BELONG
CE Multi Academy Trust

Freedom of Information Policy & Publication Scheme

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Love, Hope, Community and Compassion

Contents

Freedom of Information Policy and Publication Scheme 2

1. What is a Request Under FOI? 2

2. Time Limit for Compliance 3

3. Procedure for Dealing with a Freedom of Information Request 3

4. Refusing a Request 4

5. Refusing a Request 4

6. Charges 5

7. Contact 5

Freedom of Information Policy and Publication Scheme

Belong CE Multi-Academy Trust is committed to openness and transparency. As a public authority, we are subject to the Freedom of Information Act 2000 (FOIA) and must comply with requests for information in accordance with the principles of the Act.

This policy outlines how Belong CE MAT will respond to FOI requests and proactively publish information through our Publication Scheme.

1. What is a Request Under FOI?

1.1 Any request for recorded information held by Belong Multi-Academy Trust (Belong MAT), other than requests for personal data (which are handled as subject access requests under data protection legislation), is considered a request under the Freedom of Information Act 2000 (FOIA). This applies whether or not the requester specifically refers to the FOIA.
However, the Information Commissioner's Office (ICO) has clarified that routine requests (e.g. a parent asking for a copy of a policy) may be handled outside the formal provisions of the Act.

1.2 For non-routine requests, if the request is straightforward (e.g. a policy not already published online) and the information is to be released, the staff member who received the request may provide the information. This must be done within the required timescale, and a copy of both the request and the response must be forwarded to the Headteacher of the relevant school.

1.3 All other requests must be referred promptly to the school's Headteacher, who may delegate the response to an appropriate member of staff. This referral must take place within 3 working days of receiving the request.

1.4 When responding to an FOI request, it is important to remember that disclosure under FOIA is considered a release to the general public. Once information is provided to one individual, it is deemed accessible to anyone. Therefore, information cannot be restricted by labelling it "confidential" or "restricted" at the point of release.

2. Time Limit for Compliance

Belong Multi-Academy Trust is committed to responding to Freedom of Information requests promptly and within the statutory time limits.

- The Trust must respond to all valid FOI requests within 20 working days of receipt.
- For the purposes of FOI compliance, a working day is defined as any day when pupils are in attendance at school.
- In exceptional circumstances, where school holidays or other factors affect availability, the Trust may take up to a maximum of 60 calendar days to respond.

3. Procedure for Dealing with a Freedom of Information Request

3.1 When a request is received that cannot be fulfilled by simply providing the information, it must be referred immediately to the school's Headteacher and the Trust Data Protection Officer (DPO)**.** The DPO or Headteacher may delegate the request to a staff member with responsibility for the relevant information.

3.2 The first step in responding is to determine whether Belong MAT "holds" the requested information. Information is considered "held" if it exists in any format—electronic or paper.

- If fulfilling the request requires minimal manipulation of existing data (e.g. summing figures in a spreadsheet), the Trust is considered to hold the information.
- If fulfilling the request requires significant effort (e.g. extracting and compiling data from multiple sources), the Trust may not be considered to hold the information in the requested format. In such cases, the requester should be contacted to refine their request.

Examples:

- Held**:** Adding totals from a spreadsheet and releasing the result.
- Not Held: Manually extracting individual figures from multiple spreadsheets to compile a new dataset.

3.3 The second step is to assess whether the information can be released or if any exemptions under the FOIA apply.

Types of Exemptions

- **Absolute Exemptions** (no need to consider public interest):
  - **Section 21**: Information already publicly available
  - **Section 40(1)**: Request for the applicant's own personal data
  - **Section 40(2)**: Disclosure would release third-party personal data
  - **Section 41**: Confidential information received from a third party
- **Qualified Exemptions** (public interest test required):
  - **Section 22**: Information intended for future publication

- **Section 31**: Disclosure may prejudice crime prevention/detection (e.g. CCTV locations)
- **Section 36**: Disclosure may prejudice the effective conduct of the Trust
- **Section 38**: Disclosure may endanger physical or mental health or safety
- **Section 43**: Disclosure may harm commercial interests of the Trust or third parties

If a qualified exemption applies, Belong MAT must carry out a public interest test**,** weighing the benefits of disclosure against the potential harm.

4. Refusing a Request

4.1 When responding to a request where Belong MAT has withheld some or all of the requested information, the response must clearly explain:

- **Why the information has been withheld**
- The **specific exemption** under the Freedom of Information Act that applies (including the relevant section number)
- How the exemption applies to the information in question
  If a **public interest test** has been carried out (in the case of qualified exemptions), the reasoning behind the decision must also be included.

4.2 The response must also inform the requester of their **right to complain**. This may include:

- Requesting an **internal review** by a senior leader, governor, or the Trust Board
- Contacting the **Trust's Data Protection Officer**
- Escalating the matter to the **Information Commissioner's Office (ICO)** if they remain dissatisfied

5. Refusing a Request

5.1 A requester may ask for any recorded information held by Belong MAT. However, this does not mean the Trust is always obliged to provide it. In some cases, there may be valid reasons to withhold some or all of the requested information.

5.2 Belong MAT may refuse an entire request under the following circumstances:

- **Excessive cost or time**: If fulfilling the request would exceed the cost limit set by the FOIA or require disproportionate staff time.
- **Vexatious requests**: If the request is intended to cause disruption or is unreasonable.
- **Repeated requests**: If the same requester has submitted a similar request previously.

5.3 If Belong MAT refuses all or part of a request, a **written refusal notice** must be issued to the requester. This notice must:

- Clearly state whether the Trust holds the information
- Explain why the information is being withheld
- Reference the relevant exemption(s) under the FOIA

6. Charges

Belong Multi-Academy Trust is committed to making information accessible to the public with minimal inconvenience and cost. Our approach to charging is as follows:

- Information published on our websites is provided free of charge.
  This includes policies, reports, governance details, and other routinely available documents.
- Charges may apply where information is requested in formats that incur costs, such as:
  - Printing and photocopying
  - Postage and packaging
  - Significant staff time required to locate, compile, or prepare the information
- A full schedule of charges is available upon request.
  This includes details of per-page printing costs, postage rates, and hourly administrative fees where applicable. We will confirm any charges before processing the request, and payment may be required in advance.

7. Contact

Any questions about this policy should be directed in the first instance to the Headteacher of the school. You can also seek advice from the Trust Data Protection Officer, Leon Tootle (contactus@belong.ce.org.uk)