



## Freedom of Information Policy

### Purpose

This policy explains how the GCC handles requests for information under the [Freedom of Information Act 2000](#) (FOIA) and the [Environmental Information Regulations 2004](#) (EIR). It supports transparency and accountability in public services.

### Scope

1. This policy applies to all recorded information held by the GCC or by third parties on its behalf.
2. This includes printed documents, computer files, letters, emails, photographs, and sound or video recordings.

### Introduction

3. The FOIA enables anyone to request recorded information held by the GCC. On rare occasions, where that information is considered 'environmental information', a request will be considered under the EIR.
4. The GCC supports the underlying principle of the FOIA and the EIR: that people have a right to know about the activities of public authorities unless there are good reasons to withhold that information.
5. The GCC seeks to operate open and transparent processes and to publish as much information about its activities as reasonably possible.
6. The GCC will comply with a request for information made under FOIA (a FOI request) or the EIR (an EIR request) if it holds the information requested, unless one or more of the exemptions/exceptions under FOIA/EIR apply.
7. The GCC follows guidance from the Information Commissioner's Office (ICO), including sector-specific expectations for healthcare regulators.

### FOIA/EIR requests

8. If you cannot find the information you need on the GCC website, you can request it in writing. Include your name and contact details.

Send requests by email to: [foi@gcc-uk.org](mailto:foi@gcc-uk.org) or by post to:

General Chiropractic Council  
Park House, 186 Kennington Park Road  
London SE11 4BT

9. You do not need to mention FOIA (or the EIR), or mention the correct legislation, to make a valid request. The GCC treats all written requests for information (that is not personal data – see further below) as FOIA or EIR requests (depending on the type of information being requested).
10. The GCC aims to respond within 20 working days from the day after it receives a valid request.
11. If the GCC needs more detail to identify the information, it will ask you as soon as possible. The 20-day time limit pauses until you reply.
12. You can expect the response to:
  - confirm if the GCC holds the information (unless this in itself would disclose sensitive information, in which case we may give a ‘neither confirm nor deny’ response)
  - explain any exemptions applied to withhold information
  - outline public interest arguments if relevant
  - explain how to complain if you are not satisfied

### FOIA/EIR and data protection law

13. You cannot use FOIA/EIR to request your own personal data. To access your personal data, you should make a subject access request. The GCC’s [Subject Access Request](#) policy provides further information about how to make such a request. The GCC will always consider the scope of your request and decide whether it is best considered under FOIA, the EIR or as a subject access request under the data protection legislation, in order to provide you with the most appropriate response.
14. Any information disclosed in response to a FOIA or EIR request is ‘to the world’; that is, to the general public and not just to an individual. This is unlike a subject access request which is considered disclosed to the individual who has requested the information only. As FOIA/EIR responses are essentially made public, there are exemptions which allow us to withhold personal data in response to a FOIA or EIR request. If your request includes personal data (either your own or someone else’s), the GCC will assess its legal obligations to protect the privacy of those individuals and may decide that right to privacy outweighs the public interest in disclosure.

## Exemptions

15. Some information is exempt from disclosure under FOIA. Although the GCC aims to release as much information as possible, it uses exemptions when appropriate.
16. On the rare occasion a request is considered under the EIR, there are exceptions we can apply to withhold the information. As the majority of requests for information we handle are FOIA requests, we have only explained the main FOIA exemptions below, however, the main EIR exceptions are likely to be similar.
17. If the GCC decides not to release information, it will explain why.
18. FOIA exemptions may be:
  - Qualified exemptions: if the exemption applies, the GCC must apply a public interest test, weighing up the public interest in disclosure versus the public interest in maintaining the exemption and withholding the information
  - Absolute exemptions: we can withhold information automatically, without applying a public interest test, if the exemption applies
19. Examples of qualified FOIA exemptions include:
  - Information scheduled for future publication
  - Information related to fitness to practise investigations
  - Commercially sensitive information
  - Information that could endanger someone's health or safety
20. Examples of absolute FOIA exemptions include:
  - Information already reasonably accessible (e.g. because it is already in the public domain)
  - Information given in confidence
  - Personal data of the requester
  - Personal data of other people
21. Other than the exception regarding personal data of people other than the applicant, most of the EIR exceptions are subject to the public interest test.

## Vexatious or repeated requests

22. We will not generally take into account the identity or intentions of a requester. However, FOIA does not require the GCC to respond to vexatious requests. The EIR has a similar provision regarding 'manifestly unreasonable' requests.
23. We might refuse a request on this basis, in line with guidance from the ICO, if:

- It contains abusive or aggressive language
- It is clearly borne out of a personal grudge and the request has no reasonable foundation
- The request is clearly meant to cause disruption, distress or irritation
- The requester is unreasonably persistent
- Requests are frequent or overlapping
- The requester takes a scattergun approach
- The request is frivolous

In such cases, we will issue a refusal notice.

24. The GCC does not need to respond to identical or similar requests from the same person unless a reasonable time has passed.

### Costs

25. In general, the GCC does not charge for FOIA or EIR requests.

26. If a request involves significant cost or effort, the GCC may refuse it or ask for payment (taking into account the reasonable costs of compliance).

### Complaints

27. If you are not satisfied with the GCC's response, you can request an internal review. Requests for an internal review must be made within 40 working days of receiving our response.

28. A senior staff member who was not involved in the original decision will carry out the review.

29. The GCC aims to respond to internal reviews within 20 working days.

Send review requests by email to: [foi@gcc-uk.org](mailto:foi@gcc-uk.org)  
or by post to:

General Chiropractic Council  
Park House, 186 Kennington Park Road  
London SE11 4BT

30. If, after exhausting our internal processes, you are still dissatisfied, you can contact the ICO:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF  
Tel: 0303 123 1113

Website: [www.ico.org.uk](http://www.ico.org.uk)  
Email: [casework@ico.org.uk](mailto:casework@ico.org.uk)

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		Document Version Control			
Version No.	Date	Author	Reviewed by	Approved by	Changes made
1.0	Aug-2018	GCC Executive	Audit & Risk Committee (ARC)	Council	New policy
2.1	Oct-2025	Director of Corporate Services			Major changes made to align the policy with the Freedom of Information Act 2000 and current guidance from the Information Commissioner's Office (ICO)
2.2	19/12/25		Capsticks Solicitors		Tracked changes in document dated 19/12/25
2.3	04/03/26		ARC, March 2026	Council, June 2026	