity Confirmed	[ ] Yes [ ] No		Signed:
Consent Verified	[ ] Yes [ ] No		Signed:
Access Granted	[ ] Yes [ ] No	Date	Signed:

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