

**Case Reference: BCDISC-01417**

25 June 2025

Thank you for your request for information dated 20 May 2025 concerning English Online and IELTS examiners. Your request has been handled under the terms of the Freedom of Information Act (FOIA) 2000.

For your ease of reference, we have restated your request below in bold and have provided our response beneath.

- 1. What is the current number of subscriber students to English Online?**
- 2. What is the current number of English Online students engaged through a corporate client or government body?**
- 3. What is the current number of English Online teachers?**

Questions 1-3:

We can confirm, under section 1(1)(a) of the FOIA, that the British Council does hold the information you have requested. However, we are withholding it as the exemption under section 43 (Commercial interests) sub-section (2) applies.

Section 43(2) allows a public authority to withhold information if disclosure would, or would be likely to, prejudice the commercial interests of any organisation. A disclosure under FOI would place this information into the public domain, and so our decision is based upon the requested information becoming freely available.

Disclosure of this information in this manner could provide our competitors with clear advantages, particularly those who are commercial entities who are not subject to the Freedom of Information Act. Confirming this information to you could potentially severely impact British Council's revenue streams, displacing our products by allowing competitors to undercut price points and disrupting our working relationships with partners. Furthermore, it could also

undermine our negotiating position with partners, suppliers, or clients and impact future contract bidding or procurement outcomes.

The exemption for commercial interests is subject to the public interest test as stipulated by the Act, which means that the exemption can only be upheld if the public interest in doing so outweighs the public interest in disclosure. Whilst we acknowledge that there is a general public interest in understanding these products and how they are delivered, and that disclosure would facilitate transparency within our organisation, in this case the damage to our commercial interests that would be caused from disclosing this information outweighs the public interest in disclosure.

#### **4. In relation to the following weeks:**

- **Week commencing 26th May 2025**
- **Week commencing 27th May 2024**
- **Week commencing 29th May 2023**
- **Week commencing 30th May 2022**
- **Week commencing 31st May 2021**

#### **Can the British Council provide the following information:**

- **The total number of English Online teachers**

We are withholding this information under section 43 (Commercial interests) sub-section (2) for the same reasons given above under questions 1-3.

- **The total numbers of online IELTS examiners**

We are withholding this information under section 43 (Commercial interests) sub-section (2) for the same reasons given above under questions 1-3.

- **How many English online teachers worked between 0-5 hours**

Information you requested is not held by the British Council, it is held by agency.

- **How many English online teachers worked between 6-10 hours**

Information you requested is not held by the British Council, it is held by agency.

- **How many English online teachers worked between 11-15 hours**

Information you requested is not held by the British Council, it is held by agency.

- **How many English online teachers worked between 16-20 hours**

Information you requested is not held by the British Council, it is held by agency.

- **How many English online teachers worked between 21-25 hours**

Information you requested is not held by the British Council, it is held by agency.

**5. In relation to the following weeks:**

- **Week commencing 28th May 2025**
- **Week commencing 27th May 2024**
- **Week commencing 29th May 2023**
- **Week commencing 30th May 2022**
- **Week commencing 31st May 2021**

**Please provide a country-by-country breakdown of where English Online teachers and online IELTS examiners reside. This is not a request for any personal personal data, just the total number of teachers and examiners based in each country.**

We can confirm, under section 1(1)(a) of the FOIA, that the British Council does hold the information you have requested. However, we are withholding it as the exemption under section 43 (Commercial interests) sub-section (2) applies, for the same reasons given above under questions 1-3.

**6. What is the current average pay (hourly and yearly) of an English Online teacher?**

Information you requested is not held by the British Council, it is held by agency.

**7. What is the current average salary of an English Online manager?**

We don't recognise the job title 'English Online Manager' so we can't answer this question. Information not held.

**8. Are English Online teachers and online IELTS examiners payrolled/engaged via Flexy/Impellam included when BC English and Exams carries out pay reviews?**

No.

**9. Are London-based English Online teachers or online IELTS examiners entitled to London weighting/uplift on their wage?**

No.

**10. Are Teaching Excellence Managers directly employed by the British Council, via employment agencies, or a mix thereof?**

Yes. All Teaching Excellence Managers are employed by the British Council.

**11. How many “corporate teaching operations managers” are currently within English Online?**

We are withholding this information as the exemption under section 40 (Personal information) subsection (2) of the Freedom of Information Act 2000 applies.

Section 40(2) allows a public authority to withhold information relating to third parties if any of the conditions set out in sections 40(3A), 40(3B) and 40(4A) are satisfied. Under the FOIA disclosure of this information would breach the first data protection principle listed under section 35 of the Data Protection Act (DPA) 2018, where the processing of personal data must be fair and lawful.

**12. Are the “corporate teaching operations managers” directly employed by the British Council, through a subsidiary, or through an agency?**

We are withholding this information as the exemption under section 40 (Personal information) subsection (2) of the Freedom of Information Act 2000 applies.

Section 40(2) allows a public authority to withhold information relating to third parties if any of the conditions set out in sections 40(3A), 40(3B) and 40(4A) are satisfied. Under the FOIA disclosure of this information would breach the first data protection principle listed under section 35 of the Data Protection Act (DPA) 2018, where the processing of personal data must be fair and lawful.

**13. If “corporate teaching operations managers” are employed/engaged through a subsidiary/ies or agency/ies, what are the names of those organisations?**

We are withholding this information as the exemption under section 40 (Personal information) subsection (2) of the Freedom of Information Act 2000 applies.

Section 40(2) allows a public authority to withhold information relating to third parties if any of the conditions set out in sections 40(3A), 40(3B) and 40(4A) are satisfied. Under the FOIA

disclosure of this information would breach the first data protection principle listed under section 35 of the Data Protection Act (DPA) 2018, where the processing of personal data must be fair and lawful.

**14. Where is each “corporate teaching operations manager” based, listed by country?**

We are withholding this information as the exemption under section 40 (Personal information) subsection (2) of the Freedom of Information Act 2000 applies.

Section 40(2) allows a public authority to withhold information relating to third parties if any of the conditions set out in sections 40(3A), 40(3B) and 40(4A) are satisfied. Under the FOIA disclosure of this information would breach the first data protection principle listed under section 35 of the Data Protection Act (DPA) 2018, where the processing of personal data must be fair and lawful.

**15. Is any of the data of English Online teachers being used to train AI? This could include video or voice recordings of lessons, lessons materials, or any other data produced by the English Online teachers.**

No.

**16. If the data of any English Online teachers is being used to train AI, what is the purpose of this AI?**

N/A, please see above.

**17. Please provide a copy of the British Council’s data retention policy.**

<https://www.britishcouncil.org/about-us/how-we-work/policies/records-management>

**18. If the British Council’s data retention policy has changed in the past five years, please provide copies of any previous versions of the policy.**

The policy has not changed in the past five years.

**19. Please provide a copy of the data retention policies of any subsidiaries of and/or employment agencies used by the British Council as it relates to the employment/engagement of EOL teachers or IELTS examiners.**

Information you requested is not held by the British Council, it is held by agency.

**20. What risk assessments has the British Council undertaken in relation to the English Online staff (teachers and examiners) ? This could include risk assessments related to**

- lone working
- home working
- the scheduling system
- harassment directed towards staff by students
- any other health and safety matter
- an overall risk assessment

Information not held by the British Council because we have not undertaken any risk assessments in relation to the English Online staff.

**21. Is the British Council in possession of any risk assessments provided to it by the agencies (Impellam, Flexy, etc) which employ/engage the English Online staff or IELTS examiners?**

No.

**22. What was the total revenue produced by the English Online program covering financial year (2021-2022) to the current year (2024-2025)??**

We can confirm, under section 1(1)(a) of the FOIA, that the British Council does hold the information you have requested. However, we are withholding it as the exemption under section 43 (Commercial interests) sub-section (2) applies, for the same reasons given above under questions 1-3.

**23. What percent of the British Council's total operating budget did the revenue generated by English Online provide year-on-year, covering financial year (2021-2022) to the current year (2024-2025)?**

We can confirm, under section 1(1)(a) of the FOIA, that the British Council does hold the information you have requested. However, we are withholding it as the exemption under section 43 (Commercial interests) sub-section (2) applies, for the same reasons given above under questions 1-3.

**24. How much has the EOL “surplus” been year-on-year from financial year (2021-2022) to the current year (2024-2025)**

We can confirm, under section 1(1)(a) of the FOIA, that the British Council does hold the information you have requested. However, we are withholding it as the exemption under section 43 (Commercial interests) sub-section (2) applies, for the same reasons given above under questions 1-3.

**25. How much has the British Council paid to Impellam (and any of its subsidiaries, including Flexy) year-on-year, covering financial year (2021-2022) to the current year (2024-2025)?**

**COM8958 -  
British Council**

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	TOTAL
<b>2021</b>	867,286	767,216	688,686	710,256	224,029	735,572	1,280,167	689,586	798,416	800,955	700,310	718,282	<b>8,980,761</b>
<b>2022</b>	1,042,126	855,360	808,768	1,021,716	1,064,401	1,001,597	1,277,765	962,663	969,340	2,078,743	1,478,987	1,442,260	<b>14,003,726</b>
<b>2023</b>	1,732,589	1,599,266	1,394,122	2,353,881	1,733,991	1,861,318	2,050,933	1,681,946	1,828,497	1,994,770	1,847,783	1,955,245	<b>22,034,342</b>
<b>2024</b>	2,041,587	1,660,584	1,998,789	1,787,304	1,595,489	1,461,077	1,512,190	1,246,604	1,212,421	1,403,550	1,055,317	2,116,955	<b>19,091,866</b>
<b>2025</b>	1,084,573	934,009	1,142,249	937,794	762,447								<b>4,861,072</b>

**COM8930 -  
British Council  
UKVI Payroll**

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	TOTAL
<b>2021</b>	1,115,994	844,831	1,049,429	1,415,440	816,632	1,312,436	1,246,405	874,399	1,088,095	1,157,168	968,459	1,343,270	<b>13,232,558</b>
<b>2022</b>	1,140,140	1,023,917	1,300,302	1,326,320	943,941	1,530,099	1,731,509	1,576,714	1,518,811	1,818,830	1,635,281	1,806,833	<b>17,352,696</b>
<b>2023</b>	1,634,291	1,677,241	2,014,062	2,429,954	1,879,461	2,179,071	2,394,799	2,019,126	2,264,848	2,552,913	2,223,312	3,056,929	<b>26,326,007</b>
<b>2024</b>	2,467,274	1,933,146	2,223,839	2,675,785	1,562,579	1,872,696	2,068,255	2,192,166	1,780,211	2,109,503	1,646,536	1,017,343	<b>23,549,333</b>
<b>2025</b>	1,985,731	1,709,845	1,872,434	2,063,275	1,469,098								<b>9,100,383</b>

If you are dissatisfied with the handling of your request, we would be happy to conduct an internal review. Internal review requests should be submitted within 40 working days of our response being issued and should be addressed to:

Information Governance Advisor (Disclosures)  
Information Governance and Risk Management  
British Council  
1 Redman Pl,  
Stratford Cross  
London  
E20 1JQ

Email: [IGDisclosures@britishcouncil.org](mailto:IGDisclosures@britishcouncil.org)

If you are not content with the outcome of the internal review, you have a right to appeal to the Information Commissioner for a decision at:

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

Phone: 0303 123 1113

Website: [www.ico.org.uk](http://www.ico.org.uk)