

Freedom of Information Act 2000

Definition document for universities and other higher education institutions

This guidance is for the use of universities and other higher education institutions. It gives examples of the kinds of information that the ICO expects you to provide in order to meet your commitments under the model publication scheme.

The ICO expects you to make the information in this definition document available unless:

- you do not hold the information;
- the information is exempt under one of the Freedom of Information Act 2000 (FOIA) exemptions or Environmental Information Regulations 2004 (EIR) exceptions, or its release is prohibited under another statute (eg UK General Data Protection Regulations);
- the information is readily and publicly available from an external website. Such information may have been provided either by you or on your behalf. You must provide a direct link to that information;
- the information is archived, out of date or otherwise inaccessible; or
- it would be impractical or resource-intensive to prepare the material for routine release.

If the information is held by another public authority, you should provide details of where to obtain it.

The guidance is not meant to give an exhaustive or definitive list of everything that be covered by a publication scheme. The legal commitment is to the model publication scheme, and you should look to provide as much information as possible on a routine basis, which must include all information that is required by statute.

Publishing datasets for re-use

As a public authority, you must publish under your publication scheme any dataset you hold that has been requested, together with any updated versions, unless you are satisfied that it is not appropriate to do so. So far as reasonably practicable, you must publish it in an electronic form that is capable of re-use.

If the dataset or any part of it is a relevant copyright work and you are the only owner, you must make it available for re-use under the terms of a specified licence. Datasets in which the Crown owns the copyright or the database rights are not relevant copyright works.

The [2018 Section 45 Code of Practice](#) recommends that public authorities make datasets available for re-use under the [Open Government Licence](#).

The term 'dataset' is defined in section 11(5) of FOIA. The terms relevant copyright work and 'specified licence' are defined in section 19(8) of FOIA. The ICO has published guidance on [Datasets \(sections 11, 19 and 45\)](#). This explains what is meant by "not appropriate" and "capable of re-use".

Model publication scheme

The table below identifies the specific information the ICO expects you to publish under each of the seven classes of information set out in the [model publication scheme](#).

Class 1 - Who we are and what we do

Organisational information, structures, locations and contacts

Information in this class should only be current information unless stated otherwise.

- **Legal framework**

Information relating to the legal and corporate status of the institution.

- **How the institution is organised**

An organisational chart, if you have one. Information about the management structure of your institution, including a description of

your statutory bodies and your organisational structure together with a description of the work of each unit and the names and responsibilities of key personnel. The information should include faculty and department structures and identify senior personnel. You should also provide terms of reference, membership and description of all boards and committees.

- **Location and contact details**

Provide your postal and email address. If possible, provide named contacts including contact phone numbers and email addresses.

- **Lists of and information relating to organisations which you have responsibility for, those you work with in partnership, those you sponsor and companies you wholly or partially owned.**

On the basis that most of these bodies will be responsible for their own affairs, this information only needs to be sufficient to identify the relationship between you and these bodies (such as businesses, professions and community organisations).

- **Student activities**

Information relating to the operation and activities of the Student Union and other clubs. Where you hold it, include information about associations and non-academic activities that are organised for or by the students

- **Gender pay gap reporting**

Read the Government's guidance on the [gender pay gap reporting](#) to find out what information you need to publish. Publish this data annually if you have a head count of 250 staff or more.

Class 2 - What we spend and how we spend it

Financial information relating to projected and actual income and expenditure, procurement, contracts and financial audit

As a minimum make financial information for the current and previous two financial years available.

- **Funding / income**

Information on the sources of funding and income, such as Funding Council grants, tuition fees, endowment, rents and investment income (including investment strategy).

- **Financial statements, budgets and variance reports**

Details of expenditure over £25,000, including costs, supplier and transaction information. This should be published at least annually and, where practical, you should publish this on a half yearly or quarterly basis.

Financial information in enough detail to allow the public to see where money is being spent, where you have or are planning to spend it, and the difference between the two. Financial information should be published at least annually and, where practical, you should also provide half yearly or quarterly financial reports. You should include revenue budgets and budgets for capital expenditure.

- **Financial audit reports**

- **Capital programme**

Information on major plans for capital expenditure including any private finance initiative and public private partnership contracts.

- **Financial regulations and procedures**

- **Staff allowances and expenses**

Details of the allowances and expenses that can be claimed or incurred. Include the total of the allowances and expenses paid to individual senior staff members by reference to categories. Produce these categories in line with your policies, practices and procedures and include at least travel, subsistence and entertainment.

- **Pay and grading structures**

You can provide this as part of your organisational structure. As a minimum include the details of senior staff salaries in bands of £5,000. For all other posts, identify levels of pay by salary range.

The 'pay multiple' – the ratio between the highest paid salary and the median average salary of the whole of your workforce.

- **Register of suppliers**

- **Procurement and tender procedures and reports**

Details of procedures for acquiring goods and services. Contracts available for public tender and reports of successful tenders.

- **Contracts**

Only publish details of contracts that exceed £25,000.

- **Research funding**

High level information about research funding from public sector sources and research funding from commercial sources where appropriate.

- **TU facility time reporting**

Read the government guidance on reporting [trade union facility time](#) to find out what information you need to publish. You need to publish this information once a year.

- **Financial regulations**

Class 3 - What our priorities are and how we are doing

Strategies and plans, performance indicators, audits, inspections and reviews

Publish all relevant information in this class for at least the current and previous two years.

Below is a list of the type of information you should have readily available for publication. Also include any other reports or recorded information showing your planned or actual performance.

- **Annual report**
- **Corporate and business plans**
- **Teaching and learning strategy**
- **Academic quality and standards**

Information, or a direct link to publicly available information, on your

current internal procedures for assuring academic quality and standards and recent qualitative data on the quality and standards of learning and teaching.

- **Data Protection impact assessments (in full or summary format) or any other impact assessment (eg Health & Safety Impact assessment, Equality Impact Assessment etc), as appropriate and relevant.**
- **External and internal audit and review information**

Include information such as your annual monitoring and review process together with a statement of roles, responsibilities and authority of different bodies within your institution involved in programme approval and review.

- **Corporate relations**

Information relating to your links with employers and sponsors, in both the public and private sectors, and the development of learning programmes.

- **Government and regulatory reports**

For example, accreditation and monitoring reports by professional, statutory or regulatory bodies and 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, you may instead provide a direct link to that information.

- **Compliance with your duties under the Equality Act 2010**

This includes any information produced as part of these duties.

Class 4 - How we make decisions

Decision making processes and records of decisions

Make information in this class available for at least the current and previous two years. Information published will depend on your particular governance structure, as this can vary. Examples of this class of information include:

- **Minutes of formal meetings**

Include those where key decisions are made about your operation. Exclude material that is properly considered to be exempt from disclosure.

- **Agendas, officers' reports, background papers and minutes from governing body, Council / Senate, academic boards, steering groups and committees**
- **Teaching and learning committee minutes**
- **Minutes of staff / student consultation meetings**
- **Appointment committees and procedures**

Class 5 - Our policies and procedures

Current written protocols, policies and procedures for delivering our services and responsibilities

Information in this class should only be current information.

- **Policies and procedures for conducting your business**

Include codes of practice, memoranda of understanding, procedural rules, standing orders and similar information. Include procedures for handling requests for information. In Wales this will include details of how you comply with the requirements of the Welsh Language Act 1993 and or the Welsh Language Measure (Wales) 2011. In Northern Ireland this will include the equality scheme/statement produced in accordance with section 75 of the Northern Ireland Act 1998.

- **Procedures and policies relating to academic services**

Some of these policies may already be covered in class 3 'What our priorities are and how we are doing' in the context of external review and academic quality and standards. Include additional policies and procedures such as those relating to honorary degrees, changing course, student assessment, appeal procedures and breach of assessment regulations.

- **Procedures and policies relating to student services**

Include relevant policies and procedures, for example, to student

admission and registration, accommodation, management of the student records system, the assessment of external qualifications, internal student complaints and appeals, student support services and code of student discipline.

- **Procedures and policies relating to human resources**

Include the full range of human resources policies and procedures such as generic terms and conditions of employment, collective bargaining and consultation with trade unions, grievance, disciplinary, harassment and bullying, public interest disclosure and staff development (such as induction, probation, appraisal, promotions).

A number of policies, such as equality duties and health and safety will cover both the provision of services and the employment of staff. Some of these policies may already be covered in class 3 'What our priorities are and how we are doing'.

- **Pay policy statement**
- **Procedures and policies relating to recruitment**

If you advertise vacancies as part of your recruitment policies, make details of current vacancies available.

- **Code of Conduct for members of governing bodies**
- **Equality and Diversity policies; Equality Scheme**

Include your policies, statements, procedures and guidelines relating to equal opportunities.

- **Health and Safety**
- **Estate management**

Include your disposals policy, estates strategy and plan, facilities management policies, grounds and building maintenance.

- **Complaints policy**

Standards for providing services to the public. This will include procedures for handling and overseeing complaints against your staff. Include policies covering requests for information and operating the publication scheme.

- **Records management and personal data policies**

Include information on security policies, records retention, destruction and archive policies, and data protection (including data sharing and CCTV usage) policies.

- **File plans (or any other Business Classification Scheme used for the management of information)**
- **Research policy and strategy**

Include your quality assurance procedures, policy and procedures relating to intellectual property, ethics committee terms of reference, applications and their approval, and any other relevant codes of practice. Also include your policy, strategy and procedures relating to knowledge transfer and enterprise.

- **Publicly funded research outputs and data**

You should progressively publish information on publicly funded research or provide a direct link to it.

- **Charging regimes and policies**

Provide details of any statutory charging regimes. Charging policies should include charges made for information you routinely publish. They should clearly state what costs you are recovering, the basis on which you make them, and how you calculate them.

If you charge a fee for licensing the re-use of datasets, state in your guide to information how you calculate this and whether you make the charge under the Re-use Fees Regulations or under other legislation. You cannot charge a re-use fee if you make the datasets available for re-use under the Open Government Licence.

Class 6 - Lists and registers

Information contained only in currently maintained lists and registers

- **Public registers and registers held as public records**

If you are required to maintain any register and make the information in it available for public inspection, the existing provisions covering access will usually be adequate. However, publicise which public registers you hold, and how the information in

them is to be made available to the public. Where registers contain personal information, ensure that you consider the data protection principles.

- **Asset registers and information asset register**

You do not need to publish all details from all asset registers. However, include the location of public land and building assets and key attribute information that is normally recorded on an asset register to be available, along with some other information from capital asset registers. If you have prepared an information asset register for the Re-use of Public Sector Information Regulations 2015, you should publish the contents.

- **CCTV**

Details of the locations of any overt CCTV surveillance cameras operated by you or on your behalf. You should decide on the level of detail which is appropriate. This could be by building, campus area or more general geographic locations, such as postcodes or partial postcodes, depending on the security issues raised.

- **Disclosure logs**

If you produce a disclosure log indicating the information provided in response to FOIA and EIR requests, make it readily available. Disclosure logs are recommended as good practice.

- **Register of gifts and hospitality provided to senior staff**

Include details of gifts, given or received, and details of any hospitality afforded and by which organisation.

- **Senior staff's declaration of interests**

Include the names, faculties, departments and job titles of all senior staff who have made entries. Any information recorded in the 'professional' element of the register should also be disclosed subject to consideration of the data protection principles.

Class 7 - The services we offer

Information about the services we offer, including leaflets, guidance and newsletters

Generally, this is an extension of part of the first class of information. While the first class provides information on your roles and responsibilities, this class includes details of the services you provide, internationally, nationally and locally as a result of them.

For example, it will benefit the public to have ready access to information about the services you provide. The starting point would normally be a list or lists of the services you are responsible for, linked to details of these services.

- **Prospectus**
- **Services for outside bodies**
- **Course content**
- **Course fees**
- **Funding, such as grants and bursaries, available to students, that is available from you**
- **Services for which you are entitled to recover a fee together with those fees**
- **Welfare and counselling services**
- **Health including medical services**
- **Careers**
- **Chaplaincy services**
- **Sports and recreational facilities**
- **Facilities relating to music, art and other cultural activities**
- **Museums, libraries, special collections and archives**

Include guides to collections and scope and availability of catalogues. Further guidance is available in that provided for bodies responsible for managing museums, collections and archives.

- **Conference facilities**
- **Advice and guidance**
- **Media releases**