



# Holy Trinity CE Primary Freedom of Information Policy & Publication Scheme

## The Six Principles Of Nurture

The nurturing approach offers a range of opportunities for children and young people to engage with missing early nurturing experiences, giving them the social and emotional skills to do well at school and with peers, develop their resilience and their capacity to deal more confidently with the trials and tribulations of life, for life.

1. Children's learning is understood developmentally
2. The classroom offers a safe base
3. The importance of nurture for the development of wellbeing
  4. Language is a vital means of communication
  5. All behaviour is communication
6. The importance of transition in children's lives

Document Control	
Date Reviewed	July 2025
Date Approved By Governing Body	n/a
Date To Be Reviewed	at any update in legislation

*This policy does not need to be approved by the governors.*

## 1. Introduction

The Freedom of Information Act (FOIA) seeks to promote transparency and accountability amongst public sector organisations and improve the public's understanding on how and why such organisations carry out their duties and make the decisions they do.

This policy outlines how Holy Trinity CE Primary School comply with FOIA.

## 2. Legislation

Along with the FOIA, the school comply with the following related information-based legislation:

- The Data Protection Act (DPA) 2018 (personal data)
- The UK General Data Protection Regulation (UK-GDPR) 2021 (personal data)
- The Environmental Information Regulations (EIRs) 2004 (environmental data)

The Information Commissioners Office (ICO) are the UK governing body for the FOIA and aforementioned legislations; the school follow guidance provided by the ICO in respect of the FOIA.

It is important to note that the FOIA does not cover personal data; individuals looking to find out more about how and why we process their personal data should review the schools '**Data Protection Policy**' which can be found on the website.

## 3. Publication Scheme

The FOIA requires every public authority to have a publication scheme approved by the ICO; the scheme identifies the classes of information that the school must make public to support the transparency and accountability principles of the FOIA. The ICO's Publication Scheme can be found at '**Appendix A**' of this policy.

To support the publication scheme and comply with our obligations under the FOIA, the school has implemented a list of information that is readily available for the publish to access, where to find it and whether or not any charges will apply. Please visit '**Appendix B**' to access our school specific scheme.

In addition to the items on the publication scheme, the school is legally required by the Department for Education (DFE) to publish further information about our organisation on our website. Further information can be found here: <https://www.gov.uk/guidance/what-maintained-schools-must-publish-online>

## 4. Responsibilities

The governing body has an overall responsibility to ensure that this policy is implemented effectively and that adequate resources are available for the school to meet their FOIA obligations.

The headteacher is responsible for ensuring that the provisions set out in this policy are met on a routine basis and communicated to all staff.

The school business manager, with support from the headteacher and data protection officer where appropriate will manage requests for information under the FOIA.

All staff have a duty to inform the school business manager if they receive a request for information under the FOIA. The school has a limited period in which to provide a response to requests and ask that any staff in receipt of a request forward it without undue delay using the following information:

**SBM: Mrs K. Worthington**

**E: [k.worthington@holytrinity.manchester.sch.uk](mailto:k.worthington@holytrinity.manchester.sch.uk)**

Any requests made in writing by letter can be handed in or posted to the school office for the attention of the school business manager.

Staff should not respond to FOIA requests without the approval of the school business manager.

Depending upon the nature of the request, staff may be required to support the school in fulfilling requests. For instance, collating information to provide to the requester.

Staff should contact the school business manager in the first instance if there are any questions about this policy or concerns that the FOIA is not being adhered to.

## **5. Requests for Information**

The FOIA gives all individuals and organisations the right to request information held by the school that they feel should be public. Requests will typically relate to how and why we make the decisions we do and manage the school.

Although the aim of the FOIA is to promote openness and transparency, it recognises the need to keep certain types of information confidential. A number of exemptions are available to withhold such information and may be applied depending on the nature of the request. For instance, personal information about someone in school would not be released as part of a FOIA request unless it is deemed appropriate to do so.

The school must seek assistance from the data protection officer if there are any concerns about releasing information as part of a request.

All requests for information under the FOIA must be made in writing to the school office using the following details:

**Holy Trinity Church of England Primary School, Capstan Street, Blackley, Manchester, M9 4DU**

**T: 0161 205 1216 | E: [admin@holytrinity.manchester.sch.uk](mailto:admin@holytrinity.manchester.sch.uk)**

The FOIA states that all requests should include:

- Name of the requester
- Their address and contact details
- Details of what is being requested

The requester may also state in what format they would like to receive the information in; where possible, these wishes will be complied with, or an alternative method provided if the school is unable to meet the desired format.

The school office must forward all requests to the school business manager who will manage the process.

In most cases, the information requested is likely to be accessible in the public domain for instance on the school prospectus or school websites. If this is the case, the school will direct the individual to the 'Publication Scheme' which identifies where the desired information can be obtained.

Information that is not readily available and in the public domain will be reviewed by the data protection team in line with this policy. If a request is very general in nature, the school may contact the requester to seek clarification on what is being sought.

Should school staff receive a request for information, any immediate response should be avoided. All requests should be forwarded immediately to the school office.

## **6. Collating the Information**

The FOIA covers information held by the school at the time of the request; the school will not be expected to create new records or seek information from further sources to fulfil a request.

A reasonable search will be performed on school records relative to the nature of the search to determine whether or not the school hold the information. An assessment will be made at this point to ascertain whether or not the requested information is available and if it can be provided in the requested format.

Applicable charges to the requester should also be considered (see section 7).

If the search determines that a significant amount of work will be required to prepare the information in order to fulfil the request, the headteacher should be consulted and a projection of the time and resources required should be made.

Similarly, the headteacher and data protection officer must be consulted at this point if there is any uncertainty that the content of the information should not be provided. A decision will need to be made by a qualified person to determine whether or not to refuse the request.

**The school must consult the data protection officer prior to providing any information if it contains identifiable information about any individual or set of individuals (personal data).**

**Personal data must not be provided as part of a FOIA request unless it has been deemed reasonable to do so and authorised by the data protection officer. Remember that individuals may be identifiable indirectly from categories of information such as job titles, initials, and reference numbers.**

The school understand that wilfully concealing, damaging, or destroying information in order to avoid answering a request is an offence and that penalties for doing so may be applied.

## 7. Charges

The FOIA permits the school to charge a fee for any work that exceeds a period of 18 hours. The fee charged will be £25 per hour, per person involved in fulfilling the request; this fee should not exceed £450.

Reasonable charges will be applied to cover the cost of photocopying and postage if physical copies are requested. A schedule of charges for such items are outlined in '**Appendix B**'.

The school must inform the individual prior to issuing any information if the request is likely to be subject to a fee. If payment is not received within 3 x months of issuing a fee notice, the school will inform the individual that the request will not be responded to, and the case closed.

## 8. Refusing a Request

The school must not refuse all or part of a request without seeking the express approval from the headteacher with support from the data protection officer where necessary. This is because reasonable opinions from a qualified person will be required to ascertain whether disclosing the requested information would or would not cause the likely prejudices or inhibitions listed in the FOIA. An assessment should be carried out and documented if the school questions whether disclosure would be in the public interest.

### **Refusing a request on time and resources:**

The school reserves the right to refuse a request if sourcing, sorting, and editing the information in question is likely to be in excess of 3.5 days. This is because the FOIA outlines that requests should not cause a drain on time, resources, and finances to the extent that it affects normal public functions. In such situations, the school will provide the requester with an opportunity to revise their request.

### **Vexatious requests:**

The school will refuse any request it deems to be vexatious in nature; the FOIA does not oblige a public authority to comply with a request for information that is vexatious. Vexatious requests typically relates to requests intended to cause a disproportionate or unjustified level of disruption, irritation and stress.

**Appendix C** provides a summary of indicators that may help to determine a vexatious request; such requests must be reviewed with the data protection officer.

Any expressions of dissatisfaction from the requester regarding the school's decision to refuse a request should be reviewed by the school and instructions provided to the requester on how they can make a complaint to the ICO if the school cannot resolve the complaint.

The decision-making process should be clearly documented.

## **9. Responding to Requests for Information**

The school will respond to all requests for information under the FOIA. Each request will be reviewed on a case-by-case basis and a written response will be provided that confirms firstly whether or not the school holds the requested information.

The written response must confirm whether the school:

- Is able to meet the request in full
- Is able to meet the request in part
- Is unable to meet the request at all

Requests that cannot be met in full will typically be due to the school:

- Not holding the requested information
- Applying an exemption to all or part of the request
- Refusing the request based on the time and resources it would take to fulfil or on the grounds that it is vexatious.

Responses to requests that cannot be met in full must include:

- The reason(s) the request cannot be met in full.
- A confirmation of any exemptions applied, stating the relevant section from the FOIA.
- Details of any public interest or prejudice tests applied when making a decision to refuse all or part of the request.
- Details on how the requester can make a complaint or appeal to the school if they are unhappy with the refusal notice.

All responses must include the requesters right to complain to the ICO.

The school will provide a written response (email / letter) to the requester within 20 working days; this excludes weekends and school holidays. The school will keep the requester updated if the response is likely to take longer than 20 working days, an expected date for the response will be provided.

## **10. Appeals**

Upon notification of a refusal to meet the request (either in part or in full), the requester has the right to appeal the decision. Any such appeal will be considered by the headteacher and data protection officer along with relevant staff members and governing body where necessary.

The school must inform the requester in writing within 20 working days whether or not their appeal has been successful. The requested records will be provided in line with this policy in the case of successful appeals.

In the event of an unsuccessful appeal, the response must include the reasons why the school has maintained its position. The response should be provided on the appeals process taken and the areas considered.

All appeal responses must include the requesters right to complain to the ICO if they are unsatisfied with how the school have handled their request.

## **11. Use of Information Provided**

The FOIA allows access to information, but it does not give the requester permission to re-use that information for commercial gain. Therefore, the requester may reproduce the school's copyright protected information free of charge, without specific permission, provided it is not being reproduced for profit, material or financial gain.

The material must be reproduced accurately and must not be used in a misleading context. If the requester is publishing the material or issuing it to others, they must acknowledge the source of the information, its copyright status and the date of publication, if known.

This permission to reproduce copyright protected material does not extend to any material that is identified as being the copyright of a third party. Under those circumstances, the enquirer must seek authorisation to reproduce the material from the copyright holder concerned.

## **12. Record Keeping**

It is imperative that the school maintain accurate records of requests, this should include general details and also information relating to how the request was managed and any decision-making process.

The school have implemented a 'FOIA Request Log' that is accessible to the headteacher and school business manager. The log includes general fields to record and summarise key details about each request:

- Name and contact details of requester.
- Date received and to whom it was addressed.
- Nature of the data requested.
- Name of staff member or external party the request was referred, and the date referred; individuals responsible for managing the request)
- If the request was met in full, part of refused.
- The outcome of any deliberations or assessments made (for more complex requests) including reasons for refusal.
- Date and details of the response including staff member who sent it and via what method.
- Any subsequent appeal made by the requester.
- The outcome of the appeals committee's deliberations, including summary reasons for a refusal (in whole or in part) to meet the information request.
- The response made by the appeals committee to the requester, including the person nominated to implement the response, the date and format of the response and the details of the information provided.
- Details of any updates including complaints to the ICO.

The headteacher will maintain a separate file where required for more complex requests to record more specific details on decision making, information on appeals and the general processes followed to fulfil each request.

### **13. Training and Awareness**

The school source external support to assist with the FOIA; staff are routinely informed about their responsibilities and the process surrounding requests.

This policy is accessible in the shared staff area and on the school website.

All staff receive data protection training on a regular basis as part of their continued professional development.

### **14. Monitoring**

This policy will be reviewed annually by the school business manager with support from the headteacher and data protection officer. Updates will be made sooner should a significant change in legislation or processes occur.

### **15. Appendix A: ICO Freedom of Information Publication Scheme**

This model publication scheme has been prepared and approved by the Information Commissioner. It may be adopted without modification by any public authority without further approval and will be valid until further notice.

This publication scheme commits an authority to make information available to the public as part of its normal business activities. The information covered is included in the classes of information mentioned below, where this information is held by the authority. Additional assistance is provided to the definition of these classes in sector specific guidance manuals issued by the Information Commissioner.

The scheme commits an authority:

- To proactively publish or otherwise make available as a matter of routine, information, including environmental information, which is held by the authority and falls within the classifications below.
- To specify the information which is held by the authority and falls within the classifications below.
- To proactively publish or otherwise make available as a matter of routine, information in line with the statements contained within this scheme.
- To produce and publish the methods by which the specific information is made routinely available so that it can be easily identified and accessed by members of the public.
- To review and update on a regular basis the information the authority makes available under this scheme.
- To produce a schedule of any fees charged for access to information which is made proactively available.
- To make this publication scheme available to the public.
- To publish any dataset held by the authority that has been requested, and any updated versions it holds, unless the authority is satisfied that it is not appropriate to do so; to publish the dataset, where reasonably practicable, in an electronic form that is capable of re-use; and, if any information in the dataset is a relevant copyright work and the public authority is the only owner to make the information available for re-use under the terms of the 'Re-use of Public Sector Information Regulations' (2015), if they apply, and otherwise under the terms of



the Freedom of Information Act section 19. The term 'dataset' is defined in section 11(5) of the Freedom of Information Act. The term 'relevant copyright work' is defined in section 19(8) of that Act.

## **Classes of Information**

**Who we are and what we do:** Organisational information, locations and contacts, constitutional and legal governance.

**What we spend and how we spend it:** Financial information relating to projected and actual income and expenditure, tendering, procurement and contracts.

**What are priorities are and how we are doing:** Strategy and performance information, plans, assessments, inspections and reviews.

**How we make decisions:** Policy proposals and decisions. Decision making processes, internal criteria and procedures, consultations.

**Our policies and procedures:** Current written protocols for delivering our functions and responsibilities.

**Lists and registers:** Information held in registers required by law and other lists and registers relating to the functions of the authority.

**The services we offer:** Advice and guidance, booklets and leaflets, transactions and media releases. A description of the services offered.

The classes of information will not generally include:

- Information the disclosure of which is prevented by law, or exempt under the Freedom of Information Act, or is otherwise properly considered to be protected from disclosure.
- Information in draft form.
- Information that is no longer readily available as it is contained in files that have been placed in archive storage or is difficult to access for similar reasons.

## **The method by which information published under this scheme will be made available:**

The authority will indicate clearly to the public what information is covered by this scheme and how it can be obtained.

Where it is within the capability of a public authority, information will be provided on a website. Where it is impracticable to make information available on a website or when an individual does not wish to access the information by the website, a public authority will indicate how information can be obtained by other means and provide it by those means.

In exceptional circumstances some information may only be available 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.

Information will be provided in the language of in which it is held or in such other language that is legally required. Where an authority is legally required to translate any information, it will do so.

Obligations under disability and discrimination legislation and any other legislation to provide information in other forms and formats will be adhered to when providing information in accordance with this scheme.

**Charges which may be made for information published under this scheme:**

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

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

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

Charges may be made for actual disbursements incurred such as:

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

Charges may also be made for information provided under this scheme where they are legally authorised, they are in all the circumstances, including the general principles of the right of access to information held by the public authorities, justified and are in accordance with a published schedule or schedules of fees which is readily available to the public.

Charges may also be made for making datasets (or parts of datasets) that are relevant copyright works available for re-use. These charges will be in accordance with the terms of the 'Re-use of Public Sector Information Regulations' (2015), where they apply, or with regulations made under section 11B of the Freedom of Information Act, or with other statutory powers of the public authority.

If a charge is to be made, confirmation of the payment due will be given before the information is provided. Payment may be requested prior to the provision of the information.

**Written Requests**

Information held by a public authority that is not published under this scheme can be requested in writing, when its provision will be considered in accordance with the provisions of the Freedom of Information Act.

**16. Appendix B: Guide to information available from the school under the ICO's model publication scheme.**

Information to be published:	How the information can be obtained:	Cost:
<b>Class 1: Who we are and what we do?</b>		
Organisational information, structure, locations and contacts.	<a href="https://www.holytrinity-manchester.co.uk/">https://www.holytrinity-manchester.co.uk/</a>	NA
Who's who in the school.	<a href="https://www.holytrinity-manchester.co.uk/meet-the-staff/">https://www.holytrinity-manchester.co.uk/meet-the-staff/</a>	NA
Who's who in the governing body and the basis of their appointment.	<a href="https://www.holytrinity-manchester.co.uk/governors/">https://www.holytrinity-manchester.co.uk/governors/</a>	NA
Instrument of government and articles of association.	Hard copies available from school office	See schedule of charges
Contact details for the headteacher and the governing body (named contacts where possible).	<a href="https://www.holytrinity-manchester.co.uk/contact-details/">https://www.holytrinity-manchester.co.uk/contact-details/</a>  School office can provide direct contact details for headteacher and board of governors.	NA
School prospectus (where applicable).	Hard copies available from school office (where applicable)	NA
Annual report (where applicable).	Hard copies available from school office (where applicable)	See schedule of charges
Staffing Structure	<a href="https://www.holytrinity-manchester.co.uk/meet-the-staff/">https://www.holytrinity-manchester.co.uk/meet-the-staff/</a>	NA
School session times and term dates.	<a href="https://www.holytrinity-manchester.co.uk/term-dates/">https://www.holytrinity-manchester.co.uk/term-dates/</a>	NA
Address of the school and contact details, including email address.	<a href="https://www.holytrinity-manchester.co.uk/contact-details/">https://www.holytrinity-manchester.co.uk/contact-details/</a>	NA
<b>Class 2: What we spend and how we spend it?</b>		
Annual budget plan and financial statements	Hard copies available from school office	See schedule of charges

Capital funding.	Hard copies available from school office	See schedule of charges
Financial audit reports	Hard copies available from school office	See schedule of charges
Details of expenditure items over £2000	Hard copies available from school office	See schedule of charges
Procurement and contracts the school has entered into.	Hard copies available from school office	See schedule of charges
Pay Policy	<a href="https://www.holytrinity-manchester.co.uk/policies/">https://www.holytrinity-manchester.co.uk/policies/</a>	NA
Staff allowances that can be incurred or claimed with totals paid to individual senior staff members (basic annual salary £60K +) by reference to categories.	Hard copies available from school office	See schedule of charges
Staffing, pay and grading structure; salary range for more junior staff and in bands of £10K for senior staff.	Hard copies available from school office	See schedule of charges
Governor's allowances that can be incurred or claimed, and a record of total payments made to individual governors.	Hard copies available from school office	See schedule of charges
<b>Class 3: What our priorities are and how we are doing?</b>		
Strategies and plans, performance indicators, audits, inspections and reviews.	Hard copies available from school office	See schedule of charges
Performance data supplied to the government & latest Ofsted report	<a href="https://www.holytrinity-manchester.co.uk/ofsted-and-performance-data/">https://www.holytrinity-manchester.co.uk/ofsted-and-performance-data/</a>	NA
Performance management policy and procedures adopted by governing body.	Hard or electronic copies available from school office	See schedule of charges
The schools' future plans; proposals for and any consultation on the future of the school, such as a change in status.	Hard copies available from school office	See schedule of charges
Safeguarding and child protection.	<a href="https://www.holytrinity-manchester.co.uk/policies/">https://www.holytrinity-manchester.co.uk/policies/</a>	NA

<b>Class 4: How we make decisions?</b>		
Decision making processes and records of decisions; current and previous three years as a minimum.	Hard copies available from school office	See schedule of charges
Admissions policy / decisions (not individual decisions)	<a href="https://www.holytrinity-manchester.co.uk/policies/">https://www.holytrinity-manchester.co.uk/policies/</a>	NA
Agendas and minutes of meetings of the governing body and its committees (excluding information regarded as private)	Hard copies available from school office	See schedule of charges
<b>Class 5: Our policies and procedures</b>		
Current written protocols and procedures for delivering services and responsibilities.  As a minimum statutory policies and procedures.	Majority of policies available on school website: <a href="https://www.holytrinity-manchester.co.uk/policies/">https://www.holytrinity-manchester.co.uk/policies/</a>  Request from school office if not listed on school website.	NA
Data Protection Policy	<a href="https://www.holytrinity-manchester.co.uk/policies/">https://www.holytrinity-manchester.co.uk/policies/</a>	NA
Records Management Policy	Request electronic or hard copy from school office.	See schedule of charges
Charging regimes and policies	Request electronic or hard copy from school office.	See schedule of charges
<b>Class 6: Lists and registers.</b>		
Currently maintained lists and registers only (not including the attendance register)	Hard copies available from school office	See schedule of charges
Curriculum circulars and statutory instruments	<a href="https://www.holytrinity-manchester.co.uk/our-curriculum/">https://www.holytrinity-manchester.co.uk/our-curriculum/</a>	NA
Disclosure logs	Hard copies available from school office	See schedule of charges
Asset Register	Hard copies available from school office	See schedule of charges
Any information the school is currently legally required to hold in publicly available registers.	Hard copies available from school office	See schedule of charges

<b>Class 7: The services we offer</b>		
Extra-curricular activities	<a href="https://www.holytrinity-manchester.co.uk/topic/parents">https://www.holytrinity-manchester.co.uk/topic/parents</a>	NA
Out of school clubs	<a href="https://www.holytrinity-manchester.co.uk/topic/parents">https://www.holytrinity-manchester.co.uk/topic/parents</a>	NA
Services for which the school is entitled to recover a fee, together with those fees.	<a href="https://www.holytrinity-manchester.co.uk/topic/parents">https://www.holytrinity-manchester.co.uk/topic/parents</a>	NA
School publications, leaflets, books and newsletters.	<a href="https://www.holytrinity-manchester.co.uk/topic/parents">https://www.holytrinity-manchester.co.uk/topic/parents</a>  Hard copies available at school office	NA  See schedule of charges for hard copies

### Schedule of Charges – Publication Scheme

The following describes how the charges for any items listed have been arrived at:

<b>Type of charge</b>	<b>Description</b>	<b>Basis of charge</b>
Disbursement cost	Photocopying/printing @ 1p per sheet (black & white)	Actual cost *
	Photocopying/printing @ 2p per sheet (colour)	
	Postage (as per Royal Mail costs)  Actual cost of postage will be charged if above standard size.  Envelope 50p	Actual cost of Royal Mail standard 2 <sup>nd</sup> class  Cost of envelope
Statutory Fee		In accordance with the relevant legislation
Other		

\*The actual cost incurred by the public authority

### 17. Appendix 3: Identifying Vexatious Requests

The school follow guidance from the Information Commissioners Office (ICO) if there are any concerns that a request for information under the FOIA is vexatious in nature. This guidance provides a number of features that may help to determine if a request is vexatious or not:

This list is not definitive and provides some common elements that may help to identify a vexatious request; it is important to consider the circumstances surrounding the request before making any judgements.

1. The tone or content of the request contains threatening or abusive language towards the school or its staff members.
2. The request is intended to cause a burden on the school.
3. The requester has questionable motives; there is a personal grudge against the school or staff member.
4. The request is repetitive in nature; the requester sends frequent requests about similar things over and over again in a short space of time.
5. The request contains accusations against the school or employees.
6. There is no clear intent to obtain the information; the requester is submitting the request to cause annoyance to the school.
7. The requester persistently continues to submit correspondence to the school about issues that have been closed.
8. The requester is abusing their FOI rights to express anger at a particular decision the school has made.
9. The request is disproportionate in nature; the school would have to exhaust a incomprehensible amount of resources to fulfil the request.
10. The requester refuses to engage with the school on reasonable attempts to make complex requests more specific and workable.

Any concerns that a request is vexatious should be documented along with the reasoning and decision-making process for accountability purposes; any evidence and correspondence with the requester must be logged.