



The Societas Trust

Freedom of Information Policy

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Contents:

Statement of intent

1. Legal framework
2. Accepting requests for information
3. General rights of access to information held by the school
4. The appropriate limit
5. Charging fees
6. Means of communication
7. Providing access and assistance
8. Consultation with third parties
9. Internal reviews
10. Publication scheme
11. Contracts and outsourced services
12. Monitoring and review

Appendices

- A. FOI Request Evidence
- B. Freedom Of Information Publication Scheme

Statement of intent

The Societas Trust has an obligation to publish a freedom of information statement, outlining how we will meet our duties under the Freedom of Information Act 2000 and associated regulations. The development and effective implementation of this policy fulfils that requirement.

More specifically, this policy outlines the Trust/Academy policy and procedures for:

- The release and publication of private data and public records.
- Providing applicants with advice and assistance throughout the duration of their requests.

It also clarifies our position regarding the appropriate limit to the costs incurred by the Trust/Academy in obtaining any requested information, and on charging fees for its provision.

1. Legal framework

This policy has due regard to the following legislation:

- The UK General Data Protection Regulation (UK GDPR)
- The Data Protection Act 2018
- The Freedom of Information Act 2000
- The Freedom of Information and Data Protection (Appropriate Limit and Fees) Regulations 2004

This policy also has due regard to guidance including, but not limited to, the following:

- Cabinet Office (2018) 'Freedom of Information Code of Practice'
- ICO (2021) 'Definition document for the governing bodies of maintained and other state-funded schools in England'
- ICO (2015) 'Model publication scheme'
- ICO (2016) 'Duty to provide advice and assistance (Section 16)'
- ICO (2023) 'Time limits for compliance under the Freedom of Information Act (Section 10)'

This policy will be viewed in conjunction with the following other school policies:

- Data Protection Policy
- Freedom of Information Publication Scheme
- Data Retention Policy

2. Accepting requests for information

The Trust/Academy will only accept a request for information which meets all of the following criteria:

- It is in writing, this includes requests sent to the school's official social media accounts
- It states the name of the applicant and an address for correspondence
- It adequately describes the information requested

A request will be treated as made in writing if it meets all of the following requirements:

- It is transmitted by electronic means
- It is received in legible form
- It is capable of being used for subsequent reference

Where a request is submitted in a foreign language, the school is not expected to obtain a translation of the request. For the request to be processed, the school will ask the applicant to provide their request in English.

The Trust/Academy will publish details of its procedures for dealing with requests for information on the Trust/Academy website, which includes the following:

- A contact address and email address
- A telephone number

- A named individual to assist applicants with their requests

3. General rights of access to information held by the school

Provided that the request meets the requirements set out in section 2 of this policy, the school will comply with its duty to:

- Confirm or deny to any person making a request for information to the school, whether it holds information of the description specified in the request.
- Provide the documentation if the school confirms that it holds the requested information.

This will be completed no later than 20 school days, or 60 working days if this is shorter, from receipt of the request. Where a fee is charged, the timeframe within which the school has to respond to the request begins from the day the fee is received.

The school will not comply with this duty where:

- The school reasonably requires further information to meet a freedom of information request, has informed the applicant of this requirement, but was not subsequently supplied with that further information.
- The information is no longer readily available as it is contained in files that have been placed in archive storage or is difficult to access for similar reasons.
- A request for information is exempt under section 2 of the Freedom of Information Act 2000.
- The cost of providing the information exceeds the appropriate limit.
- The request is vexatious.
- The request is a repeated request from the same person made within 60 consecutive working days of the initial one.
- A fee notice was not honoured.
- The requested information is not held by the school for the purposes of the school's business.

Where information is, or is thought to be, exempt, the school will, within 20 school days, give notice to the applicant which:

- States that fact.
- Specifies the exemption in question.

Common exemptions under the Act that might apply include:

Section 40 (1) – the request is for the applicants' personal data. This must be dealt with under the subject access regime in the Data Protection Act 2018 (DPA), detailed in paragraph 9 of the GDPR Data Protection Policy;

Section 40 (2) – compliance with the request would involve releasing third party personal data, and this would be in breach of the DPA principles as set out in paragraph 3.1 of the GDPR Data Protection Policy;

Section 41 – information that has been sent to the school (but not the school's own information) which is confidential;

Section 21 – information that is already publicly available, even if payment of a fee is required to access that information;

Section 22 – information that the school intends to publish at a future date;

Section 43 – information that would prejudice the commercial interests of the Trust and/or a third party;

Section 38 – information that could prejudice the physical health, mental health or safety of an individual (this may apply particularly to safeguarding information);

Section 31 – information which may prejudice the effective detection and prevention of crime – such as the location of CCTV cameras;

Section 36 – information which, in the opinion of the school would prejudice the effective conduct of the school. There is a special form for this on the ICO's website to assist with obtaining this opinion.

Note: The sections mentioned in italics are qualified exemptions. This means that even if the exemption applies to the information, a public interest weighting exercise must also be carried out, balancing the public interest in the information being released, as against the public interest in withholding the information.

If information falls within scope of a qualified exemption and the school needs additional time to consider the public interest test, the school may extend the deadline. In most cases, the extension will exceed no more than a further 20 school days; however, the actual length of the extension will be decided on a case-by-case basis.

Where a public interest test extension is required, the school will write to the applicant to inform them of this, stating the following information:

- Which exemption(s) the extension relies on and why
- A revised deadline for when the applicant will receive their response

Where a deadline has to be further extended, the school will write to the applicant again, stating the information outlined above.

Requests for information that is not recorded by the school (e.g. requests for explanations, clarification of policy and comments on the school's business) will not be considered valid requests. In these cases, the applicant will be provided with an explanation of why their request will not be treated under the Freedom of Information Act 2000 and the school will respond to the applicant through other channels as appropriate.

The information provided to the applicant will be in the format that they have requested, where possible. Where it is not possible to provide the information in the requested format, the school will assist the applicant by discussing alternative formats in which it can be provided. The information provided will also be in the language in which it is held, or another language that is legally required. If, under relevant disability and discrimination regulations, the school is legally obliged to provide the information in other forms and formats, it will do so.

In some cases, a request may be dealt with under more than one access regime, e.g. if the request involves both information about the school and personal information, it will be dealt with under the Freedom of Information Act 2000 and the Data Protection Act 2018.

Staff are made aware that it is a criminal offence to alter, deface, block, erase, destroy or conceal any information held by the school with the intention of preventing disclosure following a request.

4. The appropriate limit

The school will not comply with any freedom of information request that exceeds the statutorily imposed appropriate limit of £450.

When determining whether the cost of complying with a freedom of information request is within the appropriate limit, the school will take account only of the costs we reasonably expect to incur in relation to:

- Determining whether it holds the information.
- Locating the information, or a document which may contain the information.
- Retrieving the information, or a document which may contain the information.
- Extracting the information from a document containing it.
- Costs related to the time spent by any person undertaking any of the activities outlined in this policy on behalf of the school, are to be estimated at a rate of £25 per person per hour.

The school is not required to search for information in scope of a request until it is within the cost limit. If responding to one part of a request would exceed the cost limit, the school does not have to respond to any other parts of the request.

Where multiple requests for information are made to the school within 60 consecutive working days of each other, either by a single person or by different persons who appear to be acting in concert, the estimated cost of complying with any of the requests is to be taken to be the total costs to the school of complying with all of them.

5. Charging fees

The school may, within 20 school days, give an applicant who has requested information from the school, a written notice stating that a fee is to be charged for the school's compliance.

Charges may be made for disbursements, such as the following:

- Production expenses, e.g. printing and photocopying
- Transmission costs, e.g. postage
- Complying with the applicant's preferences about the format in which they would like to receive the information, e.g. scanning to a CD

Fees charged will not exceed the total cost to the school of:

- Informing the person making the request whether we hold the information.
- Communicating the information to the person making the request.

Where a fee is to be charged, the school will not comply with the General rights of access to information held by the school section of this policy unless the requested fee is paid within a period of three months, beginning with the day on which the fees notice is given to the applicant.

Where a fee is paid by cheque, the school has the right to wait until the cheque is cleared before commencing work. Once a fee is received, the school will inform the applicant of the revised response deadline, i.e. an additional 20 school days (or 60 working days).

Where the school has underestimated the cost to be charged to an applicant, a second fees notice will not be issued; instead, the school will bear the additional costs. The school will not take into account any costs which are attributable to the time spent by persons undertaking any of the activities mentioned in the Charging fees section of this policy.

When calculating the 20th school day in which to respond to a freedom of information request, the period beginning the day on which the fee notice is given to the applicant and ending with the day on which the fee is received will be disregarded.

6. Means of communication

Where, on making a request for information, the applicant expresses a preference for communication by any one of the following means, the school will, as far as is practicable, give effect to that preference:

- The provision to the applicant of a copy of the information in permanent form or in another form acceptable to the applicant.
- The provision to the applicant of a reasonable opportunity to inspect a record containing the information.
- The provision to the applicant of a digest, or summary of the information, in permanent form or in another form acceptable to the applicant.

Where a preference is not stated by the applicant, the school will communicate by any means which are reasonable under the circumstances. For example, where an applicant uses Twitter to make a request, the school may respond via an alternative medium as Twitter restricts the length of a response.

7. Providing advice and assistance

The school will meet its duty to provide advice and assistance, as far as is reasonable, to any person who proposes to make, or has made, requests for information to the school.

The school may offer advice and assistance in the following circumstances:

- If an individual requests to know what types of information the school holds and the format in which it is available, as well as information on the fees regulations and charging procedures.
- If a request has been made, but the school is unable to regard it as a valid request due to insufficient information, leading to an inability to identify and locate the information.
- If a request has been refused, e.g. due to an excessive cost, and it is necessary for the school to assist the individual who has submitted the request.

The school will provide assistance for each individual on a case-by-case basis; examples of how the school will provide assistance include the following:

- Informing an applicant of their rights under the Freedom of Information Act 2000
- Assisting an individual in the focus of their request, e.g. by advising of the types of information available within the requested category
- Advising an applicant if information is available elsewhere and how to access this information
- Keeping an applicant informed on the progress of their request

Where an applicant's request has been refused either because the information is accessible by other means, or the information is intended for future publication or research, the school, as a matter of good practice, will provide advice and assistance.

The school will advise the applicant how and where information can be obtained, if it is accessible by other means.

Where there is an intention to publish the information in the future, the school will advise the applicant of when this publication is expected. If the request is not clear, the school will ask for more detail from the applicant in order to identify and locate the relevant information, before providing further advice and assistance.

If the school believes the applicant has not provided their real name, the school will inform the applicant that the request will not be responded to until further information is received from the applicant.

If the school is able to clearly identify the elements of a request, it will respond following usual procedures and will provide advice and assistance for the remainder of the request. If any additional clarification is needed for the remainder of a request, the school will ensure there is no delay in asking for further information.

Applicants are given two months to provide any requested clarification. If an applicant decides not to follow the school's advice and assistance and fails to provide clarification, the school is under no obligation to contact the applicant again.

If the school is under any doubt that the applicant did not receive the advice and assistance, the school will re-issue it. The school is not required to provide assistance where an applicant's request is vexatious or repeated, as defined under section 14 of the Freedom of Information Act 2000.

Where the school has already sent a refusal request in relation to a previous vexatious request, the school is not obliged to send another notice for future vexatious requests.

An ongoing evidence log (**Appendix A**) is kept, recording relevant correspondence or behaviour that has been taken into account when a request has been classed as vexatious.

The school is not required to provide information where the cost of complying with a request exceeds the limit outlined in the Freedom of Information Act 2000. In such cases, the school will firstly provide the applicant with advice and assistance to help them reframe or refocus their request with a view of bringing it within the cost limit. Then the school will consider whether any information can be provided free of charge if the applicant refuses to pay the fee.

If a request is refined, it will be treated as a new request.

A record will be kept by the **Academy Business Manager** in the **school office** of all the advice and assistance provided.

8. Consultation with third parties

The school may need to consult third parties about information held in scope of a request to consider whether it would be suitable to disclose the information. Situations where third parties may need to be consulted include the following:

- When requests relate to persons or bodies who are not the applicant and/or the school
- When the disclosure of information is likely to affect the interests of persons or bodies who are not the applicant or the school

The school will consider if a third party needs to be directly consulted about a request, particularly, if there are contractual obligations that require consultation before information is disclosed.

Third parties will also be consulted where the school is proposing to disclose information relating to them or information that is likely to affect their business or private interests.

The views of third parties will be given appropriate weighting when deciding how to respond to a request. For example, if the third party created or provided the information, they may have a better understanding of its sensitivity.

It is ultimately the school's decision as to whether information in scope of a request will be released following any relevant consultation.

Where the school decides to release information following consultation with a third party, the third party will be informed in advance that the information is going to be disclosed.

Where the school intends to release information that relates to a large number of third parties, the school will consider whether it would be more appropriate to contact a representative organisation who can express views on behalf of the third parties, rather than contacting each party individually. If no representative organisation exists, the school may also consider only notifying or consulting a sample of the third parties relating to the disclosure. Decisions will be made on a case-by-case basis.

9. Internal reviews

When responding to requests for information, the details of the school's internal review process will be set out, including information about how applicants can request an internal review. Applicants will also be informed of their right to complain to the ICO if they are still dissatisfied following the outcome of the school's internal review.

Requests for an internal review should be made in writing to the school.

For a request for an internal review to be accepted, it must be made within 40 school days from the date the school issued an initial response to the request.

Upon receipt of an application, the school will acknowledge an application and inform the applicant of the intended response date. Responses will usually be delivered within 20 school days of receipt of the application.

If an internal review is complex, requires consultation with third parties or the relevant information is of high volume, the school may need to extend the usual response timeframe. In these cases, the school will inform the applicant and provide an alternative response date. In most cases, the extension will exceed no more than a further 20 school days; however, the actual length of the extension will be decided on a case-by-case basis.

Where clarification is needed from an applicant regarding the review, the normal response period will not begin until clarification is received. Wherever possible, the review will be undertaken by a different member of staff than the person who took the original decision. During a review, the school will evaluate the handling of the request; particular attention will be paid to concerns raised by the applicant.

The applicant will be informed of the outcome of the review and a record will be kept of such reviews and the final decision that is made. If the outcome of the review is to disclose information that was previously withheld, the information will be provided to the applicant at the same time they are informed of the response to the review, where possible. If this is not possible, the applicant will be informed of when the information will be provided.

Within the response to a review, the applicant will be informed again of their right to complain to the ICO.

10. Publication scheme

The school will meet its duty to adopt and maintain a publication scheme which specifies the information which it will publish on the school's website, and whether the information will be available free of charge or on payment. **(see Appendix C)**

The publication scheme will be reviewed and, where necessary, updated on an annual basis.

11. Contracts and outsourced services

The school will make clear what information is held by third party contractors on behalf of the school.

Where a contractor holds information relating to a contract held with the school on behalf of the school, this information is considered in the same way as information held by a public authority and so is subject to the Freedom of Information Act 2000.

When entering into a contract, the school and contractor will agree what information the school will consider to be held by the contractor on behalf of the school, this will be indicated in the contract.

Appropriate arrangements will be put in place for the school to gain access to information held by the contractor on the school's behalf, in the event that a freedom of information request is made. These arrangements will be set out in a contract, and will cover areas including, but not limited to, the following:

- How and when the contractor should be approached for information and who the points of contact are
- How quickly information should be provided to the school
- How any disagreement about disclosure between the school and contractor will be addressed
- How requests for internal reviews and appeals to the ICO will be managed
- The contractor's responsibility for maintaining record keeping systems in relation to the information they hold on behalf of the school
- The circumstances under which the school must consult with the contractor about disclosure and the process for doing so
- The types of information which should not be disclosed and the reasons for this confidentiality, where appropriate

In some situations, the school may offer or accept confidentiality arrangements that are not set out within a contract with a third party. The school and the third party will both be aware of the legal limits placed on the enforceability of expectations of confidentiality and the public interest in transparency. Such expectations will only be created where it is appropriate to do so.

Contractors must comply with requests from the school for access to information they hold on behalf of the school. Requests for information held by a contractor on behalf of the school will be responded to by the school. If a contractor receives a request, this will be passed onto the school for consideration.

12. Monitoring and review

This policy will be reviewed on an annual basis, or in light of any changes to relevant legislation.

Appendix A - FOI Request Evidence Log

Date of request	Format (e.g. email or in writing)	Location (Where is the correspondence stored?)	Requester	Repeated request? (Yes/No)	Deemed vexatious or repeated? (Yes/No)	Comments

Appendix B - Freedom of Information Publication Scheme

Date of Last Review: July 2025

Class 1 – Who we are and what we do	
Organisational information, structures, locations and contacts	
Information to be published	Location
Instrument of Government or Articles of Association	<insert link to website location/hard copy document>
School Prospectus	<insert link to website location/hard copy document>
An outline of the school curriculum	<insert link to website location/hard copy document>
Trust Board / Governing Body Overview The names of the governors, the basis on which they have been appointed and details of how to contact them via the school.	<insert link to website location/hard copy document>
Information About & Duties of the Trustees/Governors Publish information on your Trust Board / Governing Body in accordance with the relevant statutory guidance.	<insert link to website location/hard copy document>
Gender Pay Gap Reporting Publish this data annually if you have a headcount of 250 staff or more. See the Government's guidance to find out what information you need to publish.	<insert link to website location/hard copy document>
School Session Times	<insert link to website location/hard copy document>
School Term Dates Publish details of school term and holiday dates.	<insert link to website location/hard copy document>
Location and Contact Information Publish the address, phone number, email and website address of the school, together with the names of key personnel. Also provide the names and positions of all staff and how they may be contacted via the school.	<insert link to website location/hard copy document>

Class 2 – What We Spend and How We Spend It

Financial information about projected and actual income and expenditure, procurement, contracts and financial audit

Information to be published	Location
Annual Budget Plan and Financial Statements Provide details of the sources of funding and income you receive by a local authority, directly by central government or from elsewhere, including the private sector. Plus, the annual budget plan and your annual income and expenditure returns.	<insert link to website location/hard copy document>
Expenditures Provide details of items of expenditure over £5,000, including costs, supplier and transaction information. Publish this at least annually or, if practical for you to do so, on a quarterly or 6 monthly interval.	<insert link to website location/hard copy document>
Capital Funding Provide information on major plans for capital expenditure, details of the capital funding allocated to you together with information on relevant building projects and other capital projects. Include any private finance initiative and public/private partnership contracts.	<insert link to website location/hard copy document>
Financial Audit Reports	<insert link to website location/hard copy document>
Procurement & Contracts Provide details of procedures used for the acquisition of goods and services and details of contracts that have gone through a formal tendering process.	<insert link to website location/hard copy document>
Staff Allowances & Expenses Provide details of the allowances and expenses that can be incurred or claimed. Include the total of the allowances and expenses paid to individual senior staff members by reference to categories. Produce this information in line with your policies, practices and procedures. As a minimum, include travel, subsistence and accommodation.	<insert link to website location/hard copy document>
Staff Pay & Grading Structures You can provide this as part of your organisational structure. As a minimum, include the details of senior staff salaries in bands of £5,000. For all other posts, identify levels of pay by salary range.	<insert link to website location>

Premiums or Other Forms of Financial Support Available Provide details of any pupil premium funding (or sports premium grant) you receive and how you spend it. See DfE guidance for details of what information should be published.	<insert link to website location>
Trade Union Facility Time Reporting Read the government guidance on reporting trade union facility time to find out what information you need to publish. You need to publish this information once a year.	<insert link to website location>

Class 3 – What Our Priorities Are & How We Are Doing

Strategies and plans, performance indicators, audits, inspections and reviews

Information to be published	Location
Performance Data Supplied to the Government	<insert link to website location/hard copy document>
Latest Ofsted Report	<insert link to website location/hard copy document>
Performance Management Information The Performance Management policy and procedures adopted by your Trust Board / Governing Body.	<insert link to website location/hard copy document>
Future Plans Any major proposals on future plans involving, for example, a consultation on a change in school status. This could be in the form of the School Development Plan (full or short version).	<insert link to website location/hard copy document>
Exam & Assessment Results	<insert link to website location/hard copy document>
Performance Tables Include a link to your performance tables page.	<insert link to website location/hard copy document>
Data Protection Impact Assessments or any other Impact Assessments (e.g. health & safety impact assessment, equality impact assessment) These could be published in full or in summary.	<insert link to website location/hard copy document>

Class 4 – How We Make Decisions

Decision Making Processes and Records of Decisions

Information to be published	Location
Admissions Policy & Decisions Provide details about your admission arrangements and procedures, together with information about the right of appeal. You do not have to publish individual admission decisions. However, provide details of application numbers and patterns of successful applicants, including criteria on which applications were successful. If you are not your own admissions authority, provide an appropriate link to the local authority.	<insert link to website location/hard copy document>
Minutes of Meetings of the Governing Body and its Committees Publish the minutes, agendas and papers considered at such meetings, unless an exemption applies to the information or parts of it.	<insert link to website location/hard copy document>

Class 5 – Our Policies & Procedures

Current written protocols, policies and procedures for delivering our services and responsibilities

Information to be published	Location
School Policies & Other Documents Include policies such as behaviour, anti-bullying, eSafety, special educational needs policies. As a minimum, include policies, procedures and documents that you are required to have by statute, your funding agreement or equivalent. Include policies that the DfE recommend. Include policies and procedures for handling requests for information and operating the publication scheme.	<insert link to website location/hard copy document>
Data Protection Policies Include data protection policies, such as the Data Protection policy, Records Management policy, Retention Schedule, CCTV policy and Subject Access Request policy.	<insert link to website location/hard copy document>
Equality & Diversity Include policies, schemes, statements, procedures and guidelines relating to your commitment to the promotion and advancement of equal opportunities, including details of your compliance with the public sector equality duty.	<insert link to website location/hard copy document>
Safeguarding & Child Protection The policies and procedures you put in place to ensure that you exercise your functions with a view to safeguarding and improving child protection and promoting the welfare of children in compliance with legislation and any guidance issued by the Secretary of State.	<insert link to website location/hard copy document>
Pay Policy The statement of the Pay policy and procedures regarding teachers' pay.	<insert link to website location/hard copy document>
Health & Safety Policy	<insert link to website location/hard copy document>

Policies and Procedures for Human Resources and the Recruitment of Staff Make details of current vacancies readily available, if they are advertised as part of recruitment policies.	<insert link to website location/hard copy document>
Careers Programme Information	<insert link to website location/hard copy document>
Complaints Procedures, including for dealing with parental complaints	<insert link to website location/hard copy document>
Charging Regimes and Policies Provide details of any statutory charging regimes, including charging for school activities. Include charging policies about charges made for information routinely published. Clearly state what costs you are recovering, the basis on which you make them and how they are calculated.	<insert link to website location/hard copy document>

Class 6 – Lists & Registers

Information to be published	Location
Curriculum Circulars & Statutory Instruments Statutory instruments (for example regulations), departmental circulars and administrative memoranda sent to the Headteacher or Trust Board/Governing Body concerning the curriculum.	<insert link to website location/hard copy document>
CCTV Details of the locations of any overt CCTV surveillance cameras operated by you or on your behalf. Schools should decide on the level of detail that is appropriate. If you have a CCTV policy, then it would be appropriate to publish this.	<insert link to website location/hard copy document>
Disclosure Log If you produce a disclosure log indicating the information provided in response to FOIA and EIR requests, make it readily available. Disclosure logs are recommended as good practice.	<insert link to website location/hard copy document>
Asset Register Make available some information from capital asset registers, if you hold such registers.	<insert link to website location/hard copy document>
Any information that you are legally required to hold in publicly available registers	<insert link to website location/hard copy document>

Class 7 – The Services We Offer

Information about the services the school provides, including leaflets, guidance and newsletters.

Information to be published	Location
Extra-curricular Activities	<insert link to website location/hard copy document>
Out of School Clubs	<insert link to website location/hard copy document>
School Publications	<insert link to website location/hard copy document>
Services for which the school is entitled to recover a fee, together with those fees	<insert link to website location/hard copy document>
Leaflets, booklets and newsletters	<insert link to website location/hard copy document>
Letters to Parents/Carers	<insert link to website location/hard copy document>