



FREEDOM OF INFORMATION POLICY

Date Agreed	Body	Review Date
Spring 2026	Board of Trustees	Spring 2027

1 INTRODUCTION

- 1.1 Policies for Chiltern Learning Trust are designed to support the ethos, aims and vision of the Trust and each school within it as outlined in the Strategic Intents and School Improvement Plan (SIP).

2 RATIONALE

- 2.1 Chiltern Learning Trust is committed to the Freedom of Information Act 2000 ("FOIA") which came into force on 1 January 2005. The Trust is committed to the principles of accountability and the general right of access to information, subject to legal exemptions. This policy outlines its framework for managing requests.
- 2.2 Under the Freedom of Information Act 2000, any person has a legal right to ask for access to information held by the Trust. They are entitled to be told whether a school or Trust holds the information, and to receive a copy, subject to certain exemptions. The Trust and each school are under a duty to provide advice and assistance to individuals making requests under the FOIA.
- 2.3 The information which a school routinely makes available to the public is included in the Trust's FOIA Publication Scheme (appendix 1). Requests for other information are dealt with in accordance with statutory guidance. While the Act assumes openness, it recognises that certain information is sensitive. There are exemptions to protect this information.
- 2.4 The Act is fully retrospective, so that any past records which a school holds are covered by the Act. The Trust has a retention schedule based on the schedule recommended by the Records Management Society of Great Britain, which guides each school as to how long it should keep records. Caution should be exercised about deleting any information that is subject to an information request as you may be legally obliged to communicate that information to the requestor.
- 2.5 Regulation 19 of the Environmental Information Regulations 2004 (EIR) makes the actions listed in section 77(1) of the FOIA an offence where environmental information has been requested under the EIR. The Trust is required to confirm that it held the information and consider its disclosure, subject to any exemption or exception. Therefore, if information you held at the time of the request is destroyed outside of the Trust's normal disposal schedule, this is likely to be a breach of the FOIA or the EIR. An offence would only have been committed if the requested information was altered, concealed or destroyed with the intention of preventing disclosure under either FOIA or the EIR.
- 2.6 For contact information regarding Trust schools and its member organisations, please visit the Chiltern Learning Trust website at chilternlearningtrust.org. Information requests for the Trust should be sent to the address listed in Appendix 1, addressed to the Company Secretary. When requesting information from the Trust, please include your name, a postal address for correspondence, and a clear description of the information you are seeking. All Freedom of Information (FOI) requests are managed by the Trust and the Data Protection Lead (DPL) for each Trust school and its organisations. The Trust encourages using foi@chilternlearningtrust.org for submitting all freedom of information requests, although it recognises the right of individuals to make requests in writing through any appropriate channel. All requests for information must be submitted in accordance with the following requirements:

All requests must be submitted in writing (including email) and clearly state the requester's name, correspondence address, and the specific information sought. Requesters are not obligated to cite any specific legislation or provide a reason for their request.

- 2.7 A response to all requests is mandatory. This response must inform the enquirer whether the requested information is held. If the information is held, it must be provided, unless a specific exemption applies. Creating new information to fulfill a request is not required; however, the collation of existing information from various sources should be considered. The Trust will seek to respond to a request for information promptly and in any event no later than 20¹ schools days or 60² working days from the date of the request whichever occurs first.

3 SCOPE

- 3.1 The Company Secretary is responsible for ensuring compliance with this policy and procedures. This policy and procedures apply to all staff within the Trust when requests for information are received.
- 3.2 Requests for personal data are covered by the Data Protection Act. Individuals can request to see what information the school or the Trust holds about them. This is known as a Subject Access Request, and must be dealt with accordingly.
- 3.3 Requests for information about anything relating to the environment – such as air, water, land, the natural world or the built environment and any factor or measure affecting these – are covered by the Environmental Information Regulations (“EIR”). Requests under the EIR are dealt with in the same way as those under the FOIA, but they can be verbal.

4 ASSOCIATED DOCUMENTS

4.1 The following documents have relevance to this policy:

- The Chiltern Learning Trust FOIA Publication Scheme (appendix 1)
- Data Retention Schedule
- Data Protection Policy

5 PROCEDURE

5.1 Obligations and duties

The Trust is committed to providing reasonable advice and assistance to any individual seeking information from the Trust.

- 5.1.1 The Trust is obligated to inform enquirers whether or not it possesses the requested information (the duty to confirm or deny) and to provide access to any held information, subject to the procedures and exemptions outlined in Appendix 2.

5.2 Publication scheme

The Trust has created a Publication Scheme derived from the Model Publication Scheme for Academies approved by the Information Commissioner. The Publication Scheme is available in appendix 1.

¹ A school day is any day on which there is a school session.

² A working day means any other day other than a Saturday, a Sunday, Christmas Day, Good Friday or a day which is a bank holiday.

5.3 Dealing with requests

The Trust will respond to all requests in accordance with the procedures in Appendix 3 and will ensure that its staff are aware of the procedures.

Vexatious or Repeated Requests: In accordance with Section 14 of the Freedom of Information Act the Trust may refuse requests that are vexatious or repeated. A request will be considered vexatious if it has the potential to cause a disproportionate or unjustified level of disruption, irritation, or distress. The Trust is not obligated to comply with a repeat request from the same individual that is the same as or very similar to a previous request, unless a reasonable timeframe has passed since the initial response.

5.4 Exemptions

Certain information is subject to either absolute or qualified exemptions. The exemptions are detailed in Appendix 3.

5.4.1 When the Trust wishes to apply a qualified exemption to a request, it will invoke the public interest test procedures to determine if public interest in applying the exemption outweighs the public interest in disclosing the information.

5.4.2 The Trust will maintain a register of requests where it has refused to supply information, and the reasons for the refusal. The register will be retained for five years from the date of the request.

5.5 Charging

The Publication Scheme clearly outlines the methods by which members of the public can access the specific information it contains, along with any potential costs involved.

5.5.1 The Trust reserves the right to charge a fee for complying with requests for information under FOIA, other than information available through its websites. The fees are according to FOIA regulations and the enquirer will be asked for payment of the charge before the information is supplied.

5.5.2 Where a fee is applicable to a request, the statutory timeframe for response will be suspended from the date a Fee Notice is issued to the Requester until the date the correct fee is received by the Trust.

5.5.3 In the event that a Requester indicates non-willingness to pay the fee as outlined in the Fee Notice, or if the stipulated fee remains unpaid for a period of three months following the issuance of the Fee Notice, the Trust will not be obligated to comply with the original request. However, the Trust will give due consideration to any subsequent narrowed or amended requests submitted by the Requester.

5.5.4 Under Section 12 of the FOIA, the Trust does not have to comply with a request for information if the estimated cost of compliance exceeds £450.

5.6 Responsibilities

The Company Secretary holds delegated responsibility for the Trust's overall compliance with the Freedom of Information Act (FOIA). This encompasses the monitoring of all enquiries, provision of FOIA guidance, and management of staff training. The responsibility for ensuring day-to-day compliance with the FOIA and this policy has been sub-delegated to the Headteacher of each school within the Trust and the designated lead for FOIA compliance within other Trust organisations.

5.7 Complaints

Any comments or complaints will be dealt with through the Trusts complaints procedure.

- 5.7.1 If, on investigation, the Trust's original decision is upheld, then the Trust has a duty to inform the complainant of their right to appeal to the Information Commissioner's Office. Appeals should be made in writing to the Information Commissioner's Office at: FOI/EIR Complaints Resolution, Information Commissioner's Officer
Wycliffe House,
Water Lane,
Wilmslow,
Cheshire
SK9 5AF. Tel: 01625 545 700

5.8 Records:

Records	Retention time (Min)	Disposal authority
Register of Requests	Five years	Company Secretary
Original Written Requests	Five years	
Response to Requests	Five years	
Correspondence Related to Freedom of Information Requests	Five years	

The Trust and each of its schools will maintain individual records of requests. A summary of total requests will be reported to the Board of Trustees annually.

6 Policy Review

This policy will be kept under review in order to keep it in line with relevant legislation and modifications authorised by the Board of Trustees.

7 Academy and Trust contact details

The contact details of our schools can be found on the Trust website at: chilternlearningtrust.org

The Trust central office address is: c/o Redgrave Children and Young Peoples Centre, Redgrave Gardens, Luton, Beds, LU3 3QN.
Email: foi@chilternlearningtrust.org

APPENDIX 1

Freedom of Information Publication Scheme Introduction The Freedom of Information Act 2000 (FOIA) requires all public authorities (including schools) to adopt and maintain a publication scheme. In 2008 the Information Commissioner's Office (ICO) changed the emphasis in the approval and operation of publication schemes to a generic model, with effect from 1 January 2009. The model commits a public authority to 'produce and publish the method by which the specific information will be available so that it can be easily identified and accessed by members of the public'. A school will breach the FOIA if it has not adopted the model scheme or is not publishing in accordance with it by this date.

Chiltern Learning Trust has adopted the ICO Model Publication Scheme in full, unedited. The Guide to Information below should be read together with the ICO Model Publication Scheme which can be found at:

<https://ico.org.uk/media2/for-organisations/documents/1153/model-publication-scheme.pdf>

The Trust are responsible for maintenance of this scheme and have delegated to their Head Teacher the day-to-day responsibility for the FOI policy and the provision of advice, guidance, publicity and interpretation of the Trust's policy.

Information to be published. This includes datasets where applicable	How the information can be obtained	Cost of hard copy
<p>Class 1 - Who we are and what we do (Organisational information, structures, locations and contacts)</p> <p>Only current information will be made available</p>		Free
Who's who in the school	Staff list/website	Free
Who's who on the governing body/board of Trustees and the basis of their appointment	Staff Handbook/Website Student/Parent/Staff Portals	Free
Instrument of Government / Articles of Association	Website	Free
Contact details for the Head teacher/Principal and for the governing body, via the school (named contacts where possible).	Website/Headed Paper/Compliment slips	Free
School prospectus (if any)	Hard copy from school office On-line version on the website	Free
Annual Report (if any)	Website – Governor section	5p per sheet
Staffing structure	Hard Copy	5p per sheet
School session times and term dates	Website/Hard copy/ Student Planner Student/Parent/Staff Portals	5p per sheet
Address of school and contact details, including email address.	Website/letter headed paper Student/Parent/Staff Portals	Free

Class 2 – What we spend and how we spend it (Financial information relating to projected and actual income and expenditure, procurement, contracts and financial audit) Information from the current and previous financial year will be made available	Trust	
Trust Annual Accounts	Website/Hard Copy	5p per sheet
Annual budget plan and financial statements	Hard Copy	5p per sheet
Capital funding	Hard Copy	5p per sheet
Financial audit reports	Hard Copy	5p per sheet
Details of expenditure items over £2000 – published at least annually but at a more frequent quarterly or six-monthly interval where practical.	Hard Copy	5p per sheet
Procurement and contracts the school has entered into, or information relating to / a link to information held by an organisation which has done so on its behalf (for example, a local authority or diocese).	Hard Copy	5p per sheet
Pay policy	Website/Hard Copy	5p per sheet
Staff allowances and expenses that can be incurred or claimed, with totals paid to individual senior staff members (Senior Leadership Team or equivalent, whose basic actual salary is at least £60,000 per annum) by reference to categories.	Hard copy	5p per sheet
Staffing, pay and grading structure. As a minimum the pay information should include salaries for senior staff (Senior Leadership Team or equivalent as above) in bands of £10,000; for more junior posts, by salary range.	Trust Annual Accounts – Website/Hard Copy	5p per sheet
Members, Trustees and Governors’ allowances that can be incurred or claimed, and a record of total payments made to individual Members, Trustees and Governors.	Hard Copy	5p per sheet

Class 3 – What our priorities are and how we are doing (Strategies and plans, performance indicators, audits, inspections and reviews) Current information will be made available	(Hard copy or website)	5p per sheet
School profile (if any) And in all cases: • Performance data supplied to the English Government, or a direct link to the data	Website	Free

• The latest Ofsted / Estyn / Education and Training Inspectorate report - Summary - Full report		If copies required 5p per sheet
Performance management policy and procedures adopted by the governing body.	Website/Hard copy	5p per sheet
Performance data or a direct link to it	Website/Prospectus	Free
The school's future plans; for example, proposals for and any consultation on the future of the school, such as a change in status	3 yr plan – hard copy Website Student/Parent/Staff Portals	5p per sheet
Safeguarding and child protection policies and procedures, including	Website Student/Parent/Staff Portals	Free
Class 4 – How we make decisions (Decision making processes and records of decisions) Current and previous three years as a minimum	Hard copy/website	5p per sheet
Admissions policy/decisions (not individual admission decisions) – where applicable	Hard copy/website	5p per sheet
Agendas and minutes of meetings of the governing body and its committees. (NB this will exclude information that is properly regarded as private to the meetings).	Hard copy/website	5p per sheet
Class 5 – Our policies and procedures (Current written protocols, policies and procedures for delivering our services and responsibilities) Current information will be made available only	Hard copy/website	Free
School policies		
Records management and personal data policies	Hard Copy	5p per sheet
Charging regimes and policies	Website/Hard Copy See Charging and remissions policy	5p per sheet
Class 6 – Lists and Registers Currently maintained lists and registers will be made available only (this does not include the attendance register).	(Hard copy or website; some information may only be available by inspection)	5p per sheet
Curriculum circulars and statutory instruments	Website	Free
Disclosure logs	Unnamed statement	5p per sheet
Asset register	Viewing only	Free
Any information the school is currently legally required to hold in publicly available registers (This does not include the attendance registers)	Website	Free

Class 7 – The services we offer (Information about the services we offer, including leaflets, guidance and newsletters produced for the public and businesses) Current information will be made available only	Hard copy or website; some information may only be available by inspection)	Free
Extra-curricular activities	Website Student/Parent/Staff Portals	Free
Out of school clubs	Website Student/Parent/Staff Portals	Free
Services for which the school is entitled to recover a fee, together with those fees	Website	Free
School publications, leaflets, books and newsletters	Website Student/Parent/Staff Portals	Free
Additional Information This will provide schools with the opportunity to publish information that is not itemised in the lists above		

How to Request Information

You can request a copy of the information you want from the contact details in 7.0.

If the information you are looking for is not available via our publication scheme and is not on our website, you may still ask if we have it. Please contact the school in writing, by email or letter. Please state that this is a Freedom of Information Request

Paying for Information

Information published on our website is free, (apart from any connection costs payable to your internet service provider). If you do not have Internet access, you can access our website using a local library or an Internet café. Single printed copies of information covered by this publication are provided free unless stated otherwise. If your request means that we have to do a lot of photocopying or printing, or pay a large postage charge, or is for a priced item such as some printed publications or DVDs we will let you know the cost before fulfilling your request.

Schedule of Charges

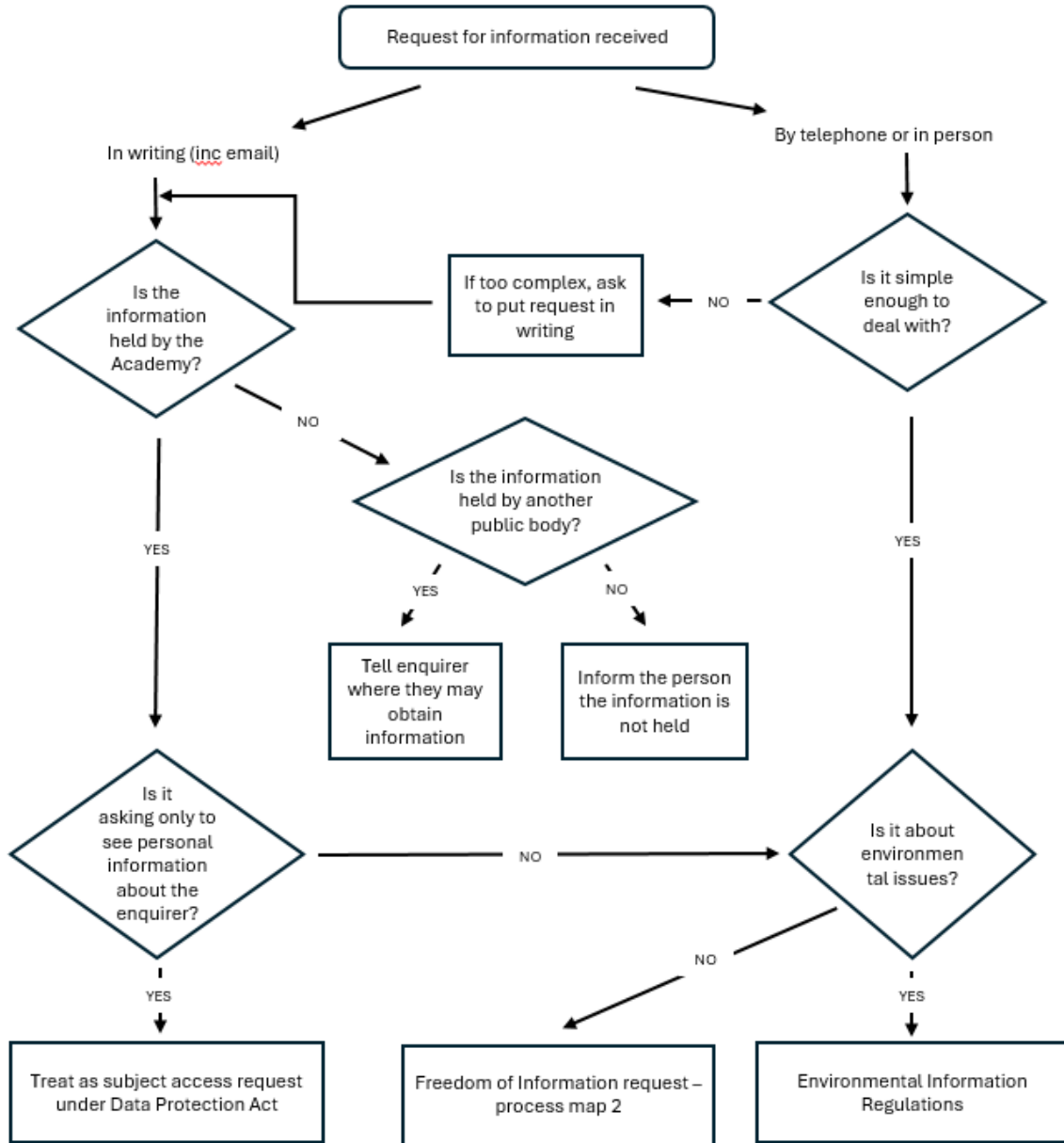
This describes how the charges set out in the Guide to Information above have been arrived at.

TYPE OF CHARGE	DESCRIPTION	BASIS OF CHARGE
Disbursement cost	Photocopying/printing @ 5p per sheet (black & white)	
	Photocopying/printing @ 8p per sheet (colour)	
	Postage	Actual cost of Royal Mail standard 2nd class
Statutory Fee		In accordance with the relevant legislation (quote the actual statute)
Re-licensing the use of datasets (No personal data will be disclosed)	<p>If the dataset is a relevant copyright work, the school will provide it under the terms of a specified licence.</p> <p>A relevant copyright work is one for which the school owns the copyright and database rights, and which is not a Crown copyright or Parliamentary copyright work.</p> <p>The school may charge a fee for communicating the information and a fee for making the dataset available for reuse if this requires cost and effort in publishing this in a reusable form.</p>	There is no re-use fee if the dataset is provided under the OGL, or the Non-Commercial Government Licence.
	<p>Under our publication scheme the school will publish datasets that have been requested, and any updated versions it holds, unless it is satisfied that it is not appropriate to do so. Factors that can be taken into account when deciding whether it is not appropriate include whether the information is exempt and the cost and effort of publishing in a reusable form.</p> <p>Complaints that the school</p>	

	has not met its duties under the dataset provisions will be dealt with by the information commissioner, in consultation with the National Archives as appropriate.	
Other	£2 which includes research for each item.	

Procedure for dealing with requests - Receiving Requests (process map 1)

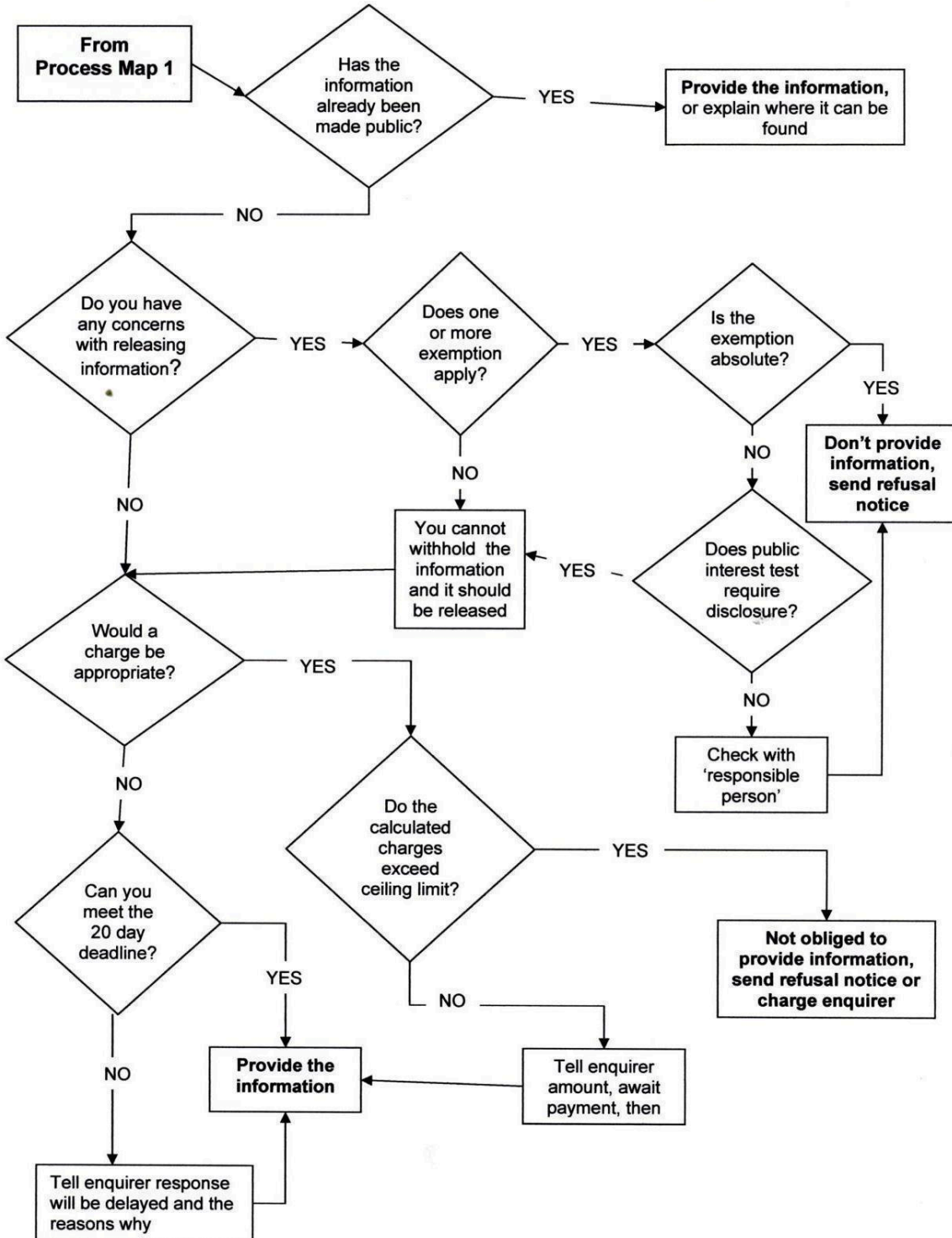
Process Map for Receiving Requests for Information



Note: While the Freedom of Information Act (FOIA) stipulates that requests should generally be made in writing, the Environmental Information Regulations (EIR) permit verbal requests. For FOIA requests, if a requester is unable to submit their request in writing, staff should advise and assist them in doing so. As a matter of best practice, and to ensure clarity and accurate record-keeping for all information requests (including those under EIR), the Trust encourages requesters to submit their enquiries in writing whenever possible.

Procedure for dealing with requests - Responding to requests/qualified exemptions (process map 2)

2 PROCESS MAP FOR HANDLING FOI ENQUIRIES



The absolute exemptions most relevant to the Trust are those that relate to:

- a) Information accessible by other means³
- b) Personal Information⁴
- c) Confidential Information⁵
- d) Prohibitions on Disclosure⁶

The qualified exemptions most relevant to the Trust are those that relate to:

- a) Information intended for future publication⁷
- b) Prejudice to the Effective Conduct of Public Affairs⁸
- c) Health and Safety⁹
- d) Legal Professional Privilege¹⁰
- e) Commercial Interests¹¹

³ Section 21

⁴ Section 40

⁵ Section 41

⁶ Section 44

⁷ Section 22

⁸ Section 36

⁹ Section 38

¹⁰ Section 42

¹¹ Section 43