Financial Reporting Council (FRC) software solution for handling complaints and Freedom of Information Act (FOIA) requests

Summary

The Financial Reporting Council (FRC) is seeking to implement a software solution in order to handle its complaints and Freedom of Information Act (FOIA) requests efficiently and effectively.

Background

The FRC is the UK regulator for auditors, accountants and actuaries. We set the UK's Corporate Governance and Stewardship Codes and promote transparency and integrity in business. Our work is aimed at investors and others who rely on company reports, audit and high-quality risk management.

In the course of undertaking our work, the FRC may receive complaints from members of the public about the conduct of its regulated entities. These complaints are often complex and may involve the collection of large volumes of written material, ranging from emails to procedures and other documentation. We need to be able to collect and sort this material, remove duplications and annotate documents. We also need to be able to track complaints and ensure we respond to complainants in a timely manner.

The FRC is also a public body which is subject to the Freedom of Information Act 2000 (FOIA) in relation to its functions under Part 42 of the Companies Act 2006. Members of the public have a statutory right to request information from us. The FRC has 20 working days in which to decide whether information should be disclosed and to respond to the requester. The FRC may withhold information when it is not within scope of its current obligations, or where it is exempted from disclosure under the FOIA and it is therefore appropriate to redact certain extracts.

In order to meet its obligations under the FOIA, the FRC must be able to collect information effectively and efficiently, ensuring that we have captured all written records which are potentially in scope of the request. Where it is not appropriate under the Act to disclose certain information, the FRC may need to redact those extracts and audit the relevant statutory exemption in relation to each extraction for its internal records. Finally, we must be able to track requests and ensure that we respond within the statutory deadlines.

Software specification

The new software solution will need to have the following functionality:

<u>Complaints handling system</u>

1. A complaints handling system enabling us to manage and review complaints and provide responses to complainants. We need the ability, in particular, to:

- Download, save and review complaints submitted online to the FRC website;
- Download emails and documents from other teams (and documents attached to the online submission form) for saving in a case or matter folder for review;
- Sort and organize downloaded emails and documents into, for example, date order;
- Identify and remove duplications;

- Add annotations, either to or alongside, saved document or emails without amending the document itself;
- Log and track incoming complaints including, for example, the complainant, the date of the complaint, the acknowledgement sent to the complainant, allocation of the case to a team, further acknowledgement (if needed), deadline(s) for responding, the date of the response, the outcome of complaint, recommendations and next steps, follow up, trends and patterns;
- Have a minimum of three alerts and reminders for two sets of acknowledgements and one response deadline;
- Search our log and records to allow searching for duplicate requests/requesters.

FOIA request handling system

2. An FOIA request handling system enabling us to manage and review requests and provide responses to requesters. We need all of the functionality as set out for the complaints system above, as well as the added ability to:

- Send links to a case or matter folder for teams to download relevant emails and documents;
- Redact documents and emails. Redaction should enable us to:
    - Highlight and select text for redaction
    - Annotate in each case the reason for the redaction; and
    - Create duplicates with 'clean' redaction (ie without visible comment/justification)
- Calculate automatically the applicable deadline (ie 20 working days from the date of receipt of the request) and diarise this deadline with automatic reminders to follow up.

3. There should be separate staff access for the complaints aspect of the system and the FOIA aspect of the system.

The FRC welcomes software proposals which meet the specifications above.