

FREEDOM OF INFORMATION POLICY AND PUBLICATION SCHEME

V1

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1.0 Policy Statement

Beckfoot Trust is committed to being remarkable, ensuring that no child is left behind and that our communities have access to the information they need. We uphold the principles of openness, transparency, and accountability in accordance with the Freedom of Information Act 2000 (FOIA).

We recognise the public's right to access information held by public authorities, including schools, while ensuring that sensitive information is protected in accordance with legal exemptions. We strive to proactively publish information online and respond effectively to requests, promoting trust and engagement with our communities.

2.0 Scope and Purpose

The purpose of this policy is to establish how Beckfoot Trust manages and responds to requests for information in accordance with the Freedom of Information Act 2000. It also covers enquiries relating to matters under the Environmental Information Regulations 2004, namely enquiries about air, water, land, natural sites, built environment, flora and fauna, and health, and any decisions and activities affecting any of these.

It reflects Beckfoot Trust's commitment to promoting transparency and accountability, ensuring the public can easily access information held by the Trust while safeguarding sensitive and confidential data.

This policy outlines the classes of information that Beckfoot Trust publishes, the methods by which it will be made available, and whether such information will be provided free of charge or subject to a fee.

This policy does not cover individual rights requests under the Data Protection Act 2018 or the UK General Data Protection Regulation (UK GDPR), where data subjects seek access to their personal data held by Beckfoot Trust. These requests will be handled separately in accordance with Beckfoot Trust's Data Protection Policy and Procedures.

3.0 Overarching Principles

3.1 Legal Framework

This policy has due regard to the following legislation:

- The UK General Data Protection Regulation
- The Freedom of Information Act
- The Freedom of Information and Data Protection (Appropriate Limit and Fees) Regulations
- Environmental Information Regulations

This policy also has due regard to Information Commissioner's Office (ICO) guidance and in accordance with The National Archives Code of Practice on the management of records.

This policy will be viewed in conjunction with Beckfoot Trust's Data Protection Policy.

4.0 Responsibilities and Arrangements

4.1 Responsibilities

The Trust Board has overall responsibility for ensuring that Beckfoot Trust complies with all relevant legislation. This responsibility is delegated to Beckfoot Trust's Audit and Risk Committee, which has oversight of compliance with these obligations.

On a day-to-day basis, the responsibility for handling requests for individual Beckfoot Trust schools is delegated to the Data Protection Lead who is responsible for managing and responding to requests for information.

Before responding to any request, the Cluster Business Manager will inform the Data Protection Officer, if unaware of the request, to ensure that no other schools within Beckfoot Trust have received the same or similar requests. This process helps maintain consistency in responses and ensures that all relevant information across Beckfoot Trust is considered before a response is provided.

For requests concerning Beckfoot Trust as a whole, the Data Protection Officer is responsible for coordinating and responding to requests.

Copies of all requests, responses and refusals will be recorded on Beckfoot Trust's Data Protection Management System (GDPRis).

4.2 Right of access

Anyone can submit a Freedom of Information request for information held by Beckfoot Trust. The request must be made in writing (including via email). It must include the requester's name and a correspondence address (which may be an email address). The request should clearly specify the information being sought with sufficient detail to allow us to identify and locate the requested data.

For requests related to environmental information covered under the Environmental Information Regulations (EIR), can be made verbally. However, we encourage all requests to be submitted in writing for clarity and efficiency.

Requests for information should be addressed to the Risk and Compliance Manager, Beckfoot Trust, Wagon Lane, Bingley, BD16 1EE or via email at compliance@beckfoot.org.

4.3 Responding to the request

Provided that the request complies with section 4.2 of this policy, Beckfoot Trust will, no later than 20 school days (or 60 working days if this is shorter) from receipt of the request, comply with our duty to:

- confirm or deny to the requester whether we hold the information described in the request
- provide the documentation, if we have confirmed that we hold the requested information.

A school day is a day when there is a session at which pupils are in attendance at school.

Therefore, if a freedom of information request is received on 31st July, the request will be counted from the first day of the new autumn term.

Where information is to be provided under the Environmental Information Regulations, it will be provided within 20 working days.

If the original request is unclear and we need to seek clarification from the requester, the response timeframe will be paused until we receive the necessary clarification.

If we do not receive the requested clarification or any further response within two months of our request for clarification, we will assume the requester no longer wishes to proceed and will close the enquiry.

4.4 Exemptions

Requested information may not be provided if one of the following applies:

- where Beckfoot Trust does not hold the information
- there is a relevant exemption available
- the request is above the cost limit (being £450 or 18 hours of a staff member's time).
- where additional clarity or a fee has been requested but has not been provided in the time specified or
- the request is considered vexatious or repeated.

The exemptions that may be relevant depend on the request that has been made, but common exemptions include data protection, prejudice to the effective conduct of public affairs and information intended for future publication.

There are other exemptions that may also be relevant, details of which can be found on the Information Commissioner's Office website.

Beckfoot Trust will inform you if one or more of these apply in any decision notice. Where the cost limit applies, we will explain how to refine the request to bring it within the cost limit and why the costs limit has been exceeded.

4.5 Internal review

Where a requester is not happy with the response to a freedom of information request that has been made, they will be entitled to ask for an internal review of the decision.

The internal review must be requested made in writing and within two months of the decision notice being sent.

A requester will in most cases receive the outcome of the internal review within 20 school days.

Where a requester wishes to have an internal review of an EIR request, this should be requested in writing within 40 working days of any breach of a requirement under the EIR. Once an internal review request is received, we aim to conclude the review and communicate the outcome of this within 20 working days.

If a requester is still not happy with the response following an internal review, they can complain to the Information Commissioner's Office by visiting <https://ico.org.uk/make-a-complaint/>

4.6 Publication Scheme

Beckfoot Trust's Publication Scheme reflects the Information Commissioner's Definition Document for the governing bodies of maintained and other state-funded schools in England.

This guide outlines the information that Beckfoot Trust is committed to making publicly available. Our aim is to provide access to information whenever legally possible, unless disclosure would cause significant harm. In such cases, we will apply the appropriate exemption under the Freedom of Information Act (FOIA). Additionally, we are bound by the data protection legislation and have a duty to protect individual's privacy.

If the information sought is not included in our publication scheme, individuals are encouraged to inquire whether we hold it and, if so, submit a request for access.

4.6.1 Class 1: Who we are and what we do

Organisational information, structures, locations and contacts. Information in this class will be current information only.

Information to be published	How you can obtain the information
Articles of Association	Trust and school websites
Members, Trustees, and Local School Committee Members: names and basis of appointment	Trust and school websites
Gender pay gap reporting	Trust website
Contact details for the Head teacher for each Beckfoot Trust School.	School website
School prospectus	School website
Curriculum outline	School website
School session times and term dates	School website
Location and contact information	Trust and school website

4.6.2 Class 2: What we spend and how we spend it

Financial information about projected and actual income and expenditure, procurement, contracts and financial audit. Financial information for the current and previous two financial years.

Information to be published	How you can obtain the information
Annual budget plan	Trust website
Financial statements	Trust website
Statutory accounts	Trust website
Capital funding	Trust website
Financial Audits reports	Trust website
Details of expenditure items over £5000 (published at least annually, where practical, at a more frequent quarterly or six-monthly interval)	On request
Procurement and contracts	On request
Staff allowances and expenses	Trust and school websites

Staff pay and grading structures	Trust and school websites
Trustee allowances	Trust website
Premiums or other forms of financial support available	Trust and school websites
TU facility time reporting	Trust website

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

Strategies and plans, performance indicators, audits, inspections and reviews. As a minimum, information in this class to be current information only.

Information to be published	How you can obtain the information
Performance data supplied to the government	School website link to information
Latest Ofsted report	School websites link to Ofsted
Performance management information	Trust and school website
Future plans - Any major proposals on future plans involving, for example a consultation on a change in school status	Trust website
Exam and assessment results	School websites
Performance tables	School websites link to information
Data protection impact assessments or any other impact assessments (e.g. health and safety impact assessments, equality impact assessments), as appropriate and relevant.	On request

4.6.4 Class 4 – How we make decisions

Decision-making processes and records of decisions. Information in this class is available for at least the current and previous three years.

Information to be published	How you can obtain the information
Admissions policy and decisions (not individual decisions)	School websites
Minutes of meetings of the governing body and its committees	On request

4.6.5 Class 5 – Our policies and procedures

Current written protocols, policies and procedures for delivering our services and responsibilities. Information in this class to be current only.

Information to be published	How you can obtain the information
School policies and other documents	Trust or School websites
Records management, personal data and access to information policies	Trust or School websites
Equality and diversity	Trust or School websites
Safeguarding and child protection	Trust or School websites

Pay policy	Trust or School websites
Health and safety	Trust or School websites
Policies and procedures for human resources and the recruitment of staff	Trust or School websites
Careers programme information	School websites
Complaints procedures, including for dealing with parental complaints	Trust or School websites
Charging regimes and policies	Trust or School websites

4.6.6 Class 6 – Lists and registers

Information to be in currently maintained lists and registers only.

Information to be published	How you can obtain the information
Curriculum circulars and statutory instruments	School website
CCTV - Details of the locations of any overt CCTV surveillance cameras operated by us or on our behalf	On request
Disclosure logs i.e. information provided in response to FOIA/EIR requests	On request
Asset register	On request
Any information you are currently legally required to hold in publicly available registers	On request

4.6.7 Class 7 – The services we offer

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

Information to be published	How you can obtain the information
Extra-curricular activities	On request
Out of school clubs	School websites or on request
School publications	School websites or on request
Services for which the school is entitled to recover a fee, together with those fees	On request
Leaflets, booklets and newsletters	School websites or on request

4.7 Schedule of charges

Beckfoot Trust is committed to making information readily available with minimal inconvenience and cost to the public. Charges for routinely published material will be transparent and kept to a minimum.

In accordance with the Freedom of Information Act 2000 and The Freedom of Information and Data Protection (Appropriate Limit and Fees) Regulations 2004, the Trust may charge for the actual costs incurred in providing information, such as photocopying, printing, and postage. A detailed breakdown of potential charges can be found in the table below.

If a request is particularly complex and is estimated to take more than 18 hours of staff time to locate, retrieve, and extract the requested information, Beckfoot Trust reserves the right to apply a fee.

Under the above regulation, the appropriate limit is set at £450 (equivalent to 18 hours of staff time at a rate of £25 per hour). If the estimated cost exceeds this limit, the Trust may refuse the request or offer the requester the option to pay the additional cost. In such cases, we will notify the requester of the estimated cost, and they can decide whether to proceed.

Additionally, if the Trust receives two or more related requests within 60 consecutive working days from the same individual or from multiple individuals who appear to be acting together as part of a campaign, the costs of responding to these requests will be aggregated. If the total cost exceeds the £450 limit, the Trust may refuse the request or apply appropriate charges.

Table of charges

Type of charge	Charge	Basis of charge
Disbursement costs	Photocopying/printing	Actual cost
	Postage	Actual cost of Royal Mail standard 2 nd class
Prescribed costs	Find, sorting and editing or materials	Charged for in full for requests in excess of £450 at the rate of £25 per hour

5.0 Review of Policy

The Risk and Compliance Manager will review this policy as appropriate and at least on an annual basis.