



# The London Interdisciplinary School

## Freedom of Information Policy

### Introduction

The Freedom of Information Act 2000 imposes a duty on public authorities such as the London Interdisciplinary School:

- To confirm or deny that the information requested is held;
- If the information is held, to communicate it to the applicant.

Anyone may make a request in writing for recorded information held by or on behalf of the School, and the School must comply within 20 working days. Unless subject to one of the 23 exemptions described by the Act, the information must be provided. The Act also promotes greater openness and accountability in the public sector by requiring all public authorities to make information available proactively, through a publication scheme. The School must adopt a publication scheme as a legal requirement of the Act.

The Information Commissioner's Office (ICO) is the independent regulatory authority for the Act, and is the avenue of appeal for any requests that have not been resolved to the applicant's satisfaction.

### Principles

The School is fully committed to the provisions of the Act and to its underlying principles of openness and transparency.

### Purpose and Scope

This policy has been produced to ensure compliance with the provisions of the Freedom of Information Act 2000, and incorporates guidance from the ICO. It provides a framework for compliance, and is supported by relevant information appropriate procedures to provide advice and maintain good practice. It applies to all members of staff, including employees, temporary or agency staff, and contractors and suppliers working for, or on behalf of, the School.

### Policies

Under the provisions of the Freedom of Information Act (2000), individuals may access information held by the School in two ways:

- *Freedom of Information requests:* These must be submitted in writing to the Registrar of the School. On receipt of a written request, the School is required to inform the applicant whether it holds the information applied for and, if it does, and subject to the exemptions set out in the Act, to supply that information within 20 working days of the receipt of the request.



- *Publication Scheme:* The School must make information routinely available proactively through a publication scheme. This is a guide to the types of information that the School publishes or intends to publish; much of this information will be available on the School's website.

## Freedom of Information Requests

### *Making a request*

Before a request for information is made, the School's publication scheme should be checked; this explains the categories of information that the School already makes available to the public.

Any recorded information that the School holds that is not already publicly available via the School's publication scheme can be requested. Requests must be made in writing (either by email or letter); they must include a name and address for correspondence (an email address will suffice); and they must detail the information requested. All requests must be sent to the School's designated Freedom of Information Officer, the Registrar, by email [\[address\]](#) or post [\[address\]](#). A request does not have to mention the Act to be a valid request, nor does it have to explain why the information is requested.

The School will respond to any request within 20 working days.

### *Rights to a response*

Anyone who submits a written request has the right to:

- Be told whether the information is held by the School;
- Receive a copy of the information held, subject to exemptions (including reasons relating to Data Protection, Confidentiality and Commercial Interests; a full list of exemptions is given in Appendix 1);
- Request an internal review if they are unhappy with the School's response;
- Request the ICO to investigate if they remain dissatisfied with the School's response following the internal review.

Not all information held by the School can be released, and the School may decide not to release information for a number of reasons under the exemptions laid out in the Act, such as data protection, confidentiality, health and safety, or to protect its commercial interests. Further details on exemptions are in Appendix 1 of this policy.

Individuals have the right of access to their personal information under the General Data Protection Regulation and Data Protection Act (see the School's Data Protection Policy for further information).

Where requests relate to persons other than the School, or disclosure may affect the interests of a third party, the School will, where appropriate, consult the third party promptly in order to determine whether an exemption applies, and to aid the decision



on disclosure. The decision rests with the School as to whether to disclose this information.

Where there is reason to believe that some or all of the information requested is held by another public authority, the School will contact the requester and provide information about where the request should be redirected.

A disclosure log will be maintained on the School's website where documents providing responses to FOI requests will be published.

Multiple requests for information on a particular subject will lead to consideration for its addition to the School's Publication Scheme during its annual review.

#### *Charges and Fees*

The School does not have to comply with requests if the costs of responding would exceed the appropriate limit (specified as £450 in the Fees Regulations). The School will offer advice and assistance wherever possible in these cases to help applicants to modify or narrow their request.

In calculating the cost of a request, the School may only take into account the time taken to determine whether it holds the information, and to locate and retrieve it. It may not take into account the time taken to consider exemptions and to seek legal advice. Costs are calculated at a hourly rate of £25.

Where communication costs (such as printing, photocopying and postage) are less than £35, the School will cover these costs. The requester will be charged in full for costs above this level.

#### *Internal Review*

If a requester is unhappy with the School's response to their request for information, they have the right to ask for an internal review within 20 working days of receiving it, unless it is an especially complex query where additional time is needed.

Reviews will be carried out by the School's appointed reviewer, the Head of Regulation, or their nominee, unless they were involved in the original request.

If the requester is dissatisfied with the outcome of the School's internal review, they can request the ICO to investigate.

#### School Publication Scheme

A publication scheme is a document that describes the information that a public authority such as the London Interdisciplinary School publishes, or intends to publish. In this context, "publish" is defined as making information routinely available.



The School's publication scheme is available through the School's website. It can be provided in hard copy format by request from the Registrar [\[email link\]](#).

The publication scheme is set out in Appendix 2 of this policy. We have adopted the model publication scheme produced by the Information Commissioner's Office. The scheme sets out the types of information we make available to the public as a matter of course and how we make this information available.

The categories of information available in the School's publication scheme are as follows (as set out in the ICO's guidance):

- Who we are and what we do;
- How we spend (note that the School does not publish what we spend, as set out in the ICO's guidance, as it is a private company);
- What our priorities are, and how we are doing;
- How we make decisions;
- Our policies and procedures;
- Lists and registers;
- The services we offer.

The School's publication scheme will be reviewed annually, taking into account any revised guidance from the ICO. Feedback is encouraged to assist with the review process.

### Roles and Responsibilities

*The School* has a responsibility to ensure the implementation of the provisions of the Act. The School has designated the Registrar as the officer with overall responsibility for this policy and compliance with this policy.

*The Registrar's department* (part of the Finance and Operations Directorate) will process and respond to all non-routine requests for information received, and provide the School with guidance and advice on Freedom of Information and Environmental Information Regulation.

*Heads of Department* have a responsibility for ensuring that freedom of information issues within their departments are managed in a way that meets the provisions of this policy.

*All Staff* are required to be aware of the Freedom of Information Act 2000, and what it means for the School. They must recognize that all recorded information may be provided to the public, and that in every case, the law requires there to be full and unconditional disclosure unless one of the exemptions applies. Employees are responsible for ensuring that the records they manage are accurate and complete. They are required to follow the stated policy and procedures in handling freedom of information requests, and ensure that all requests are logged with the Registrar's department.



Any breach of the Freedom of Information Act by an employee may lead to disciplinary proceedings.

### Environmental Protection Regulations

The School will provide access to environmental information through the Environmental Information Regulations 2004 (EIR). These regulations set out an access regime that is broadly similar to the Freedom of Information Act (2000); however there are some small but significant differences, notably in terms of exemptions and charges.

EIR requests do not need to be made in writing; however, a written record will be made of any verbal requests that are received.

The School will respond to the request within 20 working days, and will treat a request in line with the guidance provided by the ICO.

### Records Management

The School will manage its records effectively and systematically, to ensure that information retrieval is simple, timely, and meets legislative, regulatory, funding and ethical requirements.

Section 46 of the Freedom of Information Act requires the School to follow guidelines set down in the Lord Chancellor's Code of Practice on the management of records.

### Policy Review

This policy will be updated as necessary to reflect best practice, and to ensure compliance with any changes or amendments to the relevant legislation.

This policy was last reviewed in [date] and was approved by [committee] on [date].



## Appendix 1: List of Exemptions to the Freedom of Information Act

This Appendix sets out the exemptions to information that must be supplied on request under the Freedom of Information Act 2000.

There are 23 exemptions under the Freedom of Information Act 2000, that may mean that the School is not able to disclose requested information. Listed here are those that are relevant to the School.

There are two types of exemption: absolute and non-absolute. Non-absolute exemptions require a Public Interest Test, where the School must determine whether it is in the public interest to disclose or withhold the sensitive information. Where the School considers it to be in the public interest to withhold the information, it will explain, where possible, its reasons.

Absolute exemptions, where the public interest test does not apply, include:

- Information accessible by other means, for example in the School's publication schedule;
- Information supplied by, or referring to, bodies dealing with security matters;
- Court records, and information held in relation to court proceedings;
- Prejudice to effective conduct of public affairs;
- Personal information (which is available under the GDPR and DPA);
- Information provided in confidence;
- Information whereby disclosure is prohibited by an enactment or would constitute contempt of court.

Non-absolute exemptions, where the public interest test does apply, include:

- Information intended for future publication;
- Investigations and proceedings conducted by public authorities;
- Law enforcement;
- Prejudice to effect conduct of public affairs;
- Health and safety;
- Environmental information;
- Personal information relating to a third party;
- Legal professional privilege;

A full list of exemptions can be found in the Freedom of Information Act 2000. Further guidance on the application of these exemptions is available on the ICO website.



## **Appendix 2: Publication Scheme**

### 1. Who we are and what we do

Information about the origins of the School is available electronically on the School website at:

[\[link\]](#)

Facts and figures about the School are available at:

[\[link\]](#)

Information about the legal framework and corporate status of the School, including the founding documents, dates, regulations, the Board of Governors minutes and the details of the officers and committee memberships of the School is available at:

[\[link\]](#)

Information about the organization and management structure of the School is available at:

[\[link\]](#)

Information about the School's campus is available at:

[\[link\]](#)

The contact details of most School employees are publicly available on the School website's online directory:

[\[link\]](#)

Information about the School's Students' Union is available at:

[\[link\]](#)

Information about the student accommodation facilities is available at:

[\[link\]](#)

### 2. How we spend

The School's Financial Regulations and Financial Procedures is available at:

[\[link\]](#)

Information on the general rules relating to expenses is available at:

[\[link\]](#)

### 3. What our priorities are, and how we're doing



The School's vision and strategic plan is available at:

[\[link\]](#)

An annual review of the School's activities is available at:

[\[link\]](#)

Our academic regulations and procedures for our taught degree programme are available at:

[\[link\]](#)

Information on the review and monitoring of academic standards is available at: [\[link\]](#)

Details about our in-degree placements programme and careers services are available at:

[\[link\]](#)

Information about our student support services, including learning, wellbeing and pastoral support, is available at:

[\[link\]](#)

#### 4. How we make decisions

Information relating to the governance of the School is available at:

[\[link\]](#)

#### 5. Our policies and procedures

A full A-Z list of our policies and procedures, which govern and regulate the way the School conducts all aspects of its business, is available at:

[\[link\]](#)

A full A-Z list of staff and student related forms for the School are is available at:

[\[link\]](#)

Formal procedures, rules, regulations and policies relating to student academic life are available at:

[\[link\]](#)

Information on School employee policies and procedures is available at:

[\[link\]](#)

Details of current job vacancies are available at:

[\[link\]](#)

#### 6. Lists and registers



Information on senior staff's declaration if interests may be available on written request to the Secretary.

A register of gifts and hospitality is held by the School, but is not available on the website as it is being continually updated. Requests for such information may be made in writing to the School Secretary.

#### 7. The services we offer

Information about the academic, administrative and commercial services offered by the School is available via the A-Z search facility on the School website at:

[\[link\]](#)

<b>Name of policy/procedure:</b>	<b>Freedom of Information Policy</b>
<b>Document owner:</b>	<b>Hannah Kohler, Head of Student Experience</b>
<b>Date Originally Created:</b>	<b>01/2019</b>
<b>Last reviewed:</b>	<b>01/2019</b>
<b>Reviewed by:</b>	<b>[name and job title]</b>
<b>Audited by:</b>	<b>[name and job title]</b>
<b>Date of Audit:</b>	<b>MM/YYYY</b>
<b>Date of next review:</b> (annually unless otherwise agreed)	<b>MM/YYYY</b>
<b>Related documents:</b> (eg associated forms, underpinning processes, related policies or overarching policies)	<b>Data Protection Policy</b> <b>Data Retention Sce</b>

<b>Version Control</b>			
<b>Version</b>	<b>Author [name]</b>	<b>Date</b>	<b>Brief summary of changes</b>
<b>1</b>	<b>Hannah Kohler</b>	<b>13/01/2019</b>	<b>Original draft</b>