

NHS Greater Glasgow and Clyde	Paper No. 26/89
Meeting:	NHSGGC Board Meeting
Meeting Date:	25 June 2026
Title:	2025-26 Freedom of Information Annual Report
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1. Purpose

The purpose of this paper is to present the NHSGGC Board with the 2025-26 Freedom of Information (FOI) Annual Report. The Annual Report provides a comprehensive summary of FOI performance across the 2025-26 financial year, including an overview of request volumes, response times, compliance with statutory deadlines, outcomes of requests, and key trends over the reporting period.

Appendix 1 to this paper presents the 2025-26 Freedom of Information Annual Report.

2. Executive Summary

The paper can be summarised as follows:

- During 2025–26, NHSGGC received 1,688 Freedom of Information (FOI) and Environmental Information Regulations (EIR) requests-the highest volume recorded, representing an increase of over 20% compared with the previous year.
- Compliance with the statutory 20-working day response timescale was 88%. This is the first time this level of performance has been achieved since 2015-16, despite current request volumes being approximately double those seen at that time.
- The position represents full recovery from June 2024, when NHSGGC was placed under Level 3 intervention by the Scottish Information Commissioner due to sustained underperformance.

3. Recommendations

The NHS GGC Board is asked to consider the following recommendations:

- Note the 2025-26 Freedom of Information Annual Report as set out in Appendix 1 and take assurance from the sustained improvement in compliance, effective handling of increased demand, and recovery from previous regulatory intervention.

4. Response Required

This paper is presented for **Assurance**.

5. Impact Assessment

The impact of this paper on NHS GGC's corporate aims, approach to equality and diversity and environmental impact are assessed as follows:

- | | |
|------------------------|-------------------------------|
| • Better Health | <u>Positive</u> Impact |
| • Better Care | <u>Positive</u> Impact |
| • Better Value | <u>Positive</u> Impact |
| • Better Workplace | <u>Positive</u> Impact |
| • Equality & Diversity | <u>Positive</u> Impact |
| • Environment | <u>Positive</u> Impact |

6 Engagement & Communications

The issues addressed in this paper were subject to the following engagement and communications activity:

Not Applicable

7. Governance Route

The content of this paper has been previously considered by the following groups as part of its development:

- The paper was approved by the Audit and Risk Committee 4 June 2026
- The paper is being presented to NHSGGC Board on 25 June 2026

8. Date Prepared & Issued

Date Prepared: 12 June 2026

Date Issued: 17 June 2026

APPENDIX 1

2025-26 FREEDOM OF INFORMATION ANNUAL REPORT

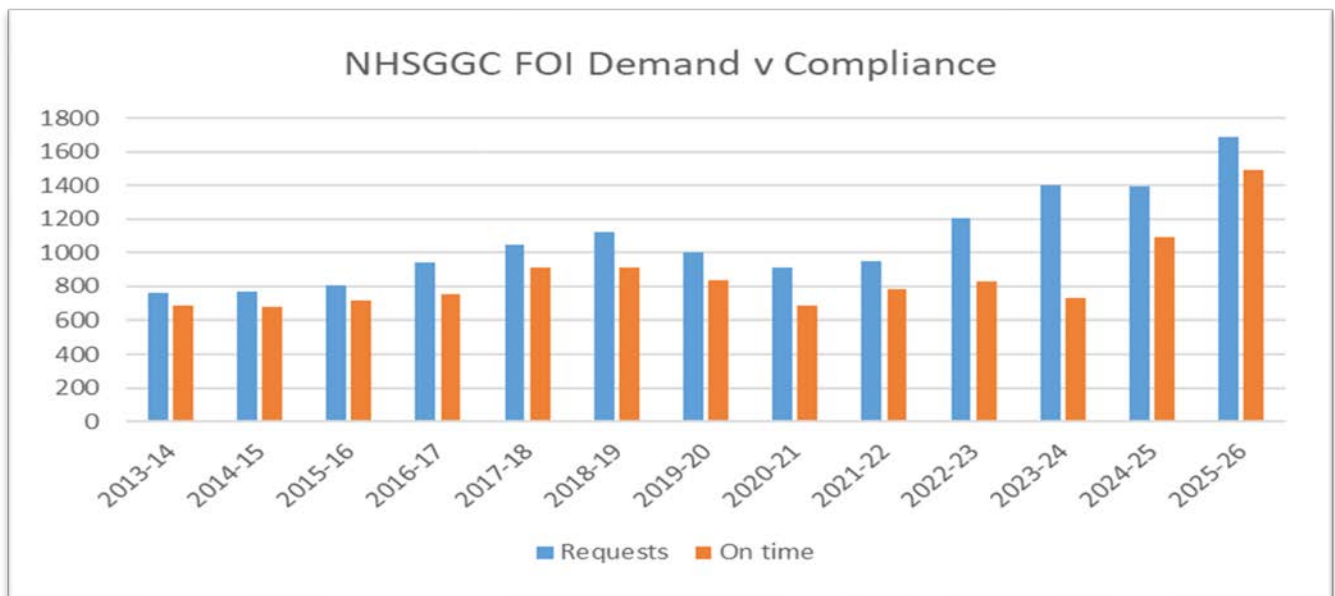
Performance Analysis

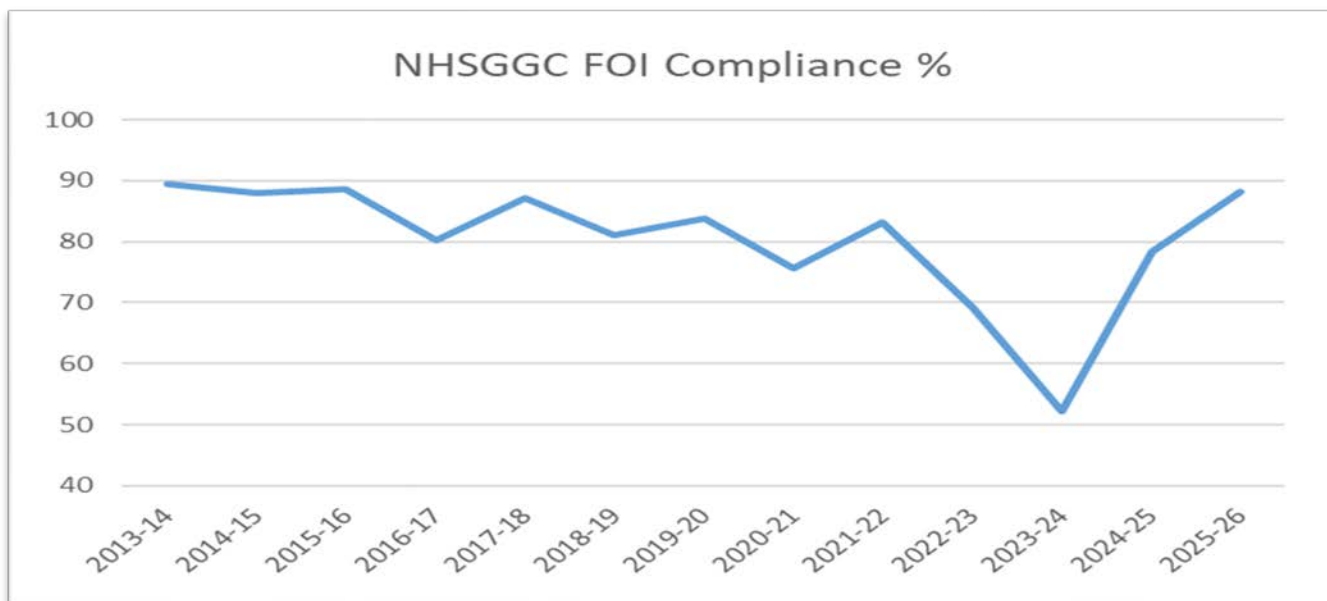
Between 1 April 2025 and 31 March 2026, NHSGGC received a total of **1,688** information requests. This represents the highest annual volume on record and reflects an increase of over 20% compared to the previous year.

Compliance with the statutory 20-working day response timescale was **88%**. This level of performance has not been achieved since 2015-16, when the volume of requests received was approximately half of current levels.

The reported compliance rate also represents an improvement of 10 percentage points compared to the previous year and demonstrates full recovery from June 2024, when NHSGGC was placed in Level 3 intervention by the Scottish Information Commissioner due to performance concerns.

The charts below illustrate trends in both the annual volume of requests received and compliance with the 20-working day response timescale over the past 12 years, providing context for the sustained increase in demand alongside recent improvements in performance.





The annual compliance rate of 88% placed NHSGGC among the top three highest-performing NHS Boards receiving in excess of 1,000 requests during the year.

NHS Board	Requests Received	Compliance %
NHS Highland	1,283	91%
NHS Ayrshire & Arran	1,064	90%
NHS Greater Glasgow and Clyde	1,688	88%
NHS Lanarkshire	1,214	87%
NHS Grampian	1,259	80%
NHS Tayside	1,187	76%
NHS Fife	1,447	71%
NHS Lothian	1,390	65%

Compliance rates throughout 2025-26 remained strong and stable despite sustained high demand. Activity levels increased further in Quarter 4, as anticipated ahead of the Scottish Parliamentary Elections, with this period representing a new quarterly peak in request volumes.

2025-26	Requests Received	Compliance %
Q1	395	88%
Q2	429	89%
Q3	391	90%
Q4	473	87%
Total	1,688	88%

Quarter 4 performance is particularly noteworthy when benchmarked against other high-volume NHS Boards, with comparator compliance rates of 43% in NHS Lothian, 57% in NHS Fife, 70% in NHS Tayside and 72% in NHS Lanarkshire, demonstrating NHSGGC's comparatively strong performance during a period of peak demand.

Reviews and Appeals

A total of 28 Reviews were requested during 2025-26, representing ***less than 2%*** of all responses issued. In all but three cases, the original decision on information disclosure was upheld as appropriate, demonstrating a high level of accuracy and consistency in initial decision-making.

Of the 25 Reviews upheld in NHSGGC's favour, five were subsequently appealed to the Scottish Information Commissioner. The Commissioner found in favour of the applicant in two of these cases, following which NHSGGC provided additional information.

Overall, the low volume of Reviews and Appeals, together with the high rate of decisions upheld, provides assurance on the robustness of NHSGGC's FOI processes and the quality of its information governance and decision-making.

Requestor Information

The Table below breaks the number of FOI requests down by Requester Category.

Requestor Category	Requests Received	%
Media	158	9%
Political	249	15%
Legal	83	5%
Public	737	44%
Organisations	461	27%
Total	1,688	100%

Media activity increased notably in the final quarter, with 36% of all media requests received in Q4. This pattern is consistent with heightened scrutiny associated with the Scottish Parliamentary Elections. It is also likely that a proportion of requests submitted by freelance journalists have been recorded within the 'Public' category, suggesting that media influence may be understated in the overall analysis.

Operationally, the complexity of information requests remains significant. Almost half of all requests required input from multiple NHSGGC services, and each request contained an average of four discrete questions.

In addition to Freedom of Information (FOI) requests, 32 information requests were processed under the Environmental Information Regulations (EIR). This represents a relatively small proportion of overall activity, noting that only 200 EIR requests were recorded across NHS Scotland from a total of over 16,000 information requests during 2025/26.

Requestor Topics

A wide range of topics underpinned the information requests received during 2025-26, reflecting both sustained public interest in key service areas and ongoing external scrutiny of NHSGGC's performance and governance.

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The most frequently requested themes were:

- Queen Elizabeth University Hospital (QEUE): including matters relating to the Scottish Hospitals Inquiry, Ward 4B closure, water and ventilation testing, and correspondence with the Scottish Government.
- Access to services: including Child and Adolescent Mental Health Services (CAMHS), Sandyford services, weight management services, Adult ADHD, mental health, and a range of outpatient and specialist services.
- Thistle Centre: primarily focused on service activity and its wider impact on the local Community.
- Dental services: including access, regulation, and levels of service activity.
- Maternity services: with a particular focus on patient safety.

These themes demonstrate a concentration of requests in areas associated with service accessibility, patient safety, and high-profile or sensitive operational matters. This pattern is consistent with wider trends in public and media scrutiny and highlights the continued importance of robust information governance, clear public messaging, and coordinated organisational responses in managing complex and high-impact requests.

Improvement Activities

The Audit and Risk Committee is reminded that NHS GGC received confirmation from the Office of the Scottish Information Commissioner (OSIC) on 8 December 2025 that the formal intervention in relation to FOI compliance had concluded and was closed. The evidence submitted during the intervention, including sustained improvements in monthly performance reporting, provided assurance to the regulator that appropriate and effective actions had been taken to address the previously identified areas of non-compliance.

Significant progress has been made in implementing the recommendations arising from the Internal Audit review of FOI completed in late 2025. This includes the revision and wider promotion of FOI procedures, alongside the clarification and formalisation of approval processes to strengthen governance and consistency of responses.

A small number of actions remain in progress. These include the roll-out of mandatory FOI training for relevant staff groups and the requirement for all services, particularly those with higher volumes of FOI activity to maintain comprehensive tracking arrangements for requests under their responsibility. These measures are intended to further embed good practice and support sustained compliance.

In line with the Internal Audit recommendation regarding FOI team capacity, additional short-to medium-term support has been agreed to respond to increasing demand and mitigate the risk of deterioration in performance. In this context, an additional FOI officer has been deployed on a full-time basis through redeployment, providing immediate capacity support to the service.

The FOI function has also been incorporated within the M365 Enabled Transformation Programme. This presents opportunities to utilise emerging AI-enabled tools to improve the identification and retrieval of previously disclosed information, with the potential to enhance response times and reduce the burden on services contributing to FOI responses across NHS GGC.