

INTO 

Freedom of Information and Environmental Information Policy

v2.0 July 2026

Introduction

The Freedom of Information Act (FOIA) 2000 and the Environmental Information Regulations (EIR) 2004 give the public the right to access information held by public authorities.

INTO University Partnerships Limited (INTO), as a Higher Education Provider (HEP), recognises its responsibility and is committed to promoting a culture of openness and transparency regarding information to meet the requirements of the FOIA.

Not all information held by INTO can be released. INTO may decide not to release information for several reasons, such as data protection, confidentiality, health and safety or to protect its commercial interests.

Purpose and Scope

INTO's Policy has been produced to ensure compliance with the provisions of the FOIA and EIR. The policy incorporates guidance from the Information Commissioner's Office (ICO).

This policy applies to all information held by INTO regardless of how it was created or received; regardless of the way information is stored; and whether the information is in paper or electronic format.

The policy provides a framework for compliance and is supported by appropriate procedures and guidance to provide advice and maintain good practice. It applies to all members of staff, including temporary or casual or agency staff, and contractors and suppliers working for, or on behalf of, INTO.

Not covered by this Policy

If somebody asks us for their own personal data, we will process their request under the Right to Access provisions of the Data Protection legislation, and requests from the police or public authorities to share personal information will be actioned, where it is necessary and appropriate to do so.

What is the difference between FOIA and EIR?

Freedom of Information Act (FOIA) provides the public with a right to access recorded information with the objective of promoting transparency, openness and accountability, and requires organisations such as HEPs to disclose records and information to the public where it is held.

Environmental Information Regulations (EIR) provides the public with a right to request and view official record relating to environmental information. The definition of 'environmental information' is very broad and includes information relating to planning, waste and recycling, noise nuisance, food safety, emissions and contaminated land.

Both FOIA and EIR require a response to be issued to requests within 20 working days, puts a duty to provide advice and assistance on covered organisations, and the same appeal procedure ("internal review") applies. However INTO does not treat EIR requests differently from FOIA requests, except in two specific circumstances:

- where an EIR request is complex, we may extend the response deadline by 20 working days; and
- the EIR uses exceptions (rather than exemptions under FOIA) in relation to withholding information.

Publication Scheme

The purpose of a publication scheme is to inform the public about the information which is routinely published by a covered organisation.

INTO has adopted and maintains a “guide to information” on its INTO Global website to comply with the requirements of a publication scheme under section 19 of the FOIA. INTO’s “guide to information” will be reviewed at least annually and can be viewed [here](#).

Where information is not available via INTO’s “guide to information”, requests for information can be submitted for consideration and an email address – FOI@intoglobal.com - is published for this purpose.

Charging

No charge will be made for viewing information listed within INTO’s “guide to information” since it is information which is routinely published by us. However, charges may be applied for actual disbursements incurred as a result of handling requests for information, such as printing or postage and packing. Requesters will be informed if any charges apply before their request for information is processed.

What is an Information Request?

Where information is not already in the public domain, this can be requested from INTO. We will manage all statutory requests for information in accordance with the appropriate legislation and will endeavour to assist members of the public wherever possible.

If appropriate, we may relocate a request received under one piece of legislation to a more appropriate one; for example where a requester asks for access to their personal data under the FOIA, they will be informed that their request will be handled in accordance with the relevant Data Protection legislation.

The FOIA and the EIR allow anyone to request information from INTO regardless of their location, motive or history, limited by the exemptions under FOIA and the exceptions under EIR.

Valid Information Requests

Requests for information not already included in INTO’s “guide to information” will be considered on receipt of a specific written request. For a request to be valid under the FOIA, it must:

- a) be in writing and legible (an email is acceptable);
- b) include a name and address for correspondence (email address is sufficient);
- c) give clear details of the information requested.

Information requests do not need to mention either the FOIA or the EIR to qualify as an official request, but any requests made under the provisions of FOIA in an invalid format will not be considered until received in a valid format.

Repeated Requests

INTO is not obliged to comply with a request that is identical or substantially similar to a previous request from the same person. In deciding whether an information request is a ‘repeat request’, we will consider:

- the time that has elapsed since the previous request;
- whether the request is:
 - identical or substantially similar to the previous request (i.e. wording and scope precisely match that of a previous request, or
 - the wording is different, but the scope is the same, or
 - the scope does not differ significantly from that of the previous request;
- whether any relevant, new information has been generated since the previous request.

In this instance, a ‘reasonable interval’ will be deemed to be at least 40 working days.

Where a request is refused because it is considered repeated, INTO will issue a refusal response within 20 working days of the request, together with information about our Internal Review process and details of the right of appeal to the Information Commissioner’s Office.

Vexatious Requests

INTO is also not obliged to comply with vexatious requests. We will apply the term ‘vexatious’ fairly and consistently, and consider all the circumstances of the request, including:

- context and history of requests submitted by the requester;
- whether the request is likely to cause a disproportionate or unjustified level of disruption;
- whether there is a strong likelihood that such requests are being made to intentionally cause harassment or distress to staff, divert resources or to disrupt the proper workings of INTO.

We will apply the term ‘vexatious’ to the activities of the requester, and not to their nature or attitude.

Where a request is refused on the grounds of being vexatious, a refusal notice will be provided within 20 working days of receipt of the request, together with information about our Internal Review process and details of the right of appeal to the Information Commissioner’s Office.

Responding to a FOIA Request

INTO will respond to a request promptly, and within 20 working days following receipt of the request. If we are unable to respond to the request within 20 working days, we will contact the requester with an explanation and propose an extension of time.

However, some information may be exempt from disclosure under one of the exemptions under the FOIA – see section below.

INTO is also under no obligation to provide information if the cost of doing so would be in excess of an 'appropriate limit'. Costs for handling a request will be calculated in accordance with the provisions of the FOI and DP (Appropriate Limit and Fees) Regulations 2004 (Fees Regulations).

Within the FOIA (Section 12), INTO can refuse requests for information where the cost of dealing with them would exceed the 'appropriate limit', which for HEPs is set at £450. This is a standard rate of £25 per hour (regardless of the grade of the Officer undertaking the work) and represents the estimated cost of one person spending 18 hours in determining whether the requested information is held, then locating, retrieving and extracting the information.

In such cases, INTO still has a duty to confirm or deny whether it holds the information, unless this alone would exceed the limit, although we are not permitted to take into account a) the time likely spent in considering exemptions that may apply to the information requested, and b) in redacting exempt material. We do not have to make a precise calculation of the costs of complying with a request; instead, only an estimate is required. However, it must be a reasonable estimate and be documented.

If searches are started without an initial estimate being made, we will stop searching as soon as it is recognised the appropriate limit to fully comply with the request will be exceeded. In addition, we are not obliged to search up to the appropriate limit.

Clarifying a Request

If the request is unclear, we will contact the requester promptly asking for clarification. This could arise if the request:

- can be read in more than one way;
- is so general and open-ended that it is impossible to determine what information falls within its scope; or
- is rendered unclear by the context.

Where INTO has offered all the advice and assistance it deems to be reasonable and the requester still fails to describe the information requested in a way which enables the relevant information to be identified and located, no further attempts will be made to seek clarification.

There is no duty to comply with a request until clarification has been received. The 20-working day deadline for a response begins when INTO receives the clarification it needs. If no clarification is received after three months, a request will be closed.

FOIA exemptions

There are several exemptions under the FOIA where INTO may decide not to provide the information requested. In such cases where a request may be subject to an exemption, consideration will be given as to whether the information can be disclosed, taking into account the public interest, data subjects' rights, legal and contractual obligations and issues of information access and security.

Information will only be withheld in accordance with the exemptions specified by legislation, and the reasons why an exemption has been applied will be provided to the requester. A full list of the exemptions from Part II of FOIA, at sections 21 to 44, can be found on the [ICO's website](#).

What is in the “public interest”?

Public interest can cover a wide range of values and principles relating to the public good, or what is in the best interests of society. Public interest takes many forms:

- transparency and accountability, to promote public understanding;
- good decision-making, and upholding standards of integrity;
- ensuring justice and fair treatment for all; and
- ensuring fair commercial competition in a mixed economy.

We will carry out the public interest test and if a request is particularly complex, section 10(3) of FOIA allows the time we need for public interest considerations to be extended “until such a time as is reasonable in the circumstances”. This is known as the “public interest extension” but the ICO’s view is that any extension to consider the public interest must be no more than a further 20 working days.

Environmental Information Regulation

Any requests for environmental information held by INTO must be responded to in accordance with the EIR, rather than the FOIA, and will be released if requested, unless subject to an exception.

EIR requests do not need to be made in writing; however, the Data Protection team will make a written record of all verbal and written requests received.

INTO will respond to a request within 20 working days and will treat these requests in line with the ICO’s guidance – we will:

- always respond in writing, regardless of whether the request was made verbally or in writing;
- tell the requester whether we hold any information; and
- make that information available, unless we consider an exception applies:
 - before applying an exception, we will complete a public interest test to evidence our discussions.

In certain circumstances within the EIR, INTO may extend the deadline up to a maximum of 40 working days (where we reasonably believe the complexity and volume of the information requested means that it is impracticable to comply with or refuse the request within the shorter timeframe). If this is the case, we will inform the requester within 20 working days that more time is needed to respond.

Internal Reviews

If a requester is unhappy with the way in which their request has been handled, they can request an internal review by contacting INTO by email at FOI@intoglobal.com or EIR@intoglobal.com, or by post to Data Protection team, INTO University Partnerships, One Gloucester Place, Brighton, East Sussex, BN1 4AA.

A request for an internal review of INTO’s initial reply should be submitted by the original requester within 40 days of receiving our first response. The requester should specify why they

do not agree with the initial response and what factors they want to be considered as part of the review. This should include any public interest arguments for disclosure.

Internal reviews will be carried out by a senior member of staff who was not involved with the original request. If the review needs additional time to be completed, the requester will be informed why and when to expect a response.

Records Management

INTO will manage its records effectively and systematically to ensure information retrieval is timely and meets legislative, regulatory, funding and ethical requirements. Section 46 of the FOIA requires INTO to follow guidelines set down in the Lord Chancellor's [Code of Practice on the management of records](#).

INTO will also publish details of its performance when handling requests for information made under the FOIA on behalf of the INTO Group – these statistics will be published quarterly via the “guide to information” on INTO Global in line with best practice recommendations in the Freedom of Information Code of Practice.

Policy Review

This policy will be updated as necessary to reflect best practice and to ensure compliance with any changes or amendments to the Freedom of Information Act (FOIA) 2000 and the Environmental Information Regulations (EIR) 2004.

This policy was last reviewed in July 2026.