



**Item No. 17**

**Meeting Date Wednesday 10<sup>th</sup> June 2026**

**Glasgow City  
Integration Joint Board  
Finance, Audit and Scrutiny Committee**

**Report By: Duncan Black, Depute Chief Officer, Finance and Resources**

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**Phone: 0141 287 8849**

**Subject Access Requests Assurance**

**Purpose of Report:**

This report provides Committee with an update on activity to address a backlog of Subject Access Requests (SARs) and the connection with ongoing issues related to improvement in Key Performance Indicators (KPIs) reported to the Committee as part of the quarterly performance report.

**Background/Engagement:**

Each quarter the Committee is presented with the quarterly performance report to enable scrutiny on the HSCP performance in relation to a suite of KPIs. Amongst the KPIs reported each quarter are a number which are the responsibility of Business Development staff working within the Complaints, Freedom of Information and Investigations Team (CFIT).

The KPIs have been illustrating failure to achieve the targets for a significant period of time, in part because of a surge in Subject Access Requests that has impacted on the ability of the team to address the areas of poor performance. At the Committee in April, it was noted that the activity to address the SAR demand was impacting on the team's ability to prioritise the KPI performance deficiencies and Committee members noted the detail behind why this is the case was not routinely shared with Members.

Officers were asked to provide more detail to a future committee to support understanding of the current position, the impact on the KPIs and to consider how to include relevant data in future performance reports.

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<b>Governance Route:</b>	The matters contained within this paper have been previously considered by the following group(s) as part of its development.  HSCP Senior Management Team <input type="checkbox"/> Council Corporate Management Team <input type="checkbox"/> Health Board Corporate Management Team <input type="checkbox"/> Council Committee <input checked="" type="checkbox"/> Update requested by IJB <input type="checkbox"/> Other <input type="checkbox"/> Not Applicable <input type="checkbox"/>
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<b>Recommendations:</b>	The IJB Finance, Audit and Scrutiny Committee is asked to: a) Note the contents of the report; b) Note the steps which have been taken to reduce the backlog of Subject Access Requests and the data gathered to support activity; and c) Consider how progress is to be shared with Committee moving forward, including consideration of data to be provided as part of the quarterly performance report.
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<b>Relevance to Integration Joint Board Strategic Plan:</b>	
Priority 4.02 - Provide the information and supports required to those who are experiencing or are at risk of experiencing harm in our city to ensure protection from harm.	
Priority 5.04 - Ensure staff are trained to deliver on the commitment to plan and deliver services within a human rights-based approach.	

**Implications for Health and Social Care Partnership:**

<b>Reference to National Health &amp; Wellbeing Outcome:</b>	N/A
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<b>Personnel:</b>	None directly arising from this report however temporary recruitment undertaken and ongoing to resolve backlog issue.
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<b>Carers:</b>	N/A
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<b>Provider Organisations:</b>	N/A
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<b>Equalities:</b>	N/A
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<b>Fairer Scotland Compliance:</b>	N/A
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<b>Financial:</b>	No direct financial implications from this report for the IJB.
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<b>Legal:</b>	None.
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<b>Economic Impact:</b>	None.
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<b>Sustainability:</b>	N/A
<b>Sustainable Procurement and Article 19:</b>	N/A
<b>Risk Implications:</b>	<p>Risk to Glasgow City Council as the continued efforts to address the Subject Access Request backlog impacts on the ability to meet other statutory obligations in relation to Freedom of Information and Complaints Handling.</p> <p>There is a risk to the IJB in relation to continued inability to dedicate the necessary resource to performance covered by the KPIs. The risk includes reputational. The impact of the activity covered by this report is reviewed in relation to the risk of negative media/publicity captured on the social care risk register and monitored at Committee.</p>
<b>Implications for Glasgow City Council:</b>	Reputational and potentially financial damage may result from continued failure to meet requirements of Data Protection legislation.
<b>Implications for NHS Greater Glasgow &amp; Clyde:</b>	N/A

### 1. Purpose

- 1.1. This report provides Committee with an update on activity to address a backlog of Subject Access Requests (SARs) and the connection with ongoing issues related to improvement in Key Performance Indicators (KPIs) reported to the Committee as part of the quarterly performance report.
- 1.2. A further purpose of the report is to provide examples of information collected by Business Development to support activity to address the SAR backlog, to inform consideration by Committee of how further updates on the SAR backlog activity can be shared.

### 2. Background

- 2.1. In [June 2025](#) a report was presented to Committee describing a significant increase in Subject Access Requests relating to social work information, partly as a result of a decision taken by the Scottish Government that the SAR process should be followed by citizens seeking information from the Council to support their involvement in the National Child Abuse Review, managed by Redress Scotland.
- 2.2. The volume of requests received, particularly over the last three years, has proven unmanageable and a backlog of outstanding SARs has accumulated. As a result, GCC is not currently complying with the statutory timescales for responding to SARs (specifically, SARs relating to Social Work records). Attempts to reduce the backlog over this period have not had any significant success and there are currently nearly 1000 overdue Social Work SARs awaiting response.

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2.3. The table below illustrates the increase in demand experienced by the team.

Year	2026 YTD	2025	2024	2023	2022	2021	2020	2019	2018	2017	2016	2015
SARs	863	1496	989	1018	985	551	411	573	389	200	162	173

2.4. The failure to meet statutory timescales for SARs was subject to investigation by the Information Commissioner's Office (ICO) and a statutory reprimand was published by the ICO on 26 February 2025 and can be seen at: [https://ico.org.uk/action-weve-taken/enforcement/glasgow-city-council/..](https://ico.org.uk/action-weve-taken/enforcement/glasgow-city-council/)

2.5. An action plan to address the ICO recommendations and resolve the SAR backlog has been agreed with the ICO and is subject to ongoing scrutiny by both the ICO and the Council's Glasgow City Council's Finance, Audit and Scrutiny Committee. The timeframe for reducing the backlog to nil is set at March 2027.

2.6. The following KPIs are presented to the Committee each quarter, and have been reported as being more than 5% outwith target for successive quarters:

- Percentage of Social Work Stage 2 Complaints responded to within timescale
- Percentage of Social Work Freedom of Information (FOI) requests responded to within 20 working days
- % of Social Work Data Protection Subject Access Requests completed within required timescale

2.7. Alongside the data the performance report contains narrative to explain the reasons for not meeting target levels and actions to mitigate the impact and resolve the issues. As part of this narrative officers have been reporting the considerable effort of the team to address the backlog as a reason for not being able to prioritise the KPI performance.

### 3. Action taken to address the backlog

3.1. The HSCP recognises the importance of addressing the SARs backlog as quickly as possible due to the impact delays have on those requesting information, in particular those seeking information as part of the Redress Scheme. It is also important to address the backlog quickly because of the consequent impact on the ability of the team to meet the demands on it, including through Freedom of Information requests and complaints.

3.2. The HSCP has taken significant action to alleviate the situation, including significant financial investment in the team to underline the importance of resolving the issue. The table below illustrates how the CFIT team has grown to address the increase in demand.

2025	2024	2023	2020	2019	2018
20	13	12	8	6	5

Staffing levels for 2026 currently sit at 24, including the Service Manager, with 14 of those staff currently on fixed term contracts.

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- 3.3. The HSCP provided funding for the Council to procure an AI-powered software tool designed to reduce the amount of time it takes to get a social work file ready for release. However the solution proved not to be effective and the contract is not being extended.
- 3.4. The Executive Summary of ICO the report is available on the [ICO website](#) and the full report can be provided to Members on request. However, the main recommendations from the report are as follows, and have all been accepted and progressed:
- Internal guidance documents required to be updated or, in some cases, created from scratch;
  - The guidance for the public on the Council website on how to make a SAR should be revised to cover being able to make a SAR verbally;
  - Mandatory staff training should include content on how to recognise a SAR and what to do if one is received; and
  - The Council should investigate entering into a service level agreement with Glasgow Life in connection with the retrieval of archived social work files from the Mitchell Library.
- 3.5. Targets were set for the team to clear sixty cases more each month than are received, based on an expectation of around 100 new cases each month. However, demand has risen unexpectedly in recent months, with 162 new cases logged in November, 208 cases logged in December, 163 cases logged in January and circa 200 logged in March and April. The team are currently working to a revised target of clearing 72 cases more than received each month. In May 153 cases were received and 160 were closed.
- 3.6. CFIT staff undertake regular process review activity to identify and implement efficiencies, in order to maximise the productivity of the team. The team also undertake regular calibration sessions to ensure consistency of approach across the group.
- 3.7. One factor in the recent increase in new SARs is a notable spike in requests from 3-4 law firms from England. Based on our early investigation into these requests, a significant proportion would appear to be speculative in nature, with no clear link to Glasgow. Nevertheless, these require the same attention as all other SARs and so are adding to the workload on the team. Work is underway to consider any possible mitigation of this increasing demand.
- 3.8. CFIT management have been in contact with Redress Scotland to support proposals to move away from the requirement for applicants to make SARs to local authorities. Redress Scotland have now indicated that a short chronology of care experience would suffice in place of a full SAR response to support applications to their scheme. It is hoped that once implemented this will enable a proportion of existing SARs to be withdrawn and a reduction in the levels of demand currently being experienced.

## 4. Progress with the Backlog

- 4.1. There are multiple priorities in addressing the backlog of Subject Access Request cases; clearing the oldest cases; reducing the 'age profile' of the backlog so that there are fewer older cases in general; reducing the overall total of cases and; taking action where possible to avoid cases being added to the backlog of overdue casework. As a result, the bulk of the work carried

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out by the team is not focussed on 'current' cases, and only a small proportion of the requests cleared at present are still within statutory timescales when cleared.

- 4.2. The output of the team in relation to addressing the backlog is being closely monitored. The impact of these new staffing resources is now being evidenced by a significant upturn in the amount of information being processed and cleared.
- 4.3. Whilst the ICO imperative is clearing the backlog of cases another significant metric is pages cleared. At the point of request, it is impossible to know whether a person's case file will contain a relatively low number of pages or tens of thousands. The team are now closely monitoring the number of pages cleared. The table below indicates the number cases closed, impact on the backlog and pages cleared. What this shows is that whilst the number of cases in the backlog is not reducing as per projections due to the increase in demand, the team are closing significant numbers of cases and processing unprecedented numbers of pages. This increased productivity underlines the importance of the staff investment.

Month	Cases closed	Current backlog (including 'in time' cases)	New SARs received	Pages processed
Feb-25	69	803	103	14875
Mar-25	77	813	87	26348
Apr-25	64	851	102	24534
May-25	61	891	101	21113
Jun-25	51	938	98	26420
Jul-25	84	1033	179	11802
Aug-25	59	1066	92	25309
Sep-25	103	1101	138	30448
Oct-25	229	970	98	37857
Nov-25	162	974	162	39109
Dec-25	139	1026	208	28510
Jan-26	194	996	163	48609
Feb-26	230	886	120	48980
Mar-26	192	876	182	57862
Apr-26	173	906	217	58151
May-26	160	891	153	65426

- 4.4 The average number of pages processed by the team prior to August was 23,111, however from September to January that has increased to 36,748 (59% increase). From January onwards, the average number of pages processed per month has again risen to 55,806 an increase of 141% over the pre-August output. The average number of cases cleared per month was 60 prior to August 2025, however from September to January that has increased to 165 (175% increase). From January onwards, that average number of case closures in a month has again risen to 190, 217% higher than pre-August levels.

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4.5 Age Profile

4.5.1 Following discussions with the ICO team, a decision was taken in October 2025 to focus some of the additional resource on clearing the oldest cases in the backlog, and some resource on addressing incoming current cases that could be quickly resolved to prevent the backlog growing excessively. It should be noted that many of the older cases are due to the need to correspond with the requestor to clarify additional details as our investigators uncover more information (e.g. details of siblings who may have pertinent information in their files on the data subject). The stats quoted are based on a start date from when the very first correspondence request was received.

4.5.2 Due to the requirement to prioritise older requests the KPI metric (% of Social Work Data Protection Subject Access Requests completed within required timescale, initially within 30 days) does not accurately reflect the productivity of the team. The KPI only refers to cases received in the period that were processed on time, but until the team can prioritise new cases over older cases this KPI will continue to be under target.

4.5.3 Age profile snapshots from November 2025, February 2026 and May 2026 evidence the progress made across the areas the team is focussed on. In November 2025, the four oldest cases were over 24 months old. In May 2026, the oldest case is between 15 and 18 months old and is in the process of being cleared. All other cases are under 15 months old. In November 2025, there were 94 cases over one year old, by May 2026 there are 12 such cases. In November 2025, there were 992 cases, with 69% of those overdue, and in May 2026 907 cases with 66% overdue In November 2025 there were 93 cases on hold, and by May 2026 this had been reduced to 50 due to improved admin processes.

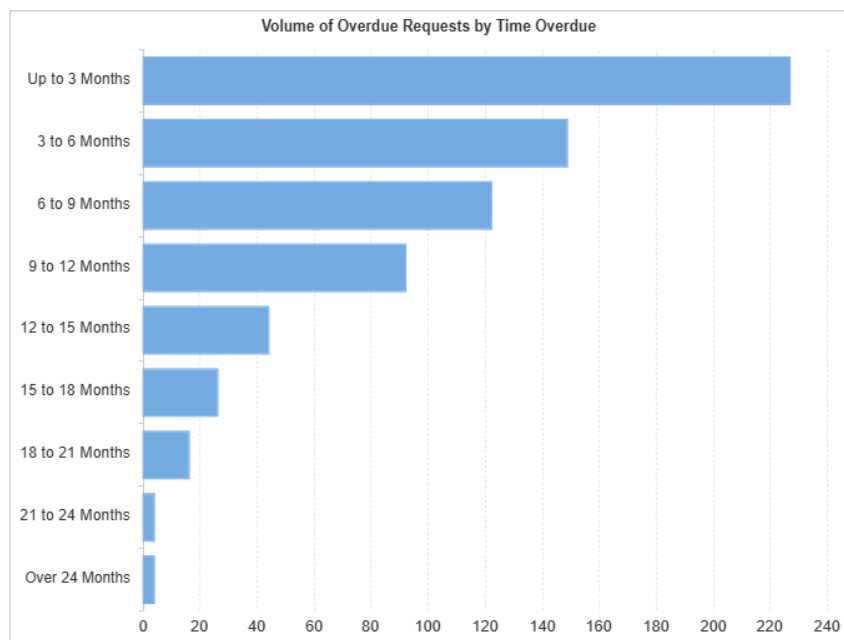
Glasgow City Council Open SAR Age Profile at 25/11/2025 12:05:50

**992**  
Currently Open

Open In SLA 215  
Open Out SLA 684  
On Hold 93

Longest Overdue:  
RQST00007842410  
10/6/2022 3:32:00 PM

Time Overdue	No	%
Up to 3 Months	227	33.2%
3 to 6 Months	149	21.8%
6 to 9 Months	122	17.8%
9 to 12 Months	92	13.5%
12 to 15 Months	44	6.4%
15 to 18 Months	26	3.8%
18 to 21 Months	16	2.3%
21 to 24 Months	4	0.6%
Over 24 Months	4	0.6%
<b>Total Overdue</b>	<b>684</b>	



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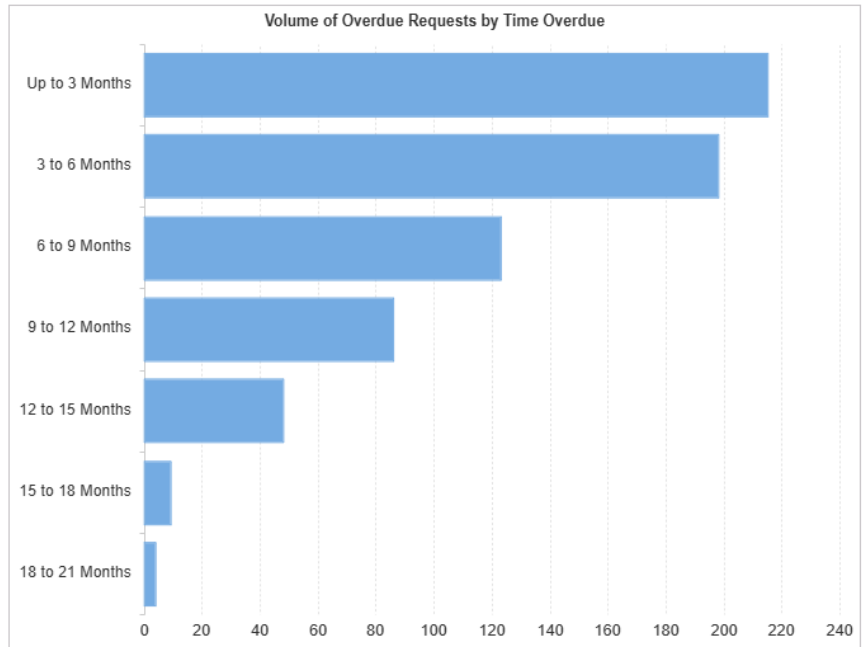
Glasgow City Council Open SAR Age Profile at 04/02/2026 09:34:23

**999**  
Currently Open

Open In SLA **244**  
Open Out SLA **683**  
On Hold **72**

Longest Overdue:  
RQST00008159910  
5/20/2024 12:39:07 PM

Time Overdue	No	%
Up to 3 Months	215	31.5%
3 to 6 Months	198	29.0%
6 to 9 Months	123	18.0%
9 to 12 Months	86	12.6%
12 to 15 Months	48	7.0%
15 to 18 Months	9	1.3%
18 to 21 Months	4	0.6%
<b>Total Overdue</b>	<b>683</b>	



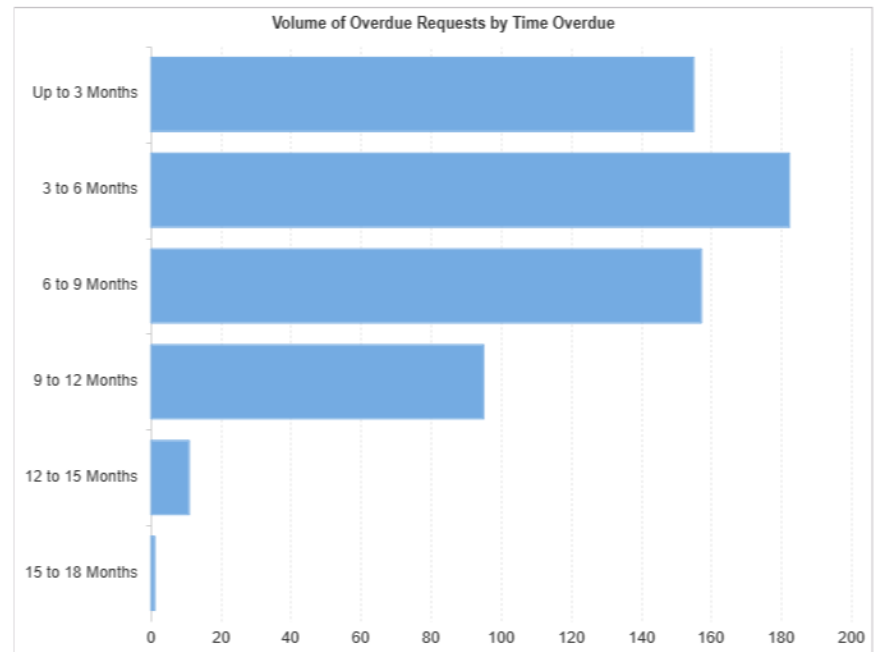
Glasgow City Council Open SAR Age Profile at 13/05/2026 14:08:58

**907**  
Currently Open

Open In SLA **256**  
Open Out SLA **601**  
On Hold **50**

Longest Overdue:  
RQST00008293704  
1/30/2025 3:59:20 PM

Time Overdue	No	%
Up to 3 Months	155	25.8%
3 to 6 Months	182	30.3%
6 to 9 Months	157	26.1%
9 to 12 Months	95	15.8%
12 to 15 Months	11	1.8%
15 to 18 Months	1	0.2%
<b>Total Overdue</b>	<b>601</b>	



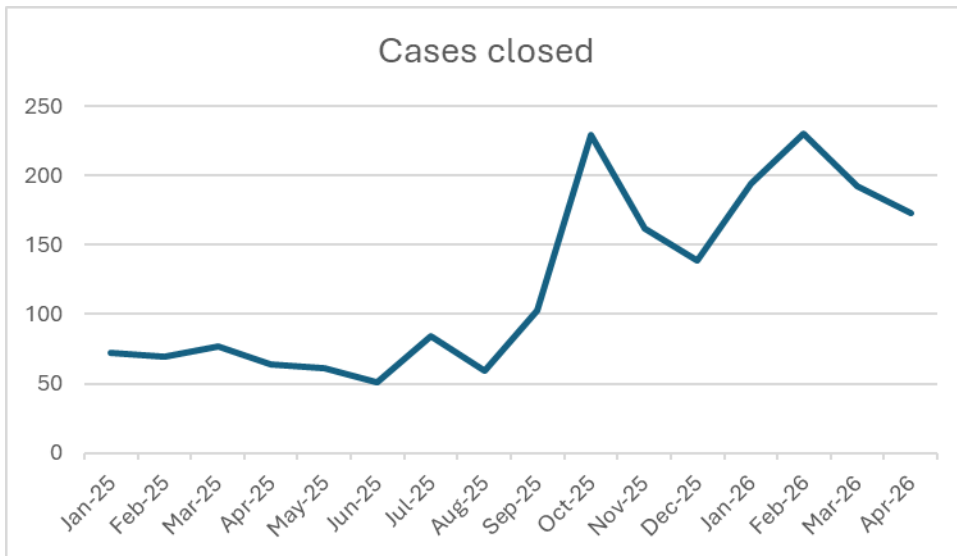
4.5.4 Whilst Subject Access Officers are being tasked with clearing the longest-standing SARs as a priority, additional work is also being undertaken to address urgent requests and to identify and clear minor requests at the earliest possible opportunity to reduce complaint activity related to delays.

## 4.6 Case Closures

4.6.1 Case closures have risen dramatically since additional staff joined CFIT in August 2025, with a particular peak in October 2025 due to increased admin resource allowing for the closure of a high volume of cases for which information had been found to have been held.

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4.6.2 There is, however, an inconsistency to the case closure figures from month-to-month for a variety of reasons - cases can vary wildly in size and complexity, and so the number of case closures may not necessarily directly reflect the efforts of the team in any given period. Regardless, the dramatic increase in case closures is still a significant indicator of the increased output of the team.



4.8 Pages Processed

4.8.1 In addition to the recording of case closures, the team also tracks the volume of pages processed. This particular metric provides a more accurate picture of the output of the team. Some cases only amount to a handful of pages, but the average size of a record is in excess of 500 pages, and the largest cases processed by the team are in excess of 10,000 pages of text. Documentation must be reviewed page-by-page and line-by-line, and so the largest cases can take over two months to complete.

4.8.2 As with case closures, figures describing pages processed per month have increased dramatically since August 2025 and where approximately 15,000 pages per month were being processed in early 2025, by May 2026 the team are consistently clearing over 50,000 pages per month.



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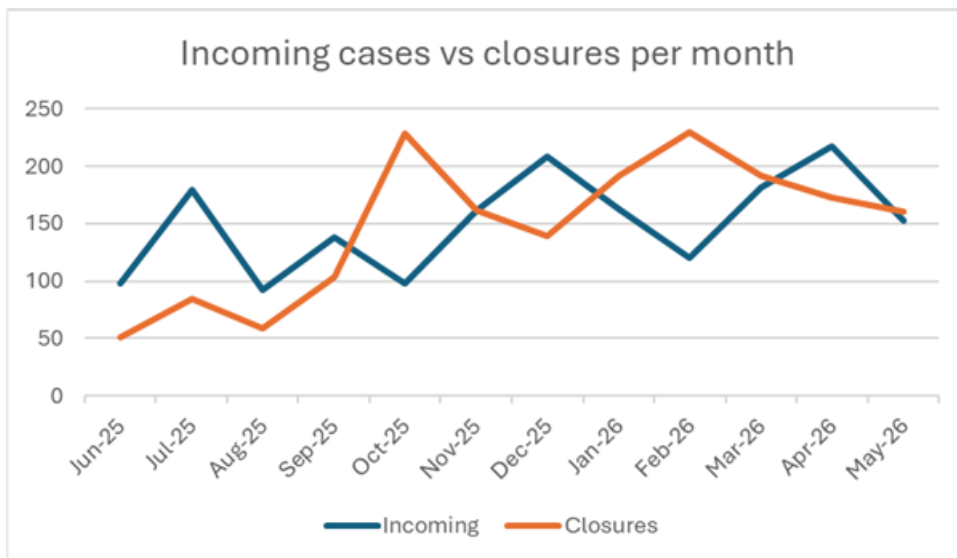
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### 4.9 Cases received versus case closures per month

4.9.1 Despite the progress achieved in terms of increasing the output of the team, reducing the backlog (particularly of our oldest cases) and improving processes, demand has also continued to increase beyond expectations in early 2026.

4.9.2 Incoming requests for April 2026, the latest complete month, were (at 217 received) the highest ever received in a single month, and 58% higher than the average for 25/26. The team are also seeing a general trend upwards in terms of the average number of pages per SAR, with the average sizes for 2026 to date as follows:

- January – 534 pages per SAR
- February – 466 pages per SAR
- March – 635 pages per SAR
- April – 631 pages per SAR
- May to date – 957 pages per SAR

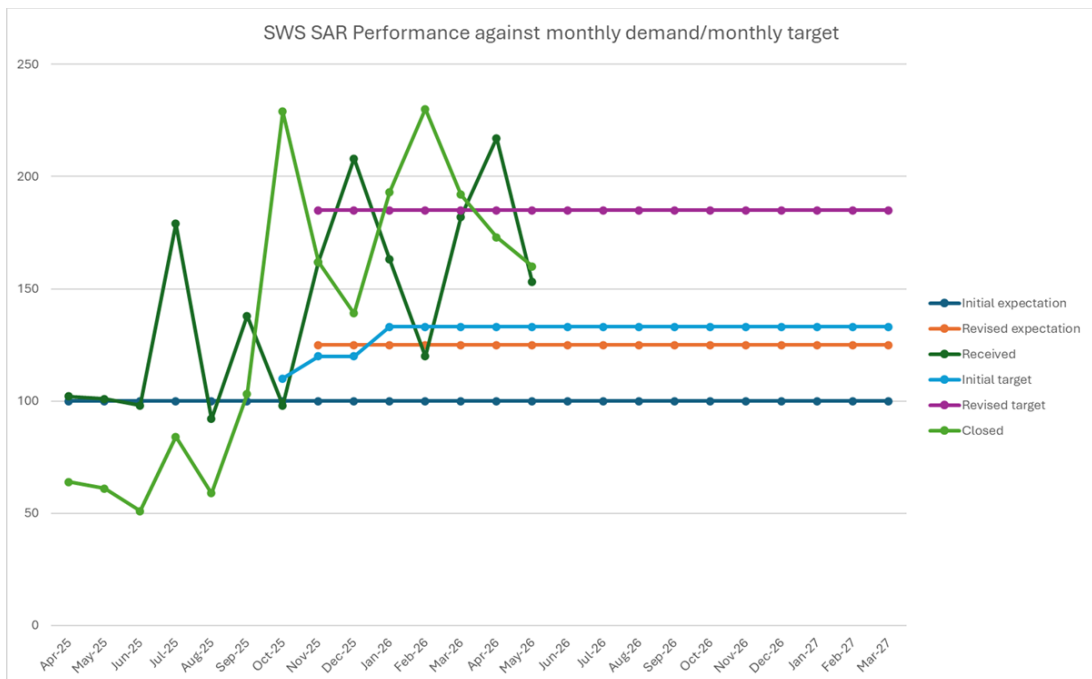
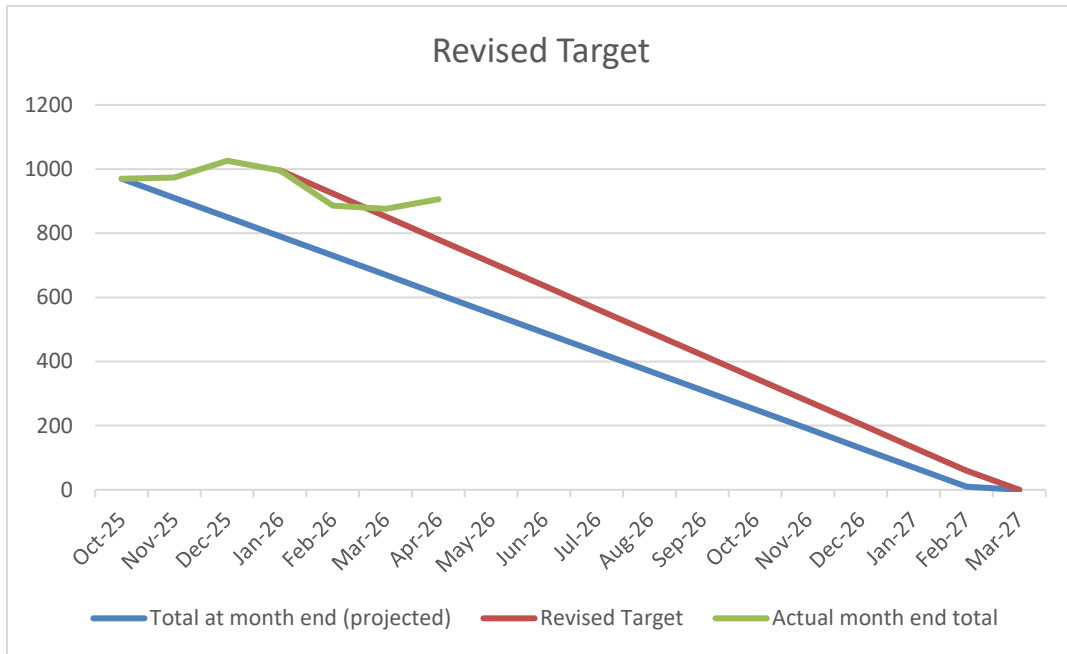


4.10 In addition to the KPIs reported quarterly, there are internal targets based around the requirement to have resolved the backlog by the end of March 2027. Given recent demand, the team have been unable to meet target for the past two months and should demand remain as high as at present (or increase further) then it will be increasingly challenging to meet target.

4.11 It has been identified that increasing demand is primarily driven by a small number of solicitors' firms based in England, who are actively looking to attract casework in this area through social media marketing. While this has resulted in a significant increase in demand, it may be that many of the requests received have only tenuous links to Glasgow and may therefore result in nil-return responses in many cases.

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4.12 Redress Scotland have recently introduced new guidance which, in contrast to previous requirements, now states that a full SAR from a local authority is not required as evidence to support any Redress applications. They have now advised that a chronology of care will be considered sufficient for either fixed rate or individually assessed payment applications. CFIT are therefore looking to reduce the number of SARs where they are no longer likely to be necessary by requesting that applicants withdraw SARs if they are not required. While some applicants may still wish to proceed with their SARs for other reasons, and yet others will have SARs that do not relate to Redress applications, it is hoped that a reduction both in SAR demand and the volume of outstanding cases will follow this amended requirement.



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**5. Recommendations**

5.1. The IJB Finance, Audit and Scrutiny Committee is asked to:

- a) Note the contents of the report;
- b) Note the steps which have been taken to reduce the backlog of Subject Access Requests and the data gathered to support activity; and
- c) Consider how progress is to be shared with Committee moving forward, including consideration of data to be provided as part of the quarterly performance report.