

Information Access and Publication Policy

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Approving body:	Senior Information Risk Owner
Date of next review:	January 2028
Review frequency:	Every 2 years
Policy/Regulation Owner:	James Bentley <i>Associate Director for Information Compliance and Data Protection Officer</i>

If you require more information about this policy/regulation, please contact the Governance Office by emailing Governance@uea.ac.uk – The Governance Office will direct your query to the relevant team or individual.

1. Overview and Purpose

- 1.1 The University processes information to deliver its primary purposes of teaching and research and achieve its wider strategic objectives. The University recognises the importance and value of this information both to the institution and the wider public.
- 1.2 This Policy is intended to establish the how information held by the University will be made public in response to statutory information requests and through proactive disclosures.
- 1.3 This Policy is supported by specific guidance and training materials. This Policy should be read in conjunction with other related policies, and the University's privacy notices.
- 1.4 Any queries about this Policy should be directed to the University's Information Compliance Team at FOI@uea.ac.uk.

2. Scope

2.1 This Policy applies to anyone processing information on behalf of the University and is intended to inform them about the requirements they must follow when doing so. It should be read and understood by:

2.1.1 all staff – including contractors - employed or working for UEA

2.1.2 all students who process information on behalf of the University

2.1.3 any individual who has, by virtue of their role or relationship with the University, any degree of access and/or use of information the University holds.

2.2 This Policy applies to all information processed by the University that is considered for publication and/or falls within the scope of a statutory information access request. This Policy does not apply to the use of UEA devices for personal use.

2.3 Adherence to approved policy and regulations is fundamental to the effective operation of the university. This policy has been developed in alignment with sector best practice to promote consistency, accountability, and compliance with relevant standards. Observing the policy ensures that decisions and actions are informed, equitable, and aligned with institutional values.

3. Definitions

Term	Definition
Archive	Records which are permanently preserved because they are considered to have enduring public, research, historical, informational, evidential or legal value.
Information Asset	A collection of any type of data, irrespective of type or format that is processed for a specific function and has shared risks & ownership. The asset is the data/information held, not the format/system it is stored within.
Information Asset Owner (IAO)	The person who acts as the principal authority and has overall responsibility for an information asset and how it is managed. This term is synonymous with previously used terms including: Data Owner, and Personal Data Owner.
Personal Data	Any information relating to an identified or identifiable living individual.
Processing	<p>An operation or set of operations which is performed on data or information:</p> <ul style="list-style-type: none"> • collection, recording, organisation, structuring or storage; • adaptation or alteration; • retrieval, consultation or use; • disclosure by transmission, dissemination or otherwise making available; • alignment or combination; or • restriction, erasure or destruction.
Security Classification	Defines how an information asset should be handled, according to the Information Classification and Data Management Policy.
Special Category Data	Personal Data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.
Supervisory Authority	In the UK, the supervisory authority for requests received under the Freedom of Information and Environmental Information Regulations is the Information Commissioner's Office (ICO).

4. Roles and Responsibilities

4.1 The proper management of information is the responsibility of everyone. This section sets out the responsibilities of all users; including those at UEA with additional responsibilities.

4.2 All users

4.2.1 Any individual with access to UEA information has an individual and collective responsibility to ensure it is processed in line with the law and this Policy. This includes:

4.2.1.1 completion of mandatory information training as directed

4.2.1.2 adherence to any organisational and service information / records management procedures

4.2.1.3 supporting the Information Compliance Team, when requested, in the processing of statutory information requests.

4.3 Parties with Additional Responsibilities:

4.4.1 Council. As the University's governing body, Council is responsible for ensuring the UEA has in place the necessary framework in place to meet the legal requirements. They will delegate to the Executive Team the strategic and operational oversight for information management compliance

4.4.2 The Executive Team, as delegated by Council, has the responsibility for ensuring the University meets its legal obligations for information management compliance.

4.4.3 The Vice-Chancellor is the University's 'qualified person' when considering the application of exemptions in line with Section 36 of the FOIA.

4.4.4 Senior Information Risk Owner (SIRO). The SIRO must be a senior officer who reports into, or is a member of, the UEA Executive Team and/or Council. They will:

4.4.4.1 promote and act as an advocate for information management

4.4.4.2 approve and own information management policies

4.4.5 Associate Director for Information Compliance. The person with overall responsibility for monitoring the University's compliance with information management legislation. They will:

4.4.5.1 act as the contact point for the supervisory authority (the ICO), and for those submitting statutory information requests.

4.4.5.2 lead a central University service (the Information Compliance Team) that has responsibility for handling statutory information requests and ensuring information rights compliance.

4.4.5.3 be responsible for reviewing and updating this policy and other documentation required by information management legislation.

4.4.6 Senior Information Asset Owners (SIAO). SIAOs are often executive leaders and are responsible for:

4.4.6.1 identifying IAOs within their Directorate/Faculty

4.4.6.2 encouraging and enabling good Records Management and information transparency practices in their Directorate/Faculty

4.4.7 Information Asset Owners (IAOs). IAOs are often operational managers and are responsible for:

4.4.7.1 identifying, owning and managing the information assets they oversee.

4.4.7.2 ensuring sought for a statutory information request, from within their information assets statutory, is provided accurately and in a timely manner

4.4.7.3 identifying datasets that could be proactively disclosed to the public

4.4.7.4 ensuring any agreed datasets are published in a timely manner

4.2.8 Information Asset Administrators. IAAs support IAOs in the day-to-day management of an asset, they responsible for enacting the directions of the IAO or SIAO in relation to an asset.

5. Policy Statement

5.1 Publication Scheme

5.1.1 The purpose of a publication scheme is to inform the public what information will be automatically or routinely published by the University and to ensure a significant amount of information is available.

5.1.2 The University has a duty to adopt and maintain a publication scheme under the Freedom of Information Act 2000 Sections 19 (1) and (2). Where possible, the data is made publicly available via the website.

5.1.3 Where information is not available via the website but can be requested, this is also shown, together with where any requests for such information should be directed.

5.1.4 The University's Publication Scheme can be viewed via our website at: <https://www.uea.ac.uk/about/university-information/statutory-legal-policies/freedom-of-information/publication-scheme>

5.1.5 Charging

5.1.5.1 No charge will be made for viewing data listed within the publication scheme unless there is a requirement to do so. Where charges do exist, these will be clearly marked.

5.1.5.2 Charges may be applied for actual disbursements incurred such as printing / photocopying or packaging and postage.

5.1.6 Scheme Management

5.1.6.1 A review of the published data will be undertaken at least annually by the appropriate Information Asset Owner(s).

5.1.6.2 New classes of data can be identified and uploaded at any time on the approval of the appropriate Information Asset Owner(s).

5.1.6.3 The scheme is managed by the Associate Director for Information Compliance who can be contacted by emailing FOI@uea.ac.uk

5.2 Statutory Information Access Requests

5.2.1 Where data is not already in the public domain, this can be requested from the University. There are various pieces of legislation governing the requesting and release of information, including those listed below.

5.2.2 The University endeavours to make requesting information as convenient as possible; where appropriate we may relocate a request received under one piece of legislation to a more appropriate one.

5.2.3 Environmental Information Regulations

5.2.3.1 The Environmental Information Regulations 2004 (“EIR”) requires local authorities to disclose environmental information to the public where held. Environmental Information is defined by the legislation as:

- the state of the elements of the environment: air, water, soil, the landscape, natural sites, and biological diversity (including genetically modified organisms)
- factors affecting, or likely to affect, the environment, such as substances, noise, radiation, emissions, discharges and waste released into the environment
- measures such as policies, legislation, plans, programmes, agreements, and activities affecting the environment, and related cost-benefit and other economic analyses
- reports on the implementation of environmental legislation the state of human health and safety so far as they are affected by the elements of the environment and by factors, measures or activities affecting the environment
- cultural sites and built structures, so far as they are affected by the elements of the environment and by factors, measures or activities affecting the environment.

5.2.3.2 Upon receipt of a valid EIR request, the University endeavours to provide responses, including copies of any relevant information, within 20 working days. Disclosures shall be uploaded to the University’s publicly accessible [Disclosure Log](#) wherever appropriate.

5.2.3.3 There may be some instances in which information or records identified for disclosure needs to be withheld. In these instances, we will consider the exceptions set out in the EIR and will conduct a public interest test to determine if the exception should be applied.

5.2.3.4 By law, an EIR can be submitted to any area of the University verbally or in writing. The University would encourage requesters to submit their requests in writing by emailing FOI@uea.ac.uk

5.2.4 Freedom of Information Act

5.2.4.1 The Freedom of Information Act 2000 (“FOIA”) requires local authorities to disclose records and information to the public where held.

5.2.4.2 Upon receipt of a valid FOIA request, the University endeavours to provide responses, including copies of any relevant information, within 20 working days. Disclosures shall be uploaded to the University’s publicly accessible [Disclosure Log](#) wherever appropriate.

5.2.4.3 There may be some instances in which information or records identified for disclosure needs to be withheld. In these instances, we will consider the exemptions set out in the FOIA and, where applicable, we will conduct a prejudice interest and public interest test to determine if the exemption should be applied.

5.2.4.4 By law, an FOI can be submitted to any area of the University in writing. The University would encourage requesters to submit their requests by emailing FOI@uea.ac.uk

5.2.5 INSPIRE

5.2.5.1 The INSPIRE Regulations 2009 (“INSPIRE”) require public authorities who hold spatial datasets where required.

5.2.5.2 Upon receipt of a valid INSPIRE request, the University endeavours to provide responses, including copies of any relevant information, within 20 working days. Disclosures shall be uploaded to the University’s publicly accessible [Disclosure Log](#) wherever appropriate.

5.2.5.3 There may be some instances in which datasets identified for disclosure needs to be withheld, for example if this risks intellectual property rights.

5.2.5.4 INSPIRE requests can be submitted in writing to the University by emailing FOi@uea.ac.uk

5.2.6 Re-use of Public Sector Information

5.2.6.1 The Re-use of Public Sector Information Regulations 2015 (RPSI) allows an individual to seek approval to reuse publicly available information of public sector bodies, however, the activities of universities are generally exempt.

5.2.6.2 The University of East Anglia is not aware it holds any information that falls within the scope of RPSI. Any enquiries in relation to RPSI requests can be submitted to FOI@uea.ac.uk

5.3 Complaints and Reviews

5.3.1 The University has a documented and regularly reviewed process in place for the administration of complaints regarding our handling of information access requests.

5.3.2 The University will resolve any complaints informally wherever possible. However, where a complaint concerns the way in which we managed a request or disputes a point in law in relation to our response, we will initiate our formal internal review process.

5.3.3 Any formal internal review will be undertaken by an officer not involved in collating or drafting the initial response.

5.3.4 In responding to a complaint or internal review request, the University endeavours to provide responses, including the disclosure of any additional relevant information, within 20 working days. Responses shall be provided to the requester in writing; when a review amends the initial response, the disclosure log will be updated to reflect the revised disclosure.

5.4 Regulator Investigations

5.4.1 The University will actively respond to and cooperate with any Information Commission's investigation pertaining to a request received by the University. This will include retention of request correspondence for a sufficient period to support any future investigation.

6. Compliance and Monitoring

6.1 The University undertakes regular monitoring of compliance with this Policy.

6.2 Failure to comply with this policy may result in disciplinary action, up to and including dismissal or termination of contract, in accordance with university HR and disciplinary procedures.

7. Related Documents

This Policy is supported by the below documents; these that should be read in conjunction with this Policy.

Associated Policies

- Information Risk Management Policy
- Records Management Policy
- Data Protection Policy

8. Revision History

Version number	Approval date	Approval mechanism	Details of change
1.0	19/02/2026	SIRO	Initial version. Replacing the previous Freedom of Information Policy v.7 & Environmental Information Regulations Policy v.3