



HASLEMERE TOWN COUNCIL

Haslemere Town Council **Freedom of Information Act 2000** **Internal Process — Reviewed June 2026**

1. Purpose & scope

This procedure sets out how Haslemere Town Council (HTC) will respond to requests for information under the Freedom of Information Act 2000 (FOIA), the Environmental Information Regulations 2004 (EIR) and how it will handle requests for personal data under the Data Protection Act 2018 (including UK GDPR). It applies to all recorded information held by the council.

2. Policy (short statements)

HTC will:

- Respond to valid requests promptly and in any event within 20 working days from the first working day after receipt, unless an extension or lawful exemption applies.
- Maintain and publish an ICO-compliant Publication Scheme and keep published information up to date.
- Protect personal data and only disclose personal information in accordance with the Data Protection Act 2018 and UK GDPR; where appropriate, consider whether a requester should use a Subject Access Request (SAR).
- Calculate and apply the cost limit and fees in line with FOIA and ICO guidance; refuse requests where the appropriate limit (section 12) would be exceeded, or offer to provide information for an agreed charge.
- Keep clear records of searches, consultations and decisions, and provide a right of internal review (see section 8).

3. What is a valid request?

A request will normally be valid if it is in recorded form (for example email, letter or a message via a social media account where a usable contact is supplied) and sufficiently describes the information required so HTC can identify and locate it. Requests do not need to mention the FOI Act, refer to 'Freedom of Information' or include the requester's name or address. Anonymous requests should be considered; however, a contact method is helpful for clarification. If the request asks for personal data about the requester, handle it as a Subject Access Request under the Data Protection Act 2018.

4. Procedure — step by step

- a) Receipt & logging: Town Clerk or nominated FOI Officer logs every request and allocates a unique reference and date received
 - b) Initial assessment: determine whether the request should be handled under FOIA, EIR or as a SAR; if unsure consult the Data Protection Officer (DPO).
 - c) Clarification & fees: if the request is unclear, ask for clarification promptly; if the cost limit might be exceeded, issue a fees notice or offer refinement. .
- If the request is deemed to be valid the Town Clerk will notify the Mayor, Chair of Staffing, Chair of Finance and Governance. She will set out the information required and how she plans to deliver the information. Where this is a straightforward request for a piece of information held on the Council's server the Clerk will send it out as soon as is practicable
- d) Searches & consultations: identify relevant data holdings and conduct searches. If consultation with third parties is necessary, do so promptly and record the consultation.
 - e) Councillor mailbox searches: only carried out with clear, documented authorisation from the Town Clerk and recorded; councillors must be informed that searches may be necessary and of the outcome once completed.
 - f) Decision & response: disclose the information unless an exemption applies; where information is withheld, provide the exemption, reasons, and the requester's right to an internal review and to complain to the ICO.
 - g) Recordkeeping: retain a record of the request, searches, decisions and correspondence in accordance with HTC's retention schedule.

5. Timescales, fees and extensions

- Standard FOI timescale: 20 working days from the first working day after receipt. Time is paused while awaiting clarification or payment of an agreed fee.
- Section 12 cost limit: HTC may refuse where the estimated cost of compliance would exceed £450 (or the current appropriate limit) — follow ICO guidance on calculating costs.
- For complex or voluminous requests HTC may rely on time extensions allowed under the regulations or consider handling under EIR if appropriate.

6. Exemptions & personal data

HTC will apply FOIA exemptions where appropriate. In cases involving personal data, HTC will consider the Data Protection Act 2018 and UK GDPR. For sensitive personal data, the council will typically rely on the appropriate personal data exemption (section 40 FOIA) and consult the DPO before disclosure.

7. Publication scheme & proactive release

HTC will maintain an ICO-compliant Publication Scheme and regularly review published material to reduce routine FOI requests. The Publication Scheme should be publicly available on the council website and include contact details for FOI requests.

8. Internal reviews & appeals

If a requester is dissatisfied, they should ask for an internal review in writing. For FOI this should normally be made within 40 working days of the council's response. HTC aims to complete internal reviews within 20 working days and in any event within 40 working days of receipt. If still dissatisfied the requester may complain to the Information Commissioner (ICO).

9. Responsibilities

- Town Clerk: overall responsibility, FOI Officer, logging and response coordination.
- Data Protection Officer: advise on SARs and personal data exemptions.
- Councillors: co-operate with lawful requests and follow authorisation protocols for mailbox searches.
- All staff: identify potential FOI requests and forward them immediately to the FOI Officer.

10. Contact for FOI requests

FOI requests should be sent to: town.clerk@haslemere-tc.gov.uk

Postal: Haslemere Town Hall (see published address on website)

If dissatisfied, a requester may complain to the Information Commissioner: <https://ico.org.uk/>