



Sam Dunning <info@ukctransparency.org>

RE: CSSA FOI, IMPFOI-23-474

IMPFOI <foi@imperial.ac.uk>

13 September 2023 at 10:04

To: Sam Dunning <director@ukctransparency.org>

Dear Sam Dunning,

Thank you for giving us the opportunity to review the College's response to your Freedom of Information Act request.

Your request was as follows:

1 Please provide all emails between email addresses belonging to university employees and the CSSA or its representatives. Please provide all emails from the past four years, from 2019 to the present.

2 Please provide all documentation regarding the CSSA submitted for the consideration of the university's governing body or its members or committees, e.g. reports, notes etc. If the body and its committee has never considered the matter of the CSSA, please say so.

The College's response was as follows:

The Chinese Students and Scholars Association (CSSA) is an Imperial College Union student society. Imperial College Union (ICU) is a separate organisation to Imperial College London and is not subject to the Freedom of Information Act. Imperial College Union is responsible for the governance of and allocation of funds to its clubs, societies and projects. The ICU [Clubs, Societies and Projects Policy](#) is available on the ICU website. The allocation of union funding to groups or clubs is governed by the union's [Budgeting Policy](#). The constitution of the CSSA is also available on the union website: [Chinese Students & Scholars Association | Imperial College Union](#).

You replied to point out that we had not addressed the first question in our response to you. We further replied to state that that part of your request was too broad in its present form and applied Section 14 (vexatious requests) to that part of the request.

You replied as follows:

Public interest: a cursory look at the university's legal obligations regarding academic freedom and freedom of speech makes clear that, should there be a body within the university that represents a systematic threat to the freedom of university members, it would be in the public interest for more information about that body to be available. I have reason to believe CSSA is such a body. There is plenty of evidence that the CSSA is controlled by the Chinese embassy, a diplomatic outpost of an authoritarian government known to curtail the academic and speech freedoms of its citizens - a large number of which study at your university. **The publication of information about the CSSA is in the public interest.**

With this in mind, I would like to ask for all emails between email addresses belonging to university employees and the CSSA or its representatives that fulfil one of the following two criteria:

- Relate to the Chinese embassy and are from the past two years (contain the word 'embassy' or 'ambassador')
- Relate to Hong Kong and are from 2019 (contain the words 'Hong Kong', 'Hongkong', 'Hong Konger' or 'Hongkonger')

As for the second part of my first request ("Please provide all documentation regarding the CSSA submitted for the consideration of the university's governing body or its members or committees, e.g. reports, notes etc. If the body and its committee has never considered the matter of the CSSA, please say so."), you seem to have ignored this entirely. You could have responded to this whilst ignoring the first part, which you claim was too large. Please provide an explanation of why this is, and a remedy for me: can I appeal the first request? How can I get you to answer the second part, which is really quite simple?

I shall deal with each part of the request in turn.

1. Emails between email addresses belonging to university employees and the CSSA

I note that you have now submitted a revised request so please consider this as the College's response to the revised request. Your request now asks for emails that meet one of two stated criteria. However, it still asks for communications from any college email address to the CSSA. We would therefore have to approach all members of College staff and ask them to search their mailboxes for the previous 4 years for any addressed to assigned CSSA email addresses (College policy prevents us from conducting searches of people's mailboxes without permission except in very limited circumstances). This would far exceed the 18-hour time limit for responding to Freedom of Information Act requests.

We are under a duty, at Section 16 of the Freedom of Information Act, to provide advice and assistance to requesters. However, I am afraid that I am at a loss to suggest how you could narrow this part of your request as I am not aware of any situation where College staff might need to communicate with a student society about the Chinese embassy or Hong Kong. Thus, I am not able to provide advice such as on limiting the search to staff in specific roles. If you have some context in mind, if you can provide details, it may be that we'd be able to identify a narrower and more manageable group of staff-members who might have cause to communicate with the CSSA on the topics mentioned.

2. Documentation regarding the CSSA submitted for the consideration of the university's governing body or its members or committees

We explained in our initial response that Imperial College Union (ICU), which is not subject to the Freedom of Information Act, is responsible for oversight and governance of its clubs and societies. Given that, we are not aware of a scenario where the College's governing body ([the Council](#)) would be called on to consider documentation regarding the CSSA. We would not be able to state categorically that the Imperial College Council had never considered documents submitted to it on the CSSA without reviewing all documents submitted to council. This would also exceed the Section 12 time-limit, especially given that no time-period was specified. However, the minutes of Council meetings since the academic year 2013/14 are published on the [College website](#). I have searched the minutes for 2019/20 and those in 2018/19 (where the meeting took place in 2019) as a sample and because you mentioned 2019. There was no reference to Hong Kong or the CSSA. The word China was mentioned on a few occasions, but not in relation to the CSSA. If you locate any reference relevant to your request in the other published minutes and would like to request access to the papers submitted to the relevant meeting, please let us know.

For clarity and so that you know how to proceed if unhappy with my response, we are refusing your request as exceeding the Section 12 time-limit. We are happy to offer advice and assistance if you provide some context that would assist in narrowing the scope of your request to one that we could reasonably reply to. Otherwise, you may complain to the Information Commissioner's Office.

Yours,

A small black rectangular redaction box covering the signature.

Access to Information Manager

Central Secretariat

[Imperial College London](#)

