



**TRAFFORD &
STOCKPORT**
COLLEGE GROUP

Freedom of Information Policy 2026-2029

If you require a copy of this Policy in any other format, please contact enquiries@TSCG.ac.uk with your specific accessible requirements and we will send you a modified copy.

Author:	Data Protection Officer
Version Date:	August 2026
Reviewed and recommended by:	Senior Leadership Team
Approved By:	Board of the Corporation
Approved Date:	October 2026
Effective Date:	1 October 2026
Next Review:	August 2029
Publication:	Internal and External

Contents

1. Introduction	3
2. Management of Requests	4
3. Refusal of a Request.....	5
4. Charges, Fees and Cost Limits	6
5. Staff Responsibilities	7
6. Contact and Complaints.....	8

1. Introduction

- 1.1 The Freedom of Information Act 2000 and the Environmental Information Regulations (EIR) 2004 form part of the Government's commitment to openness in the public sector, allowing for public access to information held by public authorities. It does this in two ways:
 - public authorities are obliged to publish certain information about their activities; and
 - members of the public are entitled to request information from public authorities.
- 1.2 Trafford & Stockport College Group (TSCG or the Group) as a Further Education Corporation is considered a public authority and has adopted the model publication scheme. This publication scheme commits TSCG to make information available to the public as part of its normal business activities. Details of what is included in this scheme can be found on the Information Commissioner's website at the link provided: [Information Commission's Office](#)
- 1.3 As well as responding to requests for information, the Group publishes information proactively. Our commitment to the scheme ensures that we publish information on our website such as policies and procedures, minutes of meetings, annual reports and financial information in line with the model publication scheme.
- 1.4 This policy will not discriminate either directly or indirectly against any individual on the grounds of gender, race, ethnicity or nationality, sexual orientation, marital status, religion or belief, age, disability, socio-economic status or any other personal characteristic.
- 1.5 Further detail on what we publish under the model publication scheme can be found on the TSCG website.
- 1.6 This policy ensures full compliance with the Freedom of Information Act 2000 (FOIA) and the Environmental Information Regulations 2004 (EIR). It establishes a robust framework for managing requests for information from students, staff, parents and the wider public.
- 1.7 TSCG also adheres to the Section 45 Code of Practice, issued by the Secretary of State under the Freedom of Information Act. This Code sets out the recommended good practice for handling requests, conducting internal reviews, managing records and maintaining effective communication with applicants. The Group is committed to following the Code to ensure openness, transparency and high standards of request handling.
- 1.8 TSCG is committed to ensuring that information is accessible to all members of the public. On request, the Group will provide this policy and any information released under FOIA or EIR in alternative formats, including large print, audio, accessible PDF, simplified text or other reasonable adjustments. Requests for accessible formats will be prioritised and fulfilled within 10 working days or as soon as reasonably practicable for complex adaptations.

2. Management of Requests

- 2.1 TSCG will comply with the Environmental Information Regulations and the Freedom of Information Act and will endeavour to provide advice and assistance to the public to ensure that they receive the information they are seeking.
- 2.2 As well as responding to requests for information, TSCG must publish information proactively. The Freedom of Information Act requires every public authority to have a publication scheme, approved by the Information Commissioner's Office (ICO), and to publish information covered by the scheme. The Group's publication scheme is available on the Group's website at:
[Freedom of Information Publication Scheme.pdf](#)

The scheme will be reviewed at least annually by the Data Protection Officer and a member of the Senior Leadership Team.

- 2.3 To be processed under the FOI framework, a request must:
- Be received in writing (including email, letter or social media channel)
 - State the applicant's real name and a reliable correspondence address
 - Describe the requested information clearly enough for staff to be able to locate it.

If you cannot make your request in writing because of a disability, please contact us and we will help you to make the request another way - for example over the phone.

Note: requests regarding environmental matters (EIR), such as land use, energy consumption or chemical disposal, can be made verbally and will be documented by staff.

- 2.4 The Group must reply to you within 20 working days from the day after receipt of the request. The response may:
1. give you the information you have asked for;
 2. tell you we do not have the information;
 3. tell you that another authority holds the information or transfer the request on your behalf;
 4. under the Freedom of Information Act, say that we have the information and offer to provide it if you pay us a fee;
 5. under the Environmental Information Regulations, make a reasonable charge for providing information in accordance with our published schedule of charges.;
 6. refuse to give you the information, and explain why; or,
 7. under the Freedom of Information Act for complex cases requiring a public interest test say that we need more time to consider the public interest in disclosing or withholding the information and tell you when to expect a response. This should not be later than 40 working days from the day after receipt of your request. We can only extend the time limit in certain circumstances and we must inform you about the extension of the statutory timeframe for response within the initial time limit, explaining why we think the information may be exempt;
 8. under the Environmental Information Regulations, say that we need more time as the information requested is particularly complex and there is a lot of information to provide. In such cases the time limit can be extended by a further 20 working days as long as we respond within the initial time limit stating when we believe we will be able to respond in full.

- 2.5 The countdown to the 20-working day deadline stops if the Group issues a fees notice or formally requests clarification from the applicant.
- 2.6 The statutory 20 working day clock continues to run during term breaks and College closures.
- 2.7 TSCG will meet its statutory duty under Section 16 of the Freedom of Information Act to provide reasonable advice and assistance to applicants. This includes helping applicants to clarify or refine unclear requests, advising where information is already publicly available, assisting applicants with disabilities to make requests in an accessible way, suggesting ways to narrow a request that is likely to exceed the cost limit and explaining how to submit a valid request. Where clarification is required, the statutory timeframe will pause until the applicant provides the necessary information.
- 2.8 Requests for environmental information will be handled under the Environmental Information Regulations (EIR) 2004. Environmental information includes but is not limited to information about land use, planning and development, energy consumption and emissions, waste, recycling and environmental impact and environmental policies, reports and monitoring data. Under the EIR requests can be made verbally or in writing and the Group must respond within 20 working days. Exceptions must be applied narrowly and are subject to a public interest test. Reasonable charges may be applied in line with the Group's published charging schedule.

3. Refusal of a Request

- 3.1 A request for information may be refused if:
 - 1. the information is not held by the Group,
 - 2. the information is exempt under any exemptions or exceptions,
 - 3. it would cost too much or take too much staff time to deal with the request,
 - 4. the request is vexatious, i.e where the request is likely to cause a disproportionate or unjustifiable level of distress, disruption or irritation,
 - 5. the request repeats a previous identical or substantially similar request from the same person, unless a reasonable time has passed between the requests.
- 3.2 TSCG can automatically withhold information because an exemption applies only if the exemption is 'absolute'. However, most exemptions are not absolute but require TSCG to apply a public interest test. The Data Protection Officer, in consultation with an appropriate member of the Group Executive Leadership, will consider the public interest arguments before deciding whether to disclose the information. The Group may disclose information even where an exemption is applicable, where it is in the public interest to do so.
- 3.3 There is also an exemption for personal data if releasing it would be contrary to the UK General Data Protection Regulation (the UK GDPR) or the Data Protection Act 2018. This exemption protects the personal data of students, parents and staff in accordance with data protection legislation.
- 3.4 Where the Group is refusing all or any part of a request, the Data Protection Officer will send the requester a written refusal notice; either, refusing to say whether TSCG holds the information or confirming that information is held but refusing to release it.

4. Charges, Fees and Cost Limits

4.1 In general, a charge cannot be applied to a request. Fees will only be applicable in cases where TSCG incurs a direct cost to produce the information and will be calculated by the Data Protection Officer and the Chief Finance and Operations Officer.

4.2 Charges made by TSCG for routinely published material will be justified and transparent and kept to a minimum. In the following circumstances, a fee will not be charged: -

- Information that is available on the website;
- Information that is available and can be emailed; and
- Information that is routinely made available.

4.3 Charges may be made for information subject to a charging regime specified by Parliament.

Charges may be made for actual disbursements incurred such as: -

- Photocopying;
- Postage and packaging; and
- The costs directly incurred as a result of viewing information.

4.4 TSCG will consider each request and may either waive its right to charge or, if it is considered necessary for a charge to be levied, will adhere to the charges outlined below:

Postage

- Postage at standard second class postage rate
- Courier charges incurred by TSCG

Photocopying

- A4 Black and white £0.10 per sheet
- A3 Black and white £0.20 per sheet
- A4 Colour print £0.25 per sheet
- A3 Colour print £0.50 per sheet

4.5 A charge may also be made in the following circumstances: -

- The need to charge in order to guarantee the continued collection and publication of the information;
- Where information has been collected and analysed for commercial purposes and where this has required professional time and skill; and
- Information which is usually provided commercially as part of the authority's trading activities.

4.6 In the above cases charges would be based on the cost incurred by TSCG (excluding staff costs). Where TSCG needs to recover research fees for retrieving archived material then the cost will be based on the actual staff rate.

4.7 Charges are subject to a periodic review.

4.8 The Freedom of Information and Data Protection (Appropriate Limit and Fees) Regulations 2004 (the Fees Regulations) govern TSCG's ability to charge for information requests under the above acts. The regulations detail the requirements placed upon public bodies on what is considered appropriate for

them to charge for requests made under the Freedom of Information and the Data Protection Acts.

- 4.9 Full details of the regulations can be found using the website link provided in reference B on page 2. In summary, TSCG is allowed to charge a fee for providing information in response to a Freedom of Information Act 2000 request, and the fee must be determined in accordance with the Fees Regulations.
- 4.10 TSCG does not have to comply with a request for information if the estimated cost of compliance exceeds the appropriate limit, as set out in the Fees Regulations. The appropriate limit for the Group is £450, equivalent to 18 hours of staff time at £25 per hour.
- 4.11 TSCG must still confirm or deny whether it holds the information requested, unless the cost of this alone would exceed the appropriate limit. In estimating whether complying with a request would exceed the appropriate limit, TSCG can only take into account the costs it reasonably expects to incur in: -
- Determining whether it holds the information;
 - Locating the information, or a document containing it;
 - Retrieving the information, or a document containing it; and
 - Extracting the information from a document containing it.

5. Staff Responsibilities

- 5.1 TSCG is required by law to respond to requests in a specific way, within the specific time frame.
- 5.2 The Data Protection Officer will share information about the requests with a member of the Executive Leadership as part of their reporting responsibilities.
- 5.3 All staff must:
1. Direct requests to the Data Protection Officer as soon as possible and within no more than three working days of receipt,
 2. Fully assist with requests for information, paying particular attention to the deadline(s) specified for the provision of information,
 3. Provide any information requested within the specified timescales,
 4. Advise the Data Protection Officer of any reasons why information should not be released. The Data Protection Officer will then consider whether any exemptions or exceptions should be applied.
- 5.4 Staff must not:
1. Attempt to answer requests themselves,
 2. Ask the person requesting the information to explain the aims or the motivation for their request (the Act generally requires that all requests are treated equally, regardless of who is making the application),
 3. Ignore the request,
 4. Alter, deface, block, erase, destroy or conceal any information to prevent it being released in response to a request, as this may lead to disciplinary or in some cases legal action.

6. Contact and Complaints

- 6.1 If a request has been refused or the applicant is not satisfied with the information disclosed to them, they have the right to appeal. In the first instance, the applicant should write to DPO@TSCG.ac.uk who will review the decision.
- 6.2 If an applicant is dissatisfied with the handling of their request or the outcome, they may request an internal review. Requests for internal review must be submitted within 40 working days of receiving the Group's response. The internal review will be carried out by a senior manager who was not involved in the original decision, ensuring an independent and fair reassessment. The internal review will consider whether the request was handled in accordance with the Freedom of Information Act 2000 or the Environmental Information Regulations 2004, including whether exemptions or exceptions were correctly applied and whether the public interest test was appropriately assessed. The Group will aim to complete the internal review within 20 working days, or 40 working days for complex cases and will inform the applicant of the outcome in writing.
- 6.3 The contact for requests for documents, questions, comments or complaints about this policy or the publication scheme is: -

Data Protection Officer (Trafford & Stockport College Group)
Manchester Road
West Timperley
Altrincham
WA14 5PR

Tel: 0161 886 7070

Email: Data Protection Officer DPO@TSCG.ac.uk

- 6.4 If TSCG is unable to resolve a complaint, enquirers have the right to complain to the Information Commission, the independent body that regulates the implementation of the Freedom of Information Act 2000.
- 6.5 For more details on how to complain see [Make a complaint | ICO](#) or alternatively send your complaint to:

Customer Contact
Information Commission
Wycliffe House
Water Lane
Wilmslow
SK9 5AF