



Central Region
Schools Trust

Founded by the RSA

FREEDOM OF INFORMATION POLICY & PUBLICATION SCHEME

Recommended by:

Chief Operating Officer

Ratified by:

Trust Board

Signed:

Position on the Board: Trust Board Chair

Ratification Date

11.12.2024

Next Review:

Autumn Term 2026

Policy Tier (Central/Hub/School):

Central

1. Introduction

Central Region Schools Trust (the Trust) is committed to transparency and accountability. This document sets out the Trust's approach to compliance with the Freedom of Information Act 2000 (FOIA) and incorporates the Trust's Publication Scheme.

The FOIA provides public access to information held by public authorities, subject to certain exemptions. This policy outlines:

- The Trust's responsibilities under the FOIA.
- How individuals can request information.
- The Trust's Publication Scheme, detailing information available as a matter of routine.

2. Legal Framework

The Freedom of Information Act 2000 (FOI) came into force on 1 January 2005. Under the Act any person has a right to ask for access to information held by the Trust and its schools. Individuals are entitled to be told whether the Trust holds the information and to receive a copy, subject to certain exemptions.

The policy also has due regard to the following legislation:

- The Data Protection Act 2018
- The Freedom of Information and Data Protection (Appropriate Limit and Fees) Regulations 2004.

The Policy also has due regard to guidance, including:

- Information Commissioner's Office 'Model publication scheme' 2021.
- Information Commissioner's Office 'Duty to provide advice and assistance (section 16)' updated guidance.
- Ministry of Justice 'Lord Chancellor's Code of Practice on the management of records issued under section 46 of the Freedom of Information Act 2000' updated 2022.

This Policy should be viewed in conjunction with the Trust's Data Protection Policy.

3. Obligation and Duties

The Trust has a duty to provide advice and assistance to individuals requesting information and will:

- Respond to straightforward verbal requests for information (although verbal enquiries are not covered by the FOI Act).
- Help enquirers to put complex verbal requests into writing so that they can be handled in accordance with the Act.
- Advise enquirers whether the Trust holds the information being requested.
- Provide access to the information held.

4. Accepting Requests for Information

A FOI request should:

- Be in writing, including email or fax, capable of being used for subsequent reference.
- State the enquirer's name and correspondence address.
- Describe the information requested.
- Not be covered by other legislation.
- Ensure it is not covered by other access rights (e.g., subject access requests under GDPR).

5. General Right of Access

Provided that the request complies with the above the Trust and its schools will, no later than 20 school days* from the receipt of the request, comply with its duty to:

- Confirm or deny to any person making a request for information to the Trust and its schools whether it holds information of the description specified in the request; and
- Provide the documentation if the Trust and its schools confirms that it holds the requested information.

*For schools, the standard time limit is 20 school days, or 60 working days if this is shorter. Working days exclude school holidays and inset or training days where the pupils are not present. A school day is any day on which there is a session, and the pupils are in attendance.

The Trust and its schools will not be obliged to comply with the 20 school day response time if:

- The Trust and its schools reasonably require further information to meet a Freedom of Information request, the applicant has been informed of this requirement, but has not subsequently supplied the further information.
- The information 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.
- 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.
- The request is vexatious.
- The request is a repeat request from the same person, made within 60 consecutive working days of the initial one.
- A fee notice was not honoured.

Where information is, or is thought to be, exempt, the Trust and its schools will, within 20 school days, give notice to the applicant which:

- States the facts.
- Specifies the exemption in question.

The information provided to the applicant will be in the format that they have requested, where possible. Where it is not possible to provide the information in the requested format, the Trust and its schools will assist the applicant by discussing alternative formats in which the information can be provided.

The information provided will also be in the language in which it is held, or another language that is legally required. If the Trust and its schools is required to translate any information, it will do so.

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

6. Appropriate Limit

The Trust and its schools will not comply with any Freedom of Information request that exceeds the statutorily imposed appropriate limit of £450. When determining whether the cost of complying with a Freedom of Information request is within the appropriate limit, the Trust and its schools 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.

Staff time will be calculated at the updated rate of £25 per person per hour, consistent with current ICO guidance.

7. Charging Fees

The Trust and its schools may, within 20 school days, give an applicant who has requested information under the Act, a written notice stating that a fee is to be charged for their compliance. Charges may be made for disbursements, such as the following:

- Photocopying.
- Postage and packaging.
- Costs directly incurred as a result of viewing information.
- Fees will also consider costs related to specialist formats (e.g., Braille or translations) if legally required.

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

- Informing the person making the request whether we hold the information.
- Communicating the information to the person making the request.

Where a fee is to be charged, the Trust and its schools will not provide the information requested under the Act unless the stated fee is paid within a period of three months, beginning with the day on which the fees notice is given to the applicant.

When calculating the 20th school 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.

8. Communication of Information

Where, on making a request for information, the applicant expresses a preference for communication by any one of the following means, the Trust and its schools will, as far as is practicable, give effect to that preference as follows. The provision to the applicant of:

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

9. Providing Advice and Assistance

The Trust and its schools 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 under the Act.

The Trust and its schools may offer advice and assistance in the following circumstances:

- If an individual requests to know what types of information the Trust and its schools hold 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 Trust and its schools are 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 Trust and its schools to assist the individual who has submitted the request.

The Trust and its schools will provide assistance for each individual on a case-by-case basis, including:

- 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

In order to provide assistance as outlined above, the Trust and its schools 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.
- The school will give particular consideration to what level of assistance is required for an applicant who has difficulty submitting a written request.

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 Trust and its schools, as a matter of good practice, will provide advice and assistance. If it is accessible by other means, they will advise the applicant how and where information can be obtained.

Where there is an intention to publish the information in the future, the Trust and its schools will advise the applicant of when this publication is expected.

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

If the Trust and its schools are 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.

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

If an applicant decides not to follow the Trust's and its schools' advice and assistance and fails to provide clarification, the school is under no obligation to contact the applicant again.

If the school is under any doubt that the applicant did not receive the advice and assistance, the Trust and its schools will re-issue it.

The Trust and its schools are 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.

The Trust and its schools are also 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 Trust and its schools will consider whether any information can be provided free of charge if the applicant refuses to pay the fee.

A full record of all advice and assistance will be maintained in line with ICO guidance to demonstrate compliance.

Appendix 1 - Publication Scheme

1. Introduction

This publication scheme commits Central Region Schools Trust (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 Trust. The scheme commits the Trust to:

- Proactively publish or otherwise make available as a matter of routine, information, including environmental information, which is held by the Trust and falls within the classifications below.
- Specify the information which is held by the Trust and falls within the classifications below.
- Proactively publish or otherwise make available as a matter of routine, information in line with the statements contained within this scheme.
- Produce and publish the methods by which the specific information is made routinely available so that it can be easily identified and accessed by members of the public.
- Review and update on a regular basis the information the Trust makes available under this scheme.
- Produce a schedule of any fees charged for access to information which is made proactively available, and
- To make this publication scheme available to the public.

2. Classes of Information

- Who we are and what we do: Organisational information, locations and contacts, constitutional and legal governance.
- What we spend and how we spend it: Financial information relating to projected and actual income and expenditure, tendering, procurement, and contracts.
- What our priorities are and how we are doing: Strategy and performance information, plans, assessments, inspections, and reviews.
- How we make decisions: Policy proposals and decisions. Decision making processes, internal criteria and procedures, consultations.
- Our policies and procedures: Current written protocols for delivering our functions and responsibilities.
- Lists and registers: Information held in registers required by law and other lists and registers relating to the functions of the authority.
- 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.

3. The method by which information published under this scheme will be made available

The 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 the 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 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 the Trust is legally required to translate any information, it will do so.

Obligations under disability and discrimination legislation and any other legislation to provide information in other forms and formats will be adhered to when providing information in accordance with this scheme.

4. 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. Charges made by the Trust for routinely published material will be justified and transparent and kept to a minimum.

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

Charges may also be made for information provided under this scheme where they are legally authorised, they are in all the circumstances, including the general principles of the right of access to information held by public authorities, justified and are in accordance with a published schedule or schedules of fees which is readily available to the public.

If a charge is to be made, confirmation of the payment due will be given before the information is provided. Payment may be requested prior to provision of the information.

5. Written Requests

Information held by the Trust 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. To help us to promptly respond to your request please mark any correspondence 'FOI Request for Information'.

6. Contact Details

If you require a paper version of any information, or want to ask whether information is available, please contact the Central Region Schools Trust or the individual school by telephone or by letter. A contact form is available on our website for digital requests in writing.

Website: www.crst.org.uk
Tel: 0121 270 3117
Assay Studios
143 Newhall Street
Birmingham
B3 1SF

The contact details for the individual schools that are part of the Trust can be found on the Trust and school websites.

7. Guide to information available under the Publication Scheme

Information to be published	How the information can be obtained	Charge
Who we are and what we do - E.g. Organisational information, structures, locations, and contacts). This will be current information only.		
Funding Agreements	Trust's website	Nil
Articles of Association and Memorandum of Association	Trust's website	Nil
Trust and school staff and structure-names of key personnel	Trust's website	Nil
Trust Board-names and contact details of the Trustees and the basis of their appointment	Trust's website	Nil
Local Academy Governing Boards-names and basis of their appointment	On each school's website	Nil
School session times, term dates and holidays	On each school's website	Nil
Location and contact information-address, telephone number and website	On each school's website	Nil
Contact details for the Principals and Executive Principals	On each school's website	Nil
School Prospectus	On each school's website	Nil
What we spend and how we spend it -e.g. Financial information relating to projected and actual income and expenditure, procurement, contracts and financial audit		
Annual budget plan and financial statements	Trust's website	Nil
Capital funding-details of capital funding allocated to each school along with information on related building projects and other capital projects	By request	According to FOI Policy
Additional funding-Income generation schemes and other sources of funding	By request	According to FOI Policy
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.	By request	According to FOI Policy

Staffing, pay and grading structure	By request	According to FOI Policy
Pay policy-a statement of the policy on procedures regarding teachers' pay.	By request	According to FOI Policy
Trustees' and Governors' allowances-details of allowances and expenses that can be claimed or incurred.	By request	According to FOI Policy
What our priorities are and how we are doing -e.g. Strategies and plans, performance indicators, audits, inspections, and reviews. This will be current information only.		
School profile: ☐ Performance data ☐ OFSTED report	On each school's website	Nil
Performance management information	By request	According to FOI Policy
Trusts and schools' future plans	Trust's website.	Nil
Safeguarding/Child protection policies and procedures	Trusts and each school's website.	Nil
How we make decisions -eg decision making processes and records of decisions. Current and previous three years as a minimum.		

Admissions Policy and decisions	On each school's website.	Nil
Board of Trustees/Local Academy Governing Board meeting agendas, papers and minutes (information that is properly considered to be private will be excluded).	By request.	According to FOI Policy
Our policies and procedures -e.g. current written protocols, policies and procedures for delivering our services and responsibilities. This will be current information only.		
Trust and school policies and procedures, including: ▪ Complaints Policy ☐ Conflicts of Interest Policy/Procedure ☐ Health & Safety Policy ☐ Recruitment and Selection Policy ☐ Scheme of Delegation ☐ Whistleblowing Policy	Trusts and each school's website.	Nil

Pupil and curriculum policies, including: ☐ Accessibility Plan ☐ Anti-Bullying Policy ☐ Behaviour Policy ☐ Educational Visits Policy ☐ E-Safety Policy ☐ Equality Policy ☐ Provider Access Policy ☐ School Uniform Policy ☐ SEND Policy	Trusts and each school's website.	Nil
Records management and personal data policies, including: ☐ Data Protection Policy ☐ Privacy Notices ☐ Records Management Policy	Trusts and each school's website.	Nil
Charging regimes and policies, including Charging and Remissions Policy	Trusts and each school's website.	Nil
Lists and Registers: Currently maintained lists and registers only. Some information may only be available for inspection.		
Curriculum circulars and statutory instruments	By request.	According to FOI Policy
Disclosure logs	By request.	According to FOI Policy
Asset register	By request.	According to FOI Policy
Any information the Trust and its schools are currently legally required to hold in publicly available registers	By request.	According to FOI Policy
The services we offer -e.g. information about the services we offer, including leaflets, guidance and newsletters produced for the public and businesses. This will be current information only.		
Extra-curricular activities	On each school's website	Nil
Out of school clubs	On each school's website	Nil
School publications	On each school's website	Nil
Services for which the Trust and its schools are entitled to recover a fee, together with those fees	Trusts and each school's website.	Nil
Leaflets, booklets, and newsletters	Trusts and each school's website.	Nil