



# Freedom of Information Policy

General Secretary: General Secretary  
Date Approved: 16th October 2025  
Review Date: October 2028

## Purpose

This policy outlines the procedures for handling requests for information under the Freedom of Information Act 2000 (FOIA) and the Environmental Information Regulations 2004 (EIR). It aims to ensure compliance with the law, promote transparency, and establish a clear process for responding to requests.

## Scope

This policy applies to all employees, volunteers, and contractors of the UKPSA who may receive or handle requests for information. It covers all information held by the UKPSA, regardless of format.

## Principles

- Openness and Transparency: The UKPSA is committed to openness and transparency in its operations, subject to statutory exemptions.
- Compliance: All requests will be handled in accordance with the provisions of FOIA and EIR.
- Timeliness: Requests will be acknowledged and responded to promptly, and within the statutory deadlines.
- Fairness: All requests will be treated fairly and without prejudice.
- Proactive Disclosure: The UKPSA will proactively publish information where appropriate, in line with its Publication Scheme.

## Definitions

- Freedom of Information Act 2000 (FOIA): Legislation that provides a general right of access to information held by public authorities.
- Environmental Information Regulations 2004 (EIR): Legislation that provides a right of access to environmental information held by public authorities.
- Request for Information: A request made in writing (including email) for recorded information held by the UKPSA.
- Information Asset Owner: The individual responsible for a specific set of information or data within the UKPSA.



## Procedure for Handling Requests

1. Receiving a Request
  - 1.1. All requests for information should be directed to the General Secretary ([Secretary@ukpsa.org](mailto:Secretary@ukpsa.org)).
  - 1.2. Upon receipt, the General Secretary will log the request, including the date received, the requester's details, and a summary of the information requested.
  - 1.3. The General Secretary will acknowledge receipt of the request within 5 working days.
2. Assessing the Request
  - 2.1. The General Secretary will determine if the request falls under FOIA or EIR.
  - 2.2. The General Secretary, in consultation with relevant Information Asset Owners, will identify and locate the requested information.
  - 2.3. The General Secretary will assess whether any exemptions or exceptions apply to the requested information. This includes, but is not limited to:
    - 2.3.1. Information intended for future publication.
    - 2.3.2. Information relating to national security.
    - 2.3.3. Information relating to investigations or proceedings.
    - 2.3.4. Commercial interests.
    - 2.3.5. Personal data (handled in accordance with GDPR).
    - 2.3.6. Environmental information where disclosure would adversely affect public safety, environmental protection, or confidentiality of commercial/industrial information.
3. Consultation
  - 3.1. Where necessary, the General Secretary will consult with relevant colleagues, legal advisors, or third parties (e.g., if the information relates to their interests) before making a decision on disclosure.
4. Responding to the Request
  - 4.1. A substantive response will be provided within 20 working days from the date of receipt.
  - 4.2. If an extension is required (e.g., for complex requests or public interest tests), the requester will be informed in writing within the initial 20-day period, stating the reasons for the delay and the estimated new response date (up to a maximum of 40 working days for EIR).
  - 4.3. The response will clearly state whether the information is being provided, withheld (with justification, referencing the applicable exemption/exception), or if the UKPSA does not hold the information.
  - 4.4. If information is being withheld, the response will explain the exemption/exception applied and, where appropriate, the public interest test undertaken. Details are provided in Appendix A.
  - 4.5. If the request is refused, the response will inform the requester of their right to an internal review and to complain to the Information Commissioner's Office (ICO). Examples of acceptable reasons for refusal are included in Appendix A.
5. Fees
  - 5.1. In general, information will be provided free of charge. However, the UKPSA reserves the right to charge a fee for disbursements (e.g., printing and postage costs) if the cost of providing the information exceeds the appropriate limit as defined by the FOIA. The requester will be notified of any potential charges before the information is released.
6. Internal Review
  - 6.1. If a requester is dissatisfied with the response to their request, they have the right to request an internal review.
  - 6.2. Requests for internal review must be made in writing within 40 working days of the date of the original response.



- 6.3. The internal review will be conducted by a member of the Charity Board not involved in the original decision.
- 6.4. The outcome of the internal review will be communicated to the requester within 20 working days of receipt of the internal review request.
- 7. Information Commissioner's Office (ICO)
  - 7.1. If the requester remains dissatisfied after the internal review, they have the right to complain to the ICO.
- 8. Record Keeping
  - 8.1. All requests, responses, and related correspondence will be securely recorded and retained in accordance with the UKPSA's data retention policy.
- 9. Training and Awareness
  - 9.1. Relevant staff will receive appropriate training on their responsibilities under FOIA and EIR and this policy.
- 10. Delegation of authority.
  - 10.1. The General Secretary may delegate the activities in this document to a member of the association as required.



### 1. Reasons for Refusal

#### a. **Excessive Cost or Time:**

A request can be refused if the cost of locating, gathering, and providing the information exceeds the statutory "appropriate limits" (e.g., £600 for central government, £450 for other authorities) or takes more than 18 hours to process.

#### b. **Vexatious or Repeated Requests:**

Requests that are likely to cause disproportionate distress, disruption, or irritation, or that repeat a previous request from the same applicant, can be refused.

#### c. **Information Not Held:**

The public authority does not hold the requested information.

#### d. **Information Already Available:**

The information is already available or is intended for future publication.

### 2. Reasons for Information Exclusion (Exemptions)

Information can be excluded under specific exemptions within the FOI Act. These are divided into two categories:

#### a. **Absolute Exemptions:**

These allow the information to be withheld without the need to apply a public interest test.

#### b. **Qualified Exemptions:**

These require the public authority to conduct a public interest test, weighing the public interest in disclosing the information against the public interest in withholding it.

#### c. **Examples of Information Excluded by Exemptions**

##### i. **Information Not Held:**

Information that is not held by the public authority is not covered by FOI.

##### ii. **Personal Data:**

Information relating to a living individual's private life is exempt under data protection legislation and the FOI Act.

##### iii. **Information that Would Prejudice Law Enforcement:**

Disclosure of information that could prejudice the prevention or detection of crime, the apprehension or prosecution of offenders, or the administration of justice is exempt.

##### iv. **Commercial Interests:**

Information that would likely prejudice the commercial interests of the public authority or others.

##### v. **National Security:**

Information that could be detrimental to national security.

##### vi. **Information About Current or Future Government Policy:**

Some information relating to the development of government policy may be exempt.

