



## Freedom of Information Policy

### Introduction

This policy applies to all employees, and our business partners.

In keeping with our objectives for openness, transparency and accountability, we have adopted a pro-disclosure position to information provision. However, when circumstances dictate, we will exercise our right to apply exemptions which may lead to some, or all, of the information requested being withheld.

Note: The processing of personal information requests is governed by our Data Protection Policy.

Our Information Management Officer must be advised immediately when a request for information is received so that it can be logged and monitored. Upon receipt of a written request we have 20 working days in which to comply with the request. The clock starts ticking on the day after receipt.

The application of exemptions must not be undertaken until our Information Management Officer has been consulted. In the event that the exemption to be applied carries a public interest test, our Monitoring Officer will ensure that this is carried out appropriately.

If it is estimated that a request will take more than 18 hours to process, we may choose to refuse the request. Under such circumstances we have a duty to advise the requester and if appropriate assist them to narrow the focus of their request to make it smaller.

Refusal notices are only to be sent out by our Information Management Officer. Normally we do not charge for FOI requests although we reserve the right to do so. Charging must not be done unless our Information Management Officer has been consulted.

All information that can be made readily available (i.e. it will attract no discussion about exemptions) should be published on Chandlers website as promptly as possible and, once there, should be regularly reviewed for accuracy, timeliness and completeness.

Line managers are responsible for ensuring they and their staff receive FOI training; their unit has documented procedures for dealing with FOI requests; their unit has documented procedures for pro-actively publishing information; their unit publishes and maintains their information; they and their staff comply with this policy.

Failure to comply with this policy may lead to disciplinary action.

A handwritten signature in black ink, appearing to read 'C Waterman', is written over a light grey horizontal line.

Mr. C Waterman CICM, MIoD

Managing Director

Dated 6<sup>th</sup> January 2016