Frank Field
Education Trust

Freedom of Information Policy and Publication Scheme

Policy Information:

Date prepared	October 2026
Adopted by Board	October 2026
Implementation Date	Immediate
Frequency of Review	Bi-Annually
Review Date	October 2028

Approved by CEO:

Cath Green

Approved by Chair of Board:

David Wooff

Frank Field
Education Trust

Contents

Contents 2
1. Statement of Intent 3
2. Legal and Regulatory Framework 3
3. Scope and Responsibilities 3
4. Recognising a Valid Request 3
5. Recording and Acknowledging Requests 4
6. Right of Access and Information Held 4
7. Time Limits 4
8. Searching for and Preserving Information 5
9. Exemptions, Refusals and the Public Interest Test 5
10. Cost Limit and Aggregation 5
11. Fees and Charges 5
12. Form and Method of Communication 6
13. Advice and Assistance 6
14. Vexatious and Repeated Requests 6
15. Consultation with Third Parties 6
16. Internal Reviews and Complaints 7
17. Contracts and Outsourced Services 7
18. Records Management and Datasets 7
19. Publication Scheme and Guide to Information 7
20. Monitoring and Review 8
Appendix 1: Model Publication Scheme Commitments 9
Appendix 2: Guide to Information 10
Appendix 3: Schedule of Charges 11
Appendix 4: Freedom of Information Request Log 16
Appendix 5: Request Handling Checklist 17

1. Statement of Intent

Frank Field Education Trust is committed to openness, accountability, and the lawful disclosure of recorded information. The Freedom of Information Act 2000 gives any person a right to request recorded information held by the Trust, subject to the provisions and exemptions contained in the Act.

This policy explains how the Trust will recognise, record, and respond to requests, provide advice and assistance, apply statutory time limits, consider exemptions and public interest, manage internal reviews, and maintain its publication scheme.

The right under the Act is a right to recorded information. It does not require the Trust to create information, give an opinion, answer questions that would require new analysis or explain a decision where no recorded information exists. The Trust may nevertheless respond outside the Act were doing so is appropriate and practical.

2. Legal and Regulatory Framework

This policy has been prepared with regard to the Freedom of Information Act 2000, the Freedom of Information and Data Protection (Appropriate Limit and Fees) Regulations 2004, the Freedom of Information (Time for Compliance with Request) Regulations 2010 and the Environmental Information Regulations 2004.

The Trust also has regard to the Cabinet Office Freedom of Information Code of Practice issued under section 45 of the Act, the Information Commissioner's Office model publication scheme, the ICO definition document for schools in England and relevant ICO guidance.

Where requested information includes personal data, the Trust will also consider the UK General Data Protection Regulation and the Data Protection Act 2018 as amended by the Data (Use and Access) Act 2025. This policy should be read alongside the Data Protection Policy, Records Management and Retention Schedules Policy, Subject Access Request procedure and Third-Party Requests for Information procedure.

3. Scope and Responsibilities

This policy applies to recorded information held by or on behalf of Frank Field Education Trust. Information held by a contractor on the Trust's behalf may be held for the purposes of the Act even though it is not stored on Trust premises or systems.

The Chief Finance & Operating Officer is responsible for coordinating the Trust's approach to freedom of information, supported by relevant staff and advised by the Data Protection Officer where a request engages personal data, confidentiality, or another information rights issue.

Every member of staff must recognise and promptly forward a possible request, preserve information within scope, cooperate with searches, and avoid unauthorised alteration, deletion, or concealment. Deliberately altering, defacing, blocking, erasing, destroying, or concealing information with the intention of preventing disclosure after a request has been made may constitute a criminal offence.

4. Recognising a Valid Request

A request under the Freedom of Information Act must be in writing, state the requester's real name and an address for correspondence, and describe the information sought. A request may be received by letter, email or another written electronic channel used by the Trust, including an official social media account where the message is legible and capable of being retained for reference.

The requester does not need to mention the Act or explain why the information is wanted. Staff must consider the substance of the communication rather than its label.

Where the request does not sufficiently identify the information sought or appears not to contain a real name or correspondence address, the Trust will explain what is required and provide reasonable assistance. The statutory response period will not begin, or will cease to run as applicable, until clarification reasonably required to identify and locate the information has been received.

A request for environmental information will be handled under the Environmental Information Regulations 2004. A request by an individual for their own personal data will normally be handled under data protection law. The Trust will explain the applicable regime where this affects the handling of the request.

5. Recording and Acknowledging Requests

All requests will be forwarded promptly to the officer responsible for coordination and recorded in the Trust's information request log. The record will include the date received, requester details, scope, statutory deadline, searches, correspondence, cost estimate, exemptions, consultation, response, review, and outcome.

The Trust will acknowledge a request where appropriate and will identify any clarification, contact information or fee required. Acknowledgement does not determine whether information is held or will be disclosed.

6. Right of Access and Information Held

Subject to the Act, the Trust will inform the requester whether it holds information falling within the request and will communicate that information. The duty applies to information held at the time the request is received.

The Trust will make reasonable searches of locations likely to contain the information. It is not required to create information that does not exist, reconstruct a record no longer held or obtain information from another body merely because that body may hold relevant material.

Archive status, age, email format, draft status, or difficulty of access does not by itself make held information exempt. Where locating or extracting information would engage the statutory cost limit, the Trust will apply section 12 and the Fees Regulations rather than treating the information as unavailable.

Where information is not held, the Trust will say so. Where it knows that another public authority may hold the information, it will normally provide contact details or, with the requester's agreement, consider transferring the request.

7. Time Limits

For requests to an academy proprietor, the Trust will respond promptly and no later than the twentieth working day following receipt, disregarding any working day that is not a school day for the relevant academy, or the sixtieth working day following receipt, whichever occurs first.

Time spent awaiting payment of a valid fee notice is disregarded when calculating the statutory response period. Where clarification reasonably required to identify and locate the information is sought, the Trust will explain the effect on the response period.

Where a qualified exemption requires additional time to consider the public interest test, the Trust will issue an initial notice within the ordinary statutory period identifying the relevant exemption and explaining why further time is required. The additional period must be reasonable in the circumstances. The Trust will aim to follow the section 45 Code benchmark and keep the requester informed where a decision cannot be completed within that period.

8. Searching for and Preserving Information

The coordinating officer will identify the business areas, individuals, systems, mailboxes, shared drives, case-management systems, paper files, and contractors reasonably likely to hold information within scope. Search instructions and responses will be recorded proportionately so that the Trust can evidence its handling of the request.

When a request is received, normal deletion or disposal must be suspended for information that may fall within scope. Staff must preserve relevant records until the request, any internal review and any reasonably anticipated ICO complaint or legal challenge have concluded.

Duplicate material, information created after receipt and information outside the request need not be disclosed, but the Trust will take care not to exclude responsive information merely because it is contained within a wider document or communication.

9. Exemptions, Refusals, and the Public Interest Test

Information will only be withheld where an exemption or other lawful restriction applies. The Trust will consider each request on its facts and will not treat a category of information as automatically exempt.

Absolute exemptions do not require a public interest test. Where a qualified exemption applies, the Trust will balance the public interest in maintaining the exemption against the public interest in disclosure. The reasons and evidence supporting the decision will be recorded.

A refusal notice will identify the exemption relied upon, explain the reasoning as far as this can be done without revealing exempt information, and set out the right to request an internal review and complain to the Information Commissioner's Office.

Personal data will be considered under the applicable provisions of the Act and data protection law. The Trust will not disclose personal data where disclosure would contravene the data protection principles or another applicable statutory restriction.

10. Cost Limit and Aggregation

The appropriate limit for the Trust is £450. For the permitted activities, staff time is calculated at the statutory rate of £25 per person per hour, which is equivalent to 18 hours.

When estimating whether the limit would be exceeded, the Trust may take account only of the reasonable cost of determining whether it holds the information, locating it, retrieving it, and extracting it. Time spent considering exemptions, applying the public interest test, or redacting information is not included in the section 12 estimate.

Related requests may be aggregated where the conditions in the Fees Regulations are satisfied, including requests made within 60 consecutive working days by the same person or by persons who appear to be acting together or as part of a campaign, and where the requests relate to the same or similar information.

Where the cost would exceed the limit, the Trust may refuse the request under section 12. Before doing so, it will provide reasonable advice and assistance to help the requester refine or narrow the request where this could bring it within the limit. Any refined request will be treated according to its revised scope and date.

11. Fees and Charges

Information will normally be supplied without charge. Where permitted, the Trust may charge for reasonable disbursements such as photocopying, printing, and postage, or apply another statutory charging regime.

Before charging, the Trust will issue a written fee notice stating the amount and how it has been calculated. Work requiring payment need not continue until the fee has been received. If payment is not received within three months, the Trust is not required to comply with the request.

Charges under the publication scheme will be transparent, justified and stated in the Guide to Information. Information available on the Trust's website will ordinarily be free of charge.

12. Form and Method of Communication

Where reasonably practicable, information will be provided in the form requested, which may include a copy, an opportunity to inspect a record, or a digest or summary. If the preferred form is not practical, the Trust will explain why and discuss a reasonable alternative.

The Trust will meet applicable accessibility and equality obligations. Information will normally be provided in the language in which it is held unless another form or language is legally required.

Responses will be sent through a method appropriate to the volume, sensitivity, and format of the information. The Trust may use secure electronic transfer, collection, inspection, or post where appropriate.

13. Advice and Assistance

The Trust will provide reasonable advice and assistance to anyone proposing to make, or having made, a request. This may include explaining the right of access, identifying information routinely available, clarifying the scope, suggesting date ranges or record types, helping to refine a request that exceeds the cost limit and explaining where information can be obtained elsewhere.

Where a person has difficulty making a written request, the Trust may record the request and send it to the person for confirmation or signpost an organisation capable of assisting. The statutory period begins when the Trust receives a valid written request.

Advice and assistance will be proportionate to the circumstances. The Trust will maintain an appropriate record of material assistance and clarification.

14. Vexatious and Repeated Requests

The Trust may refuse a request under section 14 where it is vexatious. The decision will be based on the request's context, burden, motive where relevant, value or purpose and any harassment or distress, applying the statutory test and current ICO guidance. A request will not be treated as vexatious merely because it is inconvenient, critical, or wide-ranging.

A substantially identical or similar request from the same person may be refused as repeated where the Trust has previously complied and a reasonable interval has not elapsed. There is no automatic 60-working-day definition of a repeated request; that period applies separately to aggregation for cost purposes.

Decisions under section 14 will be authorised at an appropriate senior level and supported by an evidence log. Where the Trust is not required to issue a further notice following repeated vexatious correspondence, it will record the reason.

15. Consultation with Third Parties

The Trust may consult a third party where requested information was provided by that party or disclosure may affect the third party's rights or interests. Consultation will be undertaken where it is useful and proportionate, while allowing sufficient time for the Trust to meet the statutory deadline.

The third party's views are relevant but are not determinative. The decision whether the information is held, whether an exemption applies and whether the public interest favours disclosure remains the Trust's responsibility.

Where disclosure is intended despite a third party's objection, the Trust may give advance notice where appropriate, taking account of the statutory deadline and the circumstances of the case.

16. Internal Reviews and Complaints

A person who is dissatisfied with the handling or outcome of a request may ask for an internal review. The process is straightforward and single stage. Any written expression of dissatisfaction will be considered according to its substance and need not use the words "internal review."

The Trust asks that an internal review be requested within 40 working days of the initial response. A review will normally be completed within 20 working days and, in exceptional or complex cases, within 40 working days. The requester will be informed if additional time is required.

Where possible, the review will be conducted by a person who did not make the original decision and who is suitably senior. The reviewer will make a fresh decision based on the information, legal position, and evidence relevant to the date of the original request.

The outcome will explain whether the original handling is upheld, varied, or overturned and will provide any information that should now be disclosed. The requester will be informed of the right to complain to the Information Commissioner's Office.

17. Contracts and Outsourced Services

Contracts involving information held on the Trust's behalf will clearly address access, retrieval, retention, and cooperation with information requests. Contractors must provide information promptly enough to enable the Trust to comply with statutory deadlines.

Confidentiality clauses do not override the Act. They will be used only where appropriate and will recognise the Trust's legal obligations and the public interest in transparency.

A contractor receiving a request relating to information held on the Trust's behalf must forward it promptly to the Trust and must not respond independently unless expressly authorised.

18. Records Management and Datasets

Good records management supports accurate and efficient compliance. Information will be retained and disposed of under the Records Management and Retention Schedules Policy, subject to any preservation requirement arising from a request, review, complaint, or legal proceeding.

Where the Act requires a requested dataset and updated versions to be published under the publication scheme, the Trust will consider the statutory provisions applying to electronic form, re-use, and licensing. The Trust will not publish a dataset where it is satisfied that publication would be inappropriate under the Act.

19. Publication Scheme and Guide to Information

The Trust adopts the Information Commissioner's model publication scheme and will maintain a Guide to Information describing what is routinely available, how it can be obtained and whether a charge applies.

The publication scheme represents the minimum information the Trust commits to make routinely available. A person may still request information that is not listed. Drafts, emails, notes, older versions, and archived records are not automatically exempt from a request merely because of their format or age.

The Trust will review its Guide to Information at least annually and when material changes occur. Information will normally be published on the Trust or relevant academy website, with an alternative route available where online access is unsuitable.

20. Monitoring and Review

The Trust will monitor request volumes, timeliness, refusals, internal reviews, ICO complaints, recurring search issues, and publication scheme maintenance. Material concerns and improvement actions will be reported through the Trust's governance arrangements as appropriate.

This policy will be reviewed annually by the CFOO and sooner where legislation, the section 45 Code, ICO guidance or Trust arrangements materially change. The next scheduled review is October 2027.

Appendix 1: Model Publication Scheme Commitments

The Trust commits to make information available routinely in accordance with the ICO model publication scheme. It will publish or otherwise make available information that it holds within the stated classes, specify how the information can be obtained, review and update the information regularly, publish a schedule of authorised charges and make the scheme available to the public.

Information may be omitted where it is not held, is exempt or prohibited from disclosure, is readily available from another source through a direct link, is out of date or inaccessible, or would be impractical or disproportionately resource-intensive to prepare for routine publication. This does not create an automatic exemption if the information is later requested under the Act.

Appendix 2: Guide to Information

Class	Information routinely available	Usual method	Charge
Who we are and what we do	Trust and academy structure, governance, locations, contact details, articles, and key organisational information.	Trust or academy website; Trust office where indicated.	Free online; reasonable disbursements may apply to hard copies.
What we spend and how we spend it	Published accounts, financial statements, procurement and contract information, executive pay information, and allowances where publication is required or appropriate.	Trust website, published accounts or Trust office.	Normally free online.
What our priorities are and how we are doing	Strategy, plans, performance information, inspection reports, safeguarding information, and published improvement priorities.	Trust or academy website.	Normally free online.
How we make decisions	Governance structure, agendas, approved minutes, and decision-making information suitable for routine publication.	Trust website or Trust office, subject to lawful redaction.	Normally free online.
Our policies and procedures	Current policies and procedures relating to education, safeguarding, governance, employment, equality, information rights, finance, complaints, and the operation of the Trust.	Trust or academy website; Trust office where indicated.	Normally free online.
Lists and registers	Publicly available statutory registers and other lists suitable for	Trust website, Trust office, or inspection where appropriate.	Normally free; reasonable disbursements may

Class	Information routinely available	Usual method	Charge
	publication. Personal, safeguarding and security-sensitive registers are not published merely because they exist.		apply.
The services we offer	Information about education, admissions, curriculum, support, activities, facilities, publications, and services provided by the Trust and its academies.	Trust or academy website; Trust office.	Normally free online; published charges may apply to chargeable services.

The Guide to Information should be supported by current direct links or accurate contact routes. Before publication, the Trust should verify each listed item against what is actually held and published. Material containing personal data, safeguarding information, security details, or confidential commercial information will be considered under the applicable legal provisions rather than treated as routinely available.

Publication Scheme

Information to be published	How the information can be obtained	Cost
Class 1: Who we are and what we do		
Our organisational information, structures, locations and contacts	**Hard copy or website**	**£**
Who's who in the Trust	Website www.ffet.co.uk	Free
Who's who on the governing board, and the basis of their appointment	Website www.ffet.co.uk	
Articles of Association (Trust HQ only)	Website www.ffet.co.uk	
Contact details for the Principal	Website www.ffet.co.uk	
Contact details for the governing board	Website www.ffet.co.uk	
The Trust prospectus	Website www.ffet.co.uk	
The Trust's annual report	Website www.ffet.co.uk	
The Trust's staffing structure	Trust Office	
Trust session times and term dates	Website www.ffet.co.uk	
The Trust's address	Website www.ffet.co.uk	
The Trust's contact details	Website www.ffet.co.uk	
The Trust's email address	Website www.ffet.co.uk	

The Trust website	Website www.ffet.co.uk	
The names of key personnel	Website www.ffet.co.uk	
Class 2: What we spend and how we spend it		
Our financial information concerning the Trust's projected and actual income and expenditure, procurement, contracts and financial audit – including the current and previous financial year	Hard copy or website	£
Annual budget plan and financial statements	Website www.ffet.co.uk	
Capital funding	Website www.ffet.co.uk	
Financial audit reports	Website www.ffet.co.uk	
Details of expenditure items over £5000 including costs, supplier and transaction information.	Website www.ffet.co.uk	
The pay policy	Trust Office info@ffet.co.uk	
Staff allowances and expenses that can be incurred or claimed, with totals paid to individual senior staff members by reference to categories	Trust Office info@ffet.co.uk	
The staffing, pay and grading structure	Annual Report Website www.ffet.co.uk	
Governors' allowances that can be incurred or claimed, and a record of total payments made to individual governors	Website www.ffet.co.uk	
Class 3: What our priories are and how we are doing		
Our strategies and plans, performance indicators, audits, inspections and reviews	Hard copy or website	£
The Trust profile	Website www.ffet.co.uk	
Performance data supplied to the government	Website www.ffet.co.uk	
The latest Ofsted summary	Website www.ffet.co.uk	
The latest Ofsted full report	Website www.ffet.co.uk	
The latest post-inspection action plan	Trust Office info@ffet.co.uk	
The performance management policy and procedures	Trust Office info@ffet.co.uk	
The latest performance data	Website www.ffet.co.uk	
The Trust's future plans	info@ffet.co.uk	
The safeguarding and child protection policies and procedures	Website www.ffet.co.uk	
Class 4: How we make decisions		
Our decision-making processes and records of the decision we have made – including the current year and the previous three years	Hard copy or website	£
Admissions policy	Website www.ffet.co.uk	
Information pertaining to admissions decisions	Individual school websites	

The governing board and its committees' agendas and meeting minutes	info@ffet.co.uk	
Class 5: Our policies and procedures		
Our current written protocols, policies and procedures for delivering our services and responsibilities	Hard copy or website	£
Charging and remissions policy	Website www.ffet.co.uk	
Trust behaviour policy	Website www.ffet.co.uk	
Sex education policy	Website www.ffet.co.uk	
Special educational needs (SEN) – SEN information report	Website www.ffet.co.uk	
Data protection policy – see GDPR Policy	Website www.ffet.co.uk	
Health and safety policy	Website www.ffet.co.uk	
Admissions arrangements	Website www.ffet.co.uk	
Accessibility plan	Website www.ffet.co.uk	
Central record of recruitment and vetting checks	Trust Office info@ffet.co.uk	
Complaints procedure statement	Website www.ffet.co.uk	
Freedom of information procedures	Website www.ffet.co.uk	
Governing board and committee meeting minutes, and papers considered at meetings	info@ffet.co.uk	
Premises management documents	Info@ffet.co.uk	
Equality information and objectives statement for publication	Website www.ffet.co.uk	
Register of pupils' admission to Trust	Info@ffet.co.uk	
Register of pupils' attendance	Info@ffet.co.uk	
Staff discipline, conduct and grievance (procedures for addressing)	Info@ffet.co.uk	
Child protection policy and procedures	Website www.ffet.co.uk	
Statement of procedures for dealing with allegations of abuse against staff	Info@ffet.co.uk	
Supporting pupils with medical conditions policy	Website www.ffet.co.uk	
Provider access policy statement	Website www.ffet.co.uk	

Any records management and personal data policies and procedures held in addition to the data protection policy and FOI procedures, including: • Information security policies • Records retention, destruction and archive policies • Information sharing policies	Website www.ffet.co.uk	
Charging regimes and policies	Website www.ffet.co.uk	
Class 6: Lists and registers		
Our currently maintained lists and registers – this does not include our attendance registers	Hard copy or website (Some information may only be available by inspection)	£
Disclosure logs	Trust Office info@ffet.co.uk	
Asset register	Trust Office info@ffet.co.uk	
Any information the Trust is currently legally required to hold in publicly available registers	Trust Office info@ffet.co.uk	
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 only	Hard copy or website (Some information may only be available by inspection)	£
Extra-curricular activities	info@ffet.co.uk	
Out of Trust clubs	info@ffet.co.uk	
Services for which the Trust is entitled to recover a fee (and details of the fees) see Charging Policy	Website www.ffet.co.uk	
Trust publications, leaflets, books and newsletters	Website www.ffet.co.uk	

Appendix 3: Schedule of Charges

Type of charge	Basis
Online information	Free of charge.
Black-and-white photocopying or printing	10 pence per A4 sheet, reflecting the Trust's published disbursement charge.
Colour photocopying or printing	25 pence per A4 sheet, reflecting the Trust's published disbursement charge.
Postage and packaging	Actual cost incurred.
Other media, specialist format, or inspection cost	Actual reasonable cost where charging is legally authorised and notified in advance.
Statutory or re-use fee	In accordance with the applicable legislation or licensing terms.

Appendix 4: Freedom of Information Request Log

Received	Requester and contact	Scope and regime	Deadline / clarification / fee	Outcome, exemptions, and review

Appendix 5: Request Handling Checklist

Stage	Record
Recognise and log	Confirm validity, date received, applicable regime and statutory deadline.
Clarify and assist	Record any clarification, advice, and effect on the response timetable.
Preserve and search	Issue proportionate search instructions and suspend relevant deletion.
Assess costs	Apply only permitted activities and consider refinement before section 12 refusal.
Review information	Separate responsive information, consider personal data, exemptions, and third-party consultation.
Public interest	Document the balance where a qualified exemption applies.
Respond	Confirm whether information is held, disclose securely or issue a compliant refusal notice.
Close and retain	Record delivery, fees, review rights, outcome, and retention under the records schedule.