



ONCHAN DISTRICT COMMISSIONERS

CODE OF PRACTICE FOR THE PROACTIVE PUBLICATION OF INFORMATION

Date: October 2026
Review: October 2027



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Policy Review - History:

Please be aware that a hard copy of this document may not be the latest available version, which is available in the Authority's document management system, and which supersedes all previous versions.

Those to whom this Code applies are responsible for familiarising themselves periodically with the latest version and for complying with code requirements at all times.

Effective from:	Replaces:	Originator:	Page X of Y
5 th October 2026	None (new Code)	Chief Executive/Clerk	1 to 12
Board Ratification: 5 th October 2026			

History or Most Recent Policy Changes		
Version:	Date:	Change:
1	5 th October 2026	New Code of Practice

1. SCOPE

This Code of Practice applies to all information held by Onchan District Commissioners (“the Authority”) in the exercise of its statutory functions. It applies to the Board, its Committees (such as the Health and Safety Committee), and to all employees of the Authority, and covers information published via the Authority’s website, social media channels and notice boards, or made available for inspection where online publication is not practicable.

This Code does not apply to joint committees on which the Authority is represented, as the publication of information relating to those bodies is governed by the arrangements and responsibilities of the relevant joint committee.

2. POLICY

The Authority resolved to create and formally adopt a Code of Practice for the Proactive Publication of Information at the meeting of the Board of Commissioners held on 1st June 2026.

The Authority already publishes a significant amount of information consistent with good practice; this Code recognises that practice as a benchmark, assesses it against the models referenced in Section 6 below, and identifies and addresses any gaps.

3. PURPOSE

The purpose of this Code is to guide the Authority as to what information it should routinely publish, what should be redacted or withheld, and how and where information should be made available, so as to:

- reduce reliance on Freedom of Information requests as a source of information, and the officer time taken to process them;
- improve the transparency and accountability of the Authority’s processes;
- highlight the rationale and reasoning for policy decisions; and
- encourage greater and more meaningful participation by members of the public and stakeholders, by showing current issues and the options considered to address them.

In doing so, this Code gives practical effect to the Nolan Principles of Public Life, in particular the principles of Openness and Accountability.

4. BACKGROUND AND LEGAL CONTEXT

Following the passing of the Freedom of Information Act 2015, members of the public may submit requests for information to Local Authorities, provided that information is not exempt. This Code should be read alongside Section 10 of the Freedom of Information Act 2015 Code of Practice, which provides further guidance on the proactive release of information by public authorities.

This Code has been developed with reference to two established good-practice frameworks, neither of which imposes additional statutory obligations on the Authority:

- the draft Isle of Man Government Proactive Publication of Releases: Code of Practice for Public Sector Authorities (July 2022) which, although not formally

- adopted by Isle of Man Government at the date of this Code, is recommended by Motion 81 as the basis for the Authority's own Code; and
- the UK Information Commissioner's Office (ICO) Model Publication Scheme for Parish and Community Councils which, although developed for public authorities subject to the UK Freedom of Information Act 2000 and not directly applicable to the Isle of Man, has been used by the Authority since 2021 as a good-practice framework for its website disclosure programme.

The Authority's processing of personal data is governed by the Data Protection Act 2018 and the GDPR and LED Implementing Regulations 2018 (together, the Isle of Man's applied data protection legislation), overseen by the Isle of Man Information Commissioner.

5. PRINCIPLES OF INFORMATION RELEASE

Before publishing information, the Authority will consider whether release is in the public interest, and whether any of the following considerations apply. In determining whether information is suitable for proactive publication, the Authority will have regard to whether disclosure would:

- harm the economic, commercial, external or security interests of the Authority or the Island;
- jeopardise the candour of debate on policy decisions, or relate to ongoing policy deliberations;
- prejudice legal proceedings, relate to ongoing legal proceedings, or breach legal professional privilege;
- endanger the life or safety of any person, or disrupt public order;
- increase the likelihood of damage to the environment, protected species or their habitats; or
- be premature, where an announcement on the matter is already planned.

These considerations broadly mirror the qualified exemptions in the Freedom of Information Act 2015, which apply where a specific request for information is made under that Act.

The fact that information is not considered suitable for proactive publication does not of itself determine whether that information would be disclosed in response to a request under the Freedom of Information Act 2015. Any such request will be considered separately in accordance with the Act and the Authority's Freedom of Information guidance and procedures.

6. WHAT WE PUBLISH

Published information is organised into the seven classes below. Within each class, the Authority will publish information relating to its current and previous financial or municipal year as a minimum, unless a longer period is indicated. Publication remains subject in all cases to Sections 5, 7 and 12 of this Code and to any applicable legal restrictions.

Class 1 - Authority Description

The objective of Class 1 documentation is to provide members of the public with a clear understanding of the Authority's structure, aims and duties.

Information Published	Detail / Examples	Format	Review
Structure of the Authority, Board and Committees	Structure of the Board, Lead Board Member portfolios and any Committees, including Terms of Reference.	Website	Annually / on change
Names and contact details	Board Members and key officers, with named contacts, telephone numbers and email addresses where possible	Website	On change
Location of offices and accessibility	Location of the main Commissioners' Office and accessibility arrangements	Website / Notice boards	On change
Staffing structure	Organisational chart (organogram)	Website	Annually / on change
Contact details for complaints and information requests	How to make a complaint, report a concern, or request information	Website	On change

Class 2 - Financial Accountability

The Authority's annual accounts are presented to Tynwald, but this information is often difficult to locate. The Authority will therefore also publish financial information directly.

Information Published	Detail / Examples	Format	Review
Statement of Accounts	Audited financial statements, including fixed asset information	Website (PDF)	Annually
Auditor's report	Independent auditor's report, included within the audited financial statements	Website (PDF)	Annually
Budget	Finalised annual budget and budget allocation across the organisation	Website (PDF)	Annually
Quarterly financial monitoring	Quarterly accounts considered by the Board (July / October / January / April)	Board agenda and minutes	Quarterly
Borrowing, capital funding and significant approvals	Approved borrowing, capital funding plans and significant capital commitments, where applicable	Board minutes	As they arise
Financial Regulations and Standing Orders	Approved financial regulations and relevant financial provisions within Standing Orders	Website (PDF)	Annually / on change
Grants and funding	Grants given or received, applications for significant external funding and other material funding decisions	Board agenda and minutes	As they arise
Contracts and procurement	Significant contract and procurement decisions, including tender awards and approved exemptions from normal procurement requirements, where appropriate	Board agendas and minutes/Website	As they arise
Board Members' allowances and expenses	Reported to the relevant Local Government Unit and published on the website	Website	Annually

Class 3 - Priorities and Progress

Class 3 documents provide members of the public with an understanding of the Authority's strategic priorities, its corporate plans, and how it is performing against them.

Information Published	Detail / Examples	Format	Review
Mission, corporate plans and strategies	Mission statement, strategic objectives and plans (e.g. Road Map)	Website	Annually
Annual reports and performance information	Annual or periodic performance information, where produced	Website	As produced
Significant external reports and reviews	Material reports or findings arising from external reviews, inspections or assessments of the Authority's services or assets (e.g. structural or condition reports), where appropriate for publication	Website / Board agendas and minutes	As they arise
Maintenance and improvement programmes	Planned maintenance and improvement programmes for the Authority's assets and	Website	As they arise

	services (e.g. housing stock, parks and open spaces, or highway-related works)		
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Class 4 - The Decision Making Process

Class 4 documents provide context around policy decisions and highlight issues currently under consideration.

Information Published	Detail / Examples	Format	Review
Meeting Timetables	Authority, Committee, Sub-Committee and Parish meetings	Website / Notice Boards	Annually / on change
Agendas	Published ahead of meetings, with attachments in PDF format	Website/Facebook	Before each meeting
Minutes	Published after meetings, excluding information properly regarded as private or exempt	Website/Facebook	After each meeting
Reports considered by the Board	Reports presented to Board/Committee meetings, excluding exempt items	Included in agendas, decisions recorded in minutes	Ongoing
Public consultations and engagement	Consultation papers issued and the Authority's responses to external consultations	Website / included in agenda and minutes	As they arise
Planning application responses	The Authority's responses to planning applications on which it is consulted	Included in agenda and minutes	As they arise
Byelaws	Onchan District Byelaws currently in force (e.g. dog control, parking)	Website (PDF)	On approval / on change
Externally commissioned reports	Reports commissioned from external consultants or auditors, once considered appropriately by the Board	Website (PDF) or on request	As commissioned
Monitoring of policy decisions	Progress updates against significant Board decisions and KPIs	Board reports	Periodically

Class 5 - Policies and Procedures

Current policies and procedures are made available on the Authority's website.

Information Published	Detail / Examples	Format	Review
Governance policies	Procedural Standing Orders; Corporate Governance Principles and Code of Conduct; and any approved scheme or record of delegated authority	Website (PDF)	On approval / on change
Human Resources and staff policies	Equality, Diversity and Inclusion; Health and Safety; Shared Parental Leave; Hybrid/Remote Working, Bullying and Harassment and Victimisation; Secondary Employment and Business Interests Policy; and other approved employment policies suitable for publication	Website (PDF), subject to redaction of personal data	On approval / on change
Information governance policies	Data Protection Policy; Data Subject Access Requests; Data Subject Rights; Document Retention Schedule and Disposal Policy and associated Retention Schedule; Internet and Email Policy and Procedures; and Freedom of Information guidance and procedures	Website (PDF)	Annually / on change
Complaints Policy and Procedure	Covering requests for information and operation of this Code, with statutory timescales	Website (PDF)	On approval / on change
Service delivery policies	Customer Service Standards and other policies relating to service delivery	Website (PDF)	On approval / on change

Other policies and procedures	Other approved Authority policies and procedures suitable for publication	Website (PDF)	On approval / on change
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Class 6 - Lists and Registers

Class 6 provides members of the public with access to key lists, registers and recorded information maintained or published by the Authority.

Information Published	Detail / Examples	Format	Review
Fixed Asset information	Fixed asset information contained within the Statement of Accounts	Website (PDF)	Annually
Disclosure Log	Anonymised record of information provided in response to Freedom of Information requests, where appropriate	Website or on request	Periodically
Register of Board Members' Interests	Declarations of Board Members' interests	Website / office, subject to statutory limits on personal data	Annually / on change

Class 7 - Services We Offer

Class 7 documents provide members of the public with information about the services and facilities the Authority offers, including how to access them.

Information Published	Detail / Examples	Format	Review
Parks, playing fields and recreational facilities	Including open spaces and glens	Website	As updated
Community centres and village halls	Hall hire information	Website	As updated
Public conveniences	Locations and opening arrangements	Website	As updated
Markets and regular events	Details of weekly and seasonal events	Website	As updated
Chargeable services	Information on services for which the Authority makes a charge, including applicable fees or charges where appropriate	Website/on request	On change
Housing services	Social housing and related housing services	Website	As updated
Waste and environmental services	Refuse collection, Eastern Civic Amenity Site, and related services	Website	As updated
Street lighting and cleaning	Street lighting and street cleaning services and information	Website	As updated
Building Control	Building Control services and guidance	Website	As updated
Library services	Onchan Library services and facilities	Website	As updated
Additional information	Any other information the Authority chooses to publish that is not itemised in the classes above	Website	As available

7. DATA PROTECTION AND REDACTION

All information must be reviewed for compliance with the Isle of Man's applied data protection legislation before publication. Personal data will only be proactively published where there is a lawful basis for doing so and publication is necessary and proportionate, having regard to the purpose of publication.

Unless publication is required or permitted by law, or is otherwise justified in the public interest and compliant with the Isle of Man's applied data protection legislation, information published under this Code should not include:

- personal information, including a person's name, age, address, contact details, ethnicity, marital status or family members (other than named Board Members and officers acting in their official capacity);
- a person's opinions or beliefs, including political opinions, religion or sexual orientation;
- personal identification numbers, including medical or tax numbers and records;
- information about a named individual's income, salary or financial interests; or
- a person's membership of any political group, trade union or similar body.

Documents will be reviewed and redacted as necessary before publication. For full guidance on redaction, officers should consult the Code of Practice on Access to Government Information, the Authority's Data Protection Policy, or the Office of the Information Commissioner (ask@inforights.im).

The Authority is registered as a data controller with the Isle of Man Information Commissioner. Questions about this section should be directed to Impact Professional Services as the Authority's Data Protection Officer or lead.

8. ACCESSIBILITY OF INFORMATION

Proactive publication is only effective if members of the public can actually find and use the information made available; this section sets out how the Authority will keep published information accessible to as wide an audience as possible.

- The Authority will maintain a digital presence sufficient to provide ease of public access to documents and information, primarily via www.onchan.org.im.
- Documents will be published in commonly accessible formats (typically PDF), with alternative formats provided on reasonable request, for example for members of the public with visual impairments.
- Opportunities will be made available for those who are not digitally literate, with physical copies accessible at the Authority's offices where practicable.
- Where information covered by this Code is not published online, the Authority will provide clear details of how it may be accessed or inspected.

9. PUBLISHING, INDEXING AND CHARGING

The Authority will maintain a clear and accessible index of published information relevant to the organisation, so that members of the public can quickly identify what they are looking for. The index may link to information already available from a number of sources, as well as to material the Authority publishes directly.

- The majority of information covered by this Code will be available free of charge via the Authority's website.
- Where a charge applies, details of the charge will be made clear in the relevant service information or otherwise made available on request.
- Where relevant, the Authority will make clear any copyright position or licensing terms applying to published material, and the period for which information will remain available.

10. CONTINUAL MONITORING AND REVIEW

Continual monitoring of information already published, and of information that may become suitable for publication in future, is an integral part of this Code. The Authority will adopt the following good practice:

- setting review dates as part of the approval process for new information;
- maintaining a schedule of information due for publication;
- training and encouraging officers to consider publication as they prepare information (“thinking FOI” as they write, and marking material for redaction at the point of drafting);
- treating the decision to publish new information as a deliberate step whenever that information is approved; and
- incorporating checks on this Code into the Authority's records management procedures and document review cycles.

11. ROLES AND RESPONSIBILITIES

11.1 Board

The Board is responsible for:

- approving this Code and any material amendments to it;
- supporting the Authority's commitment to proactive publication and transparency; and
- receiving an annual report on compliance with this Code.

11.2 Chief Executive/Clerk

The Chief Executive/Clerk is responsible for:

- overall ownership and implementation of this Code;
- co-ordinating compliance across the Authority;
- ensuring that appropriate arrangements are in place for the review and publication of information;
- approving information for publication, or ensuring that it has been approved by another authorised officer, before it is placed in the public domain;
- consulting the Authority's Data Protection Officer before publication where a document contains personal data;
- resolving or escalating any significant gaps in compliance; and
- reporting to the Board on compliance at least annually.

11.3 Heads of Department

Heads of Department are responsible for:

- identifying information within their areas that should be considered for proactive publication;
- ensuring that information provided for publication is accurate, current and complete;
- reviewing published information relating to their areas in accordance with the review periods set out in this Code; and
- identifying information that may require redaction or further consideration before publication.

11.4 Officer(s) Responsible for the Website

The officer(s) responsible for maintaining the Authority's website are responsible for:

- publishing information approved for publication;
- ensuring that published information is presented in an accessible and appropriate format;
- maintaining and updating published information as required; and

- bringing any technical, accessibility or website-related issues affecting publication to the attention of the relevant Head of Department or the Chief Executive/Clerk.

12. CONFIDENTIALITY AND EXEMPT INFORMATION

Nothing in this Code requires the Authority to publish information that is confidential or exempt from disclosure, including but not limited to:

- personal data protected under the Isle of Man's applied data protection legislation;
- information properly regarded as private to a meeting, for example matters considered in a closed or confidential session;
- information that is legally privileged, commercially sensitive, or otherwise exempt under the Authority's Freedom of Information guidance and procedures.

All information will be reviewed prior to publication in line with Section 7. Where information is withheld, the Authority will, so far as practicable, indicate that a category of information exists and explain the basis on which it is withheld.

13. BREACHES OF THIS CODE

As this Code represents a voluntary commitment by the Authority rather than a statutory publication scheme, an isolated failure to publish information in accordance with the Code will normally be addressed through corrective action. Nothing in this section prevents action being taken under another Authority policy where the circumstances independently warrant it. However:

- persistent or significant failure to publish information in line with this Code should be raised with the Chief Executive/Clerk for corrective action;
- any disclosure made in breach of Section 7 (Data Protection and Redaction) will be managed as a data protection incident under the Authority's Data Protection Policy and reported as required to the Isle of Man Information Commissioner within the timescale set out in Appendix B; and
- any request for information that this Code does not already cover will continue to be handled under the Authority's guidance and procedures.

14. REVIEW

This Code will be reviewed by the Chief Executive/Clerk at least annually, and reported to the Board, or sooner if there is a material change in legislation, in Isle of Man Government's own (currently unadopted) Code, or in the ICO Model Publication Scheme on which it is based.

15. RELATED DOCUMENTS

- Complaints Policy and Procedure
- Data Protection Policy
- Freedom of Information guidance and procedures
- Document Retention Schedule and Disposal Policy

FREEDOM OF INFORMATION PRE-PUBLISHING CHECKLIST*For completion before approving any document for website upload.***Document title:** _____

Check	Requirement	✓
1. Publication Class and Retention	The document has been allocated to the appropriate publication class (Classes 1–7).	☐
	The information falls within the publication period required by the Code (current and previous financial or municipal year as a minimum, unless a longer period is specified).	☐
2. Data Protection and Redaction	The document has been checked for personal data and any necessary redactions have been made in accordance with Section 7.	☐
	Names, ages, home addresses and personal contact details have been removed where required (excluding named Board Members/officers acting in an official capacity).	☐
	Personal opinions or beliefs, including political opinions, religion or sexual orientation, have been removed where required.	☐
	Personal identification numbers and records, including medical or tax information, have been removed where required.	☐
	Individual income, salary and personal financial interests have been removed where required.	☐
	Trade union, political group or similar membership information has been removed where required.	☐
3. Public Interest and Context	Publication has been considered against Section 5 and will not harm the economic, commercial, external or security interests of the Authority or the Island.	☐
	Publication will not jeopardise the candour of debate on policy decisions or disclose ongoing policy deliberations.	☐
	Publication will not prejudice legal proceedings or breach legal professional privilege.	☐
	Publication will not endanger the life or safety of any person or disrupt public order.	☐
	Publication will not increase the likelihood of damage to the environment, protected species or their habitats.	☐
	Publication is not premature where an announcement on the matter is already planned.	☐
4. Accessibility	The document is in a commonly accessible, readable format (normally PDF).	☐
	Images or scanned material have appropriate accessibility features where required, and an alternative format can be provided on reasonable request.	☐
5. Confidential or Withheld Information	The document has been checked for confidential or exempt information under Section 12.	☐
	Where information is withheld, the Authority has, so far as practicable, indicated that the category of information exists and explained the basis on which it is withheld.	☐

Checked by: _____ **Date:** _____

PUBLICATION DATA INCIDENT REPORTING TEMPLATE

To be initiated immediately by the Website Officer or Head of Department if a publication breach occurs.

1. Incident Overview

Date & Time of Discovery:	
Discovered By (Name & Job Title):	
Live URL where breach occurred:	
Document Title / File Name:	

2. Breach Characterisation (tick all that apply)

☐	Unauthorised publication of personal identifying or contact information (e.g. name, age, home address or personal contact details)
☐	Unauthorised publication of personal characteristics or family information (e.g. ethnicity, marital status or family members)
☐	Unauthorised publication of personal opinions or beliefs (e.g. political opinions, religion or sexual orientation)
☐	Unauthorised publication of personal identification numbers, medical information or records, or tax information
☐	Unauthorised publication of individual income, salary or personal financial interests
☐	Unauthorised publication of trade union, political group or similar membership information
☐	Exposure of private or closed Board/Committee meeting information
☐	Exposure of legally privileged or commercially sensitive information
☐	Other confidential or exempt information:

3. Containment and Remediation Actions

☐	Unpublish file - document taken down from the live website/server
☐	Remove or replace any affected links or copies under the Authority's control
☐	Notify the officer responsible for the website / technical support where required
☐	Preserve a copy of the affected material and relevant records for incident review
☐	Server Cache Cleared - technical team has purged the server cache to prevent recovery
Time taken down / access restricted:	
Immediate action taken / details:	

4. Notification and Escalation

Date Chief Executive/Clerk notified:	
Date Data Protection Officer notified:	
Is notification to the Isle of Man Information Commissioner required? (Yes / No, with reasons):	
Date Isle of Man Information Commissioner notified (must be within 72 hours of becoming aware, where feasible):	
Is notification to affected individuals required because of a likely high risk to their rights? (Yes / No, with reasons and date notified):	