

# Greenshaw Learning Trust

# **Freedom of Information**

# **Policy and Procedure**

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## Freedom of Information Policy and Procedure

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## **PART A - Freedom of Information Policy**

### **Application**

This GLT Freedom of Information Policy and Procedure applies to the Greenshaw Learning Trust as a whole and to all the schools in the Trust and the Trust Shared Service. The Greenshaw Learning Trust, including all the schools, their Trustees, governors and staff, must abide by this GLT Freedom of Information Policy.

This Policy is subject to the Trust's Scheme of Delegation for Governance Functions. If there is any ambiguity or conflict then the Scheme of Delegation and any specific alteration or restriction to the Scheme approved by the Board of Trustees takes precedence.

In implementing this policy and associated policies and procedures the governing body, Headteacher and school staff, and Trust Shared Service staff, must take account of any advice or instruction given to them by the GLT Data Protection Officer, the GLT CEO or Board of Trustees.

If there is any question or doubt about the interpretation or implementation of this Policy, the GLT Data Protection Officer or GLT CEO should be consulted.

## **Approval and review**

Maintenance of this Policy is the responsibility of the GLT CEO.

This Policy was approved by the Board of Trustees on: 23 July 2021.

This Policy was reviewed and approved by the Board of Trustees on 13 February 2026.

This Policy is due for review by: February 2029

## **Terminology**

- The Trust means the Greenshaw Learning Trust (GLT).
- School means a school within the Greenshaw Learning Trust.
- Headteacher means the headteacher or principal of the school.
- CEO means the Chief Executive Officer of the Greenshaw Learning Trust.
- Governors and Trustees includes governors, Trustees, non-governor members of Trust Committees and members of the Trust Panel.
- Governing body (GB) means the committee of the Board of Trustees to which Trustees have delegated appropriate powers and functions relating to the governance of the school.
- GLT Data Protection Officer means School Pro TLC.
  - SchoolPro TLC Email: DPO@schoolpro.uk
  - School Pro TLC Address: Unit 1b, Aerotech Business Park, Bamfurlong Ln, Staverton Bridge, Cheltenham GL51 6TU.
  - Telephone: 01452 947633.
  - Lead Contact: Ben Craig
- School Data Protection Lead means the point of contact for data protection matters for staff, students and parents within the school

In this policy references to the Greenshaw Learning Trust will be read as including the Trust Shared Service and all schools in the Greenshaw Learning Trust. References in this Policy to a school in the Trust should also be read as the Trust Shared Service for services, functions and staff of the Trust that are not contained within a school budget and/or are not the responsibility of a Headteacher and/or Governing Body. With respect to the Trust Shared Service, references in this Policy to the responsibilities of the Headteacher and Governing Body should be read as the GLT CEO and the Board of Trustees respectively.

## **Responsibilities**

It is the responsibility of the governing body and Headteacher of each school, and the Board of Trustees and GLT CEO for the Trust Shared Service, to ensure that their school/service and its staff adhere to this GLT Freedom of Information Policy and Procedure; in implementing this Policy the governing body, Headteacher and Trust staff must take account of any advice given to them by the GLT Data Protection Officer, GLT CEO and/or Board of Trustees.

Each Headteacher will appoint a School Data Protection Lead to be the point of contact for Freedom of Information matters for staff, students and parents, and to liaise with the GLT Data Protection Officer.

The name and contact details must be provided to the GLT Data Protection Officer.

## **Context and Principles**

The Greenshaw Learning Trust is subject to the Freedom of Information Act 2000. The Trust is the 'public authority' in the terms of the Act and is thereby responsible for the information held by the Trust and by the schools within the Trust.

The Greenshaw Learning Trust and all the schools and services in the Trust will make information available to the public as part of their normal business activities. The Greenshaw Learning Trust will endeavour to make the maximum amount of information readily available at minimum inconvenience and cost to the public; if charges have to be made they will be justified and transparent and kept to a minimum.

Each school will each adopt and follow their own Publication Scheme, in accordance with the Act and guidance issued by the Department for Education and Information Commissioner and this Policy.

The Publication Scheme of each school in the Trust will be drawn up and maintained by the Headteacher of the school in accordance with this policy.

## **Commitment to Freedom of Information**

The information covered is included in the classes of information mentioned below, where this information is held by the Trust.

The Greenshaw Learning Trust and all the schools in the Trust will:

- 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.
- Specify the information that is held by the Trust and falls within the classifications below.
- Proactively publish or otherwise make available as a matter of routine, information in line with the statements contained within their Publication Scheme.
- 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.
- Review and update on a regular basis the information the Trust/ school makes available under this their Publication Scheme.
- Produce a schedule of any fees charged for access to information which is made proactively available.
- Make their publication scheme available to the public.

Where information is only held by another public authority, the Trust will provide details of how to obtain that information.

### **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 our 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 Trust and the academies within the Trust.
- 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 GDPR, 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.

### **Requests for information**

Information provided under this policy will be provided in accordance with the relevant Publication Scheme of the Trust or individual school.

Persons seeking information about the Trust or its schools should refer to the relevant Publication Scheme of the Trust or school.

In the first instance, the quickest way to obtain information is to contact the school directly or look at the website of the Trust or the school.

Information held by the Trust or any of its schools that is not published under their publication scheme or available on their website can be requested in writing, and should include the enquirer's name, correspondence address (email addresses are allowed), and state what information they require. There must be enough information in the request to be able to identify and locate the information.

Again, the quickest way to obtain information is normally to make a simple enquiry to the school concerned.

Requests for information under the Freedom of Information Act should be addressed to the school via the school contact information as indicated on the school website or to the GLT Data Protection Officer.

Where there are no exemptions to the provision of data the School Data Protection Lead will provide the requested information within 20 school days (or 60 working days if this is shorter).

The Trust is under no obligation to comply with vexatious requests. A vexatious request is one which is designed to cause inconvenience, harassment or expense rather than to obtain information, and would require a substantial diversion of resources or would otherwise undermine the work of the school.

Where repeated identical or substantially similar requests for information from the same applicant are requested, these may be rejected and information not provided unless a reasonable interval has elapsed between requests.

Where a request is refused, the School Data Protection Lead will send a refusal notice which must include:

- The fact that the responsible person cannot provide the information asked for;
- Which exemption(s) apply;
- Why the exemption(s) apply to this enquiry (if it is not self-evident);
- Reasons for refusal; and
- The relevant complaints procedure

For monitoring purposes and in case of an appeal against a decision not to release the information or an investigation by the Information Commissioner, the School Data Protection Lead must keep a record of all enquiries where all or part of the requested information is withheld and exemptions are claimed. The record must include the reasons for the decision to withhold the information.

### **How information will be made available**

The Greenshaw Learning Trust and its schools will indicate clearly to the public what information is covered by their publication scheme and how it can be obtained.

Where it is practical, 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, the school will indicate how information can be obtained by other means and provide it by those means.

In exceptional circumstances some information may be available only 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 in which it is held or in such other language that is legally required. Where the Trust 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 for Information published under this scheme**

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

Material which is published and accessed on a website will be provided free of charge, except that there may be a charge for large and complex documents to be printed and provided in hard copy.

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 public authorities, justified and are in accordance with a published schedule or schedules of fees which is readily available to the public.

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 provision of the information.

## **PART B - Freedom of Information Procedure**

### **How To Deal With Requests For Information**

Information requested will be provided in accordance with the relevant Publication Scheme of the Trust or of the individual school.

Not every request for information has to be handled formally as a request under the Act. If it can be dealt with quickly and easily, the information should be provided.

If it is not clear what information is sought, the applicant should be asked to clarify their request.

In the first instance, persons seeking information about the Trust or its schools should be referred to the relevant Publication Scheme of the Trust or school, and to check if it is available on the school or Trust website.

For a request to be valid under the Act it must be in writing (which includes email), but requesters do not have to mention the Act or direct their request to a designated member of staff. Any letter or email to a public authority asking for information is a request for recorded information under the Act.

Requests for information held by the Trust that is not published under the appropriate publication scheme or that has not been made available following a simple enquiry to the school or service concerned may be submitted as a formal request under the provisions of the Freedom of Information Act.

A request from an individual to see any personal information held about them by the Greenshaw Learning Trust will be dealt with in accordance with a Subject Access Request Procedure, not through this Procedure. The Subject Access Request Procedure can be found in the GLT Information, Data and Cyber Security Policy and Procedures.

As soon as a request for information invokes the FoI Act notification should be sent to the GLT Data Protection Officer by email.

The request must be acknowledged immediately. The acknowledgement must confirm if the information requested is held, except in exceptional circumstances where it is not required to confirm or deny if the information is held (for example if information is sought about criminal activity which could prejudice a Police investigation).

The information requested must be provided within 20 school days, but this does not start until any necessary clarification has been provided. When calculating the 20 working day deadline, a “working day” is a school day (one in which pupils are in attendance), subject to an absolute maximum of 60 normal working days (not school days) to respond.

All requests for environmental information will be handled under the Environmental Information Regulations 2004. The deadline in this circumstance is 20 working days. Where a request is complex, the Trust may extend the response time to 40 working days.

Information should be provided by whatever means is most reasonable. For example, if a request is made by email, it should be answered by email. However, requesters have the right to specify the means by which information is provided.

The Act only covers recorded information held by an organisation. When compiling a response to a request for information, it may be necessary to draw from multiple sources of information held but there is no requirement to make up an answer or find out information from elsewhere if the information is not held. The requester should be advised of this in writing.

Before disclosure, information must be very carefully checked to ensure it does not contain personal data or information that should be withheld.

The GLT Data Protection Officer must be consulted about any refusal to provide information on the basis of data protection prior to notifying the applicant.

Information must be released unless there is a good reason not to. Reasons for not disclosing are:

- It would cost too much or take too much staff time to deal with the request.
- The request is vexatious.
- The request repeats a previous request from the same person.
- An exemption in the Act applies.

When responding to a request where the Trust or school has withheld some or all of the information, the school or service must explain why the information has been withheld, quoting the appropriate section number and explaining how the information requested fits within that exemption. If the public interest test has been applied, this also needs to be explained.

Further information is available on the Information Commissioner's website

If refusing a request, the individual has a right to request an internal review of the decision. This can be actioned by contacting the GLT DPO. Should the applicant remain dissatisfied, they may complain to the Information Commissioner.