Board of Management
Audit & Assurance Committee

Date of Meeting	**Wednesday 9 September 2026**
Paper No.	**AAC1-M**
Agenda Item	**4.1.1**
Subject of Paper	**Annual Freedom of Information Report 2025-26**
FOISA Status	**Disclosable**
Primary Contact	**Marcus Walker** **Associate Director of Governance and Risk**
Date of production	**07 August 2026**
Action	**For Noting**

1. Recommendations

1.1. To note the College's annual Freedom of Information report for the 2025-26 academic year.

2. Consultation

2.1. An annual report on the College's handling of requests submitted under the Freedom of Information (Scotland) Act 2002 and the Environmental Information (Scotland) Regulations is provided to the Audit & Assurance Committee each year before being published on the College website.

3. Key Insights

3.1. The College remains committed to the principles of openness, transparency and accountability. As a Scottish public authority, the College has statutory obligations under the Freedom of Information (Scotland) Act 2002 (FOISA) and the Environmental Information (Scotland) Regulations 2004 (EIRs) to provide access to recorded information, subject to specified exemptions and exceptions. The College also maintains and regularly reviews its Publication Scheme, which was last updated in February 2025,

to support proactive publication and reduce the need for formal information requests. The Publication Scheme is available on the College website.

3.2. The enclosed Annual Freedom of Information Report covers the period 1 August 2025 to 31 July 2026 and provides an overview of the volume, nature and outcomes of information requests received by the College. The report also considers key trends, compares performance against previous years and provides contextual information relating to performance across the wider Scottish public sector.

3.3. The College received a high volume of information requests during 2025-26, with request volumes increasing by 60% compared with the previous academic year. Despite this significant increase in workload, the College responded to 96% of requests within the statutory timescale of 20 working days. While this represents a slight reduction from the 100% compliance achieved in 2024-25, it remains a strong level of performance. The Committee should note that all three late responses occurred during a transitional period, prior to the appointment of the current Associate Director of Governance & Risk and Corporate Governance Officer in October 2025. No late responses were recorded following these appointments.

3.4. A total of 22 internal review requests were received during 2025-26, compared with none in the previous academic year. While this increase is notable, the outcomes indicate that the College's original decisions were either fully upheld or partially upheld in all cases. No reviews resulted in the College's decision being overturned. This reflects the robustness of the College's decision-making processes while also providing valuable opportunities to strengthen response quality and consistency.

3.5. No applications were made to the Scottish Information Commissioner (SIC) during 2025-26. Consequently, none of the College's decisions were subject to external investigation, or enforcement activity during the reporting period.

3.6. The College continues to submit quarterly statistical returns to the SIC covering Freedom of Information, Environmental Information Regulations and Subject Access Request activity, supporting national transparency and benchmarking.

4. Impact and Implications

4.1. The College has processes and practices in place to meet our obligations under the Freedom of Information (Scotland) Act 2002 and to uphold openness and transparency. Failure to meet these obligations would damage public trust and confidence in the College and could result in an intervention from the SIC.

Appendix 1: Annual Freedom of Information Report 2025-26

Annual Freedom of Information Report 2025-26

1. The Freedom of Information (Scotland) Act 2002 and the associated Environmental Information Regulations 2004 provide individuals with a statutory right to access information that is held by public authorities. The legislation and regulations encourage openness and transparency, helping to build trust between the College and the public we serve. This report outlines the volume and nature of the requests received by the College, and how they were responded to, during the period 1 August 2025 to 31 July 2026.

Volume and Handling of Requests

2. In 2025-26, as shown below, the College received 77 requests. This is a 60% increase in volume from the previous academic year and represents the second-highest number of requests received by the College, marginally below the peak of 78 requests recorded in 2023-24. In total, 75 were Freedom of Information (FOI) requests and two were Environmental Information Requests (EIR).

3. A total of 96% of requests were responded to within the statutory timescale of 20 working days. This represents a 4% reduction compared with the previous academic year, when the College achieved 100% compliance. All three late responses occurred during September and October 2025 during a period of staffing transition within the Governance & Risk function. Following the appointment of a new Associate Director of Governance & Risk and a Corporate Governance Officer in October 2025, no further late responses were recorded during the remainder of the reporting period. This provides assurance regarding the effectiveness and resilience of the College's governance arrangements.

	2020-21	2021-22	2022-23	2023-24	2024-25	2025-26
On-time	35 (97%)	22 (92%)	63 (97%)	71 (99%)	46 (100%)	74 (96%)
Late	1 (3%)	2 (8%)	2 (3%)	1 (1%)	0 (0%)	3 (4%)
Closed	0	0	3	6	2	0
Total requests	36	24	68	78	48	77

4. The Act and the Regulations outline several exemptions for specific types of information or requests. The table below shows the number of times these exemptions have been used by the College in the past three academic years in each request. Exemptions tend to only be applied to parts of requests, meaning most requests are responded to either in full or in part rather than refused entirely.

5. The increase in Section 17 responses reflects a greater number of broad or exploratory requests during the reporting period. In many cases, applicants sought information that fell outside the scope of records held by the College.

Section/Regulation	2023-24	2024-25	2025-26
Section 12: Excessive cost of compliance	0	1	2
Section 14(1)/(2): Vexatious or repeated request	0	0	1
Section 17/Regulation 10(4)a: Information not held	4	7	27
Section 25/Regulation 6(1)b: Information otherwise accessible	7	4	2
Section 27: Future publication	2	0	1
Section 30: Prejudice to effective conduct of public affairs	1	0	2
Section 33: Prejudice to commercial interests	1	1	6
Section 35: Prejudice to prevention/detection of crime	0	2	0
Section 36/Regulation 10(5)d: Confidentiality	1	0	2
Section 38/Regulation 11: Personal information	13	7	3
Regulation 10(4)c: Request formulated in too general a manner	0	0	0

Nature of Requests

6. The College receives requests for information from a range of different people and groups. Most requests are submitted by private individuals/organisations or trade unions, or through WhatDoTheyKnow.com (WDTK). WDTK is a web-based platform that helps people submit Freedom of Information requests and publishes both the requests and responses on their website, so the information is available to the general public.

	2023-24	2024-25	2025-26
Journalists	6%	6%	3%
MP/MSPs	8%	8%	4%
Private Individuals/Companies	21%	23%	18%
Researchers	4%	6%	3%
Solicitors	0%	0%	1%
Staff	1%	0%	0%
Students	0%	2%	0%
Trade Unions	14%	31%	22%
WhatDoTheyKnow.com	46%	23%	49%

7. In 2025-26, the largest proportion of requests related to the Executive Office (38%), followed by Human Resources and Organisational Development (23%) and Finance and Procurement (9%). The significant increase in requests relating to the Executive Office reflects heightened external interest in matters relating to senior leadership, governance and institutional decision-making. This increase reflects a combination of sector-wide requests relating to governance and public accountability, together with heightened interest in institutional decision-making

	2023-24	2024-25	2025-26
Board of Management	0%	2%	3%
Brand and Communications	1%	0%	0%
Corporate Dev & Commercial	14%	10%	6%
Estates/Facilities	21%	6%	6%
Faculties	5%	4%	6%
Finance and Procurement	9%	15%	9%
FOI and Data Protection	1%	0%	0%
HR & Organisational Development	28%	35%	23%
Information Technology	10%	6%	1%
Performance	5%	2%	0%
Principal/Executive Office	4%	6%	38%
Student Services/Records	1%	13%	6%

Internal Reviews and Appeals

8. Applicants who are dissatisfied with the handling of their request or the information provided have the right to request an internal review within 40 working days of receiving the College's response. During 2025-26, 22 internal review requests were received compared with none in the previous academic year. This represents a substantial increase, with internal reviews accounting for more than one quarter of all requests

received. In every case, the original decision was either upheld or partially upheld, with no reviews resulting in the College's position being overturned. The increase in review activity reflects both increased request volumes and wider national trends in the use of information rights legislation.

9. Applicants who remain dissatisfied following the outcome of an internal review may apply to the SIC for a formal decision. No applications relating to City of Glasgow College were submitted to the SIC during 2025-26 and, therefore, no formal decisions, enforcement actions or recommendations were issued in respect of the College.

Type of Review/Application	2023-24	2024-25	2025-26
Internal review requests			
Upheld the College's decision	3	0	19
Partially upheld the College's decision	0	0	3
Did not uphold the College's decision	0	0	0
Internal review request submitted outside of timescale	0	0	0
Closed	1	0	0
Applications to the Scottish Information Commissioner			
Decided in favour of the College	0	0	0
Decided in favour of the applicant	0	0	0
Withdrawn by the applicant	0	0	0
Yet to conclude	0	0	0

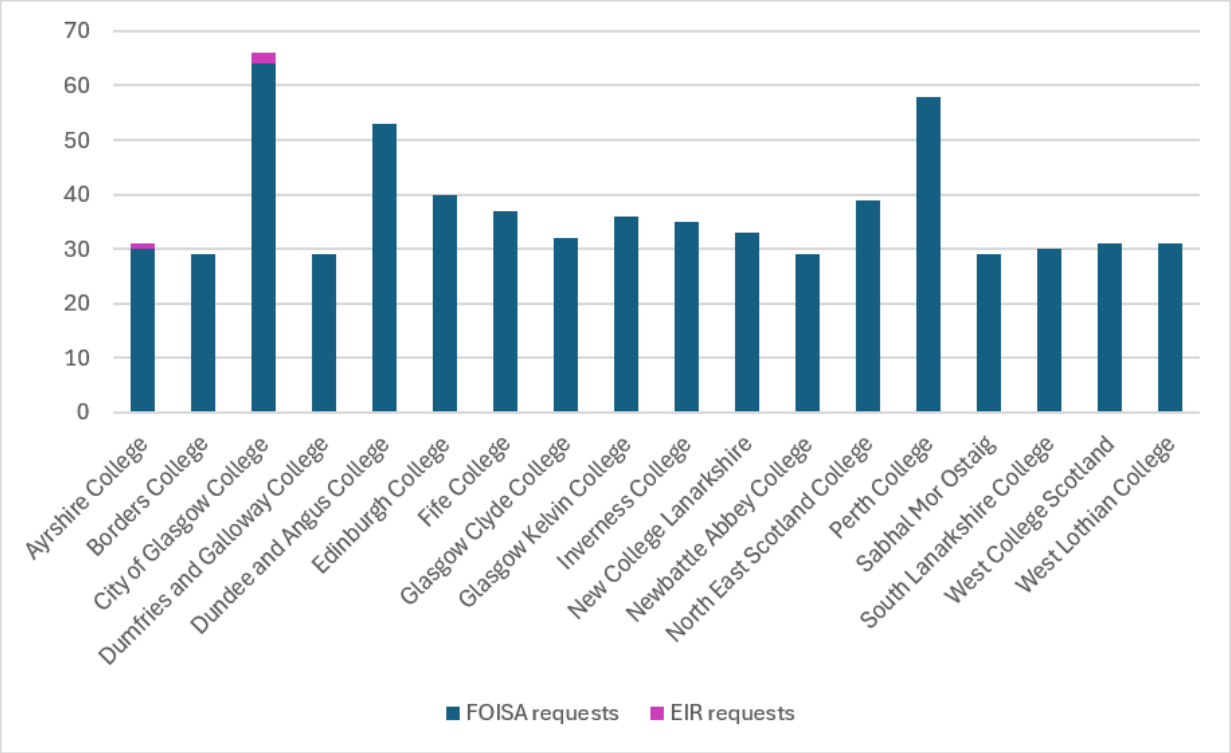
National Context

10. As illustrated in Graph 1, the College continued to experience one of the highest information governance workloads within the Scottish college sector. Data published through the SIC's Statistics Portal indicates that City of Glasgow College received the highest volume of FOISA and EIR requests amongst Scottish colleges during the reporting period. This reflects both the scale of the institution and the level of public interest in its activity.

11. It should be noted that direct comparisons between the College's annual report data and SIC-published sector data require caution. The College reports using the academic year reporting cycle of August to July, whereas the SIC's national statistics are published using a financial year reporting cycle of April to March. While the reporting periods differ, both datasets demonstrate that City of Glasgow College consistently receives significantly higher request volumes than other colleges within the sector.

12. Despite managing the highest request volumes within the sector, the College maintained a strong level of statutory compliance throughout 2025-26. The College's performance demonstrates that effective governance arrangements remain in place despite the increasing demand placed on information governance resources. More broadly, public authorities across Scotland continue to experience growth in both information requests and internal reviews. Increased public awareness of information rights, greater expectations of transparency, and the growing use of artificial intelligence tools to generate requests may all contribute to further increases in request volumes and complexity in future years. The College will continue to monitor these developments and review its information governance arrangements to ensure ongoing compliance and resilience.

Graph 1: Number of FOISA / EIR requests to Scottish colleges in 2025-26 (March to April).



Conclusion

13. The College continues to demonstrate a strong commitment to openness, transparency and compliance with information rights legislation. During 2025-26, the College managed a significant volume of information requests whilst maintaining a high level of statutory compliance and avoiding any referrals to the Scottish Information Commissioner. Although request volumes and internal review activity increased significantly, the College's overall performance demonstrates that its governance arrangements remain effective. The successful appointment of new governance staff during the year has supported organisational resilience and contributed to continued compliance. Continued monitoring of emerging trends and proactive publication of information will be important in ensuring the College remains well positioned to meet future demand and maintain public confidence.