FREEDOM OF INFORMATION POLICY

Providing access. Protecting information.
Maintaining transparency.



RIVERSIDE BRIDGE SCHOOL

INSPIRE, EMPOWER, ACHIEVE

This policy forms part of the Riverside Bridge School Policy Framework
and should be read alongside any related policies, procedures and guidance.

RIVERSIDE BRIDGE SCHOOL
INSPIRE, EMPOWER, ACHIEVE

OUR COMMITMENT

At Riverside Bridge School, every policy reflects our commitment to creating a safe, inclusive and ambitious school community in which every pupil is valued, every voice matters and every family is respected and supported.

Our policies translate our values into consistent practice. They support high expectations, clear responsibilities, effective partnership and informed decision-making, ensuring that the needs, rights, wellbeing and future outcomes of our pupils remain at the heart of our work.

We work collaboratively, act with integrity and continually reflect upon and improve our practice to achieve the best possible outcomes for every pupil.

POLICY PRINCIPLES

Our Policy Principles underpin how we work together and guide the decisions and actions we take to support every pupil and their families.



POLICY PURPOSE & FRAMEWORK

Riverside Bridge School policies set out the expectations, responsibilities and approaches that support safe, consistent and high-quality practice across the school. They translate our values, statutory responsibilities and professional expectations into clear guidance for everyday decision-making and practice.

Each policy forms part of the Riverside Bridge School Policy Framework and should be read alongside any related policies, procedures, statutory guidance and school frameworks referenced within the document.

Policies apply to the members of the school community identified within each document, including staff, governors, parents and carers, volunteers, contractors and other professionals where relevant. Everyone is expected to understand and apply the requirements appropriate to their role and to seek further guidance where clarification is required.

CURRICULUM DRIVERS



Our Drivers provide a shared golden thread across curriculum, school life, policy and leadership, helping ensure that our decisions and practice remain focused on the experiences and futures we want for every pupil.

STATEMENT OF INTENT

This policy sets out Riverside Bridge School's approach to openness, transparency and access to recorded information under the Freedom of Information Act 2000. It establishes the principles, responsibilities and arrangements through which the school recognises, manages and responds to requests for information while protecting information that should lawfully remain confidential.

Riverside Bridge School is committed to operating openly and accountably. Access to recorded information supports public confidence, informed decision-making and effective governance, and the school will make information routinely available wherever it is appropriate and lawful to do so.

As part of Partnership Learning, Riverside Bridge School will manage Freedom of Information requests in accordance with the Freedom of Information Act 2000, relevant regulations, current Information Commissioner's Office guidance and the Trust's information-governance arrangements. Requests will be considered objectively and without regard to the identity, motives or perceived intentions of the requester except where the law specifically permits these matters to be taken into account.

The school will balance its commitment to transparency with its responsibilities to protect personal information, safeguarding information, confidential or commercially sensitive material, security-related information and the rights and interests of pupils, families, staff and third parties.

The school adopts the Information Commissioner's Office model Publication Scheme and will maintain a Guide to Information setting out what information is routinely available and how it can be accessed. The ICO requires public authorities to adopt its model scheme and to proactively publish information within the recognised classes.

Our responsibilities to the public

Riverside Bridge School will make appropriate recorded information available proactively and will ensure that valid requests are recognised, recorded and responded to promptly and lawfully. We will provide reasonable advice and assistance, undertake appropriate searches, apply exemptions or other statutory provisions only where justified and explain clearly where information cannot be disclosed.

We will protect information that should not lawfully be released, maintain appropriate records of requests and decisions and seek advice from the Trust Data Protection Officer where requests are complex, sensitive or raise questions about exemptions, other information-access regimes or the public interest.

Through these commitments, Riverside Bridge School aims to provide access to information in a way that is open, fair and accountable while protecting the rights, safety and legitimate interests of the school community. We will continue to review our arrangements so that transparency and information governance remain embedded within effective school leadership and administration.

RIVERSIDE BRIDGE SCHOOL
INSPIRE, EMPOWER, ACHIEVE

TABLE OF CONTENTS

01	PURPOSE AND SCOPE	02	PUBLICATION SCHEME AND GUIDE TO INFORMATION
03	ROLES AND RESPONSIBILITIES	04	RECOGNISING AN INFORMATION REQUEST
05	MAKING A REQUEST	06	RESPONDING TO REQUESTS
07	FEES AND COST LIMITS	08	EXEMPTIONS, REFUSALS AND THE PUBLIC INTEREST TEST
09	PERSONAL INFORMATION AND OTHER ACCESS REGIMES	10	INTERNAL REVIEW AND COMPLAINTS
11	RECORDS MANAGEMENT	12	MONITORING AND REVIEW
13	RELATED POLICIES AND FRAMEWORKS		APPENDIX

APPROVED BY: Governing Board

APPROVED ON: September 2026

REVIEWED DUE ON: September 2027

Section 01

PURPOSE AND SCOPE

Defining rights. Establishing scope. Supporting lawful access.

The purpose of this policy is to establish a clear and consistent framework for managing requests for recorded information received by Riverside Bridge School. It aims to ensure that the school complies with its responsibilities under the Freedom of Information Act 2000, promotes openness and public accountability, provides appropriate advice and assistance to requesters, protects information that should lawfully remain confidential and maintains clear records of requests and decisions.

This policy applies to recorded information held by Riverside Bridge School on behalf of Partnership Learning, regardless of format. This may include paper documents, electronic records, emails and correspondence, minutes and reports, financial records, policies and procedures, photographs, audio or video recordings, CCTV footage, spreadsheets, databases and other recorded information held by the school.

The right of access applies to information held by the school at the time the request is received. The school is not required to create new information, provide opinions that are not already recorded or answer questions where no recorded information exists.

This policy applies to requests made by any individual or organisation, including parents and carers, staff and former staff, journalists, researchers, businesses, campaign groups, public bodies and members of the wider public. A requester does not normally need to explain why they want the information.

Where a request falls wholly or partly under another information-access regime, including the UK GDPR, Data Protection Act 2018, Environmental Information Regulations 2004 or relevant education-record legislation, the school will identify and apply the correct legal framework.

Operational templates, request logs, search arrangements and response letters will be maintained separately so they can be updated without requiring amendment of this policy.

Section 02

PUBLICATION SCHEME AND GUIDE TO INFORMATION

Publishing proactively. Improving access. Maintaining transparency.

Riverside Bridge School adopts the Information Commissioner's Office model Publication Scheme. The Publication Scheme represents the school's commitment to make specified categories of information routinely available without requiring members of the public to submit individual Freedom of Information requests. The ICO requires public authorities to use its model scheme and to publish information covered by the scheme.

The school will maintain a Guide to Information setting out:

- what information is routinely published;
- where the information can be found;
- the format in which it is available;
- who to contact where information is not available online;
- whether any charge applies.

Information published under the scheme may include:

- who we are and what we do;
- what we spend and how we spend it;
- our priorities and performance;
- how decisions are made;
- policies and procedures;
- registers and lists;
- services provided by the school.

Information will normally be made available through the school or Trust website where this is practicable. Where information cannot reasonably be published online, the Guide to Information will explain how it may be accessed.

The Publication Scheme, Guide to Information and any schedule of charges will be reviewed regularly to ensure that published information remains accurate, accessible and current. The ICO specifically expects public authorities to maintain a guide to information and schedule of fees alongside the model scheme.

Section 03

ROLES AND RESPONSIBILITIES

Clarifying accountability. Coordinating requests. Maintaining oversight.

Promoting openness and responding appropriately to requests for information is a shared responsibility across Riverside Bridge School.

The Governing Board will:

- promote openness and accountability across the school;
- ensure appropriate Freedom of Information arrangements are in place;
- receive assurance that requests are managed lawfully and within applicable statutory timescales;
- monitor compliance through the school's information-governance arrangements;
- review this policy in accordance with the school's review schedule.

The Headteacher is responsible for ensuring that:

- this policy is implemented effectively;
- sufficient resources are available to respond to requests;
- staff understand their responsibilities under the Freedom of Information Act;
- appropriate records are maintained;
- advice is sought from the Trust Data Protection Officer where appropriate.

The School Data Protection Lead will:

- coordinate Freedom of Information requests received by the school;
- record and acknowledge requests where appropriate;
- identify the applicable information-access regime;
- coordinate searches for relevant recorded information;
- consult with relevant staff and departments;
- maintain a register of requests, decisions and responses;
- coordinate consideration of exemptions and the Public Interest Test in consultation with the Trust Data Protection Officer where appropriate;
- prepare or coordinate responses;
- monitor statutory deadlines;
- escalate any risk to compliance promptly to the Headteacher and Trust Data Protection Officer.

The Trust Data Protection Officer (DPO) will:

- provide advice on complex or sensitive requests;
- advise on exemptions, refusals and the Public Interest Test;
- advise where another information-access regime may apply;
- support internal reviews where appropriate;
- provide legal and procedural advice;
- support the school in complying with relevant information-access legislation.

All members of staff must:

- recognise potential requests for information;
- forward requests promptly to the School Data Protection Lead;
- preserve relevant records;
- assist promptly with searches where requested;
- maintain confidentiality where appropriate;
- comply with this policy and associated procedures.

Section 04

RECOGNISING AN INFORMATION REQUEST

Recognising requests. Identifying the correct regime. Acting promptly.

A Freedom of Information request is a request for recorded information held by Riverside Bridge School. A request does not need to:

- mention the Freedom of Information Act;
- refer to legislation;
- use a specific application form;
- explain why the information is being requested.

To be valid under the Freedom of Information Act, a request must:

- be made in writing, including by email;
- state the requester's real name;
- provide an address for correspondence, which may be an email address;
- describe the information requested sufficiently clearly to enable the school to identify it.

The ICO confirms that FOI requests must contain the applicant's real name, although public authorities should not routinely require identity evidence where there is no reason to doubt the name provided.

Where a request is unclear, the school will provide reasonable advice and assistance to help the requester clarify the information required.

Staff must also consider whether the request should be handled under another statutory regime.

A request for the requester's own personal information will normally be handled as a Subject Access Request under data-protection legislation rather than FOIA.

A request for environmental information may fall under the Environmental Information Regulations 2004 (EIR). Environmental information can include information relating to land, buildings, energy, emissions, environmental conditions and measures or activities affecting the environment. The EIR provides a separate right of access to environmental information held by public authorities.

Where there is uncertainty about which regime applies, the request must be referred promptly to the School Data Protection Lead.

Section 05

MAKING A REQUEST

Making access clear. Providing assistance. Removing unnecessary barriers.

Freedom of Information requests should normally be submitted in writing to Riverside Bridge School. Requests may be sent by email, letter or other written correspondence.

Requests should be directed to the School Data Protection Lead where possible. However, a valid request received by another member of staff or through another school contact point remains a request to the school and must be forwarded promptly for coordination.

The school encourages requesters to provide sufficient detail to enable the requested information to be identified and located efficiently.

Where appropriate, the school will provide reasonable advice and assistance to help a requester describe, clarify or refine the information sought.

The school will not require a requester to explain why they want the information.

The school will not discourage legitimate requests or treat individuals unfairly because they have exercised their statutory right of access.

Section 06

RESPONDING TO REQUESTS

Searching proportionately. Meeting timescales. Responding clearly.

The school will respond to valid Freedom of Information requests promptly and within the applicable statutory timescale.

For schools, the usual time limit is 20 school days or 60 working days, whichever is sooner. The time begins when the school receives the valid request, rather than when it reaches the School Data Protection Lead.

The school will undertake reasonable and proportionate searches for recorded information falling within the scope of the request. Staff must cooperate promptly with searches and must preserve relevant information once a request has been received.

A response may:

- provide the requested information;
- explain that the information is already publicly available and identify where it can be accessed;
- advise that the information is not held;
- provide part of the information while withholding other material lawfully;
- explain that an exemption or other statutory provision applies;
- refuse the request where the law permits this.

Where information is withheld, the school will explain the basis for doing so to the extent required by law. Information will normally be provided electronically where the request was received electronically, unless another reasonable format is requested or another method is more appropriate.

Where additional time is lawfully required to consider the balance of the public interest in relation to a qualified exemption, the requester will be informed in accordance with statutory requirements.

Where the school does not hold requested information but reasonably believes another public authority may hold it, appropriate advice and assistance may be provided to the requester.

Section 07

FEES AND COST LIMITS

Managing cost lawfully. Supporting refinement. Applying limits fairly.

Most Freedom of Information requests will be responded to without charge. The school may charge reasonable disbursement costs, where permitted by law, including the actual costs of:

- photocopying or printing;
- postage;
- providing information in an alternative physical format where an appropriate charge is permitted.

Where a fee is payable, the requester will be informed before the information is provided.

The Freedom of Information and Data Protection (Appropriate Limit and Fees) Regulations 2004 set an appropriate cost limit for public authorities. For schools and most other public authorities outside central government, the limit is £450.

For the purpose of assessing whether the cost limit is exceeded, the school may take account of the permitted activities specified in legislation, including the time reasonably required to determine whether information is held, locate it, retrieve it and extract the relevant information. Staff time is calculated at the statutory rate of £25 per hour, meaning the £450 limit equates to 18 hours of relevant work.

Where the estimated cost exceeds the appropriate limit, the school may refuse the request in accordance with the legislation.

Before doing so, the school will consider whether reasonable advice and assistance can be provided to help the requester refine or narrow the request so that it can be answered within the cost limit.

Costs that cannot lawfully be counted towards the statutory cost limit will not be used to justify refusal.

Section 08

EXEMPTIONS, REFUSALS AND THE PUBLIC INTEREST TEST

Protecting information. Applying exemptions. Explaining decisions.

The Freedom of Information Act creates a general right of access to recorded information, but it also contains exemptions that protect information where disclosure would be inappropriate or harmful.

The school will consider exemptions individually and will not withhold information merely because it is sensitive, inconvenient or potentially embarrassing.

Exemptions may include, where applicable, information relating to:

- personal data;
- information provided in confidence;
- commercial interests;
- law enforcement or prevention and detection of crime;
- health and safety;
- legal professional privilege;
- information intended for future publication;
- other information protected by an exemption within the Act. Some exemptions are absolute, meaning that no Public Interest Test is required once the exemption applies.

Other exemptions are qualified. Where a qualified exemption applies, the school will consider whether the public interest in maintaining the exemption outweighs the public interest in disclosure.

The Public Interest Test will be considered objectively and will take account only of relevant factors. The school will distinguish between:

- the public interest in information being available to the public generally;
- private interests or curiosity relating only to a particular requester.

Where information can reasonably be separated, non-exempt information will be disclosed even where other information within the same record is withheld.

Where the school refuses all or part of a request, it will issue an appropriate refusal notice explaining:

- the relevant exemption or statutory basis relied upon, unless confirming this itself would be unlawful;
- the reasons for the decision to the extent required by law;
- the outcome of any Public Interest Test where applicable;
- the requester's right to seek an internal review;
- their right ultimately to complain to the Information Commissioner's Office.

The school will seek advice from the Trust Data Protection Officer before relying on complex or sensitive exemptions where appropriate.

The ICO's school guidance confirms that exemptions exist to protect information where disclosure would cause harm or be contrary to the public interest.

Section 09

PERSONAL INFORMATION AND OTHER ACCESS REGIMES

Using the correct framework. Protecting rights. Avoiding confusion.

Not every request for information received by the school should be handled under the Freedom of Information Act.

Where a requester seeks information about themselves, the request will normally be considered under the UK GDPR and Data Protection Act 2018 as a Subject Access Request.

Where a parent or carer requests information about a pupil, the school will consider whether the request should be dealt with under data-protection legislation, education-record legislation, FOIA or another relevant framework depending upon the information sought and the requester's entitlement.

Requests for environmental information will be considered under the Environmental Information Regulations 2004 where applicable. The EIR provides access to recorded environmental information and operates alongside, but separately from, FOIA.

A single request may contain information falling under more than one regime. Where this occurs, the school will apply the appropriate legal framework to each relevant part of the request.

Personal information about third parties contained within information requested under FOIA will be considered in accordance with the personal-data exemption and applicable data-protection principles.

Staff must not assume that information can or cannot be disclosed solely because it contains personal information. Appropriate advice will be sought where required.

Section10

INTERNAL REVIEW AND COMPLAINTS

Reviewing decisions. Responding fairly. Supporting accountability.

A requester who is dissatisfied with the way their Freedom of Information request has been handled may ask the school or Trust to conduct an internal review.

Requests for internal review should normally be made in writing and should explain, where possible, what aspect of the response or handling the requester wishes to be reconsidered.

The internal review will, wherever practicable, be undertaken by a person who was not responsible for the original decision and who has appropriate authority and understanding of the Freedom of Information Act.

The review will consider, as relevant:

- whether the request was recognised and interpreted correctly;
- whether appropriate searches were undertaken;
- whether statutory timescales were met;
- whether information was correctly identified as held or not held;
- whether exemptions were applied properly;
- whether the Public Interest Test was undertaken appropriately;
- whether reasonable advice and assistance was provided;
- whether the response complied with applicable legal requirements.

The requester will be informed of the outcome of the review and any action arising from it.
Where the requester remains dissatisfied following the internal review, they may complain to the Information Commissioner's Office (ICO).

Information about the right to seek internal review and complain to the ICO will be included in appropriate refusal notices and responses.

Section 11

RECORDS MANAGEMENT

Preserving evidence. Supporting searches. Maintaining accountability.

Effective Freedom of Information compliance depends upon effective records management. The school will maintain records in a manner that supports appropriate retrieval, transparency and accountability while complying with data-retention, safeguarding, confidentiality and information-security requirements.

When a request is received, relevant information must not be altered, deleted or destroyed in order to avoid disclosure.

Staff involved in searches must take reasonable steps to identify recorded information falling within the scope of the request across relevant systems, files, mailboxes and other locations where the information may reasonably be held.

The School Data Protection Lead will maintain an appropriate record of Freedom of Information requests, including:

- the date received;
- the information requested;
- relevant correspondence;
- search activity where appropriate;
- decisions regarding information held;
- exemptions or other statutory provisions considered;
- the response issued;
- any fees charged;
- internal review activity;
- relevant learning or follow-up actions.

Records relating to Freedom of Information requests will be retained in accordance with the school's Data Retention Policy and Trust information-governance arrangements.

Section 12

MONITORING AND REVIEW

Monitoring compliance. Learning from requests. Strengthening practice.

The Headteacher has overall responsibility for ensuring that Riverside Bridge School maintains effective arrangements for complying with the Freedom of Information Act 2000 and that the requirements of this policy are implemented consistently.

The School Data Protection Lead will coordinate ongoing monitoring of the school's Freedom of Information arrangements and will maintain appropriate oversight of requests received, responses issued and any matters requiring further action.

Monitoring will include consideration of:

- the number and nature of Freedom of Information requests received;
- whether requests are being recognised and referred promptly;
- compliance with applicable statutory response times;
- the nature and frequency of information being requested;
- requests where information is not held or cannot readily be located;
- the application of exemptions, refusals and the Public Interest Test;
- requests that exceed, or are likely to exceed, the statutory cost limit;
- internal reviews, complaints and any involvement of the Information Commissioner's Office;
- recurring requests that may indicate information should be published proactively;
- weaknesses or inconsistencies in records management identified through requests;
- any training, procedural or organisational improvements arising from requests or reviews.

The School Data Protection Lead will seek advice and support from the Trust Data Protection Officer where monitoring identifies significant, recurring or complex information-governance issues.

Where recurring requests relate to information that can appropriately be made routinely available, the school will consider whether the information should be added to, or made more accessible through, the school or Trust website, Publication Scheme or Guide to Information. Proactive publication will be balanced against the school's responsibilities relating to data protection, safeguarding, confidentiality, security and other applicable exemptions.

Freedom of Information activity will also be used to identify opportunities to strengthen records management. Where searches demonstrate that information is difficult to locate, inconsistently recorded or unnecessarily duplicated, appropriate action will be considered to improve the organisation, retention and accessibility of school records.

Significant compliance concerns, repeated failures to meet statutory requirements, relevant complaints or other matters requiring strategic oversight will be reported to the Headteacher and, where appropriate, the Governing Board and Partnership Learning.

The Governing Board will receive appropriate assurance that the school's Freedom of Information arrangements remain effective and that identified risks or areas for improvement are being addressed. Governors are not expected to become involved in the routine handling or determination of individual requests unless this forms part of an agreed review or governance process.

This policy will be reviewed annually, or sooner where there are significant changes to legislation, regulatory guidance, Trust arrangements, school responsibilities or information-governance practice.

Any amendments will be approved in accordance with the school's policy governance arrangements and communicated to relevant staff where changes affect their responsibilities or working practices.

Section13

RELATED POLICIES & FRAMEWORKS

Connecting practice. Strengthening consistency.

This policy should be read alongside the following Riverside Bridge School and Partnership Learning policies, frameworks and information-governance arrangements, where relevant:

- Data Protection (GDPR) Policy
- Subject Access Request Policy
- Information Security Policy
- Data Breach Response Policy
- Data Retention Policy
- CCTV Policy
- Privacy Notices
- Partnership Learning information-governance arrangements

These documents collectively support the school's approach to transparency, access to information, data protection, information security and effective records management.

Where a request engages more than one information-access or information-governance framework, the relevant requirements should be considered together and advice sought from the School Data Protection Lead or Trust Data Protection Officer where necessary.

Operational Freedom of Information materials, including request logs, search records, response templates, internal review documentation and administrative guidance, are maintained separately from this policy. These may be updated as legislation, regulatory guidance or operational arrangements change without requiring formal revision of this policy, provided that they remain consistent with its principles and requirements.

APPENDIX

RIVERSIDE BRIDGE SCHOOL
INSPIRE, EMPOWER, ACHIEVE

FREEDOM OF INFORMATION: REQUEST & RESPONSE PROCESS

A clear process for managing requests for information

1 REQUEST RECEIVED
A written request for recorded information is received anywhere within the school (e.g. by email, post or via the website).

2 REFER & RECORD
Forward the request promptly to the School Data Protection Lead.
Record the date received and the statutory deadline.

3 IDENTIFY THE REQUEST
Confirm which information-access regime applies.

FOI	SAR	EIR	Other
Recorded information held by the school.	The requester's own personal information.	Environmental information.	Another statutory or information-access route.

Continue with the FOI process (steps 4–9).

Manage or refer under the relevant framework (e.g. Subject Access Request Policy, Environmental Information Regulations 2004).

4 CLARIFY IF REQUIRED
Is the information requested sufficiently clear?

→ **YES** Proceed to search.

→ **NO** Provide reasonable advice and assistance to clarify what information is required.

5 SEARCH & LOCATE
Identify the recorded information held at the date of the request.
Coordinate reasonable and proportionate searches across relevant systems, records, files, emails and departments. Preserve relevant information.

6 REVIEW THE INFORMATION
Determine:

- Is the information held?
- Can it be disclosed?
- Does an exemption apply?
- Is a Public Interest Test required?
- Does any information need to be withheld or redacted?
- Does the statutory cost limit apply?

Seek advice from the Trust Data Protection Officer where required.

7 RESPOND
Respond promptly and within the applicable statutory timescale.
The response may:

Provide	Direct	Confirm	Partially disclose	Refuse
the information.	the requester to information already publicly available.	that the information is not held.	and explain what has been withheld or redacted.	where there is a lawful basis to do so.

Where required, explain the exemption or other statutory basis, the outcome of any Public Interest Test and the requester's review rights.

8 RECORD & CLOSE
Record the response, decision and any relevant exemptions, advice or search activity.
Retain the FOI record in accordance with the school's information-governance arrangements.

9 INTERNAL REVIEW
If the requester is disatisfied:

Request an internal review. → Review carried out by a senior member of staff (who was not the original decision-maker). → Outcome communicated to the requester. → If still disatisfied, the requester may complain to the Information Commissioner's Office (ICO).

KEY TIMESCALE

Respond promptly and within 20 school days or 60 working days, whichever is sooner.
If in doubt: do not delay. Refer the request to the School Data Protection Lead.