



Meridian Trust

Document control

Document Title	Freedom of Information Policy		
This document has been approved for operation within:	All Trust Establishments		
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Owner	Meridian Trust		
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1 The Trust will comply with:

- 1.1 The terms of the Freedom of Information Act 2000 and any other relevant legislation to ensure requests for access to information held by the school are treated in a manner that is fair and lawful.
- 1.2 Information and guidance displayed on the Information Commissioner's website: <https://ico.org.uk/>

This policy should be used in conjunction with the Trust's **Internet Use Policy** and **Data Protection Policy**.

2 Data Gathering and Storage

- 2.1 Information will only be gathered and stored for specified purposes.
- 2.2 To be able to respond to requests for information the school will implement effective records management policies to enable staff to identify whether data is held and, if it is, locate it quickly and easily.
- 2.3 The Trust's retention policies will be based on the guidance in the Information and Records Management Society's Records Management toolkit for schools and will be reviewed regularly in line with any updates to this toolkit.
- 2.4 Information held by the Trust will be regularly reviewed with a view to archiving or destruction, where appropriate.

3 Publication Scheme

- 3.1 The Trust will adopt and publish the appropriate model publication scheme, as recommended by the DfE, Information Commissioner.
- 3.2 To "Publish" means to make information available. These descriptions are called 'classes of information'. The scheme is not a list of the actual publications, because this will change as new material is published or existing material revised. It is, however, the public authority's commitment to make available the information described.
- 3.3 A publication scheme must set out the classes, or categories, of information published. It must also make clear how the information described can be accessed and whether charges will be made.
- 3.4 Meridian Trust is adopting the model publication scheme developed for Academies within the UK education sector and is therefore committed to publishing the information it describes.
- 3.5 The model is designed for Academies across England, Wales and Northern Ireland.
- 3.6 The purpose of the model is to save institutions duplicating effort in producing individual schemes and to assist the public in accessing information from across the sector. However, to reflect the diversity in size and function of an institution, a number of optional classes of information are included.
- 3.7 As a result, models within the sector will vary slightly. Any option classes relevant to us have been included in our scheme. Details of our policy will be published on the website.

4 Dealing with Requests for Information

- 4.1 When a request is received that cannot be dealt with by simply providing the information, it should be referred in the first instance to the Trust DPO, who may re-allocate to an individual with responsibility for the type of information requested.
- 4.2 The first stage in responding is to determine whether or not the Academy "holds" the information requested. The Academy will hold the information if it exists in computer or paper format. Some requests will require the Academy to take information from different sources and manipulate it in

some way. Where this would take minimal effort, the Academy is considered to “hold” that information, but if the required manipulation would take a significant amount of time, the requestor should be contacted to explain that the information is not held in the manner requested and offered the opportunity to refine their request. For example, if a request required the Academy to add up totals in a spreadsheet and release the total figures, this would be information “held” by the Academy. If the Academy would have to go through a number of spreadsheets and identify individual figures and provide a total, this is likely not to be information “held” by the Academy, depending on the time involved in extracting the information.

- 4.3 The second stage is to decide whether the information can be released, or whether one of the exemptions set out in the Act applies to the information. Common exemptions that might apply include:
- 4.3.1 Section 40 (1) – the request is for the applicants’ personal data. This must be dealt with under the subject access regime in the DPA, detailed in paragraph 9 of the DPA policy;
 - 4.3.2 Section 40 (2) – compliance with the request would involve releasing third party personal data, and this would be in breach of the DPA principles as set out in paragraph 3.1 of the DPA policy above;
 - 4.3.3 Section 41 – information that has been sent to the Academy (but not the Academy’s own information) which is confidential;
 - 4.3.4 Section 21 – information that is already publicly available, even if payment of a fee is required to access that information;
 - 4.3.5 Section 43 – information that would prejudice the commercial interests of the Academy and / or a third party;
 - 4.3.6 Section 38 – information that could prejudice the physical health, mental health or safety of an individual (this may apply particularly to safeguarding information);
 - 4.3.7 Section 31 – information which may prejudice the effective detection and prevention of crime – such as the location of CCTV cameras;
 - 4.3.8 Section 36 – information which, in the opinion of the chair of governors of the Academy, would prejudice the effective conduct of the Academy. There is a special form for this on the ICO’s website to assist with the obtaining of the chair’s opinion.
- 4.4 The sections mentioned in *italics* are qualified exemptions. This means that even if the exemption applies to the information, you also have to carry out a public interest weighting exercise, balancing the public interest in the information being released, as against the public interest in withholding the information.

5 If your request is turned down, what can you do about it?

- 5.1 Some sensitive information might not be available to members of the public. If this is the case, we will tell you why we have withheld some or all the information you requested.
- 5.2 We can turn down your request if we think it will cost them more than £450 to deal with your request.
- 5.3 We might ask you to be more specific so we can provide the information you’re looking for.
- 5.4 If we don’t provide you with the information you request, you should first contact us asking us to review our decision. If you are still not satisfied, you can complain to the Information Commissioner’s Office. – www.ico.org.uk

6 Logging Requests Received

- 6.1 The school will keep a record of all requests received for monitoring purposes, noting:
- a) the date the request was received,
 - b) name and contact details of the person or organisation making the request,
 - c) the date the request was fulfilled or refused,
 - d) the reason for any exemption being applied,
 - e) the reason for any failure to meet the 20 day deadline.

This policy will be included in the ***Staff Handbook*** and is available on the trust website.