

Requests received under the Freedom of Information Act 2000 (FOIA), and the Data Protection Act 2018 (DPA) by the University of Greenwich between January and December 2020, compared with previous two years; and other information compliance issues

1.1 FOIA Requests and the University's Log

Non-routine requests for information are included in the University's Log. These are requests in writing (which are mostly by email) from named enquirers, which are not routine. The requests fall into four types: Freedom of Information requests, requests for third party personal information, requests for own personal information, and requests for erasure (or other requests under data rights).

1.2 Total Number of Requests

	2020	2019	2018
FOI requests	242	280	242
Third Party requests	20	38	49
Subject Access requests (DPA)	27	27	20
Erasure requests (DPA)	20	20	2
Total	309	365	313

1.3 Numbers of FOIA Requests Received (as notified or directed to the Information Compliance Manager) by month

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2020	19	20	25	10	15	15	23	21	21	30	31	12	242
2019	36	17	20	24	15	21	30	24	20	31	24	18	280
2018	19	29	21	19	20	16	25	31	10	16	20	16	242

1.4 Disclosure

	2020	2019	2018
Disclosed in full	114 (47%)	125 (52%)	131 (47%)
Disclosed in part	104 (44%)	81 (33%)	104 (37%)
Not disclosed	22 (9%)	36 (15%)	45 (16%)
Total	242	280	242

Reasons for non-disclosure by exemption:

	2020	2019	2018
S21 accessible elsewhere	11	14	18
S22 future publication	1	4	7
S24 national security	3	2	1
S31 law enforcement	17	15	10
S36 prejudice to effective conduct of public affairs	1	0	0
S38 Health and safety	1	0	0
S40 personal information	39	37	30
S41 in confidence	1	0	0
S43 commercial interests	37	25	8
Information not held fully or in part	11	33	48
No clarification received	5	9	6
Over appropriate limit of 18 hours	37	41	25
Withdrawn	2	0	1

More than one exemption is often used when answering an enquiry. We have predominantly used the “personal information” and “commercially sensitive” exemptions, along with “over the appropriate limit in order to gather the information together”.

In 2020 eight requests were not completed within the statutory timescale of 20 working days (3% of requests); in 2019 five requests were not (2% of requests); in 2018 seven requests were not (3% of requests). A late return increases our risk of enquirers making complaints to the ICO.

In 2020 we had six appeals for an internal review following our response to FOI requests. We upheld our decision in four cases, and provided more information in the other two cases. In 2019 we had seven appeals. We upheld our decision in four cases, and not in one. Two were invalid. In 2018 we had four appeals and in all four cases we upheld our decision. There were no complaints to the ICO in 2018 and 2019, and so far for 2020.

1.5 Who Made FOI Requests

	2020	2019	2018
The media	64	88	51
Campaigning or representative body	12	8	14
MP or political party	1	4	2
Trades union		1	3
Other university	18	28	24
Other public body	2		2
Professional body		1	4
Commercial organisation	19	35	18
External individual	112	100	106
Student	3	2	2
Staff	3	6	3
Marketing or research person or organisation	8	7	11
Embassy			1
Lawyer			1
	242	280	242

The largest group of enquirers once again is “external individual”. However as it is only required that enquirers give a name and contact details (which can be an email address), in many cases we will not know of an enquirer’s affiliation (if any). Again we have a large number of requests from the media, commercial organisations, and other universities.

1.6 Topics of FOI Requests Received

	2020	2019	2018
Estates and buildings	17	15	3
Admissions and applications	3	9	12
Teaching and assessment	16	15	7
Animal research	1	2	1
Other research	1	4	5
Management and administration of the University	19	24	26
Procurement issues	15	24	16
HR and staff issues	26	30	20
Student issues and numbers	53	73	73
Mental health and wellbeing	14	19	5

Sexual harassment and misconduct	10	16	9
Financial information	22	23	30
ICT issues	24	20	16
Libraries	1	3	4
Terrorism / extremism / Prevent	2	2	5
Anti-semitism	3	-	-
Covid-related issues	15	-	-
	242	280	242

2.1 Subject Access Requests under the Data Protection Act received by the Information Compliance Manager, and who they were from

A Subject Access Request (SAR) is a request for one's own personal information.

	2020	2019	2018
Student	6	5	4
Student applicant	1	1	
Ex-student	12	12	12
Staff	5	6	3
Ex-staff	3		1
Staff applicant		1	
Unknown or other		2	
Total	27	27	20

3.1 Requests for Third Party information under the Data Protection Act received by the Information Compliance Manager, and who they were from

These are requests for personal information from third parties. Requesters are required to provide appropriate documentation before information is released (e.g. consent from the individual or, in the case of the police, confirmation that the information is required for an ongoing investigation and therefore subject to exemptions in the Data Protection Act 2018).

	2020	2019	2018
Government department	1	4	8
Local authority	3	8	7
Police	11	15	25
NHS		1	
Solicitor	1	2	
Student Loan Company		5	6
Private individual	3		1
Other	1	3	2
Total	20	38	49

4.1 Privacy Impact Assessments (PIAs)

Members of staff are required to complete a privacy impact assessment if they are undertaking a process involving personal data, for example an administrative system with privacy implications, an in-house or externally supplied IT system, sharing of personal data with external bodies, any process where there is a potential for damage or distress to individuals, and therefore which needs to consider a mitigation of risks. There has been another increase in PIAs that have been undertaken this year (numbers below). Some of these have not been approved or finished.

	2020	2019	2018
Total	81	72	54

4.2 Training

The Moodle module on Data Protection incorporating GDPR is mandatory for staff, and regular reports are provided to the Information Assurance and Security Committee (IASC), and to Audit Committee. The current completion rates for permanent staff are around 95%.

In addition, in 2020 the Information Compliance Manager conducted face-to-face training on 9 occasions (5 being online). This involved approximately 150 members of staff. In 2019 she conducted face-to-face training on 17 occasions, involving approximately 400 members of staff; in 2018 she conducted training on 21 occasions, involving approximately 350 members of staff.

Lucy Fincham, Information Compliance Manager, 28/01/21