Freedom of Information Policy and Publication Scheme

Revised draft for approval • November 2026

This policy explains how the school makes recorded information available to the public, handles requests fairly and protects information that must lawfully remain confidential. It includes a practical guide to the seven publication scheme classes.

Document control	Details
Status	Draft for approval
Prepared by	S Breen
Policy oversight	Board of Trustees
FOI coordination	Senior Responsible Individual
Contact	SRI@parkroadacademy.co.uk
Date approved	Trustees Ratified November 2026
Next review	November 2027 proposed, or earlier if required
Audience	Staff, trustees, parents, carers and the public
Replaces	Freedom of Information Policy 2024–2026 following approval

Document history

April 2024: previous school policy reviewed and ratified.
November 2026: revised draft combines the school policy with a publication scheme and guide to information, using the supplied July 2026 scheme as a structural reference.

1 Purpose and responsibilities

Park Road Academy Primary School is a public authority for the purposes of the Freedom of Information Act 2000 (FOIA). We promote openness by publishing information routinely and responding to requests for recorded information that we hold, including information held on our behalf by contractors.

The Headteacher oversees implementation. The Senior Responsible Individual coordinates requests with support from the Data Protection Officer. All staff must forward requests promptly, preserve relevant records and assist with searches. The Board of Trustees approves the policy and receives assurance about compliance.

Legal framework

This policy takes account of FOIA, the Freedom of Information and Data Protection (Appropriate Limit and Fees) Regulations 2004, the Freedom of Information (Time for Compliance with Request) Regulations 2004 as amended, the Environmental Information Regulations 2004 (EIR), UK GDPR and the Data Protection Act 2018 as amended. It also takes account of the section 45 Code of Practice and the ICO model publication scheme and schools definition guidance.

Read this policy alongside the school's Data Protection Policy, privacy notices, records retention arrangements and complaints procedures. FOI reviews follow the specific process in section 7.

2 Making a request

Please send requests to SRI@parkroadacademy.co.uk or write to the Senior Responsible Individual, care of the school office, Park Road Academy Primary School. Current postal contact details are available through the school office and school website. Requests received by any member of staff will be passed to the coordinator without delay.

A valid FOI request must be in writing, give the applicant's real name and an address for correspondence (including email), and describe the information sought. Applicants do not need to mention FOIA or explain why they want the information. Requests can arrive through any written channel that meets these requirements.

We will provide reasonable advice and assistance, including help to clarify or narrow a request and support for anyone who finds it difficult to submit one in writing. No special form is required. We will ask promptly for clarification where information cannot reasonably be identified and located.

Choosing the right access route

Requests for a person's own personal data are handled under data protection law. Environmental information is handled under the EIR, which permit verbal requests and normally require a response within 20 working days. For a complex and voluminous EIR request, a lawful extension to 40 working days may apply; we will explain this within the initial period. Mixed requests will be separated and handled under the appropriate regimes.

3 Responding to requests

We will respond promptly and no later than 20 school days or 60 working days after receipt, whichever is sooner. A school day is a day on which pupils attend; working days exclude weekends and bank holidays. Time runs from receipt by the school, not from the date the coordinator sees the request.

Where clarification is reasonably necessary to identify and locate the information, the response period starts when sufficient clarification is received. We will record receipt dates, deadlines, searches, decisions and correspondence in the request log.

We will confirm whether information is held and provide it unless a lawful exemption applies. We do not have to create new information or give an unrecorded opinion, but questions will be assessed for any recorded information that answers them. Information may be held in emails, messages, paper files, databases, recordings or by contractors on our behalf.

Where reasonably practicable, we will respect preferences for copies, inspection or a summary, including accessible electronic formats. We will explain any inability to provide a requested format and discuss alternatives. We will meet applicable accessibility and equality duties.

Protecting records and consulting others

Relevant records must be preserved while a request, review or appeal is being dealt with. It is a criminal offence under section 77 FOIA to alter, deface, block, erase, destroy or conceal records with the intention of preventing disclosure following a request.

We may consult third parties about confidentiality, personal data or commercial interests. Consultation does not give a third party a veto and does not automatically extend the deadline. The school remains responsible for the disclosure decision.

4 Exemptions and refusals

Each request will be assessed individually. Possible grounds for withholding information include personal information, information provided in confidence and commercial interests. An exemption will be applied only where its legal requirements are met. Where required, we will assess the public interest in disclosure and withholding and release any separable information that can lawfully be disclosed.

Refusal notices will identify the relevant provision, explain the decision as far as lawful, and give internal review and ICO complaint details. A lawful decision neither to confirm nor deny whether information is held will be explained where applicable.

If additional time is lawfully needed for a qualified exemption’s public interest test, we will issue a notice within the initial deadline stating the exemption, explaining the extension and giving an expected response date. Complexity or consultation alone does not justify a general FOI extension.

Vexatious or repeated requests may be refused only where section 14 applies. We assess the request in context, record the evidence and do not label an individual as vexatious. Any exception to issuing a further refusal notice will be considered against the statutory requirements.

5 Cost limit and charges

The FOI cost limit for the school is £450, equivalent to 18 hours at the statutory rate of £25 per person per hour. The estimate may include only determining whether information is held, locating it, retrieving it and extracting it. Time spent considering exemptions, redacting or reviewing the response is not included.

Where a reasonable, evidenced estimate exceeds the limit, we may refuse under section 12. We will explain the estimate and normally help the applicant narrow the request. We will still confirm whether information is held unless establishing that would itself exceed the limit or another lawful provision applies.

Costs may be aggregated only where requests concern the same or similar information, are made by the same person or people apparently acting together or pursuing a campaign, and are received within 60 consecutive working days. Unrelated requests and requests under different access regimes are not automatically aggregated.

Fees for responding to FOI requests

We do not charge for staff search time when a request is within the cost limit. Where lawful, we may charge reasonable actual costs of copying, postage or communicating information in a requested format. We will issue a written fees notice within the applicable deadline before incurring chargeable costs and explain how the amount was calculated.

The period between giving the fees notice and receiving payment is excluded from the response calculation; payment does not restart a fresh full response period. If payment is not received within three months of the notice, we are not obliged to comply. We will explain the revised deadline when payment is received.

6 Contractors and outsourced services

Information held by a contractor on the school's behalf is treated as held by the school for FOI purposes. Contracts must support timely access, preservation and retrieval of relevant records, identify contacts and require cooperation with requests, reviews and ICO enquiries.

Confidentiality clauses do not override FOIA. We will assess any claimed exemption on its merits and consult suppliers where appropriate. Contractors receiving a request for school-held information must forward it promptly to the school.

7 Internal reviews and complaints

An applicant who is dissatisfied with the response, interpretation of their request or delay may ask for an internal review by contacting SRI@parkroadacademy.co.uk, marked FOI Internal Review. Requests should normally be made within 40 working days of the response. We will consider reasons for a later request.

We will acknowledge the request and aim to complete a fresh review within 20 working days, extending to no more than 40 working days in exceptional cases with an explanation and revised date. These are working days, including school holidays. Wherever possible, a more senior person who did not make the original decision will conduct the review.

We will explain the outcome and disclose any additional information due. If still dissatisfied, the applicant may complain to the Information Commissioner's Office at https://ico.org.uk/make-a-complaint/ or write to Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF. EIR complaints are handled under regulation 11, including its statutory time limits.

8 Publication scheme

The school adopts the ICO model publication scheme without modification. This section explains how we implement that commitment locally; the model scheme remains the governing scheme. The seven classes and practical access guide are set out in Appendix A.

We commit to publish proactively, or otherwise make routinely available, information held within the seven classes, including environmental information; specify what is available and how to obtain it; review and update it regularly; publish any applicable fees; and make the scheme itself available to the public.

We will publish requested datasets and updated versions held where appropriate and, where reasonably practicable, in a reusable electronic form. Relevant copyright works will be made available for reuse under the applicable statutory framework, including FOIA section 19 and the Re-use of Public Sector Information Regulations 2015 where applicable. Disclosure does not automatically grant permission to reuse third-party copyright material.

Information outside routine publication

Routine publication generally excludes information whose disclosure is prohibited by law or properly exempt, draft material, and archived information that is no longer readily accessible. These exclusions from proactive publication do not remove the right to request recorded information. Any request for such material will be assessed separately under FOIA or the EIR.

Access and accessibility

We normally publish information on the school website or link to the official external source. Where information is not online, please contact the school office or SRI@parkroadacademy.co.uk. Inspection by appointment may be offered where appropriate. We will provide information in the language held or another language where legally required, and meet applicable duties to provide accessible formats.

Schedule of charges

Access method	Charge
School website and routine electronic copies	Free
Inspection by appointment	Free unless a specific lawful charging provision applies
Paper copies	Actual reasonable reproduction cost only; quotation supplied in advance
Postage	Actual postage cost; quotation supplied in advance
Alternative formats	Any lawful actual cost explained in advance; statutory accessibility duties observed
Statutory charges or dataset reuse	Only where legally authorised; applicable basis and fee explained in advance

Routine publication charges will be transparent, justified and kept to a minimum. Payment may be required in advance. This schedule does not authorise an FOI search fee or override the separate EIR charging rules.

Appendix A Guide to information

This guide follows the seven ICO classes. It identifies categories to make available where held and lawfully disclosable. Website references describe routes rather than verified page titles. Before publication, the school must confirm current links, records and availability; the guide does not assert that every example is held.

Class and information	How to obtain it
1 Who we are and what we do School contact details, term dates and session times; curriculum and prospectus information; articles of association and funding agreement; members and trustees, appointment basis, responsibilities and contact route.	School website: school information, curriculum and governance areas. School office for copies or information not online.
2 What we spend and how we spend it Annual accounts and budget information; funding, capital projects, procurement, contracts and audit information; expenditure details including items over £5,000 where held and publishable; pay structures and senior salary information; trustee expenses; pupil and sport premium funding; gender pay gap and trade union facility time reports where applicable.	School website: finance, governance and premium funding areas; published accounts and official external registers. Other recorded information through the school office, subject to lawful exemptions.
3 Our priorities and how we are doing Improvement priorities, strategy and performance information; inspection reports; published assessment results and performance tables; relevant impact assessments or summaries, including DPIAs where appropriate. Individual pupil records and staff appraisals are not routinely published.	School website: performance, inspection and relevant policy areas. Official inspection and performance websites. School office for other publishable material.
4 How we make decisions Governance arrangements, decision processes and consultations; admissions arrangements and appeals procedures; non-confidential Board and committee minutes and decisions.	School website: governance and admissions areas. School office for non-confidential minutes not online.

Appendix A Guide to information continued

Class and information	How to obtain it
5 Our policies and procedures Current policies for safeguarding, admissions, behaviour, SEND, equality, health and safety, complaints, charging, data protection, records management and access to information; relevant HR, recruitment and pay policies where held and disclosable.	School website: policies and relevant service areas. School office for publishable policies not online.
6 Lists and registers Published registers of trustee interests; relevant asset register information; any FOI disclosure log maintained; legally public registers; overt CCTV arrangements and camera-location information where disclosure is lawful and does not compromise security or privacy.	School website: governance, privacy and CCTV information where published. School office for disclosable extracts. Private pupil, safeguarding and personnel registers are excluded.
7 Services we offer Nursery admissions and sessions; breakfast, after-school and holiday clubs; extracurricular activities; charges, booking arrangements, newsletters, leaflets and other school publications.	School website: nursery, wraparound, clubs, news and charges information. School office for current information and copies.

Using the guide

We will signpost an official external source where information is already publicly available. Financial information will normally cover the current and previous two financial years where held and appropriate; other information will normally be current. Earlier recorded information may still be requested.

Where publication requires redaction, we will make the remaining information available where possible. Absence from the website does not by itself mean information is exempt or not held. Please contact the school if a link is broken, a document is missing or an accessible version is needed.

9 Monitoring and review

The Headteacher will arrange an annual review and earlier changes where legislation, guidance or school arrangements require them. The publication guide, contacts, links and charges will be checked regularly. Request logs and review outcomes will inform improvements and staff training.

Reference sources

Information Commissioner's Office: ICO model publication scheme; schools definition document; advice for schools on FOIA; and guidance on timescales, charging, cost limits and internal reviews.
https://ico.org.uk/for-organisations/foi/

Cabinet Office: Freedom of Information Code of Practice under section 45.
https://www.gov.uk/government/publications/freedom-of-information-code-of-practice