The 3-18 Education Trust

Freedom of Information Policy

'Every individual is in a great school.'

For Review: **Autumn Term 2025**
Review: **Autumn Term 2026**

www.3-18education.co.uk

Our Mission

To celebrate the diverse nature, culture and identity of our individual schools, whilst collaborating and enjoying the benefit of the team.

Our Values

Compassionate

To show care and understanding towards others.

Accomplished

To provide high quality education and training for all.

Resilient

To be solution focused and able to intelligently manage challenges.

The 3-18 Education Trust
101 Longden Road
Shrewsbury
SY3 9PS

Company Number: 08064698

Policy Monitoring and Review

Monitoring

The Chief Executive Officer will monitor the outcomes and impact of this policy on an annual basis.

Review

Member of Staff Responsible	IT Director
Relevant Guidance/Advice/Legal Reference	Freedom of Information Act 2000 ICO Definition document for the governing bodies of maintained and other state funded schools in England
Policy Adopted By	Board of Trustees
Date of Policy	Autumn Term 2025
Review Period	Annually
Date of Next Review	Autumn Term 2026

Contents

1. Introduction 5
2. Definitions 5
Data Protection Enquiries 5
Environmental Information Regulations Enquiries 5
Fee Threshold 5
Information 5
Information Commissioner's Office 5
Response Time Limits 6
3. Freedom of Information Requests 6
Information 6
Vexatious Requests 7
Fees 7
Time Limit 7
Third Party Data 8
Exemptions 8
Absolute Exemptions 8
Qualified Exemptions 9
Refusal 9
4. About the Freedom of Information Publication Scheme 9
Classes of Information 10
Making Information Available 10
Charges for Information Published Under This Scheme 10
How to Request Information 10
5. Publication Scheme 11
Class 1 – Who we are and what we do. 11
Class 2 – What we spend and how we spend it. 11
Class 3 – What our priorities are and how we are doing. 11
Class 4 – How we make decisions. 12
Class 5 – Our policies and procedures. 12
Class 6 – Lists and Registers. 12
Class 7 – The services we offer. 12
6. Internal review 12
7. Appeals 13
Appendix A - To make a request under the Freedom of Information 14

1. Introduction

1.1. The Freedom of Information Act 2000 gives individuals the right to access official information from public bodies. Under the Act, any person has a legal right to ask for access to information held by The 3-18 Education Trust and/or its schools (Trust). They are entitled to be told whether the Trust holds the information and to receive a copy, subject to certain exemptions. While the Act assumes openness, it recognises that certain information is sensitive. There are exemptions to protect this information. Full details on how requests can be made are set out below.

1.2. Public authorities should be clear and proactive about the information they will make public. For this reason, a publication scheme is available and can be found later in this policy.

1.3. This policy does not form part of any individual's terms and conditions of employment with the Trust and is not intended to have contractual effect.

1.4. This policy should be used in conjunction with the Trust's Data Protection Policy.

2. Definitions

Data Protection Enquiries

2.1. Data Protection enquiries (or Subject Access Requests/SARs) are requests where the enquirer asks to see what personal information the Trust holds about the enquirer. If the enquiry is a data protection request, the Trust's Data Protection Policy should be followed.

Environmental Information Regulations Enquiries

2.2. Environmental Information Regulations enquiries are those which relate to air, water, land, natural sites, built environment, flora and fauna, health and any decisions and activities affecting any of these. These could, therefore, include enquiries about recycling, phone masts, school playing fields, car parking etc. If the enquiry is about environmental information, follow the guidance on the Department for Environment, Food and Rural Affairs (DEFRA) website.

Fee Threshold

2.3. The fee threshold is currently £450 with staff costs calculated at a fixed rate of £25 per hour (therefore 18 hours' work is required before the threshold is reached).

2.4. When calculating costs/threshold, the Trust can take account of the staff costs/time in determining whether the information is held by the Trust, locating, and retrieving the information and extracting the information from other documents. The Trust will not take account of the costs involved with considering whether information is exempt under the Act.

Information

2.5. Information means information relating to the business of the Trust:

- that the Trust has created; or
- that the Trust has received from another body or person; or
- held by another body on the Trust's behalf.

2.6. Information means both hard copy and digital information, including email.

Information Commissioner's Office

2.7. The Information Commissioner's Office (ICO) upholds information rights in the public interest, promoting openness by public bodies and data privacy for individuals. ICO is an executive non-departmental public body, sponsored by the Department for Science, Innovation and Technology.

Response Time Limits

2.8. Compliance with a request must be prompt and within the time limit of 20 school days (this does not include the school holidays or weekends) or 60 working days if this is shorter. Failure to comply could result in a complaint by the requester to the ICO. The response time starts counting as the first day from the next working day after the request is received (so if a request was received on Monday 6th October the time limit would start from the next working day, the 7th October).

3. Freedom of Information Requests

3.1. Requests under Freedom of Information should be made to Judicium Consulting Limited. Details of how to make an online or postal request can be found in Appendix A. However, the request can be addressed to anyone in the Trust. All staff need to be aware of the process for dealing with requests.

3.2. Requests for information that are not Data Protection or Environmental Information Regulations requests will be covered by the Freedom of Information Act.

3.3. Freedom of Information requests must be made in writing (including email) and should include the requester's name, correspondence address (email addresses are allowed) and state what information they require. There must be enough information in the request to be able to identify and locate the information. If this information is covered by one of the other pieces of legislation (as referred to above), they will be dealt with under the relevant policy/procedure related to that request.

3.4. If the request is ambiguous and/or the Trust requires further information in order to deal with the request, the Trust will request this further information directly from the individual making the request. Please note that the Trust do not have to deal with the request until the further information is received. Therefore, the time limit starts from the date that the Trust receives all information required in order to deal with the request.

3.5. The requester does not have to mention the Act, nor do they have to say why they want the information. There is a duty to respond to all requests, telling the requester whether or not the information is held and supplying any information that is held, except where exemptions apply.

Information

3.6. Provided all requirements are met for a valid request to be made, the Trust will provide the information that it holds (unless an exemption applies).

3.7. If the information is held by another public authority (for example, the Local Authority), the Trust will check whether they hold the information and if so, transfer the request to them. If this applies, the Trust will notify the requester that they do not hold the information and to whom they have transferred the request. The Trust will continue to answer any parts of the enquiry in respect of information it does hold.

3.8. When the Trust does not hold the information, it has no duty to create or acquire it just to answer the enquiry; although a reasonable search will be made before confirming whether the Trust has the information requested.

3.9. If the information requested is already in the public domain, for instance, through the Publication Scheme or on the Trust's website, the Trust will direct the requester to the information and explain how to access it.

3.10. The requester has the right to be told if the information requested is held by the Trust (subject to any of the exemptions). This obligation is known as the Trust's duty to confirm or deny that it holds the information. However, the Trust does not have to confirm or deny if:

- the exemption is an absolute exemption; or
- in the case of qualified exemptions, confirming or denying would itself disclose exempted information.

Vexatious Requests

3.11. There is no obligation on the Trust to comply with vexatious requests. A vexatious request is one which is designed to cause inconvenience, harassment, or expense rather than to obtain information and would require a substantial diversion of resources or would otherwise undermine the work of the Trust. However, this does not provide an excuse for bad record management.

3.12. In addition, the Trust does not have to comply with repeated identical or substantially similar requests from the same requester unless a reasonable interval has elapsed between requests.

Fees

3.13. The Trust may charge the requester a fee for providing the requested information. This will be dependent on whether the staffing costs in complying with the request exceeds the fee threshold.

3.14. If a request would cost less than the threshold, then the Trust can only charge for the cost of informing the applicant whether the information is held and communicating the information to the applicant (e.g., photocopying, printing and postage costs).

3.15. If a request would cost more than the threshold, the Trust can turn the request down, answer and charge a fee or answer and waive the fee.

3.16. If the Trust is going to charge a fee it will send the requester a fee's notice. The Trust does not have to comply with the request until the fee has been paid. More details on fees can be found on the ICO website.

3.17. If planning to turn down a request for cost reasons or charge a high fee, the Trust will contact the requester in advance to discuss whether they would prefer the scope of the request to be modified so that, for example, it would cost less than the appropriate limit.

3.18. Where two or more requests are made to the Trust by different people who appear to be acting together or as part of a campaign, the estimated cost of complying with any of the requests may be taken to be the estimated total cost of complying with them all.

Time Limit

3.19. Compliance with a request must be prompt and within the time limit. Where the Trust has asked the requester for more information to enable it to answer, the start time begins when this further information has been received.

3.20. If some information is exempt this will be detailed in the Trust's response.

3.21. If a qualified exemption applies and the Trust needs more time to consider the public interest test, the Trust will reply within the time limit stating that an exemption applies but include an estimate of the date by which a decision on the public interest test will be made. This should be within a "reasonable" time.

3.22. Where the Trust has notified the requester that a charge is to be made, the time limit period stops until payment is received.

Third Party Data

3.23. Consultation of third parties may be required if their interests could be affected by release of the information requested and any such consultation may influence the decision.

3.24. Consultation will be necessary where:

- disclosure of information may affect the legal rights of a third party, such as the right to have certain information treated in confidence or rights under Article 8 of the European Convention on Human Rights;
- the views of the third party may assist the Trust to determine if information is exempt from disclosure; or
- the views of the third party may assist the Trust to determine the public interest test.

3.25. Personal information requested by third parties is also exempt under this policy where release of that information would breach the Data Protection Act. If a request is made for a document (e.g., Local Governing Body Meeting minutes) which contains personal information whose release to a third party would breach the Data Protection Act, the document may be issued by blanking out the relevant personal information as set out in the redaction procedure.

Exemptions

3.26. The presumption of the Freedom of Information Act is that the Trust will disclose information unless the Act provides a specific reason to withhold it. The Act recognises the need to preserve confidentiality and protect sensitive material in certain circumstances.

3.27. The Trust may refuse all/part of a request, if one of the following applies:

- There is an exemption to disclosure within the Act.
- The information sought is not held.
- The request is considered vexatious or repeated.
- The cost of compliance exceeds the threshold.

3.28. A series of exemptions are set out in the Act which allow the withholding of information in relation to an enquiry. Some are specialised in their application (such as national security) and would not usually be relevant to academy trusts and schools.

3.29. There are two general categories of exemptions:

- Absolute: where there is no requirement to confirm or deny that the information is held, disclose the information or consider the public interest; and
- Qualified: where, even if an exemption applies, there is a duty to consider the public interest in disclosing information.

Absolute Exemptions

3.30. There are eight absolute exemptions set out in the Act. However, the following are the only absolute exemptions which will apply to the Trust:

- Information accessible to the requester by other means (for example, by way of the Trust's Publication Scheme).
- National Security/Court Records.
- Personal information (i.e., information which would be covered by the Data Protection Act).
- Information provided in confidence.

3.31. If an absolute exemption exists, it means that disclosure is not required by the Act. However, a decision could be taken to ignore the exemption and release the information taking into account all the facts of the case if it is felt necessary to do so.

Qualified Exemptions

3.32. If one of the below exemptions apply (i.e., a qualified disclosure), there is also a duty to consider the public interest in confirming or denying that the information exists and in disclosing information.

3.33. The qualified exemptions under the Act which would be applicable to the Trust are:

- Information requested is intended for future publication (and it is reasonable in all the circumstances for the requester to wait until such time that the information is actually published).
- Reasons of national security.
- Government/international relations.
- Release of the information is likely to prejudice any actual or potential legal action or formal investigation involving the Trust.
- Law enforcement (i.e., if disclosure would prejudice the prevention or detection of crime, the prosecution of offenders or the administration of justice).
- Release of the information would prejudice the ability of the Trust to carry out an effective audit of its accounts, resources and functions.
- For health and safety purposes.
- Information requested is environmental information.
- Information requested is subject to legal professional privilege.
- For commercial interest reasons.

3.34. Where the potential exemption is a qualified exemption, the Trust will consider the public interest test to identify if the public interest in applying the exemption outweighs the public interest in disclosing it.

3.35. In all cases, before writing to the enquirer, the person given responsibility by the Trust for dealing with the request will need to ensure that the case has been properly considered and that the reasons for refusal or public interest test refusal, are sound.

Refusal

3.36. If it is decided to refuse a request, the Trust will send a refusals notice, which must contain:

- the fact that the responsible person cannot provide the information asked for;
- which exemption(s) apply;
- why the exemption(s) apply to this enquiry (if it is not self-evident);
- reasons for refusal; and
- the Trust's complaints/internal review procedure.

3.37. For monitoring purposes and in case of an appeal against a decision not to release the information or an investigation by the Information Commissioner, the responsible person must keep a record of all requests where all or part of the requested information is withheld and exemptions are claimed. The record must include the reasons for the decision to withhold the information.

4. About the Freedom of Information Publication Scheme

4.1. This publication scheme follows the model approved by the Information Commissioners Office.

4.2. This scheme is not a list of individual publications but rather a description of the classes of types of information that the Trust is committed to publishing. This list is not an exhaustive list of all of the types of information that the Trust publish. The Trust tries to proactively publish as much information as it can where the information would have a wider public interest.

4.3. This scheme does not include information that the Trust considers to be sensitive, such as personal information, information prevented from disclosure by law or information about security matters.

Classes of Information

4.4. There are six classes of information that the Trust holds:

- Who we are and what we do.
- What we spend and how we spend it.
- What our priorities are and how we are doing.
- How we make decisions.
- Our policies and procedures.
- The services we offer.

Making Information Available

4.5. Information will generally be made available on the Trust websites. Where it is not possible to include this information on the Trust websites, or when an individual does not wish to access the information by the websites the Trust will indicate how information can be obtained by other means and provide it by those means. This may be detailed in response to a request or within the scheme itself. This will usually be by way of a paper copy.

4.6. In some exceptional circumstances, some information may be available only by viewing in person. Where this manner is specified, contact details will be provided. An appointment to view the information will be arranged within a reasonable timescale.

4.7. Information will be provided in the language in which it is held or in such other language that is legally required. Where we are legally required to translate any information, the Trust shall do so.

Charges for Information Published Under This Scheme

4.8. The Trust may charge individuals for information published under this scheme. The purpose of this scheme is to make the maximum amount of information readily available at the minimum inconvenience and cost to the public. Charges made by the Trust for routinely published material will be justified and transparent and kept to a minimum.

4.9. Material which is published and accessed on the website will be provided free of charge.

4.10. Charges may be made for information subject to a charging regime specified by law.

4.11. Charges will be made to cover:

- Photocopying;
- Postage and packaging; and
- The costs directly incurred as a result of viewing information.

4.12. Single copies of information requested which are covered by the publication scheme will be provided free. If the request involves more than one copy and/or a large amount of photocopying, printing or postage, then this may be at a cost. If this is the case, the Trust will let the applicant know as well as the cost before fulfilling the request.

How to Request Information

4.13. If a paper version of any of the documents within the scheme is preferred, please contact the Trust's Data Protection Officer using the contact details below.

- Data Protection Officer: Judicium Consulting Limited
- Address: 5th Floor, 98 Theobalds Road, London, WC1X 8WB
- Email: dataservices@judicium.com
- Web: www.judiciumeducation.co.uk
- Telephone: 0345 548 7000 option 1 then option 1 again

4.14. Please mark all correspondence Publication Scheme Request to help the process the request quickly. If the information is not available through the scheme, please contact the Trust to ask if it has this information.

5. Publication Scheme

Class 1 – Who we are and what we do.

5.1. Organisational information, structures, locations and contacts.

5.2. Information in this class will be current information only and covers:

- Articles of Association
- School prospectus, if any and curriculum
- Members, Trust Board and Local Governing Bodies
- Information about and duties of the Members, Trustees and Local Governors
- Gender pay gap reporting
- School session times and term dates
- Location and contact information

Class 2 – What we spend and how we spend it.

5.3. Financial information about projected and actual income and expenditure, procurement, contracts and financial audit. Information in this class will be for the current and previous two financial years and covers:

- Annual budget plan and financial statements
- Expenditures
- Capital funding
- Financial audit reports
- Procurement and contracts
- Staff allowances and expenses
- Staff pay and grading structures
- Members', Trustees' and Local Governors' allowances
- Premiums or other forms of financial support available
- TU facility time reporting

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

5.4. Strategies and plans, performance indicators, audits, inspections and reviews. Information in this class will be current information.

- Performance data supplied to the government
- Latest Ofsted report
- Performance management information
- Performance management policy and procedures adopted by your governing body.
- Future plans
- Exam and assessment results
- Performance tables

- Data protection impact assessments or any other impact assessments (as appropriate and relevant).

Class 4 – How we make decisions.

5.5. Decision-making processes and records of decisions. Information in this class available will be for the current and previous three years.

- Admissions policy and decisions
- Minutes of meetings of the Trust Board and its committees

Class 5 – Our policies and procedures.

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

5.7. Information in this class will be current versions.

- School policies and other documents
- Records management, personal data and access to information policies
- Equality and diversity
- Safeguarding and child protection
- Pay policy
- Health and safety
- Policies and procedures for human resources and the recruitment of staff

Class 6 – Lists and Registers.

5.8. Information will be in currently maintained lists and registers only.

- Curriculum circulars and statutory instruments
- CCTV
- Disclosure logs
- Asset register
- Any information the Trust is currently legally required to hold in publicly available registers

Class 7 – The services we offer.

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

- Extra-curricular activities
- Out of school clubs
- School publications
- Services for which the Trust is entitled to recover a fee, together with those fees
- Leaflets, booklets and newsletters

6. Internal review

6.1. The requester has the right to ask for an internal review if they are dissatisfied with the handling of a request.

6.2. The Trust will distinguish requests for an internal review, which seeks to challenge either the outcome of process of the handling of the initial response, and a general complaint, which should be handled through the Trust's existing complaints procedure.

6.3. Internal review requests should be made within 40 working days of the initial response. This deadline should be communicated to the requester in that response. The Trust is not obliged to provide a review if it is requested after more than 40 working days.

6.4. Requests for internal review must make clear why they are dissatisfied with the original decision, detailing why they feel that the Trust has not complied with Freedom of Information Law.

7. Appeals

7.1. If the outcome is that the Trust's original decision or action is upheld, then the requester can appeal to the Information Commissioner. The appeal can be made via their website or in writing to:
Customer Contact
Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
SK9 5AF

Appendix A - To make a request under the Freedom of Information

A request can be made online through the following links:

The 3-18 Education Trust

Bowbrook Primary School

Bridgnorth Endowed School

Coleham Primary School

Much Wenlock Primary School

St Martins School

The Priory School

The Thomas Adams School

William Brookes School

Hodnet Primary School

John Wilkinson Primary School

A request can be made by post to the following name and address:

Data Protection Officer for The 3-18 Education Trust
Judicium Consulting Limited
5th Floor
98 Theobalds Road
London
WC1X 8WB