Education Learning Trust Multi Academy Trust

Freedom of Information Policy and Publication Scheme

2026/2028

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Next review	Autumn 2028

Revision History

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September2020	1.1	Annual document review Evidence log – appendix 4 added – no further changes. Circulated to staff on 11/10/20 and AGBs.	J Jones, ELT Primary SBM	Approved on 11/10/20 following Trust Board meeting on 25/09/20
September 2021	1.2	Annual Review Addition of High School/Trust details. Amended to reference UK GDPR Clarity added for environmental information requests. Other minor amends. Circulated to School/Trusts 24/09/21	J Jones, HR & Compliance Manager	Trust Board 22/09/2021
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Statement of Intent

As an educational provider, the Education Learning Trust has an obligation to publish a freedom of information statement, outlining how we will meet our duties under the Freedom of Information Act 2000 and associated regulations. The development and effective implementation of this policy fulfils that requirement. In addition, it also covers requests relating to matters under the Environment Information Regulations 2004 ("EIR"), namely requests about air, water, land, natural sites, built environment, flora and fauna, and health and any decisions and activities affecting any of these.

More specifically, this policy outlines our Trust's policy and procedures for:

- the release and publication of private data and public records
- providing applicants with advice and assistance throughout the duration of their requests

It also clarifies our position regarding the appropriate limit to the costs incurred by the School/Trust in obtaining any requested information, and on charging fees for its provision.

This policy does not cover enquiries or subject access requests under the Data Protection Act 2018 or the UK General Data Protection Regulation i.e. where the enquirer asks to see what personal information Education Learning Trust (the "Trust") holds about them. These enquiries will be dealt with under the Data Protection Policy, which can be found on the Trust websites.

1. Legal Framework

1.1 This policy has due regard to the following legislation:

- The UK General Data Protection Regulation
- The Data Protection Act 2018
- The Freedom of Information Act 2000
- The Freedom of Information and Data Protection (Appropriate Limit and Fees) Regulations 2004
- Environmental Information Regulations 2004

1.2 This policy also has due regard to guidance, including, but not limited to, the following:

- ICO (2024) 'Freedom of Information Practice Recommendations'
- Cabinet Office (2024) 'Freedom of Information Code of Practice
- ICO (2016) 'Model publication scheme'
- ICO (2016) 'Duty to provide advice and assistance (section 16)'
- ICO (2015) 'Time limits for compliance under the Freedom of Information Act (section 10)'

1.3 This policy will be viewed in conjunction with the following other Trust policies:

- Data Protection Policy
- Subject Access Request Policy

2. Accepting Requests for Information

2.1 The School/Trust will only deal with FOA requests for information under this policy that are valid. A valid FOI request must meet all of the following criteria:

- it is in writing (this includes requests sent to the School/Trust's official social media accounts)
- it states the name of the applicant (not a pseudonym) and an address for correspondence (including email addresses)
- it adequately describes the information requested; there must be enough information to be able to identify and locate the information
- not be a request falling under the Data Protection Act 2018 (i.e. be a request concerning the applicant's own personal data. Requests concerning a child must be considered according to the specific circumstances and applicable data protection rights.)

2.2 A request will be treated as made in writing if it meets all of the following requirements:

- It is transmitted by electronic means
- It is received in legible form
- It is capable of being used for subsequent reference

2.3 Where a request is submitted in a foreign language, the School/Trust is not expected to obtain a translation of the request. For the request to be processed, the School/Trust will ask the applicant to provide their request in English.

2.4 The School/Trust will publish details of its procedures for dealing with requests for information on the website, including the following contact details:

Email addresses of the School/Trust offices to contact them by email:

- admin@meadowbankprimary.com
- admin@bredburygreenprimary.com
- office@gatleyprimary.com
- admin@wernethSchool/Trust.com
- office@kingsway.stockport.sch.uk
- office@educationlearningtrust.com

Further information is published in the ELT Scheme of Publication in Appendix 1.

3. General Rights of Access to Information Held by the School/Trust

3.1 Provided that the request meets the requirements set out in section 2 of this policy, the School/Trust will comply with its duty to:

- confirm or deny to any person making a request for information to the School/Trust, whether it holds information of the description specified in the request
- provide the documentation, if the School/Trust confirms that it holds the requested information

3.2 Pursuant to paragraph 3.1 The Trust will respond promptly and no later than 20 school days, subject to the statutory maximum of 60 working days. EIR requests will normally be answered within 20 working days (i.e. excluding weekdays and School/Trust holidays, or 60 working days (if this is shorter, from receipt of the request) for information provided under FOIA. Where a request is for environmental information which can be released under the EIR, this request can be made **verbally**. We would request however that any request is made in writing to ensure clarity and accuracy.

3.3 Where a fee is charged, the timeframe within which the School/Trust has to respond to the request begins from the day the fee is received.

3.4 The School/Trust will not comply with section 3.1 of this policy where:

- the School/Trust reasonably requires further information to meet a freedom of information request, has informed the applicant of this requirement, but was not subsequently supplied with that further information
- where additional clarity or a fee has been requested but has not been provided in the time specified
- the fact information is archived or difficult to retrieve does not itself justify refusal. The Trust will consider whether the information is held, whether the cost limit applies, and whether an exemption exists.
- a request for information is exempt under section 2 of the Freedom of Information Act 2000
- the cost of providing the information exceeds the appropriate limit (being £450 or 18 hours of a staff member's time)
- the request is vexatious
- the request is a repeated request from the same person made within 60 consecutive working days of the initial one
- a fee notice was not honoured
- the requested information is not held by the School/Trust for the purposes of the School/Trust's business

3.5 Where information is, or is thought to be, exempt, the School/Trust will, within 20 School/Trust days, give notice to the applicant which:

- states that fact
- specifies the exemption in question

3.6 If information falls within scope of a qualified exemption and the School/Trust needs additional time to consider the public interest test, the School/Trust may extend the deadline. In most cases, the extension will exceed no more than a further 20 School/Trust days; however, the actual length of the extension will be decided on a case-by-case basis.

3.7 Where a public interest test extension is required, the School/Trust will write to the applicant to inform them of this, stating the following information:

- which exemption(s) the extension relies on and why
- a revised deadline for when the applicant will receive their response

3.8 Where a deadline has to be further extended, the School/Trust will write to the applicant again, stating the information outlined in 3.7.

3.9 The Freedom of Information Act 2000 provides a right of access to recorded information held by the Trust. Where a request seeks explanations, opinions, clarification or the creation of new information, the Trust is not required to create information which is not already recorded. However, the Trust will consider whether any recorded information falling within the scope of the request is held and will provide reasonable advice and assistance where appropriate.

3.10 The information provided to the applicant will be in the format that they have requested, where possible.

3.11 Where it is not possible to provide the information in the requested format, the School/Trust will assist the applicant by discussing alternative formats in which it can be provided.

3.12 The information provided will also be in the language in which it is held, or another language that is legally required.

3.13 If, under relevant disability and discrimination regulations, the School/Trust is legally obliged to provide the information in other forms and formats, it will do so.

3.14 In some cases, a request may be dealt with under more than one access regime, e.g. if the request involves both information about the School/Trust and personal information, it will be dealt with under the Freedom of Information Act 2000 and the Data Protection Act 2018.

3.15 Staff are made aware that it is a criminal offence to alter, deface, block, erase, destroy or conceal any information held by the School/Trust with the intention of preventing disclosure following a request. We will take all reasonable steps

to ensure that records that are subject to a request for information are not deleted or amended by anyone within the School/Trust once the request has been received and until it has been responded to.

4. The Appropriate Limit

4.1 The School/Trust will not comply with any freedom of information request that exceeds the statutorily imposed appropriate limit of £450 or 18 hours of a staff member's time.

4.2 When determining whether the cost of complying with a freedom of information request is within the appropriate limit, the School/Trust will take account only of the costs we reasonably expect to incur in relation to:

- determining whether it holds the information
- locating the information, or a document which may contain the information
- retrieving the information, or a document which may contain the information
- extracting the information from a document containing it
- costs related to the time spent by any person undertaking any of the activities outlined in section 4.2 of this policy on behalf of the School/Trust, are to be estimated at a rate of £25 per person per hour

4.3 The School/Trust is not required to search for information in scope of a request until it is within the cost limit.

4.4 If responding to one part of a request would exceed the cost limit, the School/Trust does not have to respond to any other parts of the request.

4.5 Where multiple requests for information are made to the School/Trust within 60 consecutive working days of each other, either by a single person or by different persons who appear to be acting in concert, the estimated cost of complying with any of the requests is to be taken to be the total costs to the School/Trust of complying with all of them.

5. Charging Fees

5.1 The provision of information in response to a request made under the FOIA generally does not attract a fee. However, the School/Trust may, within 20 School/Trust days, give an applicant who has requested information from the School/Trust, a written notice stating that a fee is to be charged for the School/Trust's compliance in accordance with the FOI & Data Protection (Appropriate Limit and Fees) Regulations 2004, as amended.

5.2 Charges may be made for disbursements, such as the following:

- production expenses, e.g. printing and photocopying
- transmission costs, e.g. postage

- complying with the applicant's preferences about the format in which they would like to receive the information, e.g. scanning to a CD

5.3 Fees charged will not exceed the total cost to the School/Trust of:

- informing the person making the request whether we hold the information
- communicating the information to the person making the request

5.4 If a fee is payable, we will notify the applicant as soon as practicable (the 'fee notice'). The fee notice will state the amount we will charge and advise how they can pay. Where a fee is to be charged, the School/Trust will not comply with section 3 of this policy unless the requested fee is paid within a period of three months, beginning with the day on which the fees notice is given to the applicant.

5.5 Where a fee is paid by cheque, the School/Trust has the right to wait until the cheque is cleared before commencing work.

5.6 Once a fee is received, the School/Trust will inform the applicant of the revised response deadline, i.e. an additional 20 School/Trust days (or 60 working days).

5.7 Where the School/Trust has underestimated the cost to be charged to an applicant, a second fees notice will not be issued; instead, the School/Trust will bear the additional costs.

5.8 The School/Trust will not take into account any costs which are attributable to the time spent by persons undertaking any of the activities mentioned in section 5.3 above.

5.9 When calculating the 20th School/Trust day in which to respond to a freedom of information request, the period beginning the day on which the fee notice is given to the applicant and ending with the day on which the fee is received will be disregarded.

6. Means of Communication

6.1 Where, on making a request for information, the applicant expresses a preference for communication by any one of the following means, the School/Trust will, as far as is practicable, give effect to that preference:

- the provision to the applicant of a copy of the information in permanent form or in another form acceptable to the applicant
- the provision to the applicant of a reasonable opportunity to inspect a record containing the information
- the provision to the applicant of a digest, or summary of the information, in permanent form or in another form acceptable to the applicant

6.2 Where a preference is not stated by the applicant, the School/Trust will communicate by any means which are reasonable under the circumstances. For example, where an applicant uses social media to make a request, the School/Trust may respond via an alternative medium as some platforms restrict the length of a response.

7. Providing Advice and Assistance

7.1 The School/Trust will meet its duty to provide advice and assistance, as far as is reasonable, to any person who proposes to make, or has made, requests for information to the School/Trust.

7.2 The School/Trust may offer advice and assistance in the following circumstances:

- if an individual requests to know what types of information the School/Trust holds and the format in which it is available, as well as information on the fees regulations and charging procedures
- if a request has been made, but the School/Trust is unable to regard it as a valid request due to insufficient information, leading to an inability to identify and locate the information
- if a request has been refused, e.g. due to an excessive cost, and it is necessary for the School/Trust to assist the individual who has submitted the request

7.3 The School/Trust will provide assistance for each individual on a case-by-case basis; examples of how the School/Trust will provide assistance include the following:

- informing an applicant of their rights under the Freedom of Information Act 2000
- assisting an individual in the focus of their request, e.g. by advising of the types of information available within the requested category
- advising an applicant if information is available elsewhere and how to access this information
- keeping an applicant informed on the progress of their request

7.4 Where the School/Trust wishes to ask a different public authority to deal with a request by transferring it to them, this will only be done with the agreement of the applicant.

7.5 In order to provide assistance as outlined above, the School/Trust will engage in the following good practice procedures:

- make early contact with an individual and keep them informed of the process of their request
- accurately record and document all correspondence concerning the clarification and handling of any request

- give consideration to the most appropriate means of contacting the applicant, taking into account their individual circumstances
- discuss with the applicant whether they would prefer to receive the information in an alternative format, in cases where it is not possible to provide the information requested in the manner originally specified
- remain prepared to assist an applicant who has had their request denied due to an exemption

7.6 The School/Trust will give particular consideration to what level of assistance is required for an applicant who has difficulty submitting a written request.

7.7 In circumstances where an applicant has difficulty submitting a written request, the School/Trust will:

- make a note of the application over the telephone and then send the note to the applicant to confirm and return – the statutory time limit for a reply would begin here
- direct the individual to a different agency that may be able to assist with framing their request

NB. This list is not exhaustive, and the School/Trust may decide to take additional assistance measures that are appropriate to the case.

7.8 Where an applicant's request has been refused either because the information is accessible by other means, or the information is intended for future publication or research, the School/Trust, as a matter of good practice, will provide advice and assistance.

7.9 The School/Trust will advise the applicant how and where information can be obtained, if it is accessible by other means.

7.10 Where there is an intention to publish the information in the future, the School/Trust will advise the applicant of when this publication is expected.

7.11 If the request is not clear, the School/Trust will ask for more detail from the applicant in order to identify and locate the relevant information, before providing further advice and assistance.

7.12 If the School/Trust believes the applicant has not provided their real name, the School/Trust will inform the applicant that the request will not be responded to until further information is received from the applicant.

7.13 If the School/Trust is able to clearly identify the elements of a request, it will respond following usual procedures and will provide advice and assistance for the remainder of the request.

7.14 If any additional clarification is needed for the remainder of a request, the School/Trust will ensure there is no delay in asking for further information.

7.15 Applicants are given two months to provide any requested clarification. If an applicant decides not to follow the School/Trust's advice and assistance and fails to provide clarification, the School/Trust is under no obligation to contact the applicant again.

7.16 If the School/Trust is under any doubt that the applicant did not receive the advice and assistance, the School/Trust will re-issue it.

7.17 The School/Trust is not required to provide assistance where an applicant's request is vexatious or repeated, as defined under section 14 of the Freedom of Information Act 2000. For further details on how the Trust handles vexatious or repeated requests, see Appendix 4: Vexatious Requests Procedure.

7.18 Where the School/Trust has already sent a refusal request in relation to a previous vexatious request, the School/Trust is not obliged to send another notice for future vexatious requests.

7.19 An ongoing evidence log is kept, recording relevant correspondence or behaviour that has been taken into account when a request has been classed as vexatious.

7.20 The School/Trust is not required to provide information where the cost of complying with a request exceeds the limit outlined in the Freedom of Information Act 2000. In such cases, the School/Trust will firstly provide the applicant with advice and assistance to help them reframe or refocus their request with a view of brining it within the cost limit. Then the School/Trust will consider whether any information can be provided free of charge if the applicant refuses to pay the fee.

7.21 If a request is refined, it will be treated as a new request.

7.22 A record will be kept in the School/Trust office of all the advice and assistance provided.

8. Consultation with Third Parties

8.1 The School/Trust may need to consult third parties about information held in scope of a request to consider whether it would be suitable to disclose the information. Situations where third parties may need to be consulted include the following:

- when requests relate to persons or bodies who are not the applicant and/or the School/Trust
- when the disclosure of information is likely to affect the interests of persons or bodies who are not the applicant or the School/Trust

8.2 The School/Trust will consider if a third party needs to be directly consulted about a request, particularly, for example, if there are contractual obligations that require consultation before information is disclosed.

8.3 Third parties will also be consulted where the School/Trust is proposing to disclose information relating to them or information that is likely to affect their business or private interests.

8.4 The views of third parties will be given appropriate weighting when deciding how to respond to a request. For example, if the third party created or provided the information, they may have a better understanding of its sensitivity.

8.5 It is ultimately the School/Trust's decision as to whether information in scope of a request will be released following any relevant consultation.

8.6 Where the School/Trust decides to release information following consultation with a third party, the third party will be informed in advance that the information is going to be disclosed.

8.7 Where the School/Trust intends to release information that relates to a large number of third parties, the School/Trust will consider whether it would be more appropriate to contact a representative organisation who can express views on behalf of the third parties, rather than contacting each party individually. If no representative organisation exists, the School/Trust may also consider only notifying or consulting a sample of the third parties relating to the disclosure.

8.8 Decisions made in line with 8.7 will be made on a case-by-case basis.

9. Internal Reviews

9.1 When responding to requests for information, the details of the School/Trust's internal review process will be set out, including information about how applicants can request an internal review. Applicants will also be informed of their right to complain to the ICO if they are still dissatisfied following the outcome of the School/Trust's internal review.

9.2 Requests for an internal review should be made in writing to the School/Trust.

9.3 For a request for an internal review to be accepted, it must be made within two months from the date the School/Trust issued an initial response to the request.

9.4 Upon receipt of an application, the School/Trust will acknowledge an application and inform the applicant of the intended response date. Responses will usually be delivered within 20 School/Trust days of receipt of the application.

9.5 If an internal review is complex, requires consultation with third parties or the relevant information is of high volume, the School/Trust may need to extend the usual response timeframe. In these cases, the School/Trust will inform the applicant and provide an alternative response date. In most cases, the extension will exceed no more than a further 20 School/Trust days; however, the actual length of the extension will be decided on a case-by-case basis.

9.6 Where clarification is needed from an applicant regarding the review, the normal response period will not begin until clarification is received.

9.7 Wherever possible, the review will be undertaken by a more senior member of staff than the person who took the original decision.

9.8 During a review, the School/Trust will evaluate the handling of the request; particular attention will be paid to concerns raised by the applicant.

9.9 The applicant will be informed of the outcome of the review and a record will be kept of such reviews and the final decision that is made.

9.10 If the outcome of the review is to disclose information that was previously withheld, the information will be provided to the applicant at the same time they are informed of the response to the review, where possible. If this is not possible, the applicant will be informed of when the information will be provided.

9.11 Within the response to a review, applicants may also contact the Information Commissioner's Office at www.ico.org.uk or by calling 0303 123 1113.

10. Publication Scheme

10.1 The Education Learning Trust will meet its duty to adopt and maintain a publication scheme which specifies the information which has published on the School/Trust website, and whether the information will be available free of charge or on payment. See **Appendix 1** for the ELT publication scheme.

10.2 The publication scheme will be reviewed annually and updated as necessary to reflect changes in legislation, guidance, or Trust practice.

11. Contracts and Outsourced Services

11.1 The School/Trust will make clear what information is held by third party contractors on behalf of the School/Trust.

11.2 Where a contractor holds information relating to a contract held with the School/Trust on behalf of the School/Trust, this information is considered in the same way as information held by a public authority and so is subject to the Freedom of Information Act 2000.

11.3 When entering into a contract, the School/Trust and contractor will agree what information the School/Trust will consider to be held by the contractor on behalf of the School/Trust, this will be indicated in the contract.

11.4 Appropriate arrangements will be put in place for the School/Trust to gain access to information held by the contractor on the School/Trust's behalf, in the event that a freedom of information request is made. These arrangements will be set out in a contract, and will cover areas including the following:

- how and when the contractor should be approached for information and who the points of contact are

- how quickly information should be provided to the School/Trust
- how any disagreement about disclosure between the School/Trust and contractor will be addressed
- how requests for internal reviews and appeals to the ICO will be managed
- the contractor's responsibility for maintaining record keeping systems in relation to the information they hold on behalf of the School/Trust
- the circumstances under which the School/Trust must consult with the contractor about disclosure and the process for doing so
- the types of information which should not be disclosed and the reasons for this confidentiality, where appropriate

11.5 In some situations, the School/Trust may offer or accept confidentiality arrangements that are not set out within a contract with a third party. The School/Trust and the third party will both be aware of the legal limits placed on the enforceability of expectations of confidentiality and the public interest in transparency.

11.6 Such expectations outlined in 11.5 will only be created where it is appropriate to do so.

11.7 Contractors must comply with requests from the School/Trust for access to information they hold on behalf of the School/Trust.

11.8 Requests for information held by a contractor on behalf of the School/Trust will be responded to by the School/Trust. If a contractor receives a request, this will be passed onto the School/Trust for consideration.

Appendix 1 - Education Learning Trust Publication Scheme

This publication scheme has been prepared using the latest information provided by the Information Commissioner and commits the Education Learning Trust 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 School/Trusts.

The scheme commits the ELT to:

- proactively publish or otherwise make available as a matter of routine, information including environmental information, which is held by the Trust/School/Trusts and falls within the classifications below

- specify the information which is held by the School/Ttust 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 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.

- review and update on a regular basis the information the Trust/School/Trusts makes available under this scheme

- produce a schedule of any fees charged for access to information which is made proactively available

- make this publication scheme available to the public

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

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 School/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 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 School/Trust 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 School/Trust, 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/Trust 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 a School/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.

To enable us to process your request quickly, please mark correspondence:

"PUBLICATION SCHEME INFORMATION REQUEST"

Freedom of information requests

Information that is not covered by this scheme can be requested in writing, where its provision will be considered under the Freedom of Information Act 2000.

To enable us to process freedom of information requests within statutory timeframes, please mark all correspondence:

"FREEDOM OF INFORMATION REQUEST"

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.

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

Where a request is made to re-use all, or part, of a copyrighted dataset, a charge may be made – this will be in accordance with the terms of the Re-use of Public Sector Information Regulations 2015, where applicable, with regulations made under section 11B of the Freedom of Information Act 2000, or with any other statutory powers held by the School/Trust.

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.

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.

Guide to Information

School/Trusts are expected to make the information outlined below available unless one of the following conditions applies:

- they do not hold the information
- there is a relevant exemption available
- the information is readily and publicly available from an external website (such information may have been provided either by the School/Trust or on its behalf); in such cases, the School/Trust must provide a direct link to that information
- the information is archived, out of date or otherwise inaccessible
- it would be impractical or resource-intensive to prepare the material for routine release

If this information is only held by another public authority, the School/Trust should provide details of where to obtain it.

Information Published.	**How the information can be obtained**	**Cost**
Class 1 - Who we are and what we do		
Who's who in the School/Trust / Trust	School/Trust website www.meadowbankprimary.com www.gatleyprimary.com. www.bredburygreenprimary.com www.thekingswaySchool/Trust.com www.wernethSchool/Trust.com www.educationlearningtrust.com Hard Copy – School/Trust office	Free
Who's who on the governing body / Trust board and the basis of their appointment	School/Trust website www.meadowbankprimary.com www.gatleyprimary.com. www.bredburygreenprimary.com www.thekingswaySchool.com www.wernethSchool.com www.educationlearningtrust.com Hard Copy – School/Trust office	Free
Articles of Association	Trust website www.educationlearningtrust.com Hard Copy – Trust office	Free
Contact details for the Headteacher, the governing body, Trust board via the School/Trust (named contacts where possible).	School/Trust website www.meadowbankprimary.com www.gatleyprimary.com. www.bredburygreenprimary.com www.thekingswayschool.com www.wernethschool.com www.educationlearningtrust.com Hard Copy – School/Trust office	Free
School/Trust/Trust prospectus	School/Trust website www.meadowbankprimary.com www.gatleyprimary.com. www.bredburygreenprimary.com	Free

	www.wernethschool.com www.thekingswayschool.com www.educationlearningtrust.com Hard Copy – School/Trust office	
Staffing structure	School/Trust website www.meadowbankprimary.com www.gatleyprimary.com. www.bredburygreenprimary.com www.thekingswayschool.com www.wernethschool.com www.educationlearningtrust.com Hard Copy – School/Trust office	Free
School session times and term dates	School website www.meadowbankprimary.com www.gatleyprimary.com. www.bredburygreenprimary.com www.kingsway.stockport.sch.uk www.wernethSchool/Trust.com Hard Copy – school office	Free
Address of School/Trust and contact details, including email address.	School/Trust website www.meadowbankprimary.com www.gatleyprimary.com. www.bredburygreenprimary.com www.thekingswayschool.com www.wernethschool.com www.educationlearningtrust.com Hard Copy – School/Trust office	Free
Class 2 – What we spend and how we spend it		
Trust annual budget plans and financial statements	School/Trust website – ELT section www.meadowbankprimary.com www.gatleyprimary.com. www.bredburygreenprimary.com www.thekingswayschool.com www.wernethschool.com www.educationlearningtrust.com Hard Copy – School/Trust office	Free
Capital funding	Hard Copy - School/Trust Office	Free
Financial audit reports	Hard Copy - School/Trust Office	Free
Details of expenditure items over £5000	Hard Copy - School/Trust Office	Free
Procurement and contracts the School/Trust has entered into, or information relating to / a link to information held by an organisation which has done so on its behalf (for example, a local authority or diocese).	Hard Copy - School/Trust Office	Free

Pay policy	Trust website www.educationlearningtrust.com Hard Copy – Trust office	Free
Staff allowances and expenses that can be incurred or claimed, with totals paid to individual senior staff members by reference to categories.	Hard Copy - School/Trust Office	Free
Staffing, pay and grading structure.	Hard Copy - School/Trust Office	Free
Governors' allowances that can be incurred or claimed and a record of total payments made to individual governors.	Hard Copy - School/Trust Office	Free
Class 3 – What our priorities are and how we are doing		
School/Trust profile • Performance data supplied to the English Government • The latest Ofsted Summary/Full report • Post-inspection action plan	School/Trust website www.meadowbankprimary.com www.gatleyprimary.com. www.bredburygreenprimary.com www.thekingswaySchool/Trust.com www.wernethSchool/Trust.com Hard Copy – School/Trust office	Free
Performance management policy and procedures adopted by the governing body.	Hard Copy – School/Trust office	Free
Performance data or a direct link to it	School/Trust website www.meadowbankprimary.com www.gatleyprimary.com. www.bredburygreenprimary.com www.thekingswayschool.com www.wernethschool.com Hard Copy – School/Trust office	Free
The School/Trust's future plans; for example, proposals for and any consultation on the future of the School/Trust, such as a change in status	Contact the School/Trust office in writing or email to relevant School/Trust: admin@meadowbankprimary.com admin@bredburygreenprimary.com office@gatleyprimary.com admin@wernethschool.com office@kingsway.stockport.sch.uk.com office@educationlearningtrust.com www.educationlearningtrust.com	Free
Safeguarding and child protection	School/Trust website www.meadowbankprimary.com www.gatleyprimary.com.	Free

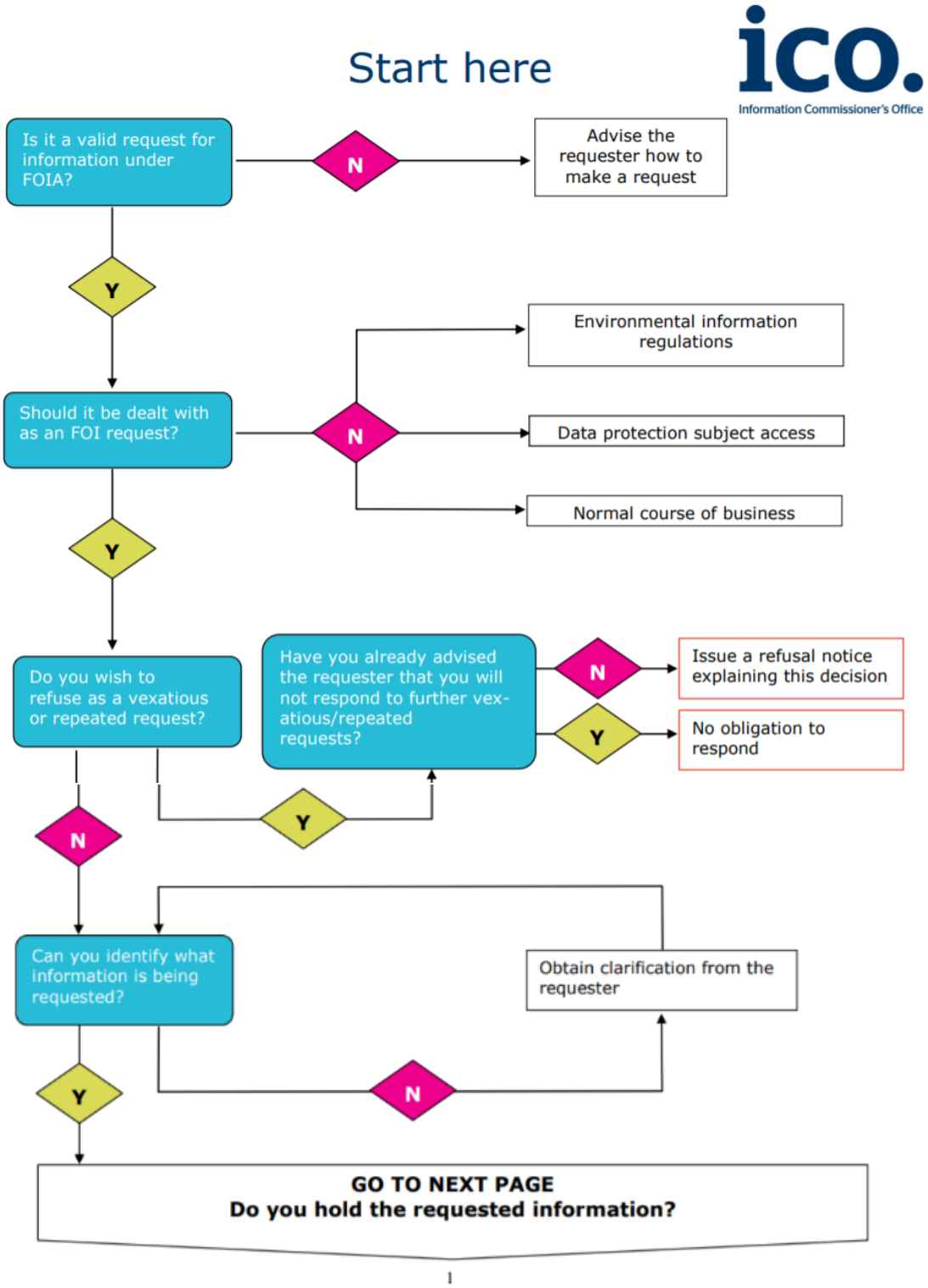
	www.bredburygreenprimary.com www.thekingswayschool.com www.wernethschool.com www.educationlearningtrust.com Hard Copy – School/Trust office	
Class 4 – How we make decisions		
Admissions policy/decisions (not individual admission decisions)	School/Trust website www.meadowbankprimary.com www.gatleyprimary.com. www.bredburygreenprimary.com www.thekingswayschool.com www.wernethschool.com Hard Copy – School/Trust office	Free
Agendas and minutes of meetings of the governing body, Trust board and its committees.	Hard Copy – School/Trust office Email attn. The Clerk of Governors office@educationlearningtrust.com	Free
Class 5 – Our policies and procedures		
Records management and personal data policies, including: • Records retention, destruction and archive policies • Data protection	School/Trust website www.meadowbankprimary.com www.gatleyprimary.com www.bredburygreenprimary.com www.thekingswayschool.com www.wernethschool.com www.educationlearningtrust.com Hard Copy – School/Trust office	Free
Charging regimes and policies.	School/Trust website www.meadowbankprimary.com www.gatleyprimary.com. www.bredburygreenprimary.com www.thekingswaySchool/Trust.com www.wernethSchool/Trust.com Hard Copy – School/Trust office	Free
Class 6 – Lists and Registers		
Curriculum circulars and statutory instruments	School/Trust website www.meadowbankprimary.com www.gatleyprimary.com. www.bredburygreenprimary.com www.thekingswayschool.com www.wernethschool.com www.educationlearningtrust.com Hard Copy – School/Trust office	Free
Disclosure logs	Contact the School/Trust office in writing or email to relevant School/Trust: admin@meadowbankprimary.com admin@bredburygreenprimary.com office@gatleyprimary.com admin@wernethSchool.com	Free

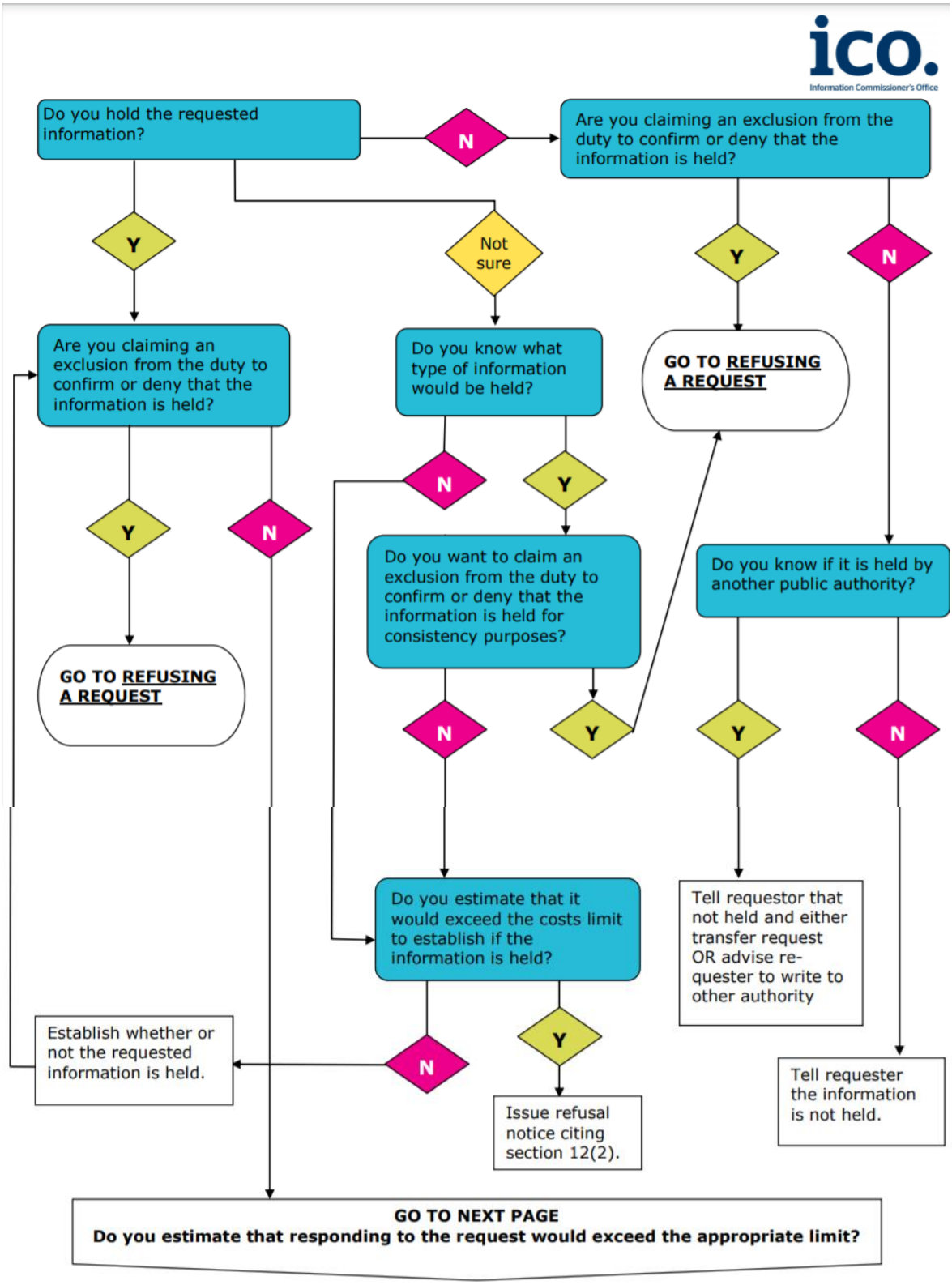
	office@kingsway.stockport.sch.uk	
Asset register	Contact the School/Trust office in writing or email to relevant School/Trust: admin@meadowbankprimary.com admin@bredburygreenprimary.com office@gatleyprimary.com admin@wernethschool.com office@kingsway.stockport.sch.uk office@educationlearningtrust.com	Free
Any information the School/Trust is currently legally required to hold in publicly available registers	Contact the School/Trust office in writing or email to relevant School/Trust: admin@meadowbankprimary.com admin@bredburygreenprimary.com office@gatleyprimary.com admin@wernethschool.com office@kingsway.stockport.sch.uk	Free
Class 7 – The services we offer		
Extra-curricular activities	Relevant School/Trust website www.meadowbankprimary.com www.gatleyprimary.com www.bredburygreenprimary.com www.thekingswayschool.com www.wernethschool.com Hard Copy – School/Trust office	Free
Out of school clubs	School website www.meadowbankprimary.com www.gatleyprimary.com www.bredburygreenprimary.com www.thekingswayschool.com www.wernethschool.com Hard Copy – School/Trust office	Free
Services for which the school is entitled to recover a fee, together with those fees	School website www.meadowbankprimary.com www.gatleyprimary.com www.bredburygreenprimary.com www.thekingswayschool.com www.wernethschool.com Hard Copy – School/Trust office	Free
School and Trust publications, leaflets, books and newsletters	School/Trust website www.meadowbankprimary.com www.gatleyprimary.com www.bredburygreenprimary.com www.thekingswayschool.com www.wernethschool.com www.educationlearningtrust.com Hard Copy – School/Trust office	Free

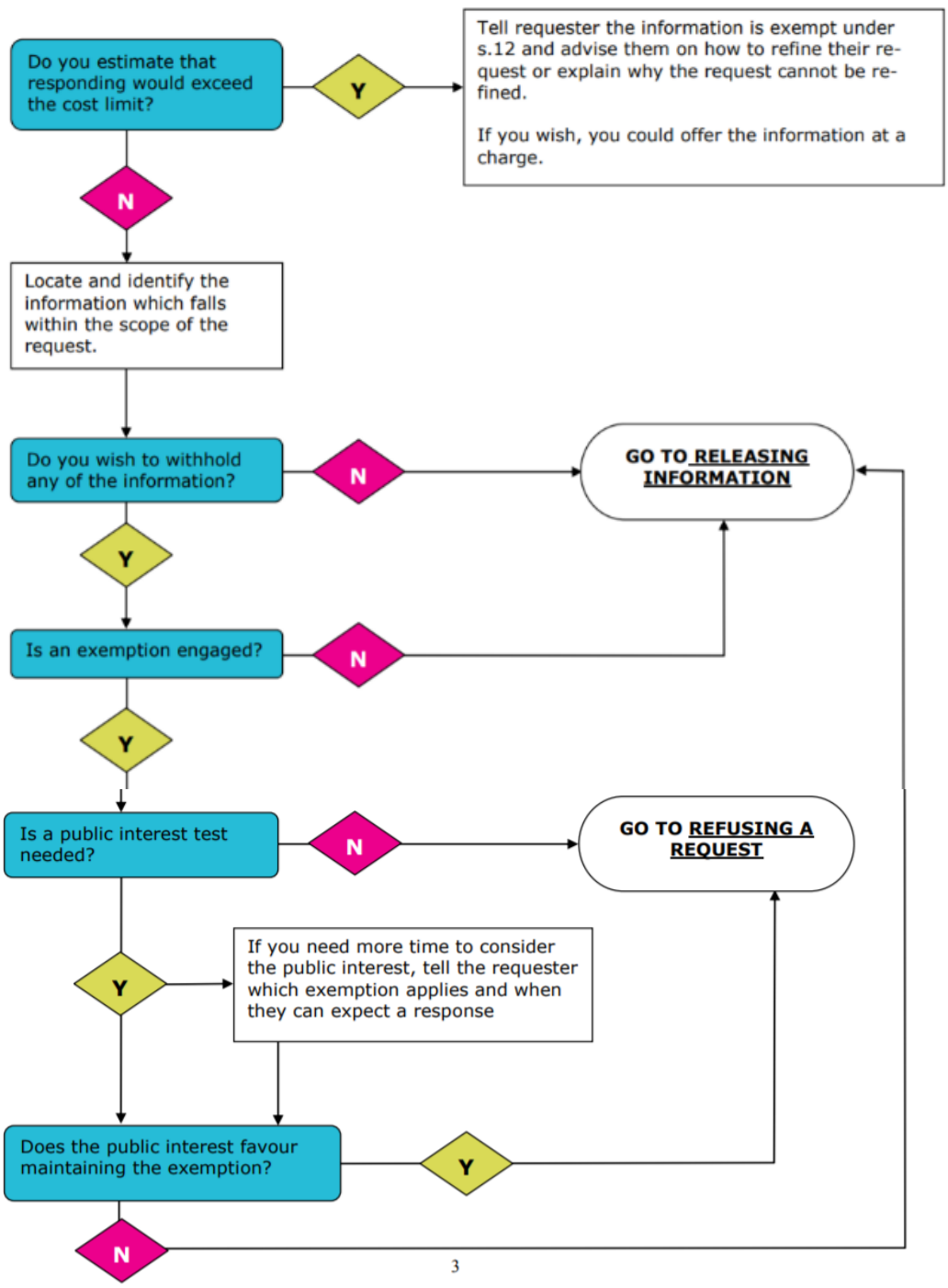
Appendix 2 Schedule of Charges

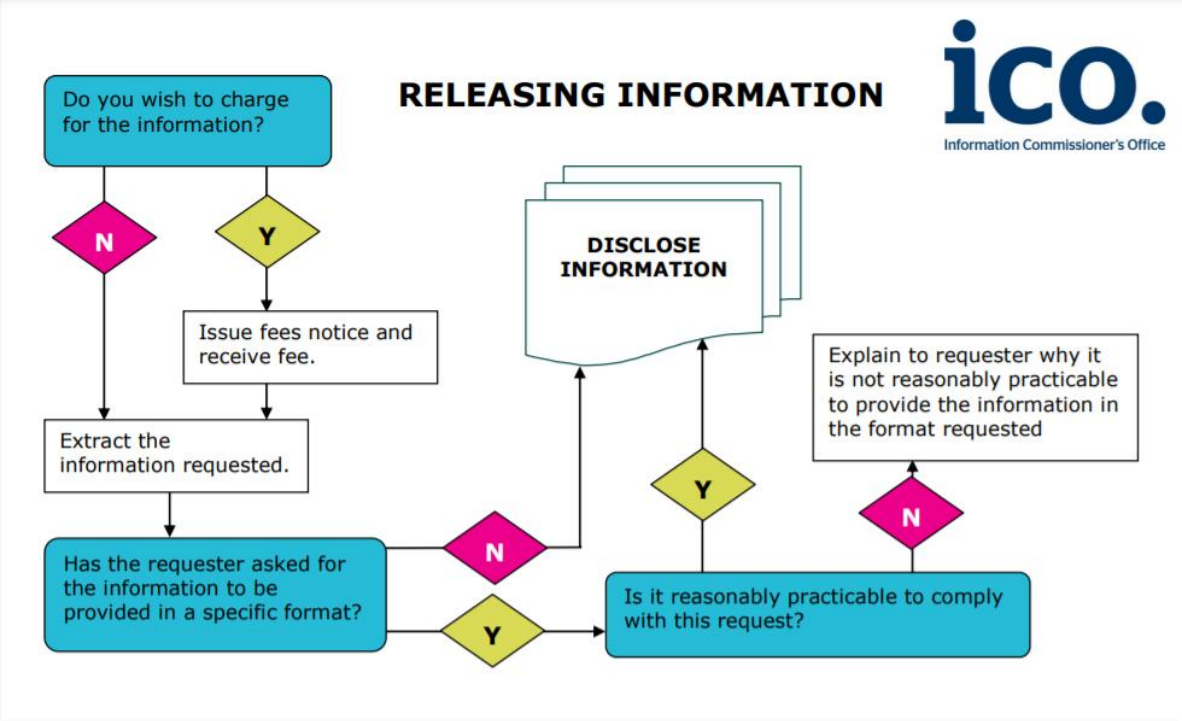
TYPE OF CHARGE	DESCRIPTION	BASIS OF CHARGE
Disbursement costs	Published Information & FOI: Photocopying/printing @ 0p per sheet (black & white)	Free of charge
	Published Information & FOI: Photocopying/printing @ 0p per sheet (colour)	Free of charge
	Published Information: Postage posted 2nd class.	Free of charge
	FOI Request: Registered delivery or requester to collect from School/Trust office and sign receipt.	Cost of secure postage
FOI Requests - Statutory Fee	If there is a charge, it will be disclosed before the request is fulfilled.	In accordance with the relevant legislation.
FOI Requests Charges	Refer to section 4.2 Appropriate Limit & Section 5.0 Charging Fees.	In accordance with time it will take to fulfil request to a maximum of £450.00 or 18 hours of a staff member's time, based on a cost of £25/per hour.

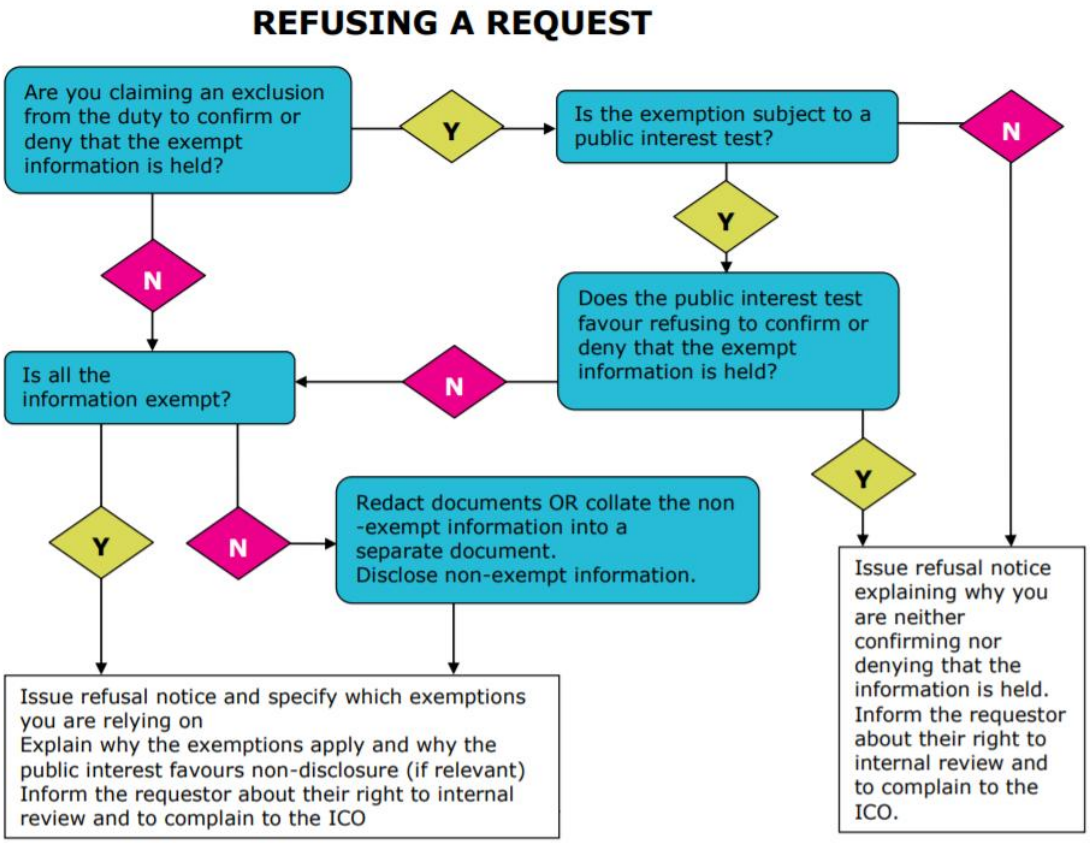
Appendix 3 ICO Freedom Off Information Request Flowchart




ico.
Information Commissioner's Office
Do you hold the requested information?
N
Are you claiming an exclusion from the duty to confirm or deny that the information is held?
Y
Not sure
Y
N
Are you claiming an exclusion from the duty to confirm or deny that the information is held?
Do you know what type of information would be held?
GO TO REFUSING A REQUEST
N
Y
Y
N
Do you want to claim an exclusion from the duty to confirm or deny that the information is held for consistency purposes?
Do you know if it is held by another public authority?
GO TO REFUSING A REQUEST
N
Y
Y
N
Do you estimate that it would exceed the costs limit to establish if the information is held?
Tell requestor that not held and either transfer request OR advise re-quester to write to other authority
Establish whether or not the requested information is held.
N
Y
Issue refusal notice citing section 12(2).
Tell requester the information is not held.
GO TO NEXT PAGE
Do you estimate that responding to the request would exceed the appropriate limit?


Do you estimate that responding would exceed the cost limit?
Y
Tell requester the information is exempt under s.12 and advise them on how to refine their request or explain why the request cannot be refined.
If you wish, you could offer the information at a charge.
N
Locate and identify the information which falls within the scope of the request.
Do you wish to withhold any of the information?
N
GO TO RELEASING INFORMATION
Y
Is an exemption engaged?
N
Y
Is a public interest test needed?
N
GO TO REFUSING A REQUEST
Y
If you need more time to consider the public interest, tell the requester which exemption applies and when they can expect a response
Does the public interest favour maintaining the exemption?
Y
N
3


RELEASING INFORMATION
ico.
Information Commissioner's Office
Do you wish to charge for the information?
N
Y
Issue fees notice and receive fee.
Extract the information requested.
Has the requester asked for the information to be provided in a specific format?
N
Y
DISCLOSE INFORMATION
Is it reasonably practicable to comply with this request?
Y
N
Explain to requester why it is not reasonably practicable to provide the information in the format requested


REFUSING A REQUEST
Are you claiming an exclusion from the duty to confirm or deny that the exempt information is held?
Y
Is the exemption subject to a public interest test?
N
Y
N
Does the public interest test favour refusing to confirm or deny that the exempt information is held?
N
Is all the information exempt?
Y
Y
N
Redact documents OR collate the non -exempt information into a separate document.
Disclose non-exempt information.
Issue refusal notice and specify which exemptions you are relying on
Explain why the exemptions apply and why the public interest favours non-disclosure (if relevant)
Inform the requestor about their right to internal review and to complain to the ICO
Issue refusal notice explaining why you are neither confirming nor denying that the information is held.
Inform the requestor about their right to internal review and to complain to the ICO.

Appendix 4 Vexatious or Repeated Requests Procedure

1. Introduction

The Education Learning Trust (ELT) is committed to openness and transparency. However, the Trust is not obliged to comply with FOI requests that are deemed "vexatious" or are repeated without significant new information. This appendix sets out the procedure for identifying and managing such requests, in line with Section 14 of the Freedom of Information Act 2000 and ICO guidance.

2. Definition of Vexatious Requests

A request may be considered vexatious if it is likely to cause a disproportionate or unjustified level of disruption, irritation, or distress, without any serious purpose or value. Indicators include, but are not limited to:

- the request is obsessive, harassing, or abusive
- the request repeats issues already addressed or answered
- the request imposes a significant burden on the School/Trust in terms of time or resources
- the language used is aggressive or offensive
- the request appears to be intended to disrupt the School/Trust's work

Each case will be considered on its own merits, taking into account the context and history of correspondence.

3. Definition of Repeated Requests

A repeated request is one that:

- is identical or substantially similar to a previous request from the same individual
- is made within 60 consecutive working days of the original request
- does not include any significant new information

4. Procedure for Handling Vexatious or Repeated Requests

4.1 Initial Assessment

- the Trust Business Lead or Data Protection Officer will review the request and any relevant correspondence
- the Trust will consider the substance and context of the request, not just the behaviour of the requester

4.2 Decision and Response

- if a request is deemed vexatious or repeated, the School/Trust will issue a written refusal notice to the requester, stating the reason for refusal and referencing Section 14 of the FOIA
- the refusal notice will explain the decision and inform the requester of their right to request an internal review and to complain to the Information Commissioner's Office (ICO)

4.3 Record Keeping

- the School/Trust will keep a record of all correspondence and evidence supporting the decision to classify a request as vexatious or repeated
- an ongoing evidence log will be maintained to record relevant behaviour or correspondence

4.4 Internal Review

- requesters may request an internal review of the decision within two months of the refusal notice
- the review will be conducted by a senior member of staff not involved in the original decision

4.5 Future Requests

- if a requester continues to submit vexatious or repeated requests, the School/Trust is not obliged to respond to further requests on the same topic but will keep a record of all such requests and responses

4. Right of Appeal

If the requester remains dissatisfied following the internal review, they may complain to the Information Commissioner's Office (ICO):

- Website: www.ico.org.uk
- Helpline: 0303 123 1113