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Access to Information and
Transparency Policy 2026

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Background

As a public authority YPO has an obligation to provide public access to certain information we hold. This obligation is set out in several pieces of legislation, and in supporting guidance and codes of practice, in particular:

- [Freedom of Information Act 2000](#)
- [The Environmental Information Regulations 2004](#)
- Information Commissioner’s Office (ICO) [Model Publication Scheme](#)
- [Local Government Transparency Code 2015](#)
- [Procurement Act 2023](#)

The main principle behind this legislation and supporting guidance is that people have a right to know about the activities of public authorities unless there is a good reason for them not to. This is described as a presumption or assumption in favour of disclosure.

A secondary principle is that where public authority spending is open to public scrutiny, this can help to combat fraud.

Purpose and Scope of the Policy

This policy sets out how YPO meets its obligations under the legislation. The document is divided into four sections:

- Part 1 Freedom of Information Act 2000 (and Appendix 1)
- Part 2 Environmental Information Regulations 2004 (and Appendix 2)
- Part 3 ICO Model Publication Scheme
- Part 4 Local government transparency code 2015 and the [Procurement Act 2023](#)

This Access to Information and Transparency Policy does not give individuals access to their own personal data. In the UK data protection is governed by the [UK General Data Protection Regulations \(UK GDPR\)](#) and the [Data Protection Act 2018 \(DPA 2018\)](#). Individuals have a right of access to information about themselves. This can be done via a Data Subject Access Request. Guidance on how to make a DSAR can be found on the [Privacy Policy](#) page of YPO’s website.

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Part 1 Freedom of Information

The Freedom of Information Act 2000 provides public access to information in two ways:

- Public authorities are obliged to publish certain information about their activities
- Members of the public are entitled to request information from public authorities

The Act covers all recorded information held by the organisation, including information it creates and, in some cases, information received from others. The organisation does not have to create new information to respond to a request.

YPO meets its obligations under the Act by:

- Publishing certain information proactively, in compliance with the ICO's [Model Publication Scheme](#)
- Publicising the fact that people can make FOI requests and tell people who we think may want information who to contact and how to make requests.

Making a Request for Information

Anyone can make a Freedom of Information request. To be valid, the request:

- Must be in writing.
- Must include the real name of the person making the request and an address for correspondence. This can be an email address.
- Does not have to mention the Act or be addressed to the person responsible for handling the requests on behalf of the organisation.

Responding to a Request for Information

All requests for information should be forwarded to: dataprotection@ypo.co.uk

When responding to a Request for Information YPO is required to:

- Tell the person making the request whether we hold the information requested
- Complete the request in 20 days
- Maintain and publish a log of all requests and responses
- Provide the information, in writing, unless an exemption applies (see below), in which case we may refuse the request in whole or in part

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Refusing a Request for Information

We may refuse a request for information if:

- We don't hold the information
- We cannot easily access the information
- The request would exceed the time or cost thresholds set out in the Act

If we do hold the information or can easily access it, we may still refuse a request under certain circumstances. The [Freedom of Information Act 2000](#) Part II includes a number of exemptions that allow information to be withheld. These are summarised in the table in Appendix 1. The Act classifies exemptions as:

- Absolute: if this applies, we do not have to release the information.
- Qualified: if this applies, we must weigh the public interest in maintaining the exemption against the public interest in disclosure. This is known as the public interest test.

Public interest here means the public good, not what is of interest to the public, nor the private interests of the requester (where they are different to the public interest). If we wish to rely on a qualified exemption we must:

- Understand what the public interest means in the context of the request
- Decide whether the exemption is engaged (applies to the information requested)
- Carry out the public interest test and decide whether the public interest is better served by maintaining the exemption or by disclosing the information

The ICO publishes further detailed guidance on the [public interest test](#), including when it applies, how to apply it, and how to extend the 20 day deadline to take account of the test. This guidance must be followed at all times. Where we rely on a qualified exemption this should be documented.

Where we refuse a request to disclose information, we must inform the person making the request in writing:

- That we are refusing to disclose the information
- The exemption we are relying on to refuse disclosure
- Why the exemption applies
- How to request an internal review if they are dissatisfied with the response
- How to appeal to the ICO if dissatisfied with the outcome of the internal review

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Part 2 Environmental Information Regulations 2004

The Environmental Information Regulations 2004 provide public access in two ways:

- Public authorities must make environmental information available for inspection, proactively, by easily accessible electronic means
- Members of the public are entitled to request environmental information from public authorities

The principle behind the law is that giving the public access to environmental information will encourage greater awareness of issues that affect the environment. This will make public bodies more accountable and transparent and build trust and confidence in them.

The regulations cover any recorded environmental information in the possession of public authorities in England, Wales and Northern Ireland, or held on their behalf.

The regulations provide a separate right of access to information about the environment to that available under the Freedom of Information Act 2000. YPO meets its obligations under the regulations by:

- Proactively publishing environmental information, where relevant
- Publicising the fact that people can make requests for information and provide contact details

Making a Request for Information

Anyone can make a request for information under the Environmental Information Regulations 2004. Requests can be made verbally or in writing.

Responding to a Request for Information

All requests for information should be forward to: dataprotection@ypo.co.uk

When responding to a request for environmental information YPO is required to:

- Clarify the request with the person making it to ensure the information requested is environmental
- Complete the request within 20 days, or within 40 days if the request is complex
- Disclose the information we hold, or explain why we cannot provide it
- Maintain and publish a log of all requests and responses

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Refusing a Request for Information

We may refuse a request for information if:

- We don't hold the information
- We can rely on one or more of the exceptions to the duty to disclose set out in [Environmental Information Regulations 2004 Part III](#)

The exceptions set out in the regulations are summarised in the table in Appendix 2. They are all subject to the public interest test except the disclosure of personal data. The ICO publishes further detailed guidance on [when can we refuse a request for environmental information](#) including how to conduct and document the public interest test. This guidance must be followed at all times.

Where we refuse a request to disclose information we must inform the person making the request in writing of:

- The reasons for the refusal, including the exception we are relying on
- The factors we considered in reaching a decision under the public interest test
- Their right to complain to ourselves and to the ICO, including relevant contact details

Part 3 ICO Model Publication Scheme

By adopting the ICO's Model Publication Scheme, YPO sets out its high level commitment to proactively publish information that falls into seven classes of information:

- Who we are and what we do
- What we spend and how we spend it
- What our priorities are and how we're doing
- How we make decisions
- Our policies and procedures
- Lists and registers
- The services we offer

YPO meets its obligations under the scheme by publishing a Guide to Information on our website [Transparency in Public Procurement](#)

YPO does not charge for information accessed electronically. It reserves the right to charge for actual costs incurred in photocopying, postage and packaging, if required.

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Part 4 Local Government Transparency Code 2015 & the Procurement Act 2023

The Local Government Transparency Code 2015 sets out the minimum levels of data that public authorities should publish. The code also recommends that organisations publish additional datasets and provides more detail on these. The code is based on three principles:

- Information is demand led
- The availability of data should be promoted and publicised
- Data is published in a timely manner

The purpose of the code is to ensure that information published enables members of the public to understand how public money is spent; how public authorities use their assets; how decisions are made; and where to find information on issues important to them. Where spending and decision making are open to public scrutiny, this can also help to combat fraud.

The code allows for some exemptions and exclusions from publication. The code also allows for data to be anonymised before publication where this would otherwise infringe the UK Data Protection principles.

The code requires the following information, relevant to YPO, to be published annually:

- Constitution
- Organisation chart
- Senior salaries
- Pay multiples
- Trade union facility time
- Information about their counter fraud work
- Information about their land and building assets

The code requires the following information to be published quarterly:

- Expenditure exceeding £500
- Government procurement card transactions
- Procurement information

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The Local Government Association (LGA) publishes guidance on complying with the transparency code, including:

- [Practitioner's Guide](#) to understanding and implementing the code
- [Publishing organisation information](#) including organisational charts, senior salaries, pay multiples, trade union facility time, and counter fraud work
- [Publishing land and building assets information](#)
- [Publishing spending and procurement information](#)

In response to the Ministry of Housing, Communities and Local Government (MHCLG), formerly the Department for Communities and Local Government (DCLG), publishing [guidance for reconciling publication requirements of the Procurement Act 2023 and the Local Government transparency code 2015](#) in January 2025, the LGA updated its guidance on publishing spending and procurement information in August 2025.

YPO meets its obligations under the transparency code by publishing information on our website [Transparency in Public Procurement](#). YPO meets its obligations to publish procurement information under the Procurement Act 2023 via the [Atamis - Commercial Management System \(CMS\)](#)

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Roles and Responsibilities for Access to Information and Transparency

YPO Managing Director and Board are responsible for ensuring that YPO complies with its legal obligations; for implementing this policy to enable compliance; and for ensuring that adequate resources are made available to implement this policy and supporting processes.

SLT and line managers are responsible for ensuring that their team members are aware of this policy and act in compliance with it.

All employees are responsible for ensuring they have read and understood the policy, and their obligations under the Freedom of Information Act 2000, Environmental Information Regulations 2004, and the Local Government transparency code 2015.

Maintaining and Reviewing Access to Information Arrangements

YPO will review this policy on a regular basis, in response to any relevant legislative changes, or any breaches in compliance, and ensure that it remains up to date with the requirements of the Freedom of Information Act 2000, Environmental Information Regulations 2004, and Local Government transparency code 2015.

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Appendix 1 Freedom of Information Act 2000 Part II Exemptions

FOI Section & Exemption	Type
Section 21 - Information already reasonably accessible	Absolute
Section 22 – Information intended for future publication	Qualified by public interest test
Sections 23 & 24 – Security bodies and national security	Section 23 – Absolute / Section 24 - Qualified by public interest test
Section 26 – Defence	Qualified by public interest test
Section 27 – International relations	Qualified by public interest test
Section 28 – Relations within the UK	Qualified by public interest test
Section 29 – The economy	Qualified by public interest test
Section 30 – Investigations	Qualified by public interest test
Section 31 – Prejudice to law enforcement	Qualified by public interest test
Section 32 – Court records	Absolute
Section 33 – Prejudice to audit functions	Qualified by public interest test
Section 34 – Parliamentary privilege	Absolute
Section 35 – Government policy	Qualified by public interest test
Section 36 – Prejudice to the effective conduct of public affairs	Qualified by public interest test
Section 37 – Communications with the royal family and the granting of honours	Parts absolute & parts qualified by public interest test
Section 38 – Endangering health and safety	Qualified by public interest test
Section 39 – Environmental Information	Qualified by public interest test
Section 40 (1) Personal information of the requestor & Section 40 (2) Data Protection	Absolute
Section 41 – Confidentiality	Absolute
Section 42 – Legal professional privilege	Qualified by public interest test
Section 43 – Trade secrets and prejudice to commercial interests	Qualified by public interest test
Section 44 – Prohibitions on disclosure	Absolute

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Appendix 2 Environmental Information Regulations 2004 Part III Exceptions

EIR Exception
Regulation 12 (3) – Personal Information
<p>Regulation 12 (4) – Exceptions based on the type of information:</p> <p>12(4)(a) - The public authority does not hold the information when an applicant’s request is received.</p> <p>12(4)(b) – The request for information is manifestly unreasonable.</p> <p>12(4)(c) – The request is too general.</p> <p>12(4)(d) – The request relates to information which is unfinished or in the course of being completed.</p> <p>12(4)(e) – The request involves the disclosure of internal communications.</p>
<p>Regulation 12 (5) – Exceptions based on the content of the information requested.</p> <p>12(5)(a) – International relations, defence, national security & public safety.</p> <p>12(5)(b) – The course of justice, the ability of a person to obtain a fair trial or the ability of a public authority to conduct an inquiry of a criminal or disciplinary nature.</p> <p>12(5)(c) – Intellectual property rights.</p> <p>12(5)(d) – The confidentiality of the proceedings of a public authority where such confidentiality is provided by law.</p> <p>12(5)(e) – The confidentiality of commercial or industrial information where such confidentiality is provided by law to protect a legitimate economic interest.</p> <p>12(5)(f) – The interest of the supplier of the information.</p> <p>12(5)(g) – Protection of the Environment</p>
Regulation 12(6) and (7) – Neither confirm nor deny
Regulation 12(9) – Emissions.

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