



Freedom of Information Policy

Policy Owner:	Data Protection Officer
Approved by:	Audit & Risk Committee
Last reviewed:	January 2026
Next review due by:	January 2029

Due to the evolving nature of The CAM Academy Trust, procedures behind this policy will be reviewed and amended accordingly to reflect changes.

At the heart of our work lie the six core principles of The CAM Academy Trust. These drive everything that we do.



Introduction

The Trust is a public authority for the purposes of the Freedom of Information Act 2000 (FOIA), and as such must comply with any requests for information in accordance with the Act.

The Trust is also a public authority for the purposes of the Environmental Information Regulations 2004, which provide public access to environmental information.

What is a request under FOIA?

In many circumstances, information may be shared as part of the Trust's normal working practices. Where appropriate a request should be treated as a Freedom of Information (FOI) request (e.g. where requested information cannot be provided straight away, or the requestor makes it clear they expect a response under the FOIA).

The FOIA provides public access to information held by the Trust about its activities and the activities of its academies. Where an individual makes a valid FOI request, they are entitled to be told whether the Trust holds the information requested and to receive a copy of that information (subject to certain exemptions).

To be valid, FOI requests must:

- be made in writing;
- include the requestor's real name and correspondence address (this may be a postal or email address); and
- describe the information required.

Requests do not have to mention the FOIA, nor provide reasons for requesting information.

Scope of requests

Requests for personal data of individuals are dealt with under the General Data Protection Regulation (GDPR) and further information about how such requests are to be handled is available in the Trust's Data Protection Policy.

Requests for information about anything relating to the environment (e.g. air, water, land, buildings, etc.) fall outside of the FOIA regime and must be dealt with under the Environmental Information Regulations (EIR). Further guidance on the application of the EIR is available via <https://ico.org.uk/for-organisations/guide-to-the-environmental-information-regulations/>

Where part of a valid FOI request is seeking personal or environmental information, these elements must be dealt with under GDPR / EIR as appropriate. The remainder of the request must be handled in accordance with the FOIA.

Time limit for compliance

The Trust must respond as soon as possible, and in any event, within 20 school days of the date of receipt of the request, or 60 working days if this is shorter. When calculating the deadline for response, a "school day" is one in which pupils are in attendance, and the total time limit is subject to an absolute maximum of 60 normal working days to respond.

In accordance with the Data (Use and Access) Act 2025, the Trust may pause the statutory time limit for responding to a request while clarification is awaited from the requester.

Procedure for dealing with a request

FOI requests may be addressed to anyone in the Trust, and all staff need to be aware of the process for dealing with requests. In the first instance, all requests must be forwarded to the Freedom of Information mailbox foi@catrust.co.uk for validation and processing as soon as possible, and at the latest within 2 working days of receipt.

The Trust must then determine whether or not it holds the information requested. In order to determine whether the Trust holds the information, it will review manual and electronic records, including records:

- the Trust has **created**;
- the Trust has **received** from another body or person, or
- held by **another body** on the Trust's behalf.

The Trust will then review the information held in order to determine whether the information can be released, or whether one of the exemptions set out in the Act applies to the information. Common exemptions that might apply include:

- Section 40 (1) – the request is for the applicant's personal data. This must be dealt with under the subject access regime under GDPR, detailed in the Trust's Data Protection Policy;
- Section 40 (2) – compliance with the request would involve releasing third party personal data, and this would be in breach of the data protection principles;
- Section 41 – confidential information that has been sent to the Trust (but not the Trust's own information) and complying with the request would constitute a breach of confidence that could be upheld in legal proceedings;
- Section 21 – information that is already readily available (for example, the information is in the public domain or has already been provided to the requestor), even if payment of a fee is required to access that information;
- *Section 22 – information that the Trust intends to publish at a future date and it is not reasonable to disclose the information before then;*
- *Section 43 (2) – information that would prejudice the commercial interests of the Trust and / or a third party; Section 38 – information that would endanger the physical health, mental health or safety of any individual;*
- *Section 31 – information which may prejudice the effective detection and prevention of crime – such as the location of CCTV cameras;*
- *Section 36 – information which, in the opinion of the chair of governors of the Trust, would prejudice the effective conduct of the Trust or any of its academies. There is a special form for this on the ICO's website to assist with the obtaining of the chair's opinion.*

The sections mentioned in italics are qualified exemptions. This means that even if the exemption applies to the information, the Trust also has to carry out a public interest weighting exercise, balancing the public interest in the information being released, as against the public interest in withholding the information.

The Trust will only conduct searches that are reasonable and proportionate and may exclude information already accessible to the requester.

Charging

The Trust is entitled to recover reasonably incurred communication costs (costs the Trust expects to directly and reasonably incur in confirming whether information is held and communicating this, including reproducing any document containing the information (e.g. printing or photocopying) or postage).

This Trust is entitled to refuse to comply or charge a fee where the Trust estimates that the cost of compliance will exceed £450. In estimating the cost of compliance, the following factors are considered:

- The costs the Trust reasonably expects to incur in determining whether information is held; locating the information or a document containing it; retrieving the information or a document containing it; and extracting the information from a document containing it. This includes staff time at £25 per hour (excluding time needed to consider whether the information requested is exempt from disclosure or in redacting documents).
- Communication costs (outlined above).
- Where a fee is payable, the Trust will notify the requestor as soon as practicable, setting out the amount to be charged and how to be paid. The timescale for responding to a request will begin on receipt of such fees.

Responding to a request

When responding to a request where the Trust has withheld some or all of the information, the Trust must explain why the information has been withheld, quoting the appropriate section number in the Act and explaining how the information requested fits within that exemption. If the public interest test has been applied, this also needs to be explained.

The response should end by giving details of the internal review (complaints) procedure and explaining the requestor's right to complain to the ICO, including the contact details for this.

The Trust is not required to provide information that is already reasonably accessible to the requester, including information published on the Trust's website.

Dealing with Vexatious or Repeated Requests

Should an applicant make a 'vexatious' or 'repeated' request for identical or substantially similar information, the trust will inform the applicant in writing that they will not fulfil the request. When responding in this manner we will offer assistance to the individual, by indicating why we consider the request is vexatious or repeated.

Publication Scheme

Information the Trust routinely makes available to the public is set out in the Publication Scheme, a copy of which is attached at Appendix A. The Publication Scheme is based on the model scheme approved by the Information Commissioner.

Complaints

Any comments or complaints should be directed to the Head of Governance governance@catrust.co.uk.

If, on investigation, the Trust's original decision is upheld then the requestor has the right to appeal to the Information Commissioner's office via:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Tel: 0303 123 1113 (local rate) or 01625 545 745 if you prefer to use a national rate number

In line with the DUA 2025, the Trust maintains a formal complaints procedure for FOI and data protection matters. Requesters may request an internal review if dissatisfied with the handling of their request.

Monitoring arrangements

This policy will be monitored by the Trust Data Protection Officer and will be reviewed every three years, or in line with any statutory changes in legislation and will be approved by the Audit and Risk Committee.

Appendix A: Publication Scheme for The CAM Academy Trust

Introduction: what a publication scheme is and why it has been developed

This publication scheme commits the Trust to making 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 authority and falls within the classifications below.
- Specify the information which is held by the authority 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 authority 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.
- Publish any dataset held by the authority that has been requested, and any updated versions it holds, unless the authority is satisfied that it is not appropriate to do so; to publish the dataset, where reasonably practicable, in an electronic form that is capable of re-use; and, if any information in the dataset is a relevant copyright work and the Trust is the only owner, to make the information available for re-use under the terms of the Re-use of Public Sector Information Regulations 2015, if they apply, and otherwise under the terms of the Freedom of Information Act section 19.
 - The term 'dataset' is defined in section 11(5) of the Freedom of Information Act.
 - The term 'relevant copyright work' is defined in section 19(8) of that Act.

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.

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 our 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, we 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 an authority 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.

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.

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.

Information to be published	How the information can be obtained	Cost
<i>Class 1 - Who we are and what we do (Organisational information, structures, locations and contacts)</i>		
Who's who in the school	Website	Free
Who's who on the Local Advisory Board (LAB) and the basis of their appointment	Website	Free
Instrument of Government / Articles of Association	Website	Free
Contact details for the principal and for the Local Advisory Board, via the school	Website	Free
School prospectus	Website /Hard copy	Free
School session times and term dates	Website	Free
Address of school and contact details, including email address.	Website	Free
<i>Class 2 – What we spend and how we spend it (Financial information relating to projected and actual income and expenditure, procurement, contracts and financial audit)</i>		
Annual budget plan and financial statements	Website	Free
Capital funding	Website	Free
Financial audit reports	Website	Free
Local Advisory Board's allowances that can be incurred or claimed, and a record of total payments made to individual LAB members.	Website	Free

Information to be published	How the information can be obtained	Cost
<i>Class 3 – What our priorities are and how we are doing (Strategies and plans, performance indicators, audits, inspections and reviews)</i>		
Performance data or a direct link to it	Website	Free
Ofsted inspection reports	Website	Free
The school's future plans; for example, proposals for and any consultation on the future of the school, such as a change in status	Website	Free
Safeguarding and child protection	Website	Free
<i>Class 4 – How we make decisions (Decision making processes and records of decisions)</i>		
Admissions policy	Website	Free
<i>Class 5 – Our policies and procedures (Current written protocols, policies and procedures for delivering our services and responsibilities)</i>		
Records management and personal data policies	Website	Free
Charging regimes and policies.	Website	Free
<i>Class 6 – Lists and Registers</i>		
Asset register	By inspection	Free
Any information the school is currently legally required to hold in publicly available registers	By inspection	Free
<i>Class 7 – The services we offer (Information about the services we offer, including leaflets, guidance and newsletters produced for the public and businesses)</i>		
Extra-curricular activities	Website	Free
Out of school clubs	Website	Free
Services for which the school is entitled to recover a fee, together with those fees	Website	Free
School publications, leaflets, books and newsletters	Website	Free

Schedule of Charges

Charge	Description	Basis of charge
Disbursement cost	Photocopying/printing @ 10p per sheet (black & white)	Actual cost
	Photocopying/printing @ 20p per sheet (colour)	Actual cost
	Postage	Actual cost of Royal Mail standard 2nd class
Statutory fees		In accordance with the relevant legislation