



**UNIVERSITY  
ACADEMY 92**  
MANCHESTER

# **Freedom of Information Policy**

**Implementation date:**

**April 2021**

**Version number:**

**1.1**

|   |                               |                                    |
|---|-------------------------------|------------------------------------|
| <b><u>Document type</u></b>                             |                               | Strategy                           |
|   | ✓                             | Policy                             |
|   |                               | Regulations                        |
|   |                               | Procedure                          |
|   |                               | Code of Practice                   |
|   |                               | Guidance                           |
| <b><u>Area of UA92 business</u></b>                     |                               | Academic                           |
|   |                               | Finance                            |
|   |                               | Governance & Compliance            |
|   |                               | Marketing and Engagement           |
|   |                               | Operations                         |
|   |                               | People                             |
|   |                               | Registry and Quality               |
|   |                               | Student Life                       |
|   |                               | Student Recruitment and Admissions |
|   |                               | External Affairs                   |
|   | Other                         |                                    |
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| <b><u>Author:</u></b>                                   | Registrar and Secretary       |                                    |
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| <b>Equality &amp; Diversity</b>                         |                               |                                    |
| <b>Legal considerations (including Consumer Rights)</b> |                               |                                    |
| <b>Information Governance</b>                           |                               |                                    |
| <b>Students</b>   |                               |                                    |
| <b>Employee Engagement Forum</b>                        |                               |                                    |
| <b>External</b>   |                               |                                    |

| <b>REVISION HISTORY</b> |                                |  |                         |
|-------------------------|--------------------------------|--|-------------------------|
| <b>Version</b>          | <b>Date</b>                    | <b>Revision description/Summary of changes</b> | <b>Author</b>           |
| 1.1                     | 9 <sup>th</sup> September 2021 | Updating of Business Areas                     | Student Admin Assistant |
|                         |                                |  |                         |
|                         |                                |  |                         |

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## 1. Purpose

- 1.1 This policy outlines the University Academy 92 approach managing its obligations under Freedom of Information Act 2000 (FOIA) and related legislation, including the Environmental Information Regulations 2004 (EIRs).
- 1.2 UA92 is committed to complying with the provisions of the Freedom of Information Act 2000 (FOIA) and related legislation, including the Environmental Information Regulations 2004 (EIRs).
- 1.3 The FOIA enables anyone, anywhere in the world, to request any recorded information held by, or on behalf of, UA92. The EIRs enable similar access to environmental information.
- 1.4 Information will be provided if it is held, unless one or more of the exemptions or exceptions listed in the legislation applies. Information which is exempt does not have to be provided.
- 1.5 UA92 aims to publish as much information as it can, both proactively and in response to requests under the FOIA and EIRs; however exemptions and exceptions will be applied where appropriate to ensure that information which is not suitable for publication is protected.

## 2. Scope

- 2.1 This policy applies to all recorded information held by UA92 or held by someone else on behalf of UA92 and includes information provided to UA92 by contractors, suppliers and other third parties. It does not apply to information which UA92 only holds on behalf of another person or organisation.
- 2.2 Relationship with data protection legislation:** UA92 is under a legal duty to protect personal data as required by current data protection legislation. UA92 will carefully consider its responsibilities under data protection legislation before disclosing personal data about living individuals, including current and former employees, students, alumni and any other individuals about whom we hold information.
- 2.3 Responsibilities of employees:** All employees are responsible for ensuring that any request for information they receive is dealt with in line with the requirements of the FOIA and EIRs and in compliance with this policy. In addition, members of the Leadership Team have responsibility for carrying out internal reviews where required, as set out in section 8 of this policy.
- 2.4 Responsibilities of UA92's Data Protection Officer:** manages and coordinates all requests for information received by the UA92 and as such, any requests for information received by members of staff must be sent to the Governance team as soon as possible following receipt by email to [compliance@ua92.ac.uk](mailto:compliance@ua92.ac.uk).

### 2.5 Key Contact details:

- For advice and assistance from UA92, please contact the Governance team: [compliance@ua92.ac.uk](mailto:compliance@ua92.ac.uk). University Academy 92 Limited, Brian Statham Way, Trafford, Manchester, M16 0PU
- Independent advice and information about the FOIA and EIRs is available from the Information Commissioner's Office: [www.ico.org.uk](http://www.ico.org.uk) Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF Tel: 01625 545 745 or 0303 123 1113.

### 3. Policy statements

#### 3.1 Dealing with requests for information

- 3.1.1 UA92 will provide advice and assistance to help people make requests under the FOIA and EIRs.
- 3.1.2 UA92 aims to respond to all requests promptly and within the statutory response period of 20 working days following receipt of a valid request.
- 3.1.3 This timescale can be extended under specific circumstances, for example where we have determined that an exemption applies and UA92 is considering whether or not it is in the public interest to disclose the information regardless of the exemption.
- 3.1.4 **Valid request:** To be valid under the Act, the request must:
- Be in writing. This could be a letter or email. Requests can also be made via the web, or even on social networking sites such as Facebook or Twitter.
  - Include the requester's real name. Note: a request can be made in the name of an organisation, or by one person on behalf of another, such as a solicitor on behalf of a client;
  - Include an address for correspondence. This need not be the person's residential or work address – it can be any address at which we can write to them, including a postal address or email address;
  - Describe the information requested. The Act covers information not documents, so a requester does not have to ask for a specific document (although they may do so). They can, for example, ask about a specific topic and expect you to gather the relevant information to answer their enquiry.
- 3.1.5 Written requests for information received by UA92 via post, email or other means will be treated as requests under the FOIA (or EIRs, where applicable) in cases where the information is not already publicly available or routinely disclosed on request.
- 3.1.6 There is no need for requests to indicate they are made under the FOIA or EIRs; however applicants making requests must provide their real name and an address for correspondence (email or postal address).

- 3.1.7 If a request is unclear, we will ask for clarification as soon as we can to enable us to proceed with considering the request. Where an applicant indicates that they would like the requested information in a particular form i.e. paper, electronic or inspection at UA92 offices, we will comply with their preference where reasonably practicable, taking into account all the particular circumstances, including cost.
- 3.1.8 UA92 reserves the right to refuse requests under the FOIA where the cost of providing the information would exceed the statutory cost limit. This limit is currently £450, which equates to 18 hours' work at a statutory rate of £25 per hour.
- 3.1.9 UA92 reserves the right to refuse requests under the EIRs where the request is considered to be manifestly unreasonable. Where we estimate that complying with a request will take more than 18 hours of office time or is manifestly unreasonable, we will try to assist applicants to make refined requests which are more manageable.

## **3.2 UA92 Publication scheme**

- 3.2.1 UA92 has adopted the Information Commissioner's Model Publication Scheme for Higher Education Institutions. The Information Commissioner is an independent regulator who enforces and advises on the FOIA and has produced and approved this scheme. A copy of the Model Publication Scheme for Higher Education Institutions and further information about the Information Commissioner is available via its website [www.ico.org.uk](http://www.ico.org.uk).
- 3.2.2 By adopting the Information Commissioner's Model Scheme, UA92 has committed to:
- Proactively publish information (including environmental information) which is held by it and contained within each class.
  - Provide a means by which UA92 can make the public aware of the types of information it will make readily available, how they can access that information and whether or not they will have to pay for it.
  - Review and update the information on a regular basis.
- 3.2.3 The Model Publication Scheme contains seven 'classes' of information. UA92 is committed to making available to the public information it holds which falls within these seven broad classes:
- Who we are and what we do;
  - What we spend and how we spend it;
  - What our priorities are and how we are doing;
  - How we make decisions;
  - Our policies and procedures;
  - Lists and registers;
  - The services we offer.
- 3.2.4 UA92 publication scheme is at appendix 1.

### **3.3 Charges**

- 3.3.1 Any charges for information contained within UA92's publication scheme are detailed within the Guide to Information.
- 3.3.2 Information provided in response to FOIA and EIRs requests will be provided electronically and free of charge where possible; however there may be circumstances where we need to charge for information e.g. if it is only available in paper form and there is a large amount of copying involved. If there will be a charge for disbursements e.g. photocopying or postage in order to provide the information, we will inform the person requesting the information as soon as possible to see if they wish to proceed; however such charges will normally be waived if they amount to less than £10.
- 3.3.3 Charges under these circumstances will be calculated at a rate of 10p per sheet of A4 for photocopying; postage will be calculated using Royal Mail's postage rates at the time the request is dealt with. Any other similar charges which may arise will be reasonable and will be calculated on the basis of the actual cost to UA92 of providing the information.

### **3.4 Complaints about requests for information**

- 3.4.1 Anyone who has made a request for information to UA92 under the FOIA or EIRs is entitled to request an internal review if they are unhappy with the way their request has been handled. Internal reviews will be carried out by a senior member of staff who was not involved with the original decision. Any internal review will consider whether or not the request was handled appropriately, in line with the requirements of the FOIA or EIRs. Applicants wishing to ask for an internal review must do so within 40 working days of the date of UA92's response to their request. UA92 aims to respond to internal reviews within 20 working days of receipt.
- 3.4.2 For Internal Review contact: [compliance@ua92.ac.uk](mailto:compliance@ua92.ac.uk), adding 'FOI Complaint' to the subject line of your message. Or write to: Data Protection Officer, Governance Team, University Academy 92 Limited, Brian Statham Way, Trafford, Manchester, M16 0PU
- 3.4.3 If you are not satisfied with the outcome of the Internal Review process, you may complain to the Information Commissioner.
- 3.4.4 For External Review contact: The Information Commissioner, Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

#### **4. Related documentation**

- University Academy 92 Publication scheme.
- Resources from the Information Commissioner's Office:
- General guidance on FOI <https://ico.org.uk/for-organisations/guide-to-freedom-of-information/>
- Guidance on receiving a request <https://ico.org.uk/for-organisations/guide-to-freedom-of-information/receiving-a-request/>
- Guidance on refusing a request <https://ico.org.uk/for-organisations/guide-to-freedom-of-information/refusing-a-request/>
- Guidance on publication schemes <https://ico.org.uk/for-organisations/guide-to-freedom-of-information/publication-scheme/>

#### **5. Appendices**

Appendix 1: UA92 Publication scheme

## Appendix 1: UA92 Publication scheme

[https://ico.org.uk/media/for-](https://ico.org.uk/media/for-organisations/documents/1245/definition_document_for_universities_and_higher_education_institutions.pdf)

[organisations/documents/1245/definition\\_document\\_for\\_universities\\_and\\_higher\\_education\\_institutions.pdf](https://ico.org.uk/media/for-organisations/documents/1245/definition_document_for_universities_and_higher_education_institutions.pdf)

| Category of Information  | Information we publish   | Method of Publication | Location on UA92 website  | Charge |
|--|--|-----------------------|---|--------|
| <b>Who we are and what we do</b><br><br><i>Current organisational information, structures, locations and contacts.</i> | Legal framework<br><br>Information relating to the legal and corporate status of the UA92.   | Website               |   | No     |
|  | How UA92 is organised<br><br>Information about the management structure and the work of the various areas of UA92, with the names and responsibilities of key personnel. Terms of reference, membership and description of the UA92 Board. | Website               |   | No     |
|  | Location and contact details   | Website               | <a href="https://ua92.ac.uk/find-us">https://ua92.ac.uk/find-us</a><br><a href="https://ua92.ac.uk/contact-us">https://ua92.ac.uk/contact-us</a>  | No     |
|  | Details of organisations which UA92 has responsibility for, works in partnership with or sponsors and companies wholly or partially owned by UA92.   | Website               | <a href="https://ua92.ac.uk/about-ua92">https://ua92.ac.uk/about-ua92</a><br><a href="https://ua92.ac.uk/about-ua92/our-partners">https://ua92.ac.uk/about-ua92/our-partners</a><br><a href="https://ua92.ac.uk/about-ua92/lancaster-university">https://ua92.ac.uk/about-ua92/lancaster-university</a> | No     |

|   |  |         |   |    |
|---|--|---------|---|----|
|   |  |         | <a href="https://ua92.ac.uk/co92">https://ua92.ac.uk/co92</a>   |    |
|   | <p>Details of activities available for students.</p> <p>Information relating to the operation and activities of the Student Union and other clubs, associations and non-academic activities that are organised for or by the students can also be included where this information is held by the HEI.</p>  | Website | <a href="https://ua92.ac.uk/study-with-us/student-life">https://ua92.ac.uk/study-with-us/student-life</a> | No |
| <p><b>What we spend and how we spend it</b></p> <p><i>Financial information relating to projected and actual income and expenditure, procurement, contracts and financial audit (current and previous two years).</i></p> | <p>Funding/income</p> <p>Information on the sources of funding and income, such as Funding Council grants, tuition fees, endowment, rents and investment income (including investment strategy).</p>   | Website |   |    |
|   | <p>Financial statements, budgets and variance reporting</p> <p>Details of expenditure over £25,000, including costs, supplier and transaction information. This should be published at least annually and, where practical, we would also expect it to be published on a half yearly or quarterly basis. Financial information in enough detail to allow the public to see where money is being spent, where an HEI is or has been planning to spend it, and the difference between the two. Financial information should be published at least annually and, where practical, we would also</p> |         |   |    |

|  |   |                        |     |    |
|--|---|------------------------|-----|----|
|  | expect half yearly or quarterly financial reports to be provided. Revenue budgets and budgets for capital expenditure should be included.   |                        |     |    |
|  | Financial audit reports   | Website                |     |    |
|  | Capital programme<br>Information on major plans for capital expenditure including any private finance initiative and public private partnership contracts   | On application to UA92 | N/A | No |
|  | Financial regulations and procedures  | Website                |     |    |
|  | Staff allowances and expenses<br>Details of the allowances and expenses that can be claimed or incurred. It should include the total of the allowances and expenses paid to individual senior staff members by reference to categories. The definition of "senior staff" is given below. These categories should be produced in line with the HEI's policies, practices and procedures and must at least include travel, subsistence and entertainment. | On application to UA92 | N/A | No |
|  | Staff pay and grading structures<br>This may be provided as part of the organisational structure and should include, as a minimum, the salaries for senior staff, which, for the purpose of this document, means staff earning over £100,000 per annum and on the   | On application to UA92 | N/A | No |

|   |  |                        |     |     |
|---|--|------------------------|-----|-----|
|   | Senior Management Team or equivalent level.<br>The salaries should be stated in bands of £10,000. For more junior posts, levels of pay should be identified by salary range. The 'pay multiple' – the ratio between the highest paid salary and the median average salary of the whole of the HEI's workforce. |                        |     |     |
|   | Register of suppliers  | On application to UA92 | N/A | No  |
|   | Procurement and tender procedures and reports<br>Details of procedures used for the acquisition of goods and services. Contracts available for public tender and reports of successful tenders   | On application to UA92 | N/A | No  |
|   | Contracts<br>We would normally only expect HEIs to publish details of contracts that exceed £25,000.   |                        |     |     |
|   | Research funding<br>High level information about research funding from public sector sources and research funding from commercial sources where appropriate.   | N/A                    | N/A | N/A |
| <b>What our priorities are and how we are doing</b> | Annual report  | Website                |     |     |
|   | Corporate and business plans   | Website                |     |     |

|  |   |  |     |    |
|--|---|--|-----|----|
| <p><i>Strategies and plans, performance indicators, audits, inspections and reviews. (current and previous three years).</i></p> | Teaching and learning strategy  | Website  |     |    |
|  | Academic quality and standards  | Website  |     |    |
|  | Privacy impact assessments (in full or summary format)  | On application to UA92                           |     |    |
|  | <p>External and internal audit; review information</p> <p>This will include information such as the annual monitoring and review process together with a statement of roles, responsibilities and authority of different bodies within the institution involved in programme approval and review.</p> |  |     |    |
|  | <p>Corporate relations</p> <p>Information relating to the HEI's links with employers and sponsors, in both the public and private sectors, and the development of learning programmes.</p>  |  |     |    |
|  | <p>Government and regulatory reports</p> <ul style="list-style-type: none"> <li>• accreditation and monitoring reports by professional, statutory or regulatory bodies</li> </ul>   | On application to Information Governance Officer | N/A | No |

|   |  |                        |  |                      |
|---|--|------------------------|--|----------------------|
|   | <ul style="list-style-type: none"> <li>information that an institution is legally obliged to make available to its funding and/or monitoring bodies. Where information provided to regulatory bodies is publicly available via those bodies, the HEI may instead provide a direct link to that information.</li> </ul> | Third party websites   | Visit the Office for Students <a href="https://www.officeforstudents.org.uk/">https://www.officeforstudents.org.uk/</a> and HESA ( <a href="http://www.hesa.ac.uk">www.hesa.ac.uk</a> ) websites to access publicly available information. | No                   |
|   | <p>The HEI's compliance with its duties under the Equality Act 2010</p> <p>This includes any information produced as part of these duties.</p>   | On application to UA92 | N/A  | No                   |
| <p><b>How we make decisions</b></p> <p><i>Decision making processes and records of decisions.</i></p> <p><i>(current and previous three years).</i></p> | Agendas, reports, papers and minutes from the UA92 Board and its sub-committees.   | On application to UA92 | N/A  | No                   |
|   | Agendas, reports, papers and minutes from the UA92 Academic Committee and its sub-committees.  | On application to UA92 | N/A  | No                   |
| <b>Lists and registers</b>  | Datasets which have been requested under the FOIA, where 'dataset' is as defined in section 11(5) FOIA.  | On application to UA92 | N/A  | Dependent on dataset |

|   |  |                        |   |                      |
|---|--|------------------------|---|----------------------|
| <i>The information we publish in this section relates only to currently maintained lists and registers.</i> | List of UA92 Buildings   | Website                | <a href="https://ua92.ac.uk/find-us">https://ua92.ac.uk/find-us</a>   | No                   |
|   | CCTV   | On application to UA92 |   | Dependent on dataset |
|   | Any register of interests kept in the HEI.                                       | On application to UA92 |   | Dependent on dataset |
|   | Register of gifts and hospitality provided to senior staff                       | On application to UA92 |   | Dependent on dataset |
|   | Senior staff's declaration of interests  | On application to UA92 |   | Dependent on dataset |
| <b>Our policies and procedures</b>  | Policies and procedures for conducting UA92 business                             | Website                |   | No                   |
|   | Code of Conduct for University Board members (Seven principles of public life)   | Website                |   | No                   |
|   | Information Governance policies<br>Records management and personal data policies | Website                |   | No                   |
|   | Procedures and policies relating to academic services                            | Website                | <a href="https://ua92.ac.uk/student-regulations-policies">https://ua92.ac.uk/student-regulations-policies</a> | No                   |
|   | Policies and procedures for relating to student services                         | Website                | <a href="https://ua92.ac.uk/student-regulations-policies">https://ua92.ac.uk/student-regulations-policies</a> |                      |

|                              |  |         |   |    |
|------------------------------|--|---------|---|----|
|                              | Procedures and policies relating to human resources  | Website |   | No |
|                              | Pay policy statement   | Website |   | No |
|                              | Procedures and policies relating to recruitment  | Website |   | No |
|                              | Health and Safety information  | Website |   | No |
|                              | Equality and Diversity policies; Equality Scheme   | Website |   | No |
|                              | Estate management  | Website |   | No |
|                              | Complaints policy  | Website | <a href="#">Student Complaints Policy and Procedure</a>   | No |
|                              | Complaints procedures will include those covering requests for information and operating the publication scheme.   | Website |   | No |
| <b>The services we offer</b> | Prospectus   | Website | <a href="https://ua92.ac.uk/order-prospectus">https://ua92.ac.uk/order-prospectus</a>                             | No |
|                              | Course content   | Website | <a href="https://ua92.ac.uk/courses">https://ua92.ac.uk/courses</a>   | No |
|                              | Course fees<br>Funding, such as grants and bursaries, available to students from the HEI<br>Services for which the HEI is entitled to recover a fee together with those fees | Website | <a href="https://ua92.ac.uk/study-with-us/fees-and-finance">https://ua92.ac.uk/study-with-us/fees-and-finance</a> | No |
|                              | Welfare and counselling services<br>Health including medical services<br>Careers   | Website |   | No |

|  |                                    |         |   |    |
|--|------------------------------------|---------|---|----|
|  | Chaplaincy services                |         |   |    |
|  | Sports and recreational facilities |         |   |    |
|  | Conference facilities              | Website |   | No |
|  | Advice and guidance                | Website |   | No |
|  | Media releases                     | Website | <a href="https://ua92.ac.uk/discover-ua92/news">https://ua92.ac.uk/discover-ua92/news</a> | No |