



Freedom of Information Policy

This policy applies to all academies of the Bonitas Multi-Academy Trust

Reviewed by Board of Trustees	Autumn 1 2025
Approved by Board of Trustees	20 October 2025
Review period	2 years
Next Review by Board of Trustees	Autumn 1 2027
Published	Bonitas Website School Website Internal network of each school

Bonitas Multi-Academy Trust Freedom of Information Policy

1. Background

With effect from 1 January 2005, the Freedom of Information Act 2000 (FOIA) came fully into force. Bonitas Multi-Academy Trust (the Trust) is committed to openness and being clear and proactive about the information it makes public. The Trust also recognises the need to protect sensitive information in certain circumstances. Even where exemptions apply, information will be released if it is in the public interest.

2. Right to Request Information

All members of the public have the right to request information from the Trust. Requests may be made under:

- Freedom of Information Enquiry (FOI)
- Data Protection Enquiry (DPE)
- Environmental Information Regulations Enquiry (EIR)

The Trust is required to produce a publication scheme detailing:

- Classes of information available
- How the information will be published
- Whether information is free or available at a cost

The scheme covers information already published and information to be published in the future. All information in the scheme is available via the Trust and school websites or in paper form upon request. Personal or sensitive information will not normally be disclosed.

The individual making a request is entitled to be told whether the Trust holds the information (duty to confirm or deny) and, if so, to have access to it. Access may include extracts, summaries, or full copies of documents. Exemptions under the FOIA include:

- Information not held
- Cost threshold reached (£450)
- Vexatious or repeated requests
- Application of FOIA exemptions (see Appendix 2)

3. Classes of Information

The publication scheme organises information into the following categories:

- **Who we are and what we do:** Staff, leadership, governance, curriculum, school terms, and events
- **What we spend and how we spend it:** Financial information, procurement, contracts
- **Our priorities and how we are doing:** Strategy, performance, OFSTED/SIAMS reports, examination results
- **How we make decisions:** Leadership decisions and Trust/School policies including Admissions

- **Our policies and procedures:** Written policies and procedures for service delivery
- **Lists and registers:** Statutory registers and other relevant listings
- **Services we offer:** Guidance, booklets, leaflets, media releases

Information not generally included:

- Information protected by law or FOIA exemptions
- Draft documents
- Archived or hard-to-access records

4. How to Request Information

4.1 Requesting Information Requests can be made in writing or by email to the Headteacher or Trust office. Requests can be for:

- Electronic copies via email
- Printed/paper copies sent by post

To help process requests quickly, mark correspondence **"FOI PUBLICATION SCHEME REQUEST"**.

4.2 Request Details Include:

- Name and contact address (email or postal)
- Description of the information required

4.3 Handling Requests Upon receipt, the designated officer will:

- Determine if the request is FOI, DPE, or EIR
- Confirm if the Trust holds the information or transfer the request if appropriate
- Provide information already publicly available
- Consider third-party interests and consult if needed
- Determine applicable exemptions and apply public interest tests
- Assess if the request is vexatious or repeated

4.4 Responding to Requests

- The Trust will respond within 20 school days or 60 working days to respond, whichever is shorter.
- If more time is required for a public interest test, the requester will be informed within the 20 days, with an estimated completion date.
- If charges apply (e.g., printing, postage), the time period pauses until payment is received.

4.5 Actions for staff receiving a request

Any member of staff who receives a written request for information under the Freedom of Information Act must not respond directly to the requester. The request should be forwarded immediately to the Headteacher (or designated FOI Lead/Trust Governance or Data Protection

Officer, as applicable) for logging and coordination of the response. Staff must ensure the request is recorded with the date received, as statutory response times begin from that date.

Staff may be asked to assist in locating or retrieving the requested information promptly. All correspondence and records relating to the request must be handled confidentially and securely, in line with the Trust's Data Protection and Records Management policies.

4.6 General Principles

- All information held is subject to FOIA and retrospective requests.
- The Trust maintains legible records and ensures well-managed information systems.
- Information will not be wilfully concealed, destroyed, or damaged.
- Dissatisfaction with responses will follow the Trust complaints procedure.
- Applicants may be charged fees under the FOI Fees Regulations; this fee may include disbursements for photocopying, postage and packaging and costs directly incurred as a result of viewing information; website information remains free of charge.

Simple requests or single copies are free. If a request involves significant work or costs, the school will tell you the fee, which must be paid before the information is provided.

Records of all requests, responses, and refusals will be kept and reviewed annually by the Trust Board.

- Personal information will be redacted when required.

5. Conclusion This policy aligns with DfE Freedom of Information guidance and ensures Trust-wide compliance with FOIA requirements. Adherence ensures transparency, accountability, and effective handling of information requests across all Bonitas Multi-Academy Trust schools.

References:

- Freedom of Information Act 2000 (FOIA)
- DfE Freedom of Information Guidance for Schools
- Environmental Information Regulations 2004 (EIR)
- Data Protection Act 2018 (DPA)

Guide to information available from school, under the publication scheme

Information to be published	How the information can be obtained
Who we are and what we do <i>(Organisational information, structures, locations and contacts. Current information only.)</i>	
Academy Funding Agreement – link to the document on the Department for Education website	School website
Board of Governors / Local Governing Body – names of members	School website
School session times, term dates and holidays	School website
School location and contact information – address, telephone number, and website	School website
Contact details for the Headteacher and the Governing Body	School website
What we spend and how we spend it	
Company accounts filed with the Charity Commission and Companies House	School website and Companies House
Annual budget plan and financial statements	Available on request from the Trust Head of Finance
Capital funding – details of capital allocations, related building projects, and other capital works	Available on request from the Trust Head of Finance
Additional funding – income generation schemes and other sources of funding	Available on request from the Trust Head of Finance
Procurement and contracts – procedures for the acquisition of goods and services, and details of contracts awarded through formal tendering	Available on request from the Trust Head of Finance
Pay policy – statement of procedures governing pay for teaching and support staff	Available on request from the Trust Head of Finance
Governors' allowances policy – details of allowances and expenses that can be claimed or reimbursed	Available on request from the Clerk to the Governing Body
What our priorities are and how we are doing <i>(Strategies, plans, performance indicators, audits, inspections and reviews. Current information only.)</i>	
Government-supplied performance data (including DfE School Performance Tables)	DfE website
Ofsted inspection report – summary and full report	School website
SIAMS inspection report	School website
Pupil Premium allocation and spending plans	School website
Safeguarding and child protection – policies and procedures for promoting the welfare of children	School website
How we make decisions	
Records of decision-making processes <i>(subject to confidentiality restrictions)</i>	Available on request from the Clerk to the Governing Board
Admissions policy – arrangements, procedures, and right of appeal <i>(including application numbers and numbers of successful applicants by oversubscription criteria)</i>	School website

Board of Trustees and Local Governing Body meeting agendas, papers, and minutes (<i>excluding information considered confidential</i>)	Available on request from the Clerk to the Governing Board
Policies:	
Charging and Remissions Policy	School website
Health and Safety Policy	School website
Complaints Policy and Procedure	School website
Pay Policy	School website
Staff Discipline and Grievance Policies	Available on request from HR
Pupil and Curriculum Policies, including:	
Safeguarding Policy	School website
Curriculum Policy	School website
Relationships, Sex and Health Education Policy	School website
Special Educational Needs and Disabilities (SEND) Policy	School website
Accessibility Plan	School website
Equality Policy	School website
Collective Worship Policy	School website
Behaviour Policy	School website
Home–School Agreement	Student diaries
Data Protection Policy	Website
Lists and Registers	
Currently maintained lists and registers only	Hard copy- some information may only be available for inspection
Asset Register	Available on request from the Trust Head of Finance
Any information the school is legally required to hold in publicly available registers	Available on request from the school
The Services We Offer	
Extra-curricular activities	School website
Out-of-school clubs	School website
School publications	School website
Services for which the school may charge a fee, and details of those fees	School website (if applicable)
Leaflets, booklets, and newsletters	School website

1. Discretion to Charge

The Trust may charge a fee for providing information under the Freedom of Information Act 2000, in accordance with the relevant regulations and guidance.

2. Costs Considered

The Trust may charge for the communication costs of providing information, such as:

- Photocopying or printing;
- Postage or other delivery costs; and
- The cost of providing the information in another format, where reasonably requested.

No charge will be made for the time taken to locate, retrieve, or extract the information unless the estimated cost of compliance exceeds the statutory limit of £450 (equivalent to 18 hours of staff time at £25 per hour).

3. Requests Exceeding the Cost Limit

If the estimated cost of complying with a request exceeds £450, the Trust may:

- Refuse the request outright, or
- Choose to comply and charge the full cost of doing so.

Where the Trust chooses to comply, the fee may include:

- The staff time taken to locate, retrieve, and prepare the information (charged at a flat rate of £25 per hour);
- Any additional disbursements such as photocopying, printing, and postage; and
- Communication costs associated with sending the information.

The requester will receive a written fees notice outlining the estimated costs.

Work will not begin until written agreement to pay is received.

The requester will be offered the opportunity to refine or narrow their request to bring costs within the limit.

The statutory timescale for compliance will be paused until payment is received, which must be within three months of the notice.

4. Multiple Requests

Requests made by different individuals acting together or as part of a campaign may have their costs aggregated for the purpose of applying the cost limit.

Appendix 2 – Exemptions

1. Principle

The Trust operates on a presumption of openness but will withhold information if an exemption applies.

2. Reasons for withholding

Information may be withheld if:

- It is not held;
- The request is vexatious or repeated;
- Costs exceed the threshold;
- An exemption applies.

3. Duty to confirm or deny

- Requesters are normally told whether information is held, unless:
- An absolute exemption applies;
- Confirming would reveal exempt information.

4. Absolute exemptions (examples relevant to the Trust)

- Information accessible by other means;
- Personal information;
- Information provided in confidence;
- Prohibitions on disclosure under other legislation.

5. Qualified exemptions (examples relevant to the Trust)

- Information intended for future publication;
- Investigations or law enforcement;
- Commercial interests;
- Legal professional privilege;
- Health and safety;
- Environmental information.

6. Applying exemptions

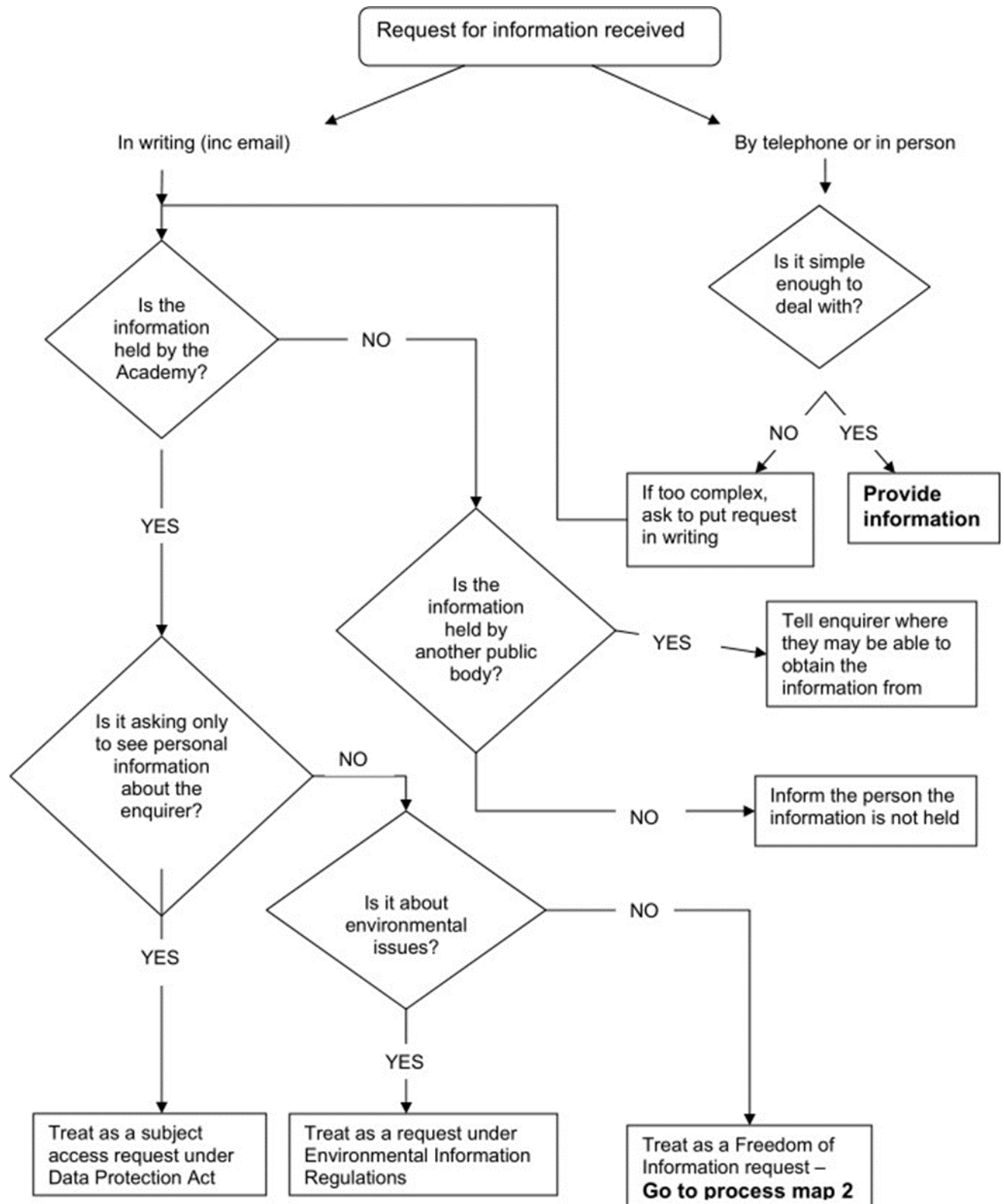
Confidential markings alone do not automatically exempt information; each request is considered on its merits.

Previous withholding does not automatically apply to new requests; each request is assessed individually.

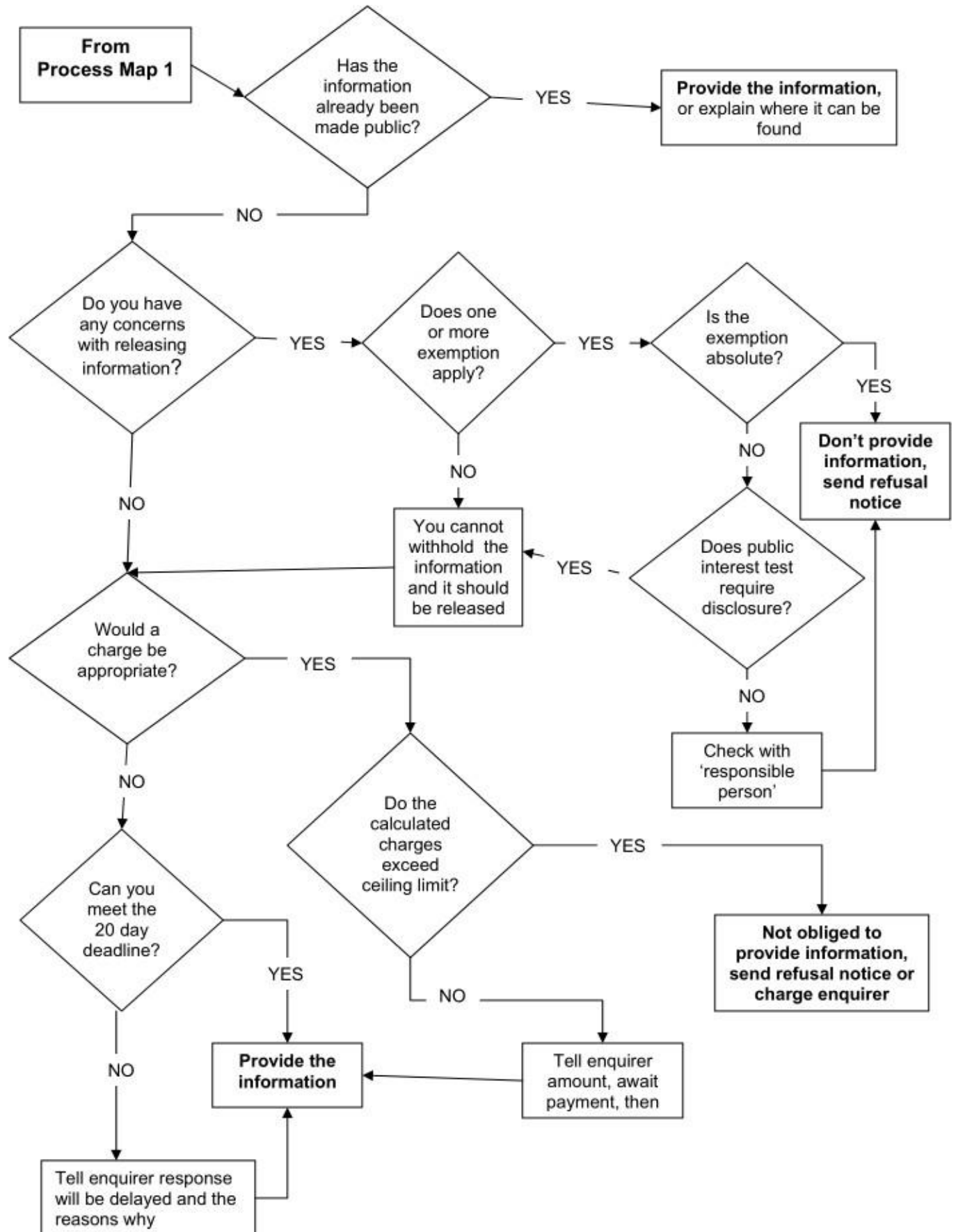
7. Decision-making

Before refusing a request, the Headteacher ensures that exemptions and public interest considerations are properly applied.

PROCESS MAP FOR RECEIVING REQUESTS FOR INFORMATION



PROCESS MAP FOR HANDLING FOI ENQUIRIES



Applying the Public Interest Test

Background

Once we have established that a qualified exemption applies, we will carry out a public interest test. This is to decide whether the public interest in applying the exemption outweighs the public interest in disclosing the information. Information will be released unless there is a clear public interest in withholding it. While precedent and case law are relevant, each case will be considered on its own merits.

Carrying Out the Test

The public interest is not the same as public curiosity. Just because the public may be interested in something does not automatically mean it is in the public interest to disclose it. In most cases, deciding where the balance lies is straightforward. However, some decisions may be complex.

Applying the test requires objective judgement and a basic understanding of the subject and its wider impact on the trust and, where relevant, beyond. Factors to consider when weighing the public interest include:

For Disclosure	Against Disclosure
Is disclosure likely to increase access to information held by Trust?	Is disclosure likely to distort public reporting or be misleading because it is incomplete?
Is disclosure likely to explain the reasons for a decision, help individuals understand decisions affecting their lives, or assist them in challenging those decisions?	Is premature disclosure likely to prejudice fair scrutiny or release sensitive issues still under consideration?
Is disclosure likely to improve accountability and transparency in the use of public funds, and show that value for money is being achieved?	Is disclosure likely to cause unnecessary public alarm or confusion
Is disclosure likely to contribute to public debate and improve understanding of existing or proposed policy?	Is disclosure likely to seriously jeopardise The Trust's legal or contractual position?
Is disclosure likely to increase public participation in decision-making?	Is disclosure likely to infringe other legislation e.g. Data Protection Act?
Is disclosure likely to increase public participation in political processes in general?	Is disclosure likely to create a controversial precedent or impair the Trust's ability to obtain information in the future?
Is disclosure likely to reveal information affecting public safety?	Is disclosure likely to adversely affect the Trust's proper functioning or discourage openness in expressing opinions?
Is disclosure likely to reduce further enquiries on the topic?	If a large amount of information on the topic has already been released, would further disclosure add value or serve any useful purpose?

Note also that:

The balance of the public interest in disclosure will not always depend on whether releasing information would cause harm. In some cases, higher-level considerations apply, such as the need to preserve the confidentiality of internal discussions.

Potential or actual embarrassment to, or loss of confidence in, the Trust, its staff, or trustees is not a valid reason to withhold information, even if the content is technical or may be misunderstood. Misunderstanding alone is not a sufficient ground for withholding information.

The potential harm of releasing information usually lessens over time. We will therefore consider the likely impact at the time the request is made, rather than at the time the original decision was taken.

A decision not to release information may itself be unreasonable if withholding it could result in harm to public safety, the environment, or to a third party.

We will record the answers to all relevant questions and the reasons for our decisions.

Determining the public interest is not a simple matter of counting how many factors fall on each side; rather, it involves weighing the significance of each factor and making an overall, reasoned judgement.

For Disclosure

Where the balance of the public interest lies in favour of disclosure, the enquiry will be dealt with and the requested information released. Where the factors are evenly balanced, the decision will normally favour disclosure (subject to the third bullet point above).

Against Disclosure

If, after carrying out the public interest test, it is decided that the exemption should still apply, we will write to the requester explaining this decision.

In some cases, where a qualified exemption applies but additional time is needed to complete the public interest test, we will contact the requester within 20 working days to confirm:

- that a particular exemption applies; and
- an estimated date for when the final decision will be made.

This will be within a reasonable timeframe (normally within a further 20 working days).

The 'Qualified Person' for Section 36 – prejudice to the effective conduct of public affairs is the Chair of the Board of Trustees.