

FREEDOM OF INFORMATION POLICY

Policy owner:	University Secretary
Approver (Date):	University Executive Board - 14 October 2025
Review due date:	September 2027
Current Version and update history:	v1.1 v1.0 Approved by Council, 28 June 2010
Document Type:	Strategic Policy
Classification:	Public

Freedom of Information Policy

Contents

1.	Introduction	2
2.	Scope of Policy	2
3.	Responsibilities	3
4.	Policy Statement	3
5.	Exemptions	3
6.	Internal Review and Appeals	4
7.	Publication Scheme	4
8.	Review of Policy	5
9.	Relationships with Existing Policies	5
10.	Reporting	5

1. Introduction

- 1.1 The Freedom of Information Act 2000 (the Act) is intended to foster a culture of openness and transparency in public authorities, including Universities. The Act establishes a general right of access to all types of recorded information, subject to exemptions, and imposes obligations on the University to disclose information upon request.
- 1.2 The University also recognises its obligation under the Environmental Information Regulations 2004 (EIR) and under the UK General Data Protection Regulations (UK GDPR) and the Data Protection Act 2018. Requests for information will therefore be considered under the appropriate legislative framework.
- 1.3 The University has adopted the Information Commissioner's Office (ICO) Model Publication Scheme for Higher Education.

2 Scope of Policy

- 2.1 This policy applies to all the recorded information created, received and maintained by the University in the course of its work, regardless of format or medium. This Policy also applies to information held by University-controlled companies, subsidiaries, and joint ventures where the University exercises significant control.
- 2.2 Information held by third parties on behalf of the University is also in scope.
- 2.3 Information held solely by the Roehampton Students' Union or by the Colleges is not in scope of this Policy.

3 Responsibilities

- 3.1 Information Governance Manager: The University has appointed an Information Governance Manager to oversee FOI compliance, coordinate responses to requests, apply exemptions where appropriate, and advise departments.
- 3.2 Departments and Colleges: Responsible for supplying information promptly to the Information Governance Manager and for assisting in the application of exemptions.
- 3.3 All Staff: Required to forward any FOI or EIR request immediately to the Information Governance Manager and to comply with this policy and associated procedures.
- 3.4 University Secretary: Holds overall responsibility for ensuring institutional compliance and may act as the reviewer in internal review cases.
- 3.5 Where specific job titles are referred to in this policy, the individuals concerned may delegate their responsibilities to a nominee.

4 Policy Statement

- 4.1 The University upholds the principles of openness, accountability, and integrity in line with the Nolan Principles of Public Life, ensuring that information is managed transparently and accessibly.
- 4.2 The University is committed to:
 - 4.2.1 Promoting a culture of transparency and openness in the management of information.
 - 4.2.2 Ensuring compliance with FOIA, EIR and related legislation.
 - 4.2.3 Responding to all valid requests for information within 20 working days of receipt, subject to permitted extensions.
 - 4.2.4 Applying exemptions only where necessary and in accordance with statutory requirements, including the conduct of a public interest test where required.
 - 4.2.5 Issuing a clear refusal notice when information cannot be disclosed, citing relevant exemptions.
 - 4.2.6 Providing advice and assistance to applicants in line with Section 16 of the Act and ICO guidance.
- 4.3 There are two forms of disclosure placed on public authorities, including universities:
 - 4.3.1 To proactively publish information under a “Publication Scheme”; and
 - 4.3.2 To respond to requests for recorded information held by or on behalf of the University.

5 Publication Scheme

- 5.1 The University proactively publishes information in line with the ICO's Model Publication Scheme for Higher Education. The University is committed to:
- 5.1.1 Regularly reviewing the Publication Scheme to ensure accuracy and relevance.
 - 5.1.2 Making information accessible via the University website wherever possible.
 - 5.1.3 Proactively publishing information to reduce the need for individual FOI requests.

6 Handling FOI requests

- 6.1 A valid FOI request must be in writing, state the name of the applicant and an address for correspondence, and describe the information requested.

7 Exemptions

- 7.1 The University recognises that some information may be exempt from disclosure. Exemptions fall into two categories:
- 7.1.1 Absolute exemptions: Information will not be disclosed under any circumstances (e.g., information accessible by other means).
 - 7.1.2 Qualified exemptions: Require a public interest test to assess whether disclosure outweighs the potential harm of release.
- 7.2 Refusal Notices will provide a clear explanation of the exemptions relied upon and, where applicable, the outcome of the public interest test.

8 Fees

- 8.1 Where a fee is payable under the FOI Fees Regulations 2004, the applicant will be notified within 20 working days. The time allowed for compliance is suspended until payment is received. Requests exceeding the statutory cost limit may be refused.

9 Internal Review and Appeals

- 9.1 Applicants dissatisfied with the University's response may request an internal review. Requests for internal review must normally be made within 40 working days of the University's response.
- 9.2 Internal reviews will be conducted by a senior staff member not involved in the original decision, usually the University Secretary or their nominee. The University aims to complete internal reviews within 20 working days, extendable to 40 working days in complex cases.
- 9.3 If the applicant remains dissatisfied, they may lodge a complaint with the Information Commissioner's Office (ICO); [Make a complaint | ICO](#).

10 Review of Policy

10.1 This policy and supporting procedures will be reviewed regularly to ensure:

- 10.1.1 Continued compliance with legislation and ICO guidance;
- 10.1.2 Effective stakeholder engagement and feedback; and
- 10.1.3 Ongoing alignment with best practice in information governance.

11 Relationships with Existing Policies

11.1 This Policy should be read alongside related University policies and procedures, including the Data Protection Policy.

12 Reporting

12.1 The University will:

- 12.1.1 Submit an annual report on FOIA compliance to the Audit Committee; and
- 12.1.2 co-operate with the Information Commissioner's Office in the event of a complaint.

APPENDIX A: FOIA EXEMPTIONS

The FOIA contains twenty-three exemptions to the general right of access to information. Exemptions fall into two categories:

- Absolute exemptions: the information may be withheld and the public authority is not required to carry out a public interest test
- Qualified exemptions: the public authority is required to carry out a public interest test to balance arguments for and against disclosure.

The exemptions most likely to be relevant to the University are as follows:

Absolute Exemptions

- S.21 Information accessible to applicant by other means
- S.32 Court records
- S.40 Personal data
- S.41 Information provided in confidence
- S.44 Prohibitions on disclosure (information is exempt because its disclosure is prohibited by other laws)

Qualified Exemptions

- S.22 Information intended for future publication
- S.22A Research
- S.31 Law Enforcement
- S.36 Prejudice to effective conduct of public affairs
- S.38 Health and Safety
- S.42 Legal Professional Privilege
- S.43 Commercial Interests