

Corporate Policies and Procedures

Freedom of Information Policy

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Review Date	15/09/2027, or in line with legislation changes and / or review of all Information Governance Policies
Target Audience	This policy applies to all Advance Northumberland Group employees and staff who are seconded to the Advance Northumberland Group regardless of length of service. It also applies to agency workers. The Advance Northumberland Group, for the avoidance of doubt, shall include Advance Northumberland and any subsidiary company thereof which forms part of the Group. The policy provides guidance to all employees, including Directors, and Non-Executive Board Members.

History of previous versions of this document:

Approved Where	Approved When	Version	Issue Date	Review Date	Contact Person
Board	25/02/2022	1	11/03/2022	Aug 2023	Head of Business Operations
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07/08/2024	16/08/2024	4	19/08/2024	Sept 2025	Head of Business Transformation
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Statement of changes made in most recent version:

Date	Version	Details of review
2	01/08/2023	Policy review against s.45 Code of Practice for Access and s.46 Code of Practice for Records Management. Job descriptions updated throughout; Chief Operating Officer removed. Replaced with Group Executive Director. References to relevant parts of legislation added throughout. Contents and order of information updated. Section 3 added for Responsibilities. Section 4 updated to Introduction: Right of Access Section 5 updated to Our Obligations, incorporating 5.1 Publication Scheme and 5.2 Requests for information. Section 5.2 added to provide more

		detailed information on a valid request, including provision for social media. Section 6 updated to Responding to Requests. Information on fees and fees notices added. Section 7 updated to cover vexatious requests. Section 8 updated to provide correct information on Internal Reviews. Section 9 added for procedural complaints. Section 10 corrected information for Environmental Information Regulations. Section 11 updated for transferring requests. Appendices updated in Section 14.
3	03/10/2023	Appendix 1, Publication Scheme amended to state Board Minutes will be published within 12 months of meeting date, and Senior Executives updated to reflect changes in Project Management Team.
4	10/07/2024	Appendix 1, Publication Scheme amended to update Board and Executive Team. Date of latest Articles of Association updated. Policy owner title changed to reflect new role. No other change to Policy Document.
5	10/06/2025	ERDF Logo removed HR Manager updated to Head of People and Organisational Development Section 13.1 updated for monitoring and reporting to state monthly reporting requirements and annual reporting requirements. Section 13.2 updated to state the review of the policy if there is a need to update the Publication Scheme. Appendix 1, Publication Scheme amended to update Board and Executive Team
6	07/09/2026	Head of Business Transformation updated to Head of Business Operations. Appendix 1, Publication Scheme updated to reflect current, published version.

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1. Purpose

Advance Northumberland Limited and all subsidiary companies (the Company) meet the definition of a Public Authority, as set out in Schedule 1 of the Freedom of Information Act (FOIA) 2000. The purpose of this policy document is to ensure the Company is aware of and meets all statutory obligations placed on us by the FOIA. This policy also covers our obligations for disclosing information, as set out in the Environmental Information Regulations 2004.

This policy forms part of the wider Information Governance Framework and should be read in conjunction with all Company Policies, with a particular focus on the following:

- Data Protection Policy
- Record Management Policy
- Information Security Policy
- Document Retention Schedule
- Staff Code of Conduct.

2. Scope

This policy applies to all Employees, including the Board of Directors, contractors, agents, consultants, partners, or other parties who manage, and handle information held by, or on behalf of the Company. It applies to information deemed to be held by the Company, in any form, electronic or paper, including printed documents, computer files, letters, notes, emails, photographs and sound recordings such as video or CCTV. Information is not limited to official documents.

The Company is not required to create new information to comply with a request for information under the Act. We must however consider information already in existence at the time a request is received.

3. Responsibilities

The Executive Director for Governance and Sustainability has overall responsibility for Freedom of Information in the Company. They ensure:

- All employees, including Board Members, are appropriately trained and understand their responsibilities as set out in this Policy.
- Procedures for handling Freedom of Information requests are clearly described.
- Anyone wanting to make enquiries about making a Freedom of Information request knows how to do so.
- There is a nominated role with specific responsibility for Freedom of Information in the Company. The nominated Officer for the Company is the

Head of Business Operations.

The Head of Business Operations is responsible for:

- Review and implementation of the Company Policy.
- Overseeing the day-to-day operation of Freedom of Information procedures.
- Ensuring all information requests are correctly logged with a unique reference.
- Ensuring information requests are promptly and courteously dealt with.
- Ensuring the correct statutory route to information is used by the Company.
- Ensuring requests are disseminated to the appropriate Head/s of Service to support the collation of our response.
- Monitoring requests to ensure statutory deadlines are met.
- Review with the Executive Director for Governance and Sustainability.
- Issuing Company responses to information requests: clarification requests, fee notices, acknowledgements, refusal notices, and responses.
- Offering advice to staff on information requests.
- Manage the content of the Freedom of Information available to the public and staff.
- Ensure that suppliers and contractors are aware that any information supplied to the Company will be subject to the terms of the Act.
- Our performance in handling Freedom of Information requests is reviewed, assessed, and published on a regular basis.

Each Director and Head of Department has responsibility for:

- Ensuring their teams follow procedures for handling requests for information.
- Ensuring their teams manage records to ensure that requests for information can be handled efficiently and effectively.
- Their teams are aware of their responsibilities in compliance with the Freedom of Information Act.
- Their teams complete mandatory training regarding requests for information.

All employees, whether or not they create, receive or maintain information, have responsibilities under the Act. It is the duty of all employees of the Company to:

- Ensure that they are fully aware of this Policy and their responsibilities.
- Comply with this Policy and associated procedures.
- Ensuring that all information requests are forwarded to the Freedom of Information mailbox immediately upon receipt.
- Provide advice and assistance to individuals making requests for information.
- Providing information to the Head of Business Operations to ensure the Company can properly respond to requests for information.

- Ensure that records are maintained according to the Company's Records Management Policy and Retention Schedule.

It is the responsibility of those staff dealing with external partners, consultants or Contractors to:

- Ensure they use the correct terms of engagement to make them aware of their duties and responsibilities under the Act.

4. Introduction: The Right of Access

The Act provides any legal person with a global right of access to request information held by a public authority. A "person" under the FOIA is any legal entity, from anywhere in the world. A requester is not required to give any reason for the request and all requests must be treated equally. Whilst there is a presumption in favour of disclosure, information is only disclosed under the Act if the Company would provide it to anyone, i.e., as if it were being released to the world at large, and it falls within the scope of the Act.

The Act provides two distinct rights. Under the Act, any person who makes a request to a public authority must:

- i. Be informed in writing whether the public authority holds the information requested.
- ii. If that is the case, to have that information communicated to them.

The Information Commissioner's Office (ICO) regulates the Act in the UK and their guidance about the legislation can be accessed at www.ico.org.uk.

5. Our obligations under FOIA

The Company has two main responsibilities under the Act:

1. Publish and maintain information proactively under a Publication Scheme to increase transparency, see section 5.1.
2. Respond to valid requests for information, by confirming in writing if we hold the information requested, and communicating that information, see section 5.2 and section 6.

5.1 Publication Scheme

The Company must adopt, publish, and review a Publication Scheme in the format approved by the ICO. The approved format covers seven classes of information, as below:

1. Who we are and what we do.
2. What we spend and how we spend it.
3. What our priorities are and how we are doing.
4. How we make decisions.
5. Our policies and procedures.
6. Lists and registers.
7. The services we offer.

The Company Publication Scheme (attached at Appendix 1) must be published via the Company website. It is the responsibility of the Head of Business Transformation to maintain the Company Publication Scheme.

The following information will not be made available via the Company Publication Scheme:

- Information prevented from disclosure by law or by an exemption under the FOIA, EIR or General Data Protection Regulation (see section 6.3).
- Information in draft form.
- Information no longer readily available including that which has been archived or is difficult to access for similar reasons.

Section 19 of the FOIA now means that the Company must publish any datasets released under FOIA in its Publication Scheme. The Company will also consider publishing electronic dataset information made available under the EIR in the same way.

Where possible these datasets will be made available in a form that is capable of re-use. Where the Company alone owns the Copyright of the dataset details of the terms under which the information can be re-used will also be advised in the Publication Scheme.

Any regular updates to the datasets that it is reasonable for the Company to make will also be regularly added to the scheme.

5.2 Requests for Information

The Act provides any legal person, from anywhere in the world, with the right to request access to information held by the Company. The requester does not have to state the request is being made under the Act. Any request for information that cannot be answered as part of normal day-to-day business or where the requester asks for it to be handled under the Act will be treated as a potential FOI request.

The Company must ensure we use the correct statutory route to information. Following a request, we must assess the correct regime or determine the combination of regimes to apply. For example, an FOI request for someone's own personal information would be refused under the FOIA, but we would respond using General Data Protection Regulations 2018.

5.2.1 Valid Requests

Section 8 of FOIA sets out the requirements for a valid information request. Note these are different from a request under EIR. EIR is covered later in this policy in section 10. To constitute a valid request under FOIA it must:

- **Be in writing:** it is deemed to be in writing if submitted as a hard copy letter, and if transmitted electronically by email or social media platform where the Company has an established presence, and is in a legible format. Note where a person is unable to frame their request in writing, for example owing to a disability, the Company must ensure assistance is provided to enable them to make a request for information. This could include advising the individual the request can be made on their behalf by another person or agency (e.g., Citizen's Advice Bureau), or in more exceptional circumstances, offering to record the request via telephone and writing back to the requester for confirmation. Once this is verified, it would constitute a written request for information.
- **Provide enough information to determine the information requested:** note the Company has a statutory duty to provide advice and assistance and we must seek to clarify unclear requests. Also note, there is no legal requirement to state why the information is required. We must not therefore ask for clarification of why the information is being requested.
- **Include the requester's real name:** pseudonymous requests are not valid requests under FOIA.
- **Include a valid correspondence address:** this can be a postal address, email address or unique social media address.

Note that information submitted in a foreign language is not considered to be a valid request and the Company is not expected to obtain a translation. However, the Company must respond and ask for the information to be submitted in English for the request to be processed.

5.2.2 Sending Requests for Information

The Company will proactively publish the following postal address and email address for requests:

- Post: FOI Coordinator, Advance Northumberland Limited
Wansbeck Workspace, Rotary Parkway, Ashington, Northumberland, NE63 8QZ
- Email: foi@advancenorthumberland.co.uk

The Company will accept information requests received directly by members of staff, or via other social media platforms and will train all staff to recognise a valid request for information, see section 5.2.1.

5.2.3 Logging Requests for Information

Requests for information are received directly (via the routes in 5.2.2 above) by the Head of Business Operations. Requests received via other routes should be forwarded to the Head of Business Operations without undue delay. They are responsible for:

- Logging all requests on the Data Governance Tracker, saved in a central location in SharePoint.
- Allocating a unique reference to the request.
- Providing an acknowledgement to the requester, or
- Seeking clarification of the request from the requester (because it is unclear), or
- Sending a refusal notice on the basis the request is invalid.

6. Responding to requests for information

Requests for information need to be responded to within 20 working days. We must respond as soon as possible within the statutory time limits and not deliberately delay. Working days are any day other than a Saturday, Sunday, Christmas Day, Good Friday, Boxing Day or a day which is a Bank Holiday under the Banking and Financial Dealings Act 1971. Working days are calculated from the day following receipt of the request.

The time may be extended by a further 20 working days if a valid exemption applies (see section 6.3) to permit us to carry out a public interest test.

6.1 Fees and Costs Limits

The Company is permitted to make a charge for information, but within specified cost limits, set out in the FOIA. The cost limit is £450, the equivalent of 18 staff hours worked, at a rate of £25 per hour irrespective of the staff member. The charging policy must be stated in the Publication Scheme. When considering the costs involved in compliance, the Company must only consider the following sequential steps:

- Determining whether the information is held.
- Locating the information.
- Retrieving the information.
- Extracting the relevant information.

The Company cannot include costs for:

- Deciding whether exemptions apply.
- Time to redact information.
- Time to exempt information.
- Time to carry out a public interest test.

If compliance would place the organisation under a grossly oppressive burden, FOIA s.14 should be considered instead, the provision for Vexatious Requests, see section 7.

Where the cost of responding is estimated to exceed the cost limit, FOIA s.12 provides an exemption to comply, but the Company is still obligated to inform the requester whether the information is held and support the requester to narrow the request so a response can be provided.

6.1.1 Fees Notice: Where the Company intends to charge for information, a Fees Notice covering the amount to be paid and how the fee was calculated must be sent as soon as possible, and within the 20-working day response time. It must include itemised costs and how the figures have been reached. It must also include:

- How to pay.
- The right to an internal review and right to complain to the ICO.
- Notice of stopping the clock in terms of time to respond. Once the Fee Notice is issued, the Company will stop the calculation of 20 working days, and only resume once the fee has been received.
- Notice the request will be held for 60 working days, and if no response has been received from the requester, the request will be discontinued.

6.2 Disclosure

Responses must include:

- A statement the request has been dealt with under the FOIA, or EIR where applicable, see section 10.
- Confirmation the information is held / not held by the Company, or a statement neither confirming nor denying the Company holds the

information.

- The information requested, or
- If some, or all of the information cannot be disclosed, details setting out why this is the case, including the details of the legislation (e.g. quote the specific exemption and associated harm, prejudice or public interest test) the Company is relying on.
- The process and contact details for an Internal Review.
- Information about the applicant's right of appeal to the ICO.

Also:

- Supply the information wherever possible in the format requested, assuming this is reasonable.

6.3 Exemptions and Non-disclosure

The Act sets out exemptions from disclosure, which can be Absolute or Qualified. Note however, some exemptions prevent disclosure under FOI, but do not cancel out other rights to information. Exemptions in some instances exist to support the correct statutory route, rather than providing a reason not to release information. For example, we must continue to protect the personal data entrusted to us, by disclosing that information only in accordance with the provisions of the General Data Protection Regulations.

An **Absolute** exemption means there is no duty to confirm or deny the information is held, nor the duty to communicate. There are very few absolute exemptions. All Absolute exemptions are **Class** based, where the exemption describes the type of information. For example, s.21 Information Available by Other Means. Where there is a class-based exemption, it is necessary to assess the harm of releasing information, which will either be high or low. For s.21, Information Available by Other Means, since information is already in the public domain, the harm would be low, and the Company should release where the collation of the information would be reasonable.

Other exemptions are **Qualified**, which means they are subject to a Public Interest Test. A qualified exemption can also be class based (where the exemption describes the type of information) and an assessment of harm would be required before carrying out a public interest test. For example, s.22 Intended for Future Publication or Research is a Qualified class-based exemption and consideration should be given to the harm of releasing information, classed as high or low, followed by a public interest test.

Other Qualified exemptions are **Prejudice** based, which means the Company must

identify the potential prejudice, it must be real / actual, there must be a causal link between disclosure and the prejudice, and we must confirm whether the prejudice would or would be likely to occur. The prejudice needs to be more likely than not to occur to rely on the exemption, and there must still be a public interest test. The information will only be withheld if the public interest in not disclosing is greater than the public interest in disclosing.

In summary:

- The application of exemptions can be complex. Specific guidance has been developed in the Withholding and Disclosing Information Safely guidance document.
- It is the responsibility of the Head of Business Operations to carry out the assessment of exemptions, and to seek further advice as required by the nature of the request.
- Where exemptions are to be relied on, we will issue a refusal notice which will explain the assessment of harm, or the public interest and / or a prejudice test.
- Where we rely on an exemption, we will meet our duty to confirm or deny we hold the information unless disclosure of this would reveal something of the content. This would be explained in our refusal notice.
- We will consider partially withheld information, through the process of redaction. Where this is the case, our response will explain our reasoning.
- Where we require an extension of time (maximum 20 working days) to complete a Public Interest Test, we will confirm this in writing to the applicant within the first 20 working days from receipt.
- All information relating to exemptions applied and associated assessments of harm, prejudice and Public Interest Tests will be recorded in the central register of information requests.

7. Vexatious / Repeat requests

S.14 (1) of FOIA sets out the provision for a public authority not to comply with a request for information if the request is vexatious. Section 14 (2) states where a public authority has previously complied with a request for information, which was made by any legal person, it is not obliged to comply with a subsequent identical or substantially similar request from that person unless a reasonable amount of time has elapsed.

The FOIA does not absolutely define vexatious, and the Company must consider each case individually. It is the responsibility of the Head of Business Operations to review all cases received. Where it is to be deemed vexatious or a repeat request, this is to be approved by the Executive Director for Governance and Sustainability.

Where a request is deemed vexatious or a repeat request, it does not mean the Company can ignore all future requests from this person. Each request must be considered on its own merits.

Considerations for a vexatious request:

- Is the request manifestly unreasonable or objectionable that it is clear it is vexatious – e.g., abusive, offensive, or threats against staff?
- Would it require a disproportionate or unjustified level of disruption, irritation, or distress?
- Is there any harassment of staff?
- What is the potential value or purpose of the request?
- What previous dealings has the Company had with the requester?
- Does the request include a real name?

Advance Northumberland will issue a refusal notice, unless it is unreasonable to do so, for example where a refusal notice has already been issued to that person for that request. S.17

(6) excludes the Company from the duty to provide a refusal notice where it is unreasonable, and once it is established the complaint is vexatious. The Head of Business Transformation must keep detailed and contemporaneous evidence logs to substantiate use of s.14 and classifying a request as vexatious.

8. Internal Review

Following a Fees Notice, a disclosure, or a refusal notice from the Company, the requester has a statutory right to request an internal review within 40 working days of the Company response. This right must be stated in our disclosures, fee notices and / or refusal notices.

An internal review should be carried out by someone different to the original response. In most cases this will be the Executive Director of Governance and Sustainability, unless other exceptional circumstances apply. Internal reviews consider decisions made, rationale, public interest, timeliness and all other relevant aspects of the request. It is the responsibility of the Head of Business Operations to include information about Internal Reviews on the centralised Information Governance Tracker.

8.1 Request for Review within 40 Working Days

The Head of Business Transformation should log the request for an Internal Review and provide an acknowledgement to the requester, confirming 20 working days for a response. The Head of Business Operations is responsible for passing the relevant details to the Executive Director of Governance and Sustainability to undertake the review and prepare a response.

Responses to an internal review should include:

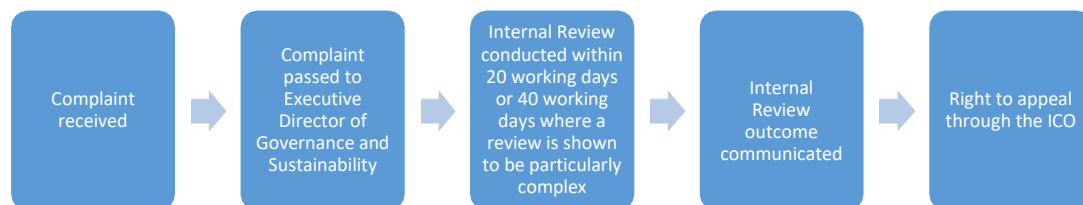
- Whether the internal reviewer agrees with the original response or not.
- Whether the reviewer considers that new exemptions are applicable and if so, the details of these exemptions and why the Company relies on them.

Requesters who remain unsatisfied with the outcome of an Internal Review will be advised they may exercise their right to appeal to the Information Commissioner, with contact details provided.

8.2 Request for Review outside 40 Working Days

The Head of Business Operations should log the request for an Internal Review and carry out a review with the Executive Director of Governance and Sustainability to confirm whether the Company will issue a response to a request outside of the 40 working days. The Company has no statutory obligation to do so, but may choose to respond. Where the Executive Director of Governance and Sustainability confirms a response will be provided, the information in 8.1 above applies. Where no internal review will be conducted, the Head of Business Operations should:

- Provide an acknowledgement to the requester.
- Confirming the request has been received outside of 40 working days.
- Provide contact details for the Information Commissioners Office (ICO)



9. Complaints

The Company must establish a complaints procedure for the failure to follow FOIA. This is different for a request for an Internal Review, an Internal Review relates to the information disclosed or not disclosed. A complaint should be recorded for procedural failures. Where a complaint is received, this must be logged by the Head of Business Operations and logged as per the Customer Feedback Policy, a reference allocated and records updated to state the Information Governance Complaints process set out here will apply.

- Complaints must be in writing.
- Where the complaint is verbal, the complainant should be advised it must be submitted in writing to be treated as a complaint under the Freedom of Information Policy.
- Complaints will be acknowledged by the Head of Business Operations.
- Complaints will be passed to the Executive Director of Governance and Sustainability for review and response within 20 working days.
- Complaint responses will be issued in writing confirming the outcome of the investigation.
- Requesters who remain unsatisfied with the outcome of a complaint investigation will be advised they may exercise their right to appeal to the Information Commissioner, with contact details provided.

10. Environmental Information Regulations (EIR) 2004

The Environmental Information Regulations (EIR) 2004 provide public access to environmental information held by public authorities. Recorded information that is written, visual, aural, electronic or any other material form on the state of the environment is disclosable under EIR. Examples of information disclosable under EIR are (this list is not exhaustive):

- Development of land
- Energy
- Accidents
- Water Quality
- Emissions
- Fire
- Noise
- Asbestos
- COSHH

The Code of Practice produced under Regulation 16 of EIR 2004 sets out best practice guidance for the Company and we must comply with this code of practice to fulfil our obligations. The policy steps set out above for FOIA will be followed with the following differences:

- 10.1 It will be the responsibility of the Head of Business Operations to determine whether an information request should be treated as an FOI or an EIR request, or seek external advice where appropriate.
- 10.2 Requests need not be in writing, but responses must be in writing. All staff

must be trained in recognising a request for information under EIR (see section X below).

- 10.3 The time limit for responding to all requests including the time to complete a public interest test is 20 working days. Regulation 7 of EIR allows an extension to 40 working days for high volume or complex requests, but there can be no extension to complete the public interest test as there is with FOI.
- 10.4 No exception can be made for requests that will involve costs more than the appropriate cost limit (as covered in section 6.1). All requests must be dealt with and all costs must be reasonable. Though costs can be considered within an assessment of whether the request is manifestly unreasonable.
- 10.5 Different exceptions for disclosure are available under EIR. The exemptions set out in FOIA do not apply. Note, no exception can be applied to information that relates to emissions.

11. Transfer of Requests

Where the Company believes information to be held by another public body it can transfer a request under both FOIA and EIR. The Company, as the transferring authority will follow best practice to assist the applicant and will either:

- Inform the requester in writing the information is not held, but may be held by another public authority.
- Explain the link between the public authorities so the applicant understands the link (or not) between the parties.
- Seek the applicant's consent to transfer the request to the appropriate body, and once given pass the information to the appropriate contact, or
- Supply the applicant with the name and address of the public authority to be contacted.

12. Training and Awareness

The Executive Director of Governance and Sustainability will ensure that employees are appropriately trained, understand their responsibilities as set out in this Policy.

- The post nominated as the competent person for information governance, and therefore to complete accredited training to confirm such competence is the Head of Business Operations.
- The Head of People and Organisational Development (POD) is responsible for including information governance awareness in the

Corporate Induction and Staff Handbook. Support for content should be given by the Head of Business Operations as required.

- The Head of POD is responsible for the creation of mandatory training modules, to be available via the e-learning platform to include information governance.
- All staff must complete the mandatory training and complete refresher training annually.
- All Line Managers must monitor training completion rates and ensure their team members complete the training requirements specified by the Company.

13. Monitoring and review

13.1 Monitoring

Data is to be reported by the Head of Business Operations:

- Number of requests received to reported to the Chief Executive on a monthly basis.

An annual summary should be provided within the Publication Scheme to include:

- Number of requests responded to within the statutory timeframe.
- Number of requests exceeding the statutory timeframe.
- Number of refusal notices.
- Number of partial responses.
- Number of full responses

13.2 Policy Review

This policy will be reviewed with all related Information Governance policies every two years or where there are changes to Legislation. Note however, the Policy should be reviewed where an amendment is required to the Publication Scheme. It is the responsibility of the Head of Business Operations to review the Policy.

Appendix 1: Publication Scheme to be displayed on the Advance Northumberland website.

Publication Scheme

Under Section 19 of the Freedom of Information Act 2000 all public authorities have a duty to maintain a Publication Scheme.

The Publication Scheme is a list of what information Advance Northumberland publishes, how it is made available, or whether there is a charge to obtain this information. The aim of our scheme is to enable transparency in how we operate and to ensure people can find the information they are after without having to take time to request it separately from us.

The term 'publish' is not limited to information produced in paper forms such as leaflets and booklets and includes information that is on our website. Please note that some information cannot be published, and this typically includes information that relating to individuals (i.e., that would breach the Data Protection Act), draft information, information that is prohibited by law from disclosure, or would be exempt from the Freedom of Information Act.

If you are searching for information that is not listed, please contact foi@advancenorthumberland.co.uk to request it under the Freedom of Information Act or Environmental Information Regulations.

Class 1 – Who we are and what we do

Roles and Responsibilities

Advance Northumberland is a wholly owned subsidiary of Northumberland County Council, set up under Section 95 Local Government Act 2003 as a Local Authority Trading Company. Northumberland County Council holds all the shares in Advance Northumberland.

Advance Northumberland was established for the commercial purpose of delivering Northumberland County Council's Corporate Plan and Economic Strategy in November 2018. The Advance Northumberland Group brings together a number of subsidiary companies under the parent company – Advance Northumberland – delivering services in investment, housing, commercial business growth and physical development.

Advance Northumberland is governed by a Board drawn from public and private sectors. Board Members are responsible for:

- Ensuring that the Company has a clear strategic direction and vision and working

closely with the Council and the Company's senior management to set Advance Northumberland's overall direction, policy, and plans.

- Ensuring that the Board performs effectively and efficiently as a collective entity, to direct and control the work of the Company and each subsidiary to ensure that it maximises output against its strategic objectives, quality of service and value for money.
- Upholding the values of Advance Northumberland, providing strategic direction and motivational leadership in the delivery of its business plans.
- Providing clear demarcation of governance between the Council Shareholder and the Company.

Articles of Association

The Advance Northumberland Articles of Association are regularly reviewed and the latest version adopted on 9th April 2024.

Board Membership

The Board comprises four non-executive independent directors (who are individuals with significant relevant business experience), one senior employee of Northumberland County Council, two Executive Directors of Advance Northumberland, and a non-executive Chair (an elected member of Northumberland County Council).

Andrew Moffat CBE - Non-Executive Chair of the Board: Andrew is a Non-Exec Director at Gateshead Health NHS Foundation Trust & Port of Tyne, CEO 2008-18. Andrew has over 13 years' experience as a member of the board, Audit, Remuneration and Finance Committees whilst at Port of Tyne and Gateshead NHS Foundation Trust. Prior to this he gained extensive experience in senior positions in the mobile telecommunications sector, including Strategy Director at Orange and CFO at Three UK and Italy.

Adam McGhin - Non-Executive Director: Adam is a qualified solicitor in excess of 20 years, specialising in real estate, corporate and finance transactions. Adam has substantial experience in investment, property development, equity and debt capital markets transactions, and corporate governance.

Hilary Florek - Non-Executive Director: Hilary is a strategic communications and marketing specialist and is currently Chair of the Marine Management organisation, an executive non-departmental public body sponsored by the Department for Environment, Food and Rural Affairs, a position she took up in February 2018. Prior to this she was Chairman of the Port of Tyne for three years having served previously as

Deputy Chairman.

Iain Slater - Non-Executive Director: Iain is a successful, commercially focused and creative property professional, with over 30 years' experience. Extensive experience gained in land development and brownfield site regeneration throughout the UK, including housing, retail, leisure, renewables, industrial, and office schemes.

David Warburton: David is the Head of Regeneration at Northumberland County Council, responsible for leading the Council's economic regeneration function, including the development of clear economic regeneration plans, projects and programmes.

Fiona Creighton - Non-Executive Director: Fiona is Executive Director of Homes, MSV, with over 25 years' experience spanning property development and sales, property management, and building safety.

Steven Harrison, Chief Executive, Advance Northumberland (see Senior Executives section below).

William Thompson, Executive Director of Governance and Sustainability, Advance Northumberland (see Senior Executives section below).

Board Minutes:

The publication of Board Minutes will be within 12 months of the meeting date. The aim of this is to lessen the impact of time and enable us to disclose more information. Individuals retain the right to make a Freedom of Information request at any time ahead of formal publication of minutes.

Senior Executives:

Steven Harrison – Chief Executive: Steven is responsible for leading the day-to-day operations of the company and is accountable for the strategic direction, general management and performance of Advance Northumberland and its subsidiaries.

William Thompson - Executive Director of Governance and Sustainability:

William is responsible for ensuring the appropriate legal and statutory governance of the group and leading the sustainability agenda across Advance Northumberland and its subsidiaries.

Chris Healy – Director of Developments and Investments: Chris is responsible for driving commercial investments and managing our Commercial asset base.

Richard Mansel – Director of Finance: Richard is responsible for analysing group company finances, creating group budgets and ensuring the financial health and stability of the company.

Andrew Mowbray - Director of Projects: Andrew is responsible for driving commercial development and managing successful Commercial schemes which are delivered to a high-quality, on time and on budget.

Organisational Structure

Senior Management Organisational Structure (note: this information appears online as a hyperlink to another document, which opens in a new window).

Location and Contact Details

Wansbeck Workspace, Rotary Parkway, Ashington, Northumberland, NE63 8QZ
enquiries@advancenorthumberland.co.uk

Gender Pay Gap Reporting

The Advance Northumberland Gender Pay Gap report is available here (hyperlink to report location)

Class 2 – What we spend and how we spend it

Group accounts can be accessed through Companies House here; <https://find-and-update.company-information.service.gov.uk/company/11161983/filing-history>

Expenditure

Each company within the Advance Group manages its expenditure independently. As each Company undertakes a different type of business activity, the typical expenditure profile varies for each entity within the Group. The bulk of expenditure for each of the individual entities is as follows:

- Advance Northumberland Commercial Limited: Staff costs, consultancy/legal fees, and council tax/business rates.
- Advance Northumberland (Developments) Limited: Housing development and staff costs.
- Advance Northumberland (Housing) Limited: Property repairs and maintenance, staff costs and council tax/business rates.
- Advance Northumberland Projects Limited: Employee costs, project management costs and administration.
- Advance Northumberland Limited: Employee costs, company and systems administration.

Staff Pay and Grading Structure

See separate 'Senior Management Organisational Structure' document.

Advance Northumberland maintains information on staff pay.

Staff and board members' allowances and expenses

Since their appointment in May 2023, current Non-Executive Directors were remunerated at a flat rate of £10,000 per annum, increased in accordance with annual salary uplift as applies to the group. Additional allowances and/or expenses cannot be claimed.

Staff members, excluding Non-Executive Directors, have access to the following employee benefits:

- Healthcare cash plan.
- Private Healthcare Plan.
- Employee Assistance programme.
- Group life assurance.
- Reduced cost gym membership.
- Pension scheme.
- Enhanced Family friendly policies.
- Home electronics and Cycle to work scheme.
- Flexible working options, including hybrid working.

Capital Programme

Advance Northumberland own a large portfolio of property and land. As asset management strategy is currently in development which will, in turn, support the creation of a capital programme.

Procurement and tender procedures and reports

The Procurement Policy is available [here](#) (this is a hyperlink to the current Procurement Policy, Version 8, approved by Board in December 2024).

Advance Northumberland are seeking to create a page within this website to provide specific information to suppliers, including frequently asked questions and advertising available opportunities. We aim to have this functional within the 2026/27 financial year.

List of contracts awarded and their value

The Procurement Act of 2023 requires a Contracting Authority, as defined by the legislation, to publish Contract Details Notices of any public contract with an estimated

value of more than £5 million.

Advance Northumberland Limited, or any subsidiary, acting as a Contracting Authority have not awarded any contracts above this value and therefore have nothing to declare.

Advance Northumberland maintain a contract register which will be published at the end of the financial year 2026/27.

Class 3 – What our priorities are and how we are doing

Annual Report and Business Plan

Annual financial reports and our published Business Plans can be found here:

<https://www.advancenorthumberland.co.uk/about>

Customer surveys

Advance Northumberland undertake customer satisfaction monitoring. The Customer Feedback policy, included in Class 5 below, provides more information on how we currently manage complaints, compliments and suggestions about the services and products provided by Advance Northumberland. The summary of the 2025/26 satisfaction survey is available here (hyperlink to pdf document).

Data Protection Impact Assessments

Advance Northumberland maintains a schedule of Impact Assessments which will be published at the end of the financial year.

The last summary report is available here. (this is a hyperlink to the attached PIA Summary)

Class 4 – How we make decisions

Copies of Board Minutes can be found here;

<https://www.advancenorthumberland.co.uk/about>

Class 5 – Our policies and procedures

- Conducting business: Code of Conduct.
- Delivering your services: Freedom of Information Policy.
- Recruiting and employing staff: Recruitment and Selection Policy.
- Equality and diversity: Dignity at Work.
- Health and safety: Health and Safety Policy.
- Customer service and complaints: Customer Feedback Policy.

- Record Management: Record Management Policy.

Charging Regimes:

Fees under EIR

Under EIR, the Advance Northumberland cannot charge for:

- allowing access to any public register; and
- allowing any person to examine relevant information (at a location and time agreed by the Company)

In all other instances, Advance Northumberland reserves the right to charge a fee for complying with requests for information under EIR.

Fees under FOI

Advance Northumberland will not normally make a charge for responding to the request for information under FOIA unless the cost of responding exceeds £450. This is calculated on a standard rate of £25 per hour, as set by Government, and is based on estimating the staff time taken to:

- determine if the information is held.
- locate the information or a document which may contain the information.
- retrieve the information, or a document, which may contain the information.
- edit or extract the releasable information contained within a document.

This calculation does not take into account the time spent/costs of:

- checking that a request for information meets the requirements of FOIA.
- considering the application of exemptions; prejudice and/or public interest tests
- obtaining internal or external legal advice.
- consulting with third parties and obtaining authorisation to send out information.

Where the cost limit of £450 is exceeded, Advance Northumberland can choose to either decline to respond to the request, or to do so only after payment of a fee. The minimum fee would therefore be £450.

Communication Costs

Advance Northumberland may charge a fee where it estimates that the communication costs exceed £10. Communication costs will be charged at the following rates:
(All costs quoted are for single sided printing and are inclusive of VAT)

Printing and Photocopying – pence per sheet

Black & White A4	15 pence
Black & White A3	60 pence
Colour A4	60 pence
Colour A3	85 pence

Applicants may also be expected to meet the costs for postage and packaging which will be charged at cost based on current Royal Mail rates.

Advance Northumberland is committed to the use of electronic means to provide information that has been requested and will encourage and advocate the use of these means in all appropriate cases, subject always to the stated preference of the applicant. Normally, information supplied electronically will not involve a cost unless hard copy information has been specifically converted for this purpose.

Other or additional costs (to postage and printing charges) incurred as a result of communicating information in a way requested by the applicant where the overall amount exceeds £10.00, may be payable. This includes, but is not limited to, requests to supply information on another medium, or in a language other than English.

Timescale

In responding to a request for information under FOIA or EIR, where Advance Northumberland identifies that fees and/or costs are chargeable, the Company will issue a fee notice to you within 20 Working Days of receipt of your request for information.

The period from the day the fees notice is issued to the day the fee is received does not count towards the 20-working day limit for response.

If Advance Northumberland does not receive payment within 60 working days of issuing a fee notice, it is no longer obliged to respond to the request.

Class 6 – Lists and Registers

List of main contractors or suppliers

Advance Northumberland manages all contractors and suppliers through its finance system, QL. Contractors and suppliers are allocated to the specific Company within the Group that they are contracted to deliver on behalf of. Therefore, any extract of this data is encouraged to specify the single entity for which the request applies.

Advance Northumberland are seeking to create a page within this website to provide specific information to suppliers, including frequently asked questions and advertising

available opportunities. We aspire to have this functional in the 2025/26 financial year.

Asset Register

Advance Northumberland own a large portfolio of property and land. Ownership is a matter of public record and is available through the land registry. Each company within the Advance Group manages its assets independently. As each Company undertakes a different type of business activity, assets will be under the ownership of the most appropriate Company within the Group.

Information Asset Register

Advance Northumberland maintains an Information Asset Register and a summary report will be published at the end of the financial year following an annual review.

Disclosure logs

Advance Northumberland maintains a log of FOI requests received and a summary report will be published at the end of the financial year following an annual review. The last summary report is available **here**. (this is a hyperlink to the attached Disclosure Summary)

Senior Staff Declaration of Interests

Advance Northumberland requires all staff to complete an annual declaration of interest as a minimum. All senior members of staff have completed a declaration to the satisfaction of the Executive Director of Governance and Sustainability.

Senior Staff and Board Member Register of Gifts and Hospitality

Advance Northumberland maintains a Gifts and Hospitality Register which will be published at the end of the financial year.

CCTV

Advance Northumberland have static CCTV systems which cover key commercial properties under the ownership of the Group. These are detailed within the Commercial Privacy Policy which can be found on our website.

Remote monitoring of live construction sites is ongoing dependent upon build-stage and appropriate signage is visible where this is in operation.

Class 7 – The services we offer

Ascent Homes: <https://www.advancenorthumberland.co.uk/what-we-do/ascent-homes>



Commercial: <https://www.advancenorthumberland.co.uk/what-we-do/commercial>

Developments: <https://www.advancenorthumberland.co.uk/what-we-do/developments>

Homes: <https://www.advancenorthumberland.co.uk/what-we-do/homes>

Investments: [advancenorthumberland.co.uk/what-we-do/investments](https://www.advancenorthumberland.co.uk/what-we-do/investments)

Corporate communications and media releases:

<https://www.advancenorthumberland.co.uk/news-events>

If you require additional information through the Freedom of Information Act or Environmental Information Regulations, please contact us at any of the following:

Email us using address: foi@advancenorthumberland.co.uk

Call us on: 01670 528400

Write to us at: FOI Coordinator, Wansbeck Workspace, Rotary Parkway, Ashington, Northumberland, NE63 8QZ.

Appendix 2 Template Responses

The following text should be copied to either an electronic or letter format to respond to an applicant. The template list is not exhaustive and all requests should be treated individually:

2.1 Acknowledgements FOI / EIR Request:

Dear [name as shown on the request],

I write to acknowledge your recent request for information, submitted on [add date]. I have entered this on our register, with reference [add unique reference]. Your request will be dealt with under the terms of the Freedom of Information Act 2000/ Environmental Information Regulations 2004 and a response submitted within the statutory timescale permitted in the Act.

If you need to discuss this with us in the meantime, please contact me using this email address. Yours sincerely,

[Name]

Freedom of Information

Coordinator Advance

Northumberland Limited

fi@advancenorthumberland.co.uk

A2.2 Acknowledgement Internal Review Request:

Dear [name as shown on the request],

I write to acknowledge your recent request for an internal review, received on [add date], for the Freedom of Information response issued on [add date].

This will be reviewed by a senior colleague, independent of the original response, and they will review all correspondence and write to you with our final response within 20 work days.

Yours sincerely,
[Name]

**Freedom of Information
Coordinator Advance
Northumberland Limited**
fi@advancenorthumberland.co.uk

A2.3 Fees Notice:

Dear [name as shown on the request],

I refer to your request for information received on [add date]. This request is being handled under the Freedom of Information Act / Environmental Information Regulations. I am writing to notify you of the fee required to process this request. The fee is as itemised below, I have also included the details of how this has been calculated:

[Add itemised costs and calculation steps]

You can pay this fee via our online payment portal, available at <https://www.advancenorthumberland.co.uk/make-a-payment>

The statutory timescale to respond is paused while we await your payment, and this will resume once payment is received. If I do not receive your payment within 60 days from today, I will close your request. If after this period you then provide the payment, it will be treated as a new request.

If you have any queries relating to this request, I can be contacted using the details below. If you are unhappy with the way your request for information has been handled, please contact me using the same details below and I will endeavour to resolve this.

Alternatively, you can formally request an internal review as set out in Section 17 of the Act by writing within 40 days of the date of this response. Internal reviews are carried out by the Executive Director of Governance and Sustainability, who can be contacted at:

Advance Northumberland Limited, Wansbeck Workspace, Rotary Parkway,
Ashington NE63 8QZ, or email bi@advancenorthumberland.co.uk

If you remain dissatisfied with the handling of your request or complaint, you have a right by Section 50 of the Act to apply to the Information Commissioner for a decision as to whether your request has been dealt with in accordance with the requirements of the Act at:

The Information Commissioner's Office
Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF



Tel: 01625 545 745 / Fax: 01625 524 510 or Email: enquiries@ico.gsi.gov.uk

There is no charge for making an appeal.

Yours sincerely,

[Name]

Freedom of Information

Coordinator Advance

Northumberland Limited

fi@advancenorthumberland.co.uk

A2.4 Request for Clarification

Dear [name as shown on the request],

I refer to your request for information received on [add date]. This request is being handled under the Freedom of Information Act / Environmental Information Regulations.

I am writing to ask for clarification of your request. This is because I need more detail from you to identify or locate the information you require/ I am not sure I understood the information you would like to obtain.

I would be grateful if you could [clear request, stating exactly what is needed] by [add date]. Please contact me at this email address if you require assistance with this. The statutory timescale to respond is paused while we await your clarification, and this will resume once clarification is received.

If I do not receive your clarification within 40 days from today, I will close your request. If after this period you then provide this, your request will be treated as a new request.

Yours sincerely,
[Name]

**Freedom of Information
Coordinator Advance
Northumberland Limited**
foi@advancenorthumberland.co.uk

A2.5 Standard Response letter

Re: Information Request – Ref [Add Ref]

Dear [name as shown on the request],

I refer to your Freedom of Information request received [add date], where you asked for [describe information], as copied below:

[copy request if possible to do so]

I have reviewed this request with reference to the Freedom of Information Act (FOIA) 2000. The Right of Access is set out in Section 1(1) of the Act. This provides any person making a request for information to a public authority is entitled:

- to be informed in writing by the public authority whether it holds information of the description specified in the request (which Section 1(6) of the Act designates as the "duty to confirm or deny"), and

- if that is the case, to have that information communicated to them.

Advance Northumberland Limited confirms it holds the information requested. For clarity, where I refer to Advance Northumberland Limited, this includes all subsidiary companies within the Group. Please refer to the below / attached in response.

If you have any queries relating to the information provided, I can be contacted using the details below. If you are unhappy with the way your request for information has been handled, please contact me using the same details below and I will endeavour to resolve this.

Alternatively, you can formally request an internal review as set out in Section 17 of the Act by writing within 40 days of the date of this response. Internal reviews are carried out by the Executive Director of Governance and Sustainability, who can be contacted at:

Advance Northumberland Limited, Wansbeck Workspace, Rotary Parkway,
Ashington NE63 8QZ, or email foi@advancenorthumberland.co.uk

If you remain dissatisfied with the handling of your request or complaint, you have a right by Section 50 of the Act to apply to the Information Commissioner for a decision as to whether your request has been dealt with in accordance with the requirements of the Act at:

The Information Commissioner's Office
Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF
Tel: 01625 545 745 / Fax: 01625 524 510 or Email: enquiries@ico.gsi.gov.uk

There is no charge for making an appeal. Yours sincerely,

FOI Coordinator

Advance Northumberland Limited

Email: FOI@advancenorthumberland.co.uk

A2.6 Refusal Notice

Re: Information Request – Ref [Add Ref]

Dear [name as shown on the request],

I refer to your Freedom of Information request received [add date], where you asked for [describe information], as copied below:

[copy request if possible to do so]

I have reviewed this request with reference to the Freedom of Information Act (FOIA) 2000. The Right of Access is set out in Section 1(1) of the Act. This provides any person making a request for information to a public authority is entitled:

- to be informed in writing by the public authority whether it holds information of the description specified in the request (which Section 1(6) of the Act designates as the "duty to confirm or deny"), and
- if that is the case, to have that information communicated to them.

[delete appropriate statement] Advance Northumberland Limited confirms it holds the information requested. Advance Northumberland Limited neither confirms nor denies it holds the information requested. For clarity, where I refer to Advance Northumberland Limited, this includes all subsidiary companies within the Group. Please refer to the below / attached in response.

Please treat this letter as notice of refusal as regards for the information covered by [add details of statutory provision to be applied].

If you have any queries relating to the information provided, I can be contacted using the details below. If you are unhappy with the way your request for information has been handled, please contact me using the same details below and I will endeavour to resolve this.

Alternatively, you can formally request an internal review as set out in Section 17 of the Act by writing within 40 days of the date of this response. Internal reviews are carried out by the Executive Director of Governance and Sustainability, who can be contacted at:

Advance Northumberland Limited, Wansbeck Workspace, Rotary Parkway,
Ashington NE63 8QZ, or email foi@advancenorthumberland.co.uk

If you remain dissatisfied with the handling of your request or complaint, you have a right by Section 50 of the Act to apply to the Information Commissioner for a decision as to whether your request has been dealt with in accordance with the requirements of the Act at:

The Information Commissioner's Office
Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF
Tel: 01625 545 745 / Fax: 01625 524 510 or Email: enquiries@ico.gsi.gov.uk



There is no charge for making an appeal. Yours sincerely,

FOI Coordinator

Advance Northumberland Limited

Email: FOI@advancenorthumberland.co.uk