

Freedom of Information Policy

1. Introduction

Freedom of Information Act 2000 (the Act). This policy details the means by which the staff, students, an organization or any member of the public may submit a request for access to information (access to information request information) to the Group.

1.2 The Act provides a general legal right to all information held in power of the Group (with certain exemptions). Therefore, any person or organization has the legal right to:

- To access all the information on the Group's Publications Scheme.
- Request all information held by the Group, regardless of when it was created, by whom or how it was created currently preserved.
- Be informed if the Group has such information and, if so, affirmative, that such information be communicated to him.

1.3 The Act applies in conjunction with the Data Protection Act 2018 and the Environmental Information Regulations 2004, and the supervision of all three falls to the Information Commissioner's Office. Therefore, this policy should be read together with the Group's Data Protection Policy.

1.4 This policy applies to all recorded information held by the Group, including information created, received and maintained by its employees in the performance of their duties. It also includes information belonging to the Group but has been transferred to another public authority, and the information that belongs to the Group but is retained on behalf of a third party.

2. General principles of compliance

2.1 The Group has two obligations: to confirm or deny whether it has the information and provide the information.

2.2 The Group will respond to any request promptly and, in any case, within a within 20 business days (the response period). If the Group reasonably requests further information to address the request, the response period will not begin until such information is received.

2.3 If the Group requires the applicant to pay a fee (see section 5), the period response is suspended until the fee is received.

2.4 The Group will proactively publish information as part of its Publication Plan and will update it periodically.

- 2.5 The Group will always disclose the requested information unless there is a very strong good reason, permitted by law, for not doing so.
3. **Responsibilities**
- 3.1 The responsibility for ensuring compliance with this policy and the Law rests with the Director of Operations and the Data Protection Officer.
- 3.2 The Director of Operations is the “qualified person” who has the responsibility to respond to the disclosure or non-disclosure of information that “prejudices the effective conduct of public affairs” (Section 36 of the Act).
- 3.3 The Data Protection Officer has daily responsibility to coordinate the Group's Freedom of Information function, including:
- The general development and maintenance of compliance with the Freedom Law of Information throughout the Group and, in particular, the establishment and promotion of good practices.
 - The overall development and maintenance of compliance with the Environmental Information Regulations throughout the Group, and in particular the establishment and promotion of good practices.
 - Review this policy and all procedures and guidance
 - Ensure that the Group's Publication Scheme is maintained and updated periodically.
 - Ensure that all requests for information have been responded to in accordance with the law.
 - Provide general guidance and training, as well as advice specific, on any aspect of the Freedom of Information Act and the Regulations of Environmental Information, including the Publication Plan, how to handle requests of information and how to apply exemptions.
 - Establish links with the Information Commissioner's Office.
- 3.4 All staff, regardless of whether they create or manage information, have responsibilities under the Act. You must ensure that any request for information received is sent to the Data Protection Officer.



4. Publication scheme

- 4.1 The Group's Publications Scheme is a document that is available at the Group's website (<https://www.vae-universitydo.uk/>).
- 4.2 The Plan establishes the classes or categories of information published. It also establishes clearly how the information described can be accessed and whether charges will apply.
- 4.3 This document describes the information that the Group publishes or plans to publish, publish and where to find it. You can include links to web information and contacts to access other formats.

5. Rates and charges

- 5.1 Under the Act, the Group may charge fees for the provision of information.
- 5.2 No fees will be charged for information available through the Group Publications Plan unless a fee is already included in the plan.
- 5.3 An appropriate limit of £450 or 18 hours of work has been set in accordance with guidelines issued by the Information Commissioner. The Group may reject the application, inform the applicant about the Complaints Procedure of the Group or charge additional fees if it is estimated that the cost of compliance would exceed the corresponding limit. The corresponding limit must be applied separately to each request.
- 5.4 When the Group rejects a request, it still has a duty to confirm or deny whether possesses the information, unless the cost of doing so exceeds £450.
- 5.5 When estimating whether the cost of responding to a request for information is likely to be will exceed 450 pounds sterling, the Group can only consider costs that reasonably expects to incur to: determine whether it has the requested information; locate it; retrieve it; and extract it from a document containing it or from files. The Group's staff may be its own or independent contractors. hired by the Group to assist in the management of requests for information.
- 5.6 Where the estimated cost of dealing with a request is less than £450, The Group may charge the costs it reasonably anticipates incurring in reporting to the applicant if it has the information and communicate it to him, including postal delivery, copying and, if necessary, converting the information to the format requested by the applicant. The Group will not charge for the necessary labor. You can find more information on the Information Commissioner's Office website.



- 5.7 The Group may add the estimated costs of fulfilling a request for information, for the purposes of assessing whether the £450 limit is exceeded, when the Group receives two or more requests for information that: come from the same person or of different people who appear to the Group to be acting in concert or in after a campaign; relate to the same or similar information; and have been received by the Group within a period of 60 consecutive working days.

6. Exemptions

- 6.1 The Act provides for 23 exemptions that may mean we cannot disclose the requested information.
- 6.2 If the Group considers applying a qualified exemption upon receiving a request for information, is obliged to consider whether there is an overriding public interest in provide the information to the applicant or maintain the exemption. This is known as the public interest test.

7. Complaints

- 7.1 The Group has a procedure for handling complaints, both in terms of regarding the processing of information requests as well as its system of publication. This procedure allows for a fair and thorough review of the form in which the Group manages requests for information and decisions that adopted in accordance with the Law, including those relating to the application of exemptions and the public interest test.
- 7.2 In response to the complaints, the Group:
- Acknowledge the complaint promptly and give the complainant the deadline for Group to determine the complaint;
 - Make sure the review is performed by someone higher up than the person who made the original decision;
 - Ensure that the review involves a complete re-evaluation of the case;
 - Disclose the information originally requested as soon as possible, and inform the applicant when this will happen, if the outcome of the review is that the information must be disclosed.
 - In all cases, the applicant's right to file a claim with the

Information Commissioner.

- 7.3 Complaints should be addressed to email:

admin@vae-universityuk.uk

ADDRESS:

UNIVERSIDAD DO PRIVADA LTD, with registered office at C/27 OLD GLOUCESTER STREET,
(WC1N 3AX) LONDON UK

8. Status of this Policy

- 8.1 The Policy was approved by the Group Leadership Team and supersedes all previous previous documentation.
- 8.2 The operation of this Policy will be reviewed by the Data Protection Officer.
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- 8.3 It may be reviewed and amended periodically to reflect changes in response to revised legislation and applicable standards and guidelines.

Date of	March 2025
approval:	Data Protection Officers Group Leadership Team
Updated	March 2026