

## HORIZONS EDUCATION TRUST

### Freedom of Information Policy

September 2025

#### POLICY ISSUE CONTROL

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## 1. Introduction

This policy outlines the trust's commitment to the principles of the Freedom of Information Act 2000 (the Act) and provides a framework for handling information requests. The trust aims to promote transparency and accountability by providing the public with access to information, subject to certain exemptions set out in the Act.

## 2. Scope

This policy applies to all information held by Horizons Education Trust regardless of its format. This includes any information created or received by staff, Governors and any third parties (such as contractors) where the information relates to work undertaken on behalf of the trust.

## 3. Key Principles

- **Transparency:** The trust is committed to being open and transparent about its operations and decision-making processes.
- **Accountability:** The trust will hold itself accountable to the public by allowing access to information and explaining decisions when requested.
- **Compliance:** The trust will comply with the requirements of the Act and any relevant guidance issued by the national regulator: the Information Commissioner's Office (ICO).

## 4. Responsibilities

The AAG (academic advisory group) of each academy has overall responsibility for ensuring compliance with the Freedom of Information Act. The Headteacher has day to day responsibility for FOI compliance and the school secretary is the point of contact for enquiries. At trust level the Director of Operations is the person with significant responsibility and the DPO is outsourced to the IT Services.

## 5. Publication Scheme

The FOI Act requires authorities to proactively publish core information so that it is available without the need to submit a request. Horizons Education Trust has adopted the Model Publication Scheme for Schools produced by the Information Commissioner's Office (ICO). [Publication schemes: a guide | ICO](#)

The Publication Scheme and the materials it covers will be readily available on the trust's website.

## 6. Receiving requests for information

Anybody is entitled to submit a request and it can relate to any information that may be held by the trust. The identity or motive of the requestor is only considered to determine if:

- The request may be refused as 'vexatious' under Section 14 of the FOI Act.
- The request is estimated to exceed the 18 hour 'appropriate limit'.
- The request should be processed under the UK General Data Protection Regulation rather than the FOI Act.

A valid request must be made in writing, clearly explain the information being requested and provide contact details, including name, to be used for correspondence.

The request does not have to mention the FOI Act or be sent to a specific person; however, we encourage people to submit their request via email to the academy office and to state that it is intended to be considered by the academy under the FOI Act so that we can consider the request as efficiently as possible.

## **7. Handing requests for information**

The trust's handling of requests will be made with regard to the Code of Practice issued under Section 45 of the FOI Act.

Upon receiving a request, the trust will:

- Review the wording and seek clarification if the scope of the request is unclear.
- Acknowledge receipt of the request (once clarified, if necessary) and confirm the statutory deadline.
- Consider whether the requested information is held by the academy or trust. If not, a response will be issued confirming this and – where possible – provide advice and assistance if the information is held by another organisation (for example, a local council or government department).
- Collect together all relevant information and then review it for disclosure with reference to the FOI Act exemptions and related ICO guidance.
- If some, or all, of the information is being withheld, a refusal notice will be issued that explains why the information is not being disclosed and provides complaints details if the requestor wishes to challenge the decision. We will still disclose as much information as possible and only refuse to supply the specific information that is covered by an exemption.

## **8. Timescales**

The statutory deadline for the academy or trust to respond to an FOI request is either:

- 20 school days, or
- 60 working days, if this is shorter.

“Working days” are defined as calendar days minus weekends and public holidays. This deadline typically only applies if the request period includes part of the summer school closure.

The trust will aim to respond to requests as soon as possible within the statutory timescale. In limited circumstances, the Act allows a public authority to extend the deadline and where this applies the trust will notify the requestor.

## **9. Complaints**

Any complaints about Freedom of Information requests, known as ‘Internal Reviews’, will be dealt with by the Director of Operations for the trust. We will aim to respond to all complaints within twenty working days as recommended by the ICO.

If the requestor remains dissatisfied following the Internal Review, they are entitled to appeal to the Information Commissioner’s Office. <https://ico.org.uk/>

## **10. Other relevant legislation**

Requests for environmental information will be processed in line with the Environmental Information Regulations 2004 (EIR).

Requests made by an individual for their own personal information, or on behalf of someone they have authority to act for, will be processed as a Subject Access Request under the UK General Data Protection Regulation (UK GDPR) and Data Protection Act 2018.

It is the trust's responsibility to determine which legislation applies to the request.

## **11. Records Management**

The trust will be mindful of the Code of Practice for Records Management issued under Section 46 of the FOI Act in how information is created and managed.

The academy and trust will maintain accurate records of all requests received and the responses provided.

## **12. Policy / procedure review**

This policy will be reviewed every two years. Any associated procedures will be reviewed every two years, or as required in response to changes in the legislation or national guidance.