



HASLEMERE TOWN COUNCIL

Haslemere Town Council

Freedom of Information Policy (Proposed clean version)

1. Purpose and scope

This policy sets out Haslemere Town Council's approach to handling requests for information under the Freedom of Information Act 2000 (FOIA). It covers recorded information held by the Council and explains how members of the public may request information, the Council's responsibilities, timescales and fees. It also summarises related regimes (Environmental Information Regulations 2004 and the Data Protection Act 2018 / UK GDPR).

2. Legislation and guidance

Primary legislation: Freedom of Information Act 2000. Relevant guidance and the ICO model publication scheme are followed. The Council also has duties under the Environmental Information Regulations 2004 and the Data Protection Act 2018 (UK GDPR).

3. Publication scheme

Haslemere Town Council adopts the ICO model publication scheme. We proactively publish the classes of information below and keep a disclosure log of FOI responses (non-exempt).

Class of information	Examples	Where published	Frequency	Charge
Who we are and what we do	Councillors, contact details, annual report	Website (Freedom of Information area)	Annually / as changed	Free
What we spend and how we spend it	Annual accounts, AGAR, payments over £100	Website / accounts section	Annually	Free
How we make decisions	Agendas, minutes, committee reports	Website (minutes & agendas)	Monthly / as published	Free

Our policies and procedures	FOI policy, Financial regs, Data protection	Website (policies)	As changed	Free
Lists and registers	Asset register, contracts register	Website / on request	Annually	Free / cost for copies

4. Making a request

To be valid under FOIA a request must be in writing, state the name of the applicant, give an address for correspondence and describe the information requested. Requests may be submitted by email, letter, WhatDoTheyKnow or social media where a means of reply is available. If a request is unclear we will provide advice and assistance under section 16 of FOIA and will pause the 20 working day compliance clock until we receive necessary clarification.

How to submit:

- Email: town.clerk@haslemere-tc.gov.uk
- Post: Town Clerk, Town Hall, High Street, Haslemere, Surrey, GU27 2HG
- Telephone: 01428 654305 (for enquiries only; not a formal request route)

5. Timescales and advice

The Council will respond no later than 20 working days from the date of receipt of a valid request, unless an exemption applies or we have asked for and are awaiting clarification. We provide reasonable advice and assistance to help people refine requests where appropriate.

6. Fees and charges

We will apply charges in line with the Fees Regulations and ICO guidance. For estimating the appropriate limit we use the prescribed costs rate used for FOI (commonly cited as £25 per hour) and the statutory appropriate limit for non-central Government (£450). If the estimated cost of compliance exceeds the appropriate limit we may refuse under section 12 and/or issue a fees notice. Where we charge for disbursements (copies, postage) we will be transparent and provide an itemised estimate.

7. Exemptions and refusal notices

Where an exemption applies we will explain which exemption(s) we are applying and, where relevant, carry out and publish a public interest test. Refusal notices will follow the form set out in FOIA and ICO guidance (including section references).

8. Vexatious and repeated requests

The Council may refuse requests that are vexatious or repeated. Decisions to refuse on these grounds will follow ICO guidance and be taken by the Town Clerk in consultation with the Chair of F&G (or delegated committee) where appropriate; the requester will be notified of the right to an internal review and to complain to the ICO.

9. Internal review and complaints

If you are unhappy with our response you may request an internal review. Please request a review in writing to town.clerk@haslemere-tc.gov.uk within 40 working days of our response. We aim to complete reviews within 20 working days in most cases and within 40 working days in exceptional circumstances. If you remain dissatisfied you may complain to the Information Commissioner.

10. Personal data and Subject Access Requests (SARs)

FOI does not give people the right to access anyone else's personal data. Individuals seeking personal data about themselves should use a Subject Access Request under the Data Protection Act 2018 / UK GDPR. Where a requester asks for personal data about themselves as part of an FOI request, we will usually treat this as a SAR and respond under the DPA regime.

11. Publication of responses and record-keeping

Where we disclose non-exempt information in response to a request we will usually publish the response in our disclosure log (subject to redaction of any exempt material). The Town Clerk is responsible for maintaining FOI records and the disclosure log.

12. Responsibilities and training

The Town Clerk is responsible for maintaining this policy, for staff training and for ensuring timely responses. Council will review the policy at least every three years or earlier if legislation or ICO guidance changes.

13. Contact for FOI matters

Town Clerk
Haslemere Town Council
Town Hall, High Street
Haslemere, Surrey GU27 2HG
Email: town.clerk@haslemere-tc.gov.uk
Telephone: 01428 654305