Name of Policy:	Freedom of Information Policy & Publication Scheme 2026
Author:	Katie Findlater
Applicable to:	Staff (including Employees, Governors, Trustees, and Volunteers), Students, and Parents
Effective date:	28/10/2026
Date of next review:	27/10/2027

Version History Log

Version	Description of Change	Date of Policy Release
1.0	Original BRIT School Freedom of Information Policy.	January 2026
2.0	Updated to align with Judicium Master Template v7 (Added Document Owner & Approval block, Version History Log, explicit ICO definition of 'School Days', Freedom of Information Compliance Reporting section, updated Information Commission branding/contact info, and Appendix 1 - FOI Disclosure Log).	28/10/2026

Introduction

The Freedom of Information Act 2000 gives individuals the right to access official information from public bodies. Under the Act, any person has a legal right to ask for access to information held by the school. They are entitled to be told whether the school holds the information and to receive a copy, subject to certain exemptions. While the Act assumes openness, it recognises that certain information is sensitive. There are exemptions to protect this information. Full details on how requests can be made are set out in section 1 of this policy.

Public authorities should be clear and proactive about the information they will make public. For this reason, a publication scheme is available and can be found at section 2 of this policy.

This policy does not form part of any individual's terms and conditions of employment with the School and is not intended to have contractual effect.

This policy should be used in conjunction with the School's Data Protection Policy.

Section 1 – Freedom of Information Requests

Requests under Freedom of Information should be made to Katie Findlater. However, the request can be addressed to anyone in the School. All staff need to be aware of the process for dealing with requests.

If staff receive an FOI request in their inbox, it should be instantly forwarded to Katie Findlater.

Requests for information that are not data protection or environmental information requests will be covered by the Freedom of Information Act.

Data protection enquiries (or Subject Access Requests/SARs) are requests where the enquirer asks to see what personal information the school holds about the enquirer. If the enquiry is a data protection request, the School's Data Protection Policy should be followed.

Environmental Information Regulations enquiries are those which relate to air, water, land, natural sites, built environment, flora and fauna, health and any decisions and activities affecting any of these. These could, therefore, include enquiries about recycling, phone masts, school playing fields, car parking etc. If the enquiry is about environmental information, follow the guidance on the Department for Environment, Food and Rural Affairs (DEFRA) website.

Freedom of Information requests **must** be made in writing (including email) and should include the enquirer's name, correspondence address (email addresses are allowed) and state what information they require. There must be enough information in the request to be able to identify and locate the information. If this information is covered

by one of the other pieces of legislation (as referred to above), they will be dealt with under the relevant policy/procedure related to that request.

If the request is ambiguous and/or the School requires further information in order to deal with your request, the School will request this further information directly from the individual making the request. Please note that the School does not have to deal with the request until further information is received. Therefore, the time limit starts from the date that the School receives all information required in order to deal with the request.

The requester does not have to mention the Act, nor do they have to say why they want the information. There is a duty to respond to all requests, telling the enquirer whether or not the information is held and supplying any information that is held, except where exemptions apply. There is a time limit of 20 school days (i.e., excluding school holidays) for responding to the request.

Information

Provided all requirements are met for a valid request to be made, the School will provide the information that it holds (unless an exemption applies).

Holding information means information relating to the business of the school:

- That the school has created; or
- That the school has received from another body or person; or
- Held by another body on the school's behalf.
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Information means both hard copy and digital information, including email.

If the information is held by another public authority (for example, the Local Authority), check whether they hold the information and if so, transfer the request to them. If this applies, the School will notify the enquirer that they do not hold the information and to whom they have transferred the request. The School will continue to answer any parts of the enquiry in respect of information it does hold.

When the School does not hold the information, it has *no duty to create or acquire it* just to answer the enquiry; although a reasonable search will be made before confirming whether the School has the information requested.

If the information requested is already in the public domain, for instance, through the Publication Scheme or on the School's website, the School will direct the enquirer to the information and explain how to access it.

The requester has the right to be told if the information requested is held by the School (subject to any of the exemptions). This obligation is known as the school's *duty to confirm or deny* that it holds the information. However, the school does not have to confirm or deny if:

- The exemption is an absolute exemption; or
- In the case of qualified exemptions, confirming or denying would itself disclose exempted information.

Vexatious Requests

There is no obligation on the School to comply with vexatious requests. A vexatious request is one which is designed to cause inconvenience, harassment or expense rather than to obtain information and would require a substantial diversion of resources or would otherwise undermine the work of the school. However, this does not provide an excuse for bad records management.

In addition, the School does not have to comply with repeated identical or substantially similar requests from the same applicant unless a reasonable interval has elapsed between requests.

Fees

The School may charge the requester a fee for providing the requested information. This will be dependent on whether the staffing costs in complying with the request exceeds the threshold. The threshold is currently £450 with staff costs calculated at a fixed rate of £25 per hour (therefore 18 hours' work is required before the threshold is reached).

If a request would cost less than the threshold, then the school can only charge for the cost of informing the applicant whether the information is held and communicating the information to the applicant (e.g., photocopying, printing and postage costs).

When calculating costs/threshold, the School can take account of the staff costs/time in determining whether the information is held by the School, locating and retrieving the information and extracting the information from other documents. The School will not take account of the costs involved with considering whether information is exempt under the Act.

If a request would cost more than the appropriate limit (£450), the school can turn the request down, answer and charge a fee or answer and waive the fee.

If the School is going to charge, they will send the enquirer a fees notice. The School does not have to comply with the request until the fee has been paid. More details on fees can be found on the Information Commissioner's Office (ICO) website.

If planning to turn down a request for cost reasons or charge a high fee, you should contact the applicant in advance to discuss whether they would prefer the scope of the request to be modified so that, for example, it would cost less than the appropriate limit.

Where two or more requests are made to the School by different people who appear

to be acting together or as part of a campaign, the estimated cost of complying with any of the requests may be taken to be the estimated total cost of complying with them all.

Time Limits

Compliance with a request must be prompt and within the time limit of 20 school days (this does not include the school holidays or weekends) or 60 working days if this is shorter. **'School days' is defined by the ICO as any day on which there is a session, and the pupils are in attendance.** Failure to comply could result in a complaint by the requester to the ICO. The response time starts counting as the first day from the next working day after the request is received (so if a request was received on Monday 6th October the time limit would start from the next working day, the 7th October). Where the School has asked the enquirer for more information to enable it to answer, the 20 school days start time begins when this further information has been received.

If some information is exempt this will be detailed in the School's response.

If a qualified exemption applies and the School needs more time to consider the public interest test, the School will reply in 20 school days stating that an exemption applies but include an estimate of the date by which a decision on the public interest test will be made. This should be within a "reasonable" time.

Where the School has notified the enquirer that a charge is to be made, the time period stops until payment is received.

Third-Party Data

Consultation of third parties may be required if their interests could be affected by the release of the information requested and any such consultation may influence the decision.

Consultation will be necessary where:

- Disclosure of information may affect the legal rights of a third party, such as the right to have certain information treated in confidence or rights under Article 8 of the European Convention on Human Rights;
- The views of the third party may assist the School to determine if information is exempt from disclosure; or
- The views of the third party may assist the School to determine the public interest test.
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Personal information requested by third parties is also exempt under this policy where release of that information would breach the Data Protection Act. If a request is made for a document (e.g., Governing Body minutes) which contains personal information whose release to a third party would breach the Data Protection Act, the document may be issued by blanking out the relevant personal information as set out in the

redaction procedure.

Exemptions

The presumption of the Freedom of Information Act is that the School will disclose information unless the Act provides a specific reason to withhold it. The Act recognises the need to preserve confidentiality and protect sensitive material in certain circumstances.

The School may refuse all/part of a request, if one of the following applies:

1. There is an exemption to disclosure within the Act;
2. The information sought is not held;
3. The request is considered vexatious or repeated; or
4. The cost of compliance exceeds the threshold.
5.

A series of exemptions are set out in the Act which allow the withholding of information in relation to an enquiry. Some are specialised in their application (such as national security) and would not usually be relevant to schools.

There are two general categories of exemptions:

- **Absolute:** where there is no requirement to confirm or deny that the information is held, disclose the information or consider the public interest; and
- **Qualified:** where, even if an exemption applies, there is a duty to consider the public interest in disclosing information.

Absolute Exemptions

There are eight absolute exemptions set out in the Act. However, the following are the only absolute exemptions which will apply to the School:

- Information accessible to the enquirer by other means (for example, by way of the School's Publication Scheme);
- National Security/Court Records;
- Personal information (i.e., information which would be covered by the Data Protection Act);
- Information provided in confidence.
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If an absolute exemption exists, it means that disclosure is not required by the Act. However, a decision could be taken to ignore the exemption and release the information taking into account all the facts of the case if it is felt necessary to do so.

Qualified Exemptions

If one of the below exemptions applies (i.e., a qualified disclosure), there is also a duty to consider the public interest in confirming or denying that the information exists and in disclosing information.

The qualified exemptions under the Act which would be applicable to the School are:

- Information requested is intended for future publication (and it is reasonable in all the circumstances for the requester to wait until such time that the information is actually published);
- Reasons of national security;
- Government/international relations;
- Release of the information is likely to prejudice any actual or potential legal action or formal investigation involving the School;
- Law enforcement (i.e., if disclosure would prejudice the prevention or detection of crime, the prosecution of offenders or the administration of justice);
- Release of the information would prejudice the ability of the School to carry out an effective audit of its accounts, resources and functions;
- For health and safety purposes;
- Information requested is environmental information;
- Information requested is subject to legal professional privilege; and
- For commercial interest reasons.
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Where the potential exemption is a qualified exemption, the School will consider the public interest test to identify if the public interest in applying the exemption outweighs the public interest in disclosing it. In all cases, before writing to the enquirer, the person given responsibility by the School for dealing with the request will need to ensure that the case has been properly considered and that the reasons for refusal or public interest test refusal are sound.

Refusal

If it is decided to refuse a request, the School will send a refusal notice, which must contain:

- The fact that the responsible person cannot provide the information asked for;
- Which exemption(s) apply;
- Why the exemption(s) apply to this enquiry (if it is not self-evident);
- Reasons for refusal; and
- The School's complaints procedure.

For monitoring purposes and in case of an appeal against a decision not to release the information or an investigation by the Information Commission, the responsible person must keep a record of all enquiries where all or part of the requested information is withheld and exemptions are claimed. The record must include the reasons for the decision to withhold the information.

The School will get advice from their Data Protection Officer (DPO) prior to withholding data under an exemption or refusing the request in its entirety.

Freedom of Information Compliance Reporting

In line with best practice guidance from the ICO, we publish statistics on our

compliance with the FOI Act 2000. We provide regular summaries of:

- The number of FOI requests received;
- The percentage of responses issued within the statutory 20 school days deadline;
- The number of requests where exemptions were applied; and
- The number of internal reviews and ICO complaints (if applicable).
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These compliance statistics are published annually on our website and are reviewed by the Governing Body to ensure continued compliance and transparency.

We are committed to maintaining high standards of accountability and responding to FOI requests within the legal timeframe. In addition, a summary of FOI requests and our responses will be published through our FOI Disclosure Log (Appendix 1) available on our website, where appropriate and subject to data protection considerations.

Section 2 – Freedom of Information Publication Scheme

This publication scheme follows a model approved by the Information Commissioner's Office.

This scheme is not a list of individual publications but rather a description of the classes of types of information that we are committed to publishing. This list is not an exhaustive list of all of the types of information that we publish. We try to proactively publish as much information as we can where the information would have a wider public interest. This scheme does not include information that we consider to be sensitive, such as personal information, information prevented from disclosure by law or information about security matters.

Classes of Information

There are six classes of information that we hold:

- Who we are and what we do
- What we spend and how we spend it
- What our priorities are and how we are doing
- How we make decisions
- Our policies and procedures
- The services we offer

Making Information Available

Information will generally be made available on the school website. Where it is not possible to include this information on the school website, the school will indicate how information can be obtained by other means and provide it by those means. This may be detailed in response to a request or within the scheme itself. This will usually be by way of a paper copy.

In some 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 we are legally required to translate any information, we shall do so.

Charges for Information Published Under This Scheme

The school may charge individuals for information published under this scheme. The purpose of this scheme is to make the maximum amount of information readily available at the minimum inconvenience and cost to the public. Charges made by the school for routinely published material will be justified and transparent and kept to a minimum.

Material which is published and accessed on the website will be provided free of charge.

Charges may be made for information subject to a charging regime specified by law.

Charges will be made to cover:

- Photocopying;
- Postage and packaging; and
- The costs directly incurred as a result of viewing information.

Single copies of information requested which are covered by the publication scheme will be provided free unless otherwise stated within the scheme. If the request involves a large amount of photocopying, printing or postage, then this may be at a cost. If this is the case, we will let you know as well as let you know the cost before fulfilling your request.

How to Request Information

If you require a paper version of any of the documents within the scheme, please contact the school using the contact details below.
Telephone: 0208 665 5242
Email: info@brit.croydon.sch.uk
Address: 60 The Crescent, Croydon, CR0 2HN

Please mark all correspondence *Publication Scheme Request* in order to help us process your request quickly. If the information you are looking for isn't available via the scheme, you can still contact the school to ask if we have this information.

The Publication Scheme

Category	Description
Who We Are and What We Do	
Information relating to the Governing Body	Information contained in official governing body documents including the governor's annual report: who is who, basis of governors appointment, constitution of governing body, category of school, inspection action plan progress, agreed board/committee minutes, financial statement (including gifts/expenses), SEN policy implementation, disabled access/facilities & accessibility plan, whole staff development policy, pupil numbers & absence rates, key stage results, instruments of government, terms of office.
School prospectus	Name, address, website, telephone number, school type, Headteacher name, staffing structure, SEN policy summary, aims & values, admissions policy, term dates, uniform, pupil numbers/absence rates, religious affiliation/worship details.
What We Spend and How We Spend It	
Financial statement for current and previous financial year	Projected and actual income/expenditure, procurement, contracts, budget plans, financial statements, and financial audit reports.
Details of expenditure	Details of items of expenditure over £5,000 including cost, supplier name, and transaction information.
Procurement and contracts	Details of procurement and contracts entered into directly or via third parties (e.g. Local Authority).
Pay policy & Allowances	Copy of school staff pay policy; details of allowances and expenses incurred by staff and governors.
Pupil Premium & Overheads	How the school uses pupil premium; details of school overheads and running costs.
What Our Priorities Are and How We Are Doing	
Ofsted report	Published report of the outcome of our latest Ofsted inspection.
Performance management policy	Procedures adopted relating to performance management of staff and annual Headteacher report

Category	Description
	on appraisal procedures.
Charging and remissions policies	Statement of policy regarding charges/remissions for optional extras, music tuition, trips, etc.
Health & Safety / Conduct / Curriculum	Health & Safety policy & risk assessments; staff conduct/discipline/grievance procedures; statutory curriculum circulars/memoranda.
How We Make Decisions	
Admissions Policy / Decisions	Policy statement regarding admissions and decision-making criteria (excludes individual pupil decisions).
Our Policies and Procedures	
Core Policies	Home-School Agreement, Curriculum Policy, Complaints Policy, Equality & Diversity Policy, Child Protection & Safeguarding Policy, Relationships & Sex Education Policy, Inclusion Policy, Behaviour Policy, Collective Worship statement.
Lists and Registers	
Public Registers & Asset Register	Curriculum circulars, Asset Register (major physical assets, available on request), CCTV camera location details, Disclosure Log (FOI Requests - Appendix 1), publicly available registers (staffing structure/senior leadership names & governors).
The Services We Offer	
Extra-curricular activities	Details of extra-curricular activities and out of school clubs contained on website, newsletters, and leaflets.

Internal Review

The requester has the right to ask for an internal review if they are dissatisfied with the handling of a request.

Internal review requests should be made within 40 working days of the initial response. This deadline should be communicated to the requester in that response. We are not obliged to provide a review if it is requested after more than 40 working days.

Requests for internal review must make clear why they are dissatisfied with the original

decision, detailing why they feel that the School has not complied with Freedom of Information Law.

Complaints and/or Appeals

Any written (including email) expression of dissatisfaction should be handled through the School's existing complaints procedure. Wherever practicable the review should be handled by someone not involved in the original decision.

The Governing Body should set and publish a target time for determining complaints and information on the success rate in meeting the target. The school should maintain records of all complaints and their outcome.

If the outcome is that the School's original decision or action is upheld, then the applicant can appeal to the Information Commissioner. The appeal can be made via their website or in writing to:

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

APPENDIX 1 – FOI DISCLOSURE LOG

Guidance note: This is to record a summary of what has been provided as part of an FOI request that has been complied with. It is considered best practice by the ICO, especially if you receive frequent or similar FOI requests. It also assists with improving transparency and reducing administrative work by pre-empting repeat questions. The log should be clear and non-technical. We recommend that this is accessible and published on the school website. The school should avoid disclosing personal or sensitive information (i.e. not detailing requesters' names and contact information). The log should be kept up to date.

Request Number / ID	Date of Request	Summary of Request	Date of Response	Summary of Response	Exemptions Applied (if any)	Link to Information (if applicable)
Example: FOI2026/01	*01/01/2026*	*Number of exclusions in 2024/25 by year group*	*20/01/2026*	*Provided figures broken down by year group*	*None*	*N/A*