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| <b>Title</b>               | Freedom of Information Policy                                                    |
| <b>Associated Policies</b> | <ul style="list-style-type: none"> <li>• Data Protection (TPO/STA/25)</li> </ul> |

REVIEWED: **DECEMBER 2022**

NEXT REVIEW: **DECEMBER 2025**

**1. Policy Statement**

- 1.1 This policy covers requests for information under the Freedom of Information Act 2000 (“FOIA”). It also covers enquiries relating to matters under the Environmental Information Regulations 2004 (“EIR”), namely enquiries about air, water, land, natural sites, built environment, and health, and any decisions and activities affecting any of these.
- 1.2 This policy does not cover enquiries or subject access requests under the Data Protection Act 2018 or the General Data Protection Regulation i.e. where the enquirer asks to see what personal information Brooke Weston Trust holds about them. These enquiries will be dealt with under the Data Protection Policy which can be found on the Trust’s website.
- 1.3 Brooke Weston Trust understands its responsibilities in relation to the Freedom of Information Act (FOIA) and is committed to applying them. This policy is designed to set out the ways that persons can access their rights to information.

**2. Who is responsible for implementing and reviewing this policy?**

- 2.1 The implementation of this policy will monitored by each Academy’s Senior Leadership Team and remain under review by The Brooke Weston Trust (Audit & Risk Committee).

**3. Publication Scheme & Right of Access**

- 3.1 The Trust has adopted the [Information Commissioners’ Office model publication scheme](#). Further details on what the Trust provides access to can be found at the end of this policy.
- 3.2 Any person can make a freedom of information request for information that the Trust holds. The request must be in writing (which can include email) and state the requestor’s name and correspondence address (including email address). It should clearly describe the information being requested with enough detail to enable us to identify and locate the information.
- 3.3 Requests should be made to the Freedom of Information team – [FOIA@brookewestontrust.org](mailto:FOIA@brookewestontrust.org) or Brooke Weston Trust, Deeble Road, Kettering, Northamptonshire NN15 7AA.
- 3.4 A response will be provided as soon as possible but in any event within 20 school days (or 60 working days, if shorter).
- 3.5 Where the original request is not clear and we are required to seek further clarity from you, the time for responding to your request will cease until we receive a further response from you. In the event that we do not receive a further response or the clarification requested within 2 months of our request for clarification we will assume you no longer wish to pursue your enquiry and close the matter down.
- 3.6 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.
- 3.7 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.

## 4. Exemptions

- 4.1 The Brooke Weston Trust will make the information set out in the table below available unless:
- It does not hold the information;
  - The information is exempt under one of the FOI exemptions or Environmental Information Regulations (EIRs) exceptions, or its release is prohibited under another statute;
  - The request would come above the cost limit (being £450 or 18 hours of a staff member's time); or
  - The request is considered vexatious or repeated.
- 4.2 The exemptions that may be relevant depend on the request that has been made, but common exemptions include data protection, prejudice to the effective conduct of public affairs and information intended for future publication. There are other exemptions that may also be relevant.
- 4.3 We will inform you if one or more of these apply in any decision notice. Where the cost limit applies, we will explain how to refine the request to bring it within the cost limit and why the costs limit has been exceeded.

## 5. Payment & Charges

- 5.1 In the case of information not obtainable through the Trust or Academy websites, the Trust reserves the right to charge for actual disbursements incurred. Actual disbursements incurred include:
- Photocopying;
  - Postage and packaging; and
  - Costs directly incurred as a result of viewing information.
- 5.2 Information provided under this scheme where the Trust is legally authorised to charge in accordance with a published schedule or schedules of fees is readily available to the public.
- 5.3 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.

## 6. Internal Review

- 6.1 Where a requester is not happy with the response to a freedom of information request that has been made, they will be entitled to ask for an internal review of the decision. The internal review must be requested within two months of the decision notice being sent. The internal review will usually be dealt with by someone more senior than the member of staff that provided the initial response. A requester will in most cases receive the outcome of the internal review within 20 school days.
- 6.2 If a requester is still not happy with the response following an internal review, they can raise their concerns to the Information Commissioner.

## 7. Policy Review

- 7.1 This policy will be monitored as part of the Trust's annual review and reviewed on a three year cycle or as required by legislative changes.

| Information to be published                                                                                                                                                               | How the information can be obtained                                    | Cost |
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| <b>Class 1 - Who we are and what we do</b><br>(Organisational information, structures, locations, contacts, constitutional and legal governance)<br>This will be current information only | (hard copy and/or The Brooke Weston Trust/ individual Academy website) |      |
| Who's who on the board of the Trust and the basis of their appointment                                                                                                                    | Trust website                                                          |      |
| Articles and Memorandum of Association                                                                                                                                                    | Trust website                                                          |      |
| Academy Funding Agreement                                                                                                                                                                 | Trust website                                                          |      |
| Academy Order                                                                                                                                                                             | Director of Finance                                                    |      |
| Contact details for the Chief Executive and for the board of directors (named contacts where possible with telephone number and email address (if used))                                  | HOG to CEO                                                             |      |
| Individual Academy prospectus                                                                                                                                                             | Academy Website                                                        |      |
| Staffing structure in an individual Academy (names of key personnel including the Principal)                                                                                              | Individual Academy                                                     |      |
| School session time, term dates and holidays                                                                                                                                              | Academy Website                                                        |      |
| Who's who on the governing body of an individual Academy and the basis of their appointment                                                                                               | Trust website                                                          |      |
| GCSE results for an individual Academy                                                                                                                                                    | Academy Website                                                        |      |

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| <b>Class 2 – What we spend and how we spend it</b><br>(Financial information relating to projected and actual income and expenditure, tendering, procurement, contracts and financial audit of the Trust)<br><br>Current and previous financial year as a minimum (accounts that have been filed with Companies House) | (hard copy and/or The Brooke Weston Trust/ individual Academy website) |  |
| Annual budget plan and financial statements                                                                                                                                                                                                                                                                            | Trust Website                                                          |  |
| Capital funding – details of capital funding allocated to an individual Academy along with information on related building projects and other capital projects                                                                                                                                                         | CORO                                                                   |  |
| Additional funding - income generation schemes and other sources of funding                                                                                                                                                                                                                                            | CFO                                                                    |  |
| Procurement and contracts – details of procedures used for the acquisition of goods and services. Details of contracts that have gone through a formal tendering process                                                                                                                                               | CORO                                                                   |  |
| The Trust's Pay policy                                                                                                                                                                                                                                                                                                 | Trust Website                                                          |  |
| Staffing and grading structure                                                                                                                                                                                                                                                                                         | CFO                                                                    |  |
| Governors' allowances - details of allowances and expenses that can be claimed or incurred.                                                                                                                                                                                                                            | CFO                                                                    |  |
| Annual budget plan and financial statements                                                                                                                                                                                                                                                                            | CFO                                                                    |  |

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| <p><b>Class 3 – What our priorities are and how we are doing</b><br/>(Strategies and plans, performance information, assessments, audits, inspections and reviews)<br/>Current information as a minimum</p>                                                                          | (hard copy and/or The Brooke Weston Trust/ individual Academy website) |  |
| <p>Individual Academy profile</p> <ul style="list-style-type: none"> <li>Government supplied performance data</li> <li>The Academy’s latest Ofsted report                             <ul style="list-style-type: none"> <li>- Summary</li> <li>- Full report</li> </ul> </li> </ul> | Academy Website                                                        |  |
| Performance management information                                                                                                                                                                                                                                                   | CORO/CFO                                                               |  |
| The Trust’s future plans - any major proposals on safeguarding and promoting the welfare of children.                                                                                                                                                                                | Trust Website                                                          |  |
| Child protection - policies and procedures on safeguarding and promoting the welfare of children.                                                                                                                                                                                    | Trust Website                                                          |  |

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| <p><b>Class 4 – How we make decisions</b><br/>(Policy proposals and decisions. Decision making processes, internal criteria and procedures, consultations)<br/>Current and previous three years as a minimum</p>                       | (hard copy and/or The Brooke Weston Trust/ individual Academy website) |  |
| Admissions policy/decisions (not individual admission decisions), arrangements and procedures and right of appeal - including information on application numbers and number of successful applicants by each oversubscription criteria | Academy Website                                                        |  |
| Agendas of meetings of the governing body and (if held) its sub-committees                                                                                                                                                             | HOG to CEO                                                             |  |
| Minutes of meetings (as above) - nb this will exclude information that is properly regarded as private to the meetings                                                                                                                 | HOG to CEO                                                             |  |

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| <p><b>Class 5 – The Trust’s policies and procedures</b><br/>(Current written protocols, policies and procedures for delivering the Trust’s services and responsibilities)<br/>Current information only</p>                                                                                                                                                                         | (hard copy and/or The Brooke Weston Trust/ individual Academy website) |  |
| <p>The Trust’s policies including:</p> <ul style="list-style-type: none"> <li>Charging and remissions policy</li> <li>Health and Safety</li> <li>Complaints procedure</li> <li>Staff conduct policy</li> <li>Discipline and grievance policies</li> <li>Staffing structure implementation plan</li> <li>Equality and diversity (including equal opportunities) policies</li> </ul> | Trust Website                                                          |  |
| <p>Pupil and curriculum policies, including:</p> <ul style="list-style-type: none"> <li>Home-school agreement</li> </ul>                                                                                                                                                                                                                                                           | Trust Website                                                          |  |

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| <ul style="list-style-type: none"> <li>• Special educational needs</li> <li>• Behaviour and discipline</li> </ul>                                                                                                                                                             |               |  |
| Records management and personal data policies, including: <ul style="list-style-type: none"> <li>• Information security policies</li> <li>• Records retention destruction and archive policies</li> <li>• Data protection (including information sharing policies)</li> </ul> | Trust Website |  |
| Charging regimes and policies                                                                                                                                                                                                                                                 | Trust Website |  |

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| <b>Class 6 – Lists and Registers</b><br><br>Currently maintained lists and registers only       | (hard copy and/or The Brooke Weston Trust/ individual Academy website; some information may only be available by inspection) |  |
| Curriculum circulars and statutory instruments                                                  | Individual Academy                                                                                                           |  |
| Disclosure logs                                                                                 | Individual Academy                                                                                                           |  |
| Asset register                                                                                  | CORO                                                                                                                         |  |
| Any information the Trust is currently legally required to hold in publicly available registers | Trust Website                                                                                                                |  |

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| <b>Class 7 – The services the Trust offers</b><br>(Information including leaflets, guidance and newsletters produced for the public and businesses)<br><br>Current information only | (hard copy and/or The Brooke Weston Trust/ individual Academy website; some information may only be available by inspection) |  |
| Extra-curricular activities                                                                                                                                                         | Individual Academy                                                                                                           |  |
| Out of school clubs                                                                                                                                                                 | Individual Academy                                                                                                           |  |
| School publications                                                                                                                                                                 | Individual Academy                                                                                                           |  |
| Services for which the Trust is entitled to recover a fee, together with those fees                                                                                                 | CFO                                                                                                                          |  |
| Leaflets books and newsletters                                                                                                                                                      | Individual Academy                                                                                                           |  |

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| <b>Additional Information</b> |  |  |
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