



KEELE UNIVERSITY

FREEDOM OF INFORMATION POLICY

1.0 Introduction

- 1.1. It is a legal requirement under the Freedom of Information (FOI) Act 2000 that the University complies with this legislation.
- 1.2. Keele University is committed to supporting and implementing the Act and this document provides the policy statement and framework through which this compliance is achieved.

2.0 Context

- 2.1. The FOI Act 2000 gives the public a general right to access information held by public authorities, subject to certain conditions and exemptions.
- 2.2. Requests for information can be made by anyone, anywhere and for any reason. The Act applies to both historic and new information held by the University and applies to all information recorded in any format.
- 2.3. The purpose of the FOI Act 2000 is to create a culture of openness across the public sector.
- 2.4. The University endorses and adheres to the principle of public access to official information.

3.0 Scope

- 3.1. This policy applies to all information that is created, received or maintained by staff and students at Keele University and by external partners on behalf of Keele University.
- 3.2. This policy applies to all records of information regardless of format, i.e. both hard copy and electronic records, formal and informal.

4.0 Requirements

- 4.1. The University is required under the FOI Act 2000 to:
 - Maintain a Publication Scheme, which identifies a range of information documents that are routinely and proactively published in the public domain.
 - Provide access to University information which is not otherwise published on receipt of a written request, stating the name and address of the requestor and describing the information required
 - Inform the requestor in writing whether we hold the information requested and, where applicable, to communicate that information to them within 20 working days, subject to any exemption or fees
 - Where information is exempt from disclosure, to send the requestor a notice which specifies and explains the reason why
 - If a fee is chargeable, to send the requestor a fees notice, stating the amount required
 - To provide advice and assistance, as far as is reasonably possible, to anyone seeking information from the University.
- 4.2. The University will ensure that robust systems for the management of University records and information are in place, including maintaining a

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Records disposal schedule setting out retention and disposal periods for records.

- 4.3. The University will provide guidance documents to staff, students and members of the public on relevant aspects of the FOI Act 2000.

5.0 Roles and Responsibilities

- 5.1. It is the responsibility of all members of Keele University to comply with this policy and the FOI legislation by consulting with the Governance Team. This includes staff, students and those who are contracted to the University for a particular service or research project.
- 5.2. The Governance Team are responsible for ensuring that the University has sufficient policies, guidance and training available in order for the University to comply with the Freedom of Information Act legislation.
- 5.3. Senior Management are responsible for ensuring that staff within their areas are made aware of the existence and contents of this policy and that staff in their areas comply with requests for information from the Governance Team in response to requests for information.

6.0 Publication Scheme

- 6.1. The Publication Scheme specifies:
- What information the University will make available to the public as a matter of course
 - When information becomes obsolete or suspended that the information is removed or replaced
 - Whether this information will be made available free of charge or on payment of a fee
- 6.2. The Publication Scheme shall be reviewed annually by the Governance Team in accordance with University policies to ensure that:
- When new information is produced by the University, details are incorporated into the scheme
 - When information becomes obsolete or suspended that the information is removed or replaced
 - Contact details of key staff or teams are accurate and data is accessible.

7.0 Requests for Information

- 7.1. Information not available via the publication scheme will generally be accessible through written requests for information which may be submitted in any format to any member of staff. Oral requests are not acceptable.
- 7.2. Requests for information do not need to make direct reference to the Freedom of Information Act, but they must describe clearly the information being sought.
- 7.3. Applicants who submit a request have the right to be informed whether the information is held, a right to receive the information (subject to exemptions) and the right to appeal non disclosures and to request internal reviews

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- 7.4. Applicants who submit a request do not need to give a reason for their request nor proof of identity. A valid name and correspondence address is required with all requests. (This can be either electronic or postal)
- 7.5. All requests for information that are outside of normal working practice* will be dealt with by the Governance Team. Requests for information received by staff should be forwarded immediately to the Governance Team.
- 7.6. Valid requests shall be dealt with within 20 working days of receipt, unless there is a requirement for the applicant to provide further clarification or the payment of fees, in which circumstances the 20 working days will re-start once the further clarification or fee has been received.

8.0 Exemptions

- 8.1. Some information is exempt from disclosure under the FOI Act and so does not need to be provided. Where information is exempt from disclosure, the University will:
- Where the exemption allows, state whether the information is held
 - Give details of the reasons why the information has been withheld
 - Explain which sections of the FOI Act details the exemption used to withhold the information
 - Inform the applicant of their right to appeal the decision, initially to the FOI Officer, then subsequently to the Secretary of the University Council ultimately, if still unsatisfied, to the Information Commissioners Office.
- 8.2. There are 23 exemptions under the Act. Many of the exemptions may only be applied if the public interest in withholding the information is greater than the public interest in releasing it; these are referred to as qualified exemptions. Some exemptions are automatic, such as personal information and these are referred to as absolute exemptions.

9.0 Charges and Fees

- 9.1. Unless otherwise specified, information made available through the Publication Scheme will be free of charge
- 9.2. In cases where it is appropriate to provide information in hard copy format, we may charge to cover the photocopying costs only if the documents in question exceed 50 sheets of A4 paper. This is charged at 10p per sheet plus postage and packaging.
- 9.3. If the costs of obtaining information exceed reasonable limits (as set out by the Fees Regulations, currently £450 or about 2.5 days of staff time), the University will alert the applicant and attempt to refine the request to as to reduce the potential retrieval cost. Where this is not possible, the University may pass on the cost to the applicant. In this instance, the University will issue an official invoice based on our estimate of costs and will undertake

* Examples of normal working practice would be requests for prospectuses or copies of documents that would normally be undertaken as part of day to day working.

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retrieval after payment of the costs. In extreme circumstances, the University may still exercise the right of exemption of the information through disproportionate effort.

10.0 Appeals and Complaints

- 10.1. If an applicant is dissatisfied with the outcome of a request, or the manner in which it was handled, applicants have the right to appeal to the FOI Officer. Receipt of the appeal shall be acknowledged and a comprehensive reply will be provided within 14 working days.
- 10.2. If the applicant is still dissatisfied, applicants have the right to complain to the Secretary of the University Council for review. Receipt of the complaint will be acknowledged and a comprehensive reply provided within 14 working days.
- 10.3. If a complainant remains dissatisfied with the outcome of their complaint, they may see an independent review from the Information Commissioner's Office (ICO), which is the independent body responsible for overseeing the act. The ICO can be contacted using the following address:

Information Commissioner's Office

Wycliffe House
Wilmslow
Cheshire
SK9 5AF

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