



## Freedom of Information Policy

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### 1. Introduction and Purpose

This Policy forms part of a suite of policies and procedures that support an information governance framework.

The Freedom of Information Act 2000 (FOIA) gives the public a right of access to information held by public authorities. Under the terms of this legislation the University, as a public authority as defined by the Act, is expected to respond to any request for recorded information (FOI requests) within 20 working days, subject to exemptions and limits on the amount of work to be undertaken. Environmental information regulations (EIR) require similar measures for all environmental information held by the University. The FOIA also requires that the University maintains a publication scheme which lists all recorded information which is routinely made available.

Compliance with this legislation will be achieved through the implementation of controls (people, process, technology) including measures to ensure that FOI and EIR requests and internal reviews are recognised when they are received by the University, and that they are dealt with appropriately within the time limit. Measures will also be implemented to ensure that appropriate advice is given by the Information Governance Office (IGO) regarding exemptions and the refusal of requests where necessary, to ensure that this is done in a way which is consistent and in line with the legislation.

A publication scheme will be maintained and kept up to date by the IGO working in consultation with all areas of the University which hold relevant information. Areas of the University which hold commonly requested information will consider proactive publication of relevant data.

### 2. Scope and definitions

This Policy applies to:

- all approved users of University records including all members of staff, as well as individuals conducting work at or for the University and/or its subsidiaries, who have access to University information ("staff"). This includes temporary, honorary, visiting, casual, voluntary and agency workers, students employed by the University and suppliers (this list is not intended to be exhaustive).
- all recorded information (including raw data) held and processed by the University. This includes any information created by the University or its staff in the course of University business. It includes information held in any system or format, electronic or manual.
- information held by third parties where that information is a record of services provided to the University; and
- all locations in which University records are held including off-campus locations and personal devices if they are used to hold or store University data.

### 3. Roles and Responsibilities

3.1 It is the corporate responsibility of the University to maintain its information and records management systems in accordance with the regulatory environment. This responsibility therefore extends to all staff who work with University records.

3.2 It is the responsibility of Directors of Professional Services, Heads of Faculty Compliance and Heads of School Operations, or their nominees, to ensure that advice, guidance and policies issued by the IGO are implemented and complied with.

3.3 It is the responsibility of all staff to take up training which is offered to them in order to understand the essential requirements of the university FOI policy which apply to them.

3.4 It is the responsibility of the Information Governance Office:

- a. to provide advice and guidance in respect of Records Management and Data Protection, including FOI policy, practices and compliance
- b. to ensure that the University maintains a 'Publication Scheme' which can be easily accessed online by members of the public.
- c. to produce and maintain the University's Freedom of Information Standard Operating Procedure (SOP) for use within the University.
- d. to maintain a register of all FOI and EIR requests and internal reviews to the University.
- e. to provide FOI and EIR procedures and guidance.
- f. to provide advice in support of this Policy and the FOI SOP.
- g. to provide relevant FOI Training to staff where necessary.
- h. to ensure that requests and proposed responses are communicated to relevant key University stakeholders (including comms team) where appropriate.
- i. to deal with FOI and EIR requests, which includes co-ordinating the preparation and issue of responses to such requests.
- j. to identify if a previous response has been provided
- k. to communicate the final response to the requester in an appropriate format.
- l. to ensure that an 'Internal Review Process' is established and documented, details of which will be
  - m. made available to FOI and EIR requestors as well as being published on the University website FOI pages. The Internal Review Process should be used to consider complaints from FOI and EIR requestors:
    - i. who think that their request has not been dealt with in accordance with the required legislative timescales; or
    - ii. who think that they have not received information which answers their request.

3.5 Heads of Faculty Compliance, Heads of School Operations and Directors of Professional Services are considered to be the Information Asset Owners (IAO) for data held within the relevant division of the University. It is the responsibility of these IAO role-holders, or their nominees:

- a. to safeguard the data within their directorate, faculty or school
- b. to ensure that any request by the IGO for information required for either a FOI or EIR response is acknowledged and provided in a timely manner back to the IGO.
- c. to ensure that the FOI SOP is complied with.
- d. to provide appropriate sign off ('Approval'), of all information prior to it being released to the Information Rights Team within the IGO after:

- i. ensuring that the information provided to the IGO in response to an FOI or EIR request or subsequent internal review is accurate, relevant and not excessive.
  - ii. working with the IGO to clarify a FOI or EIR request, when necessary.
  - iii. working with the IGO to discuss the use of exemptions, when appropriate
  - iv. ensuring that the information is in an appropriate format to share
  - v. raising any other concerns or considerations relating to the request
  - vi. ensuring that all staff members within the relevant division are aware of their responsibilities in line with the FOI Act as it applies to the University
- e. to ensure that staff within their respective directorate, faculty or school comply with role-based FOI awareness training.

3.6 It is the responsibility of the Procurement and Contracts teams:

- a. to ensure that all new contracts issued by the University in respect of their Directorate, faculty or school include a clause causing the parties to the contract to comply with FOI and EIR requests from the IGO where necessary.

3.7 It is the responsibility of all staff and other approved users of University held information:

- a. to be able to recognise FOI or EIR requests and know how to deal with them.
- b. to understand where to send FOI or EIR requests upon receipt, and the timescale for doing so.
- c. to respond swiftly and as a matter of priority to any request for information received from the Information Governance Office to ensure that the University is able to fulfil its obligations within the prescribed time limits; and
- d. to be aware that any recorded information created by anyone working for and on behalf of the University is subject to FOI legislation, and that its content should be appropriate for public scrutiny. This also includes information recorded/stored on personal devices or notebooks.
- e. to complete appropriate FOI training as provided by or via the IGO, when required to do so.

#### **4. Monitoring Compliance**

Reports on the matters related to this Policy will be provided via regular reports to the Information Governance Committee (IGC).

<b>Version amendment history</b>		
<b>Version</b>	<b>Date</b>	<b>Reason for Change</b>
1.0	Oct 2012	Creation and approval by the Board of Governors
1.1	Dec 2017	Minor amendments: removal of detailed legislation; consistency with other SOPs; links updated – approved by IGC 23 Jan 2018
1.2	24 Jan 2018	1.2 24 Jan 2018 Minor amendments requested by OGC – submitted for endorsement by PRC on 6
1.3	12 Dec 2018	Links updated
1.4	23 Mar 2021	Minor amendments to clarify additional IGO responsibilities
2.0	09 Oct 2023	Amendments to reflect the need to, a) for Directors and Heads of School to explicitly authorise the release on information to the 'Rights Team' within the IGO, b) expand the publication scheme and c) make public, details of the 'FOI Review Process', following the recent UNIAC FOI Audit recommendations.
2.1	15 Oct 2025	Minor amendments – update in line with University format.

<b>Document control box</b>	
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Next review date:	01 Oct 2027
Equality impact outcome:	Medium
Related Statutes, Ordinances, General Regulations:	Ordinance 14 Intellectual Property Rights, Data Protection and the Use of Information Systems Statute XIII Part III disciplinary procedures for staff
Related policies	Data Protection Policy: <a href="http://documents.manchester.ac.uk/DocuInfo.aspx?DocID=14914">http://documents.manchester.ac.uk/DocuInfo.aspx?DocID=14914</a> Records Management Policy: <a href="http://documents.manchester.ac.uk/DocuInfo.aspx?DocID=14916">http://documents.manchester.ac.uk/DocuInfo.aspx?DocID=14916</a> Information Security Policy: <a href="http://documents.manchester.ac.uk/DocuInfo.aspx?DocID=6525">http://documents.manchester.ac.uk/DocuInfo.aspx?DocID=6525</a> Acceptable Use Policy: <a href="http://documents.manchester.ac.uk/DocuInfo.aspx?DocID=16277">http://documents.manchester.ac.uk/DocuInfo.aspx?DocID=16277</a>
Related procedures	Related Standard Operating Procedures: <a href="http://www.staffnet.manchester.ac.uk/igo/policy-procedures/">http://www.staffnet.manchester.ac.uk/igo/policy-procedures/</a> University Records Retention Schedule: <a href="http://documents.manchester.ac.uk/display.aspx?DocID=6514">http://documents.manchester.ac.uk/display.aspx?DocID=6514</a>
Related guidance and / or codes of practice	BS ISO 15489-1:2016 standard for records management Information Governance Guidance: <a href="http://www.staffnet.manchester.ac.uk/igo/policy-procedures/">http://www.staffnet.manchester.ac.uk/igo/policy-procedures/</a> IT Security guidance: <a href="http://www.itservices.manchester.ac.uk/secure-it/">http://www.itservices.manchester.ac.uk/secure-it/</a>
Policy owner:	Director of Information Governance
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