



FREEDOM OF INFORMATION

Reviewed by:	Finance, Risk and Audit Committee
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1. Purpose

Campfire Education Trust (CET) is committed to openness, transparency and accountability. This policy explains how CET complies with the Freedom of Information Act 2000 (FOIA) and makes information available to the public.

CET recognises the public's right to access information held by publicly funded authorities and will respond to requests openly and promptly whilst protecting information that is exempt from disclosure.

This policy applies to all academies within the Trust and to all Trust central services.

2. Scope

This policy applies to:

- Members
- Trustees
- Local Governing Boards
- Headteachers
- Employees
- Agency staff
- Volunteers

- Contractors acting on behalf of the Trust

The policy covers all recorded information held by the Trust regardless of format, including:

- Paper records
- Electronic records
- Emails
- Audio and video recordings
- Meeting minutes
- Reports
- Photographs
- Databases

3. Legislative Framework

This policy operates within the requirements of:

- Freedom of Information Act 2000
- UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- Environmental Information Regulations 2004 (EIR)
- Re-use of Public Sector Information Regulations 2015

CET has adopted the Information Commissioner's Office Model Publication Scheme and will make information available in accordance with that scheme. ico.org.uk

4. Definitions

Freedom of Information Request: A request made by any person seeking recorded information held by the Trust.

Recorded Information: Information held in any format, including:

- Letters
- Emails
- Reports
- Databases
- Policies
- Minutes
- Electronic files

Publication Scheme: A guide to information routinely made available by the Trust without the need for a formal request.

Applicant: The person making the request.

5. Roles and Responsibilities

Board of Trustees

The Board of Trustees has overall responsibility for ensuring compliance with Freedom of Information legislation.

The Board will:

- Approve this policy
- Monitor compliance
- Ensure appropriate governance arrangements are in place

Chief Executive Officer

The Chief Executive Officer is accountable for ensuring the Trust complies with statutory obligations under FOIA.

Trust Administrator

The Trust Administrator will:

- Coordinate responses to Freedom of Information requests
- Maintain records of requests and responses
- Ensure statutory deadlines are met
- Log all requests received by the Trust and allocate actions to the appropriate member of staff
- Liaise with Headteachers, leaders and central team staff to gather information required to respond to requests
- Provide advice to staff in conjunction with the Trust's legal service provider and any other professional advisers as appropriate.
- Coordinate internal reviews where required
- Maintain a disclosure log where appropriate
- Support the Trust in complying with the requirements of the Freedom of Information Act 2000

School Office Staff

School office staff will:

- Act as the first point of contact for requests received directly by their school
- Notify the Trust Administrator immediately upon receipt of a Freedom of Information request
- Coordinate the gathering of information relating solely to their academy where requested by the Trust Administrator
- Support Headteachers and Trust leaders in providing information required to respond to requests
- Ensure records are retrieved and provided within the timescales requested by the Trust Administrator

Headteachers

Headteachers will:

- Support the identification and retrieval of information held within their school
- Ensure records are maintained appropriately
- Oversee school-level responses where information is held solely by their school
- Assist with Trust-wide responses where required
- Notify the Trust Administrator immediately upon receipt of a Freedom of Information request

All Staff

All staff must:

- Maintain accurate records in accordance with Trust policies
- Retain information in line with the record retention schedule
- Cooperate with requests for information and investigations into information held
- Forward FOI requests immediately to the Trust Administrator

6. Publication Scheme

The Trust adopts the Model Publication Scheme issued by the Information Commissioner's Office. ico.org.uk

The Trust will routinely publish information under the following classes:

Class 1: Who We Are and What We Do

Information relating to:

- Trust structure
- Schools within the Trust
- Governance arrangements

- Scheme of Delegation
- Articles of Association
- Funding Agreement
- Contact details
- Senior leadership structure
- Members and Trustees
- Governance attendance records
- Register of Interests

Class 2: What We Spend and How We Spend It

Information relating to:

- Annual accounts
- Financial statements
- Trust budget information
- Procurement arrangements
- Tendering processes
- Staff pay structures
- Executive pay disclosures
- Reserves policy
- Investment policy

Class 3: What Our Priorities Are and How We Are Doing

Information relating to:

- Trust strategic plans
- School improvement priorities
- Performance information
- OFSTED reports
- Annual reports
- Safeguarding arrangements

Class 4: How We Make Decisions

Information relating to:

- Governance decision-making arrangements
- Trustee minutes (where appropriate)
- Committee structures
- Consultation processes
- Admissions arrangements

Class 5: Policies and Procedures

Current Trust and school policies including:

- Child Protection
- Complaints and Resolutions
- Behaviour
- Admissions
- Data Protection
- Health and Safety
- SEND
- Charging and Remissions
- Whistleblowing
- Equality Information
- Staff Code of Conduct

Class 6: Lists and Registers

Information contained within statutory registers including:

- Register of Interests
- Asset Registers (where appropriate)
- Statutory disclosures
- Other legally required public registers

Class 7: Services We Provide

Information relating to:

- Education services
- School prospectuses
- Extra-curricular provision
- Community activities
- Facilities lettings

7. Making a Freedom of Information Request

Requests for information under the Freedom of Information Act must:

- Be made in writing
- Include the applicant's name
- Include a correspondence address or email address
- Clearly describe the information requested

Requests may be submitted by:

- Email
- Letter
- Any other written communication that provides a permanent record of the request

Requests should be directed to: **The Trust Administrator** – Campfire Education Trust, c/o Moorland Primary School, Maslin Drive, Beanhill, Milton Keynes MK6 4ND.

Email: enquiries@campfiretrust.co.uk / Telephone: 01908 671803

Applicants do not need to explain why they are requesting information.

Requests may be submitted directly to a school or to the Trust's central office. All requests will be logged centrally by the Trust Administrator to ensure statutory timescales are met and a clear audit trail is maintained. Where a request relates solely to a specific school, the relevant school office will coordinate the collection of information and draft a response under the oversight of the Trust Administrator. Requests relating to more than one school or to Trust-wide matters will be coordinated centrally by the Trust Administrator.

The Trust Administrator will acknowledge receipt of requests where appropriate and coordinate responses with the relevant school, department, senior leader or professional adviser as necessary.

8. Acknowledgement and Response Times

The Trust will acknowledge requests as soon as reasonably practicable.

The Trust will respond promptly and no later than: **20 school days or 60 working days, whichever is the shorter period.**

The response period begins on the first working day after receipt of a valid request.

Where clarification is required, the Trust may pause processing until clarification is received.

9. Requests for Personal Information

The Freedom of Information Act does not provide access to an individual's own personal information.

Requests for personal information will be processed under:

- UK GDPR
- Data Protection Act 2018

These requests will be treated as Subject Access Requests and managed in accordance with the Trust's Data Protection Policy.

10. Environmental Information Requests

Some requests related to environmental matters may fall under the Environmental Information Regulations 2004.

Examples include:

- Energy usage
- Environmental surveys
- Asbestos information
- Waste management
- Biodiversity projects
- Building and land management

Such requests will be considered under the Environmental Information Regulations where appropriate.

11. Exempt Information

The Trust recognises that certain information may be exempt from disclosure.

Exemptions may include:

- Personal data
- Safeguarding information
- Information provided in confidence
- Commercially sensitive information
- Legal advice protected by privilege
- Information intended for future publication
- Investigation and disciplinary records
- Security-related information

Where exemptions apply, the Trust will explain the basis upon which information has been withheld unless doing so would itself disclose exempt information.

12. Vexatious or Repeated Requests

The Trust may refuse requests that are:

- Vexatious
- Harassing
- Repeated without reasonable grounds
- Designed to cause disruption
- Excessively burdensome

Any refusal will be issued in accordance with the provisions of the Freedom of Information Act.

13. Cost Limits and Fees

The Trust will usually provide information free of charge.

However, under the Freedom of Information Act, a request may be refused where the cost of compliance exceeds the appropriate statutory limit.

The Trust may also charge for:

- Photocopying
- Printing
- Postage

- Specialist reproduction costs

Applicants will be informed in advance if any charge applies.

14. Schedule of Charges

Type of Charge	Basis of Charge
Black and white photocopying	Actual cost
Colour photocopying	Actual cost
Postage	Actual cost
Specialist reproduction	Actual cost
Statutory fee where applicable	As prescribed by legislation

Information published on Trust or school websites will normally be available free of charge.

15. Refusal of Requests

The Trust may refuse a request where:

- An exemption applies
- The cost limit is exceeded
- The request is vexatious
- The request is repeated
- The information is not held

If a request is refused, the Trust will provide a refusal notice explaining the reasons.

16. Internal Review Procedure

Applicants who are dissatisfied with a response may request an Internal Review.

Requests for review should normally be submitted within 40 working days of the response.

Reviews will be conducted by a suitably senior officer not involved in the original decision wherever possible.

Applicants will be informed of the outcome in writing.

17. Complaints to the Information Commissioner's Office

Where an applicant remains dissatisfied following completion of the Internal Review process, they may complain to the:

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

Website: www.ico.org.uk

The ICO is the UK's independent authority responsible for enforcing Freedom of Information legislation.

18. Records Management

The Trust will maintain records in accordance with:

- Trust records management and record retention schedule
- Data Protection legislation
- Information governance requirements

Good records management supports compliance with Freedom of Information obligations.

19. Monitoring and Review

The Trust will monitor:

- Number of FOI requests received
- Response times
- Internal reviews
- ICO complaints and outcomes

This policy will be reviewed every two years or sooner if legislative changes require.

Appendix A: Publication Scheme

The Trust adopts the current Model Publication Scheme issued by the Information Commissioner's Office and publishes information in accordance with its seven prescribed classes of information.
ico.org.uk

Appendix B: Contact Details for Freedom of Information Requests

Trust Administrator

Campfire Education Trust
c/o Moorland Primary School
Maslin Drive
Beanhill
Milton Keynes MK6 4ND

Email: enquiries@campfiretrust.co.uk

Telephone: 01908 671803