



LUMINA OPEN UNIVERSITY: FREEDOM OF INFORMATION POLICY

1. Purpose and Scope

The purpose of this Freedom of Information (FOI) Policy is to ensure that Lumina Open University (hereinafter referred to as "the University") adheres to the principles of transparency, accountability, and accessibility in the management and dissemination of information. This policy establishes the framework under which the University will provide access to public records and information, subject to appropriate legal and ethical restrictions, and balances the right to information with the protection of sensitive data.

This policy applies to all employees, students, and external stakeholders of the University. It covers all forms of information generated, received, or maintained by the University, including but not limited to academic records, financial reports, research materials, administrative documentation, and communication with third parties.

2. Guiding Principles

Lumina Open University is committed to the following principles with respect to freedom of information:

- **Transparency:** The University will provide access to information in a manner that supports transparency in its decision-making, operations, and governance.
- **Accountability:** The University recognizes the importance of accountability in its operations and will ensure that relevant information is available to the public, thereby strengthening its accountability to students, staff, and stakeholders.
- **Access to Information:** All members of the University community have the right to request access to information held by the institution, subject to the exclusions outlined below.
- **Protection of Privacy:** While promoting access to information, the University will also protect personal privacy, confidentiality, and security as required by law and institutional regulations.
- **Ethical Considerations:** Information will be provided in a way that maintains academic integrity, intellectual property rights, and legal compliance.

3. Right to Information

All individuals (including students, faculty, staff, alumni, and external stakeholders) have the right to request access to information held by the University, provided that the requested information does not fall under one of the exemptions listed below.

Requests for information can be made in writing, either electronically or in hard copy, and must include sufficient details to enable the University to identify the information sought. The University will process these requests promptly and in accordance with established timelines.

4. Exemptions to Access

While Lumina Open University is committed to providing access to information, there are certain exemptions to the right of access. These exemptions include, but are not limited to:

- **Confidential Information:** Information that is protected by confidentiality agreements, proprietary rights, or legal restrictions (e.g., personal data, intellectual property).
- **Sensitive Personal Data:** Information that relates to an individual's private matters, including medical records, personal contact details, and other private data protected by applicable data protection laws.
- **Security and Safety Information:** Information related to the safety or security of the University's operations, students, staff, or assets, including internal security policies or plans that could compromise safety if disclosed.
- **Ongoing Investigations:** Information related to ongoing disciplinary or legal investigations or matters under litigation.
- **Internal Communications:** Internal communications between University officials, such as emails and memos, unless they are deemed essential for transparency.

5. Procedure for Requesting Information

Requests for information should be submitted in writing to the University's designated Freedom of Information (FOI) Officer. Requests must include the following details:

- The requester's name and contact details.
- A clear description of the information being requested.
- The preferred format for receiving the information (e.g., electronic copy, hard copy).

Upon receiving a request, the FOI Officer will:

- Acknowledge receipt of the request within a specified time frame (usually within 5 working days).
- Review the request to ensure that it is specific and clear.
- Assess whether the information requested is exempt under any of the exclusions listed in Section 4.
- Provide the requested information or inform the requester of the reasons for any refusal to disclose the information, within 20 working days from the receipt of the request.

6. Fees for Accessing Information

In some cases, a fee may be charged to cover the costs of locating, retrieving, and providing the requested information. The University will provide an estimate of any applicable fees prior to processing the request. Fees will be charged only when the cost of fulfilling the request exceeds

a certain threshold, and will be calculated based on the resources required to retrieve and provide the information.

7. Review and Appeals Process

If a requester is dissatisfied with the University's decision regarding the release of information, they have the right to request a review of the decision. The review process will be conducted by the University's FOI Officer, in collaboration with relevant departments or personnel.

If, after the review, the requester is still dissatisfied with the outcome, they may appeal the decision to an external, independent body or ombudsman, as appropriate, in accordance with applicable laws and regulations.

8. Responsibilities of Staff and Stakeholders

All University staff, faculty, and administrators are responsible for ensuring that information within their custody is handled in accordance with this Freedom of Information Policy. Staff members are required to:

- Ensure that records are accurately maintained and accessible, as appropriate, in line with the University's data retention and privacy policies.
- Respond to information requests in a timely and professional manner, under the guidance of the FOI Officer.
- Maintain confidentiality and privacy standards when handling sensitive information.

9. Training and Awareness

The University will ensure that all staff, faculty, and students are informed about the Freedom of Information Policy. Training programs will be implemented to raise awareness of the importance of transparency and responsible management of information. Additionally, staff members who handle information requests will receive specific training on how to process and respond to FOI requests.

10. Monitoring and Review

The University will monitor the implementation of this policy to ensure that it is being followed effectively. The FOI Officer will conduct an annual review of the policy, assessing its effectiveness, identifying any issues, and proposing necessary amendments to improve transparency and compliance.

11. Conclusion

Lumina Open University is committed to upholding the principles of freedom of information while ensuring that it complies with all legal and ethical responsibilities regarding the protection of sensitive data. By promoting transparency and accountability, the University strives to create

an open, accessible, and accountable environment for all its stakeholders, while safeguarding privacy and security as necessary.

This Freedom of Information Policy serves as a foundation for the University's dedication to providing access to public records and fostering trust and confidence within the University community.