



FREEDOM OF INFORMATION POLICY AND GUIDANCE

Author:	Lead Governance Professional
Approver:	Finance & Resources Committee
Date:	17 th June 2025
Next review:	June 2028 or earlier if the Information Commissioner's Office (ICO) issues revised guidance
Category of policy	Trust Board

Changes history

Version:	Date:	Amended by:	Substantive changes:	Purpose:
1				New trust policy

1: Introduction

All public authorities, including schools, are required under the Freedom of Information Act to adopt a publication scheme that has been approved by the Information Commissioner. The Information Commissioner's Office (ICO) has produced a model publication scheme. Schools must adopt the model publication scheme and make it publicly available. The link to the ICO's model publication scheme is here: [model-publication-scheme.pdf](#) A paper copy of the scheme can also be obtained by contacting Mrs Rebecca Marr at Agape Multi Academy Trust, C/O The Piggott School, Twyford Road, Wargrave, Berkshire, RG10 8DS. Email: MarrR@agapetrust.co.uk. Telephone: 01189 402357.

The Agape Multi Academy Trust and schools within the Trust (The Trust) is subject to the Freedom of Information Act 2000 (FOI) as a public authority and as such will comply with any requests for information in accordance with the principles laid out in the Act and as set out in this policy.

2: FOI Procedure

A request for any information from our Trust is technically a request under the Act, irrespective of whether the individual specifically mentions the FOI Act. However, the ICO has advised that routine requests for information (such as a parent requesting a copy of a policy) can be dealt with outside of the provisions of this Act.

A FOI request does not grant access to personal data held about individuals by the Trust. If we receive a request for an individual's personal information this will be a subject access request and will be considered in line with our data protection policy.

All FOI requests are managed by

Altwood School: Satswana Services, Suite G12 Ferneberga House, Alexandra Road, Farnborough, Hampshire, GU14 6DQ. Email: admin@satswana.com Telephone: 01252 759177. Enquiries and requests should be sent in the first instance to Mrs N. Walker, Headteacher's PA, Altwood School, Altwood Road, Maidenhead, Berkshire, SL6 4PN nwalker@altwoodschool.co.uk

For The Piggott School: Mr David Thatcher, The Piggott School, Twyford Road, Wargrave, Berkshire, RG10 8DS. Email: dpo@piggottschool.org Telephone: 01189 402357

The Agape Multi-Academy Trust: Mrs Rebecca Marr. All requests should be made in writing either by email MarrR@agapetrust.co.uk or via post Agape Multi Academy Trust, C/O The Piggott School Twyford Road, Wargrave, Berkshire, RG10 8DS.

All requests received by any other member of staff of the Trust must be forwarded to the relevant member of staff as identified above within 2 school days of receiving the request unless it is a routine request.

We will only accept a request for information which meets all of the following criteria:

- It is in writing
- It states the name of the requestor and an address for correspondence
- It describes adequately the information requested

In circumstances where a requestor has difficulty submitting a written request, we will make a note of the application over the telephone and then send a note to the requestor to sign and return. The statutory time limit to reply would begin on the date the note is received by us. We may decide to take other assistance measures which are appropriate to the situation.

We may in some instances require further information in order to comply with a FOI request. We ask that you respond as soon as possible. Please note that if this further information is not fully provided, we will be unable to comply with your request.

3: Fulfilling the request

The first stage in responding is to determine if we 'hold' the requested information. Information can be 'held' in an electronic or paper format. Some requests may require us to take information from different sources and manipulate it in some way. Where this will take minimal effort, we consider ourselves to be 'holding' the information. If, however, it will take a significant amount of time we will inform the requestor that the information is not held in the manner requested and will be offered the opportunity to amend their request.

Agape MAT document: This is a Trust policy which means it must be followed by all schools in Agape MAT

To process a request for information we will follow process maps (Appendices 2 and 3).

Please note:

- The FOI Act allows us to apply exemptions when releasing data and means in certain instances we will not share some or all of the requested information. Exemptions exist to protect data that should not be disclosed, for example because disclosing it would be harmful to another person, or it would be against the public interest.
- As per the requirements of the UK GDPR and Data Protection Act, we are only required to keep information as long as it is necessary. Therefore, please be aware we can only provide you with documents we are currently holding.
- There is no obligation to comply with vexatious requests. This is taken to mean a request which is designed to cause inconvenience, harassment or expense rather than to obtain information and would require a substantial diversion of resources or otherwise undermine our work. This also includes repeated identical or substantially similar requests unless a reasonable time has elapsed between requests. In determining what is a reasonable time we will consider how often the information we hold changes.
- If the total cost exceeds £450, we are not obliged to comply with the request. When determining if the cost is within this limit, we will only take account of the costs we reasonably expect to incur in relation to:
 - Determining whether we hold the information.
 - Locating the information, or a document that may hold the information.
 - Retrieving the information or a document that may contain the information.
 - Extracting the information from a document containing it

The costs related to a person undertaking any of the above tasks will be taken to be £25.00 per person per hour. When calculating the costs of complying we will aggregate the costs of all related requests we have received within 60 working days from the same person or from people who seem to be working together.

The classes of information we hold are set out in our Publication Scheme (Appendix 1).

The classes of information will not generally include:

- Information the disclosure of which is prevented by law, or exempt under the FOI 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.

4: Exemptions to access by data subjects

The FOI Act includes a number of exemptions, which means that certain information may not be disclosed in response to a FOI request.

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

What are the Absolute Exemptions?

There are 8 absolute exemptions listed in the Act. The most relevant absolute exemptions applicable to the Trust are set out below:

Information accessible to you by other means (Section 21)

If information is reasonably accessible to you by another route than the Act, it is exempt information. This is the case even if you would have to pay for the information under that alternative route. This exemption includes cases where we are required to give information under other legislation, or where the information is available via the Publication Scheme.

Personal information (Section 40)

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Where you ask to see information about yourself, this is exempt under the Act because it is covered by the Data Protection Act.

Information provided in confidence (Section 41)

This relates to information obtained from a person, if its disclosure would constitute a breach of confidence actionable by that, or another, person.

Prohibitions on disclosure (Section 44)

Information is exempt where its disclosure is prohibited under any other legislation by order of a court or where it would constitute a contempt of court or where it is incompatible with any EU obligation.

What are the Qualified Exemptions?

With qualified exemptions, even if it is decided that an exemption applies, we have a duty to consider the public interest in confirming or denying that the information exists and in disclosing information. There are 11 qualified exemptions. The qualified exemptions in the Act most relevant to the Trust are set out below:

Information available by other means (Section 21)

Information is exempt from the right of access under the Freedom of Information Act if that information is reasonably accessible to you by other means even if the payment of a fee is required to access that information.

Information intended for future publication (Section 22)

If at the time the request was made, information is held with a view to publication, then it is exempt from disclosure if it is reasonable that it should not be disclosed until the intended date of publication. This could apply for instance to statistics published at set intervals, for example annually or where information is incomplete, and it would be inappropriate to publish prematurely.

Investigations and proceedings conducted by public authorities (Section 30)

Information is exempt if it has at any time been held by us for the purposes of criminal investigations or proceedings, such as determining whether a person should be charged with an offence or whether a charged person is guilty, or investigations which may lead to a decision to institute criminal proceedings. The duty to confirm or deny does not apply to such information.

Law enforcement (Section 31)

Information which is not exempt under Section 30 Investigations and Proceedings, may be exempt under this exemption in the event that disclosure would, or would be likely to, prejudice the following among others: -

- the prevention or detection of crime
- the apprehension or prosecution of offenders
- the administration of justice
- the exercise of functions such as ascertaining if a person has broken the law, is responsible for improper conduct, whether circumstances justify regulatory action, ascertaining a person's fitness or competence in relation to their profession, ascertaining the cause of an accident or protecting or recovering charities or its properties.
- any civil proceedings brought by us or on behalf of the Agape Trust arise out of an investigation carried out for any of the purposes mentioned above.

Our duty to confirm or deny does not arise where prejudice would result to any of these matters.

Health and Safety (Section 38)

Information is exempt if its disclosure would or would be likely to endanger the safety or physical or mental health of any individual. Our duty to confirm or deny does not arise where prejudice would result. This may particularly apply to safeguarding information.

Environmental information (Section 39)

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Information is exempt under FOI where it is covered by the Environmental Information Regulations. Environmental information can cover information relating to air, water, land, natural sites, built environment, flora and fauna, and health. It also covers all information relating to decisions or activities affecting any of these.

Personal information (Section 40)

Where you seek information about yourself the Data Protection Act powers apply. Where the personal information concerns a third party, it is exempt if its disclosure would contravene the Data Protection Act, or the data protection principles; or if the person to whom the information relates would not have a right of access to it because it falls under one of the exemptions to the Data Protection Act. Our duty to confirm or deny does not arise in relation to this information if doing so would be incompatible with any of the above. We may release the document but redact parts relating to personal information of a third party. We will notify you that this is the case if this applies.

Legal professional privilege (Section 42)

Legal professional privilege covers any advice given by legal advisers, solicitors and barristers. Generally, such information will be privileged. If we wish to disclose the information we will need to seek consent from the provider of the advice. This exemption covers all such information where a claim to legal professional privilege can be in legal proceedings. Our duty to confirm or deny does not arise where to do so would involve the disclosure of such information.

Commercial interests (Section 43)

Information is exempt if it constitutes a trade secret or would be likely to prejudice the commercial interests of any person or body (including The Agape Trust). Our duty to confirm or deny does not arise where prejudice would result to commercial interests but not where the information constitutes a trade secret.

When considering if an exemption to disclosure should apply, we will bear in mind that the presence of confidential markings such as Restricted, Confidential and Private does not constitute an exemption and is not in itself sufficient grounds on which to prevent disclosure. Each case will be considered on its merits.

5: Responding to the request

We will respond as soon as possible and in any event with 20 school days (or 60 working days if this is shorter). A school day is one in which pupils are in attendance.

If we need more time to consider the public interest test, we will reply to the requestor advising that the exemption applies within 20 school days and include an estimate of when a decision on the test will be made. This will usually be in 10 school days.

Where we have notified you that a charge is to be made, the time period for us to comply stops until payment is received. Once the payment has been received the time period for us to comply with your request resumes.

We will confirm or deny if we have the information requested and will either provide the documents in accordance with this policy or explain why we will not be complying with the request.

Where we withhold some or all the information, we will explain why we have withheld the information, quote the appropriate exemption section number and explain how the information fits with this exemption. If a public interest test has been applied this will also be explained to the requestor.

Where we are unable to redact information of third parties a decision may be made that the information cannot be released.

Where it is not possible to provide the information in the requested format we will assist the requestor by discussing alternative formats it can be provided in.

The information provided will also be 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 will.

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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 policy.

Documents will usually be sent via email unless the requestor has specified another method. If the information is posted it will be sent via tracked delivery to the address provided by the requestor. In exceptional circumstances information may only be available by viewing in person. If this applies, an appointment will be made to view the requested information within a reasonable timeframe.

A copy of the information sent will be retained by the Trust for 2 years unless there is a legal basis for retaining the information of a longer period.

6: Freedom of Information Publication Scheme

Under the FOI Act we have developed a publication scheme which lists the documents the Trust makes public as a matter of routine. Before submitting a FOI request, please refer to our publication scheme to check if the information is already routinely published and where you can find that information. If the information you require is not listed in the publication scheme you can make a request for it in writing (please see section 2 on how to make a request).

Most of the information is available on our website however where it is impractical to publish the information on our website or an individual is unable to/cannot access the information this way we will provide the data by another means.

Our publication scheme is set out at Appendix 1.

7: Schedule of Charges under the Publication Scheme

Photocopying/printing per sheet in black & white @ 10p per sheet

Photocopying/printing in colour @ 50p per sheet

Postage – actual cost of tracked delivery (Royal Mail) This depends upon the size and weight of the package. We will advise you in advance of the cost.

Where the total cost is less than £10, we will provide it free of charge. Where the cost is £10 or more our charges will be anything over and above £10.00. In this instance we will send you a fees notice. Please note we will not comply with your request until the fee has been paid.

8: Contact

Questions, concerns or complaints about this policy can be sent to contact@agapetrust.co.uk. We aim to reply in 20 school days or 40 school days if exceptional circumstances apply. If you are not satisfied by our response or we have not been able to resolve your complaint you can contact the Information Commissioner's Office who will investigate your case at their discretion. Their contact details are:

Information Commissioner's office

Wycliffe House,

Water Lane

Wilmslow

Cheshire

SK9 5AF

Telephone: 0303 123 1113

Email address: www.ico.org.uk/foicomplaints

Equality Act 2010

We have carefully considered and analysed the impact of this policy on equality and the possible implications for people with protected characteristics as part of our commitment to meet the public sector equality duty requirement to have due regard to the need to eliminate discrimination, advance equality of opportunity and foster good relations. If you feel you have or may be negatively impacted by this policy please contact us.

Appendix 1: Publication Scheme

Links to websites:

Agape Multi Academy Trust www.agapetrust.co.uk

Altwood School www.altwoodschool.co.uk

Piggott School www.piggottschool.org (Secondary phase)

www.piggottschool.org/primary (Primary phase)

Companies House Companies House - GOV.UK

Ofsted: reports: Find an Ofsted inspection report

Class 1: Who we are and what we do Organisational Information, locations and contacts, constitutional and legal governance Current information only		
Information available	How the information can be obtained	Charge
Who's who in The Agape Trust	Agape Trust website Paper copy via request	Free 10p per page (black & white)
Members of the Agape Trust (names, basis of appointment, date of appointment and register of interests)	Paper copy via request Agape Trust website	Free 10p per page (black & white)
Trustees of the Agape Trust (names, basis of appointment, date of appointment, responsibilities, attendance at meetings, and register of interests)	Agape Trust website Paper copy via request	Free 10p per page (black & white)
Contact details of the Trust Board	Agape Trust website Paper copy via request	Free 10p per page (black & white)
Governors on Local Governing Committees (names, basis of appointment, date of appointment, responsibilities, attendance at meetings and register of interests)	Individual school websites Paper copy via request	Free 10p per page (black & white)
Contact details of the Local Governing Committee	Individual school websites Paper copy via request	Free 10p per page (black & white)
Members and Trustees who have left the Trust Board in the last 12 months (names, basis of appointment, date of appointment and register of interests)	Agape Trust website Paper copy via request	Free 10p per page (black & white)
Governors who have left the Local Governing Committees in the last 12 months (names, basis of appointment, date of appointment and register of interests)	Individual school websites Paper copy via request	Free 10p per page (black & white)

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School's staffing structure and names of key personnel including the Headteacher	Individual school websites Paper copy via request	Free 10p per page (black & white)
Contact details of the school including location, address and telephone number	Individual school websites Paper copy via request	Free 10p per page (black & white)
Articles of association	Agape Trust or individual schools websites Paper copy via request	Free 10p per page (black & white)
Funding agreements	Agape Trust website Paper copy via request	Free 10p per page (black & white)
Memorandum of association	Agape Trust website Paper copy via request	Free 10p per page (black & white)
Structure of the governance of the Agape Trust	Individual school websites Paper copy via request	Free 10p per page (black & white)
Scheme of delegation	Agape Trust or Individual school websites Paper copy via request	Free 10p per page (black & white)
Terms of reference for Local Governing Sub Committees (The Piggott School Only)	The Piggott School website Paper copy via request	Free 10p per page (black & white)
Gender pay gap report	Agape Trust website Paper copy via request	Free 10p per page (black & white)
School prospectus	Individual school websites Paper copy via request	Free 10p per page (black & white)
School curriculum	Individual school websites Paper copy via request	Free 10p per page (black & white)
School session times, term dates and holidays	Individual school websites Paper copy via request	Free 10p per page (black & white)
<p style="text-align: center;">Class 2: What we spend and how we spend it Financial information relating to projected and actual income and expenditure, tendering, procurement, and contracts (Minimum of current and the previous 2 years financial year)</p>		
Annual financial statements, capital funding and income generation	Electronic copy by request Paper copy by request	Free 10p per page (black & white)
Expenditure	Agape Trust website or Companies House website Paper copy by request	Free 10p per page (black & white)
Details of capital funding allocated to the school along with information on related building projects and other capital projects or sources of current funding for the current year	Electronic copy by request Paper copy by request	Free 10p per page (black & white)
Statutory accounts	Agape Trust website or Companies House website Paper copy by request	Free 10p per page (black & white)
Financial audit reports	Agape Trust website or Companies House website Paper copy by request	Free 10p per page (black & white)
Procurement and contracts	Electronic copy by request Paper copy by request	Free 10p per page (black & white)

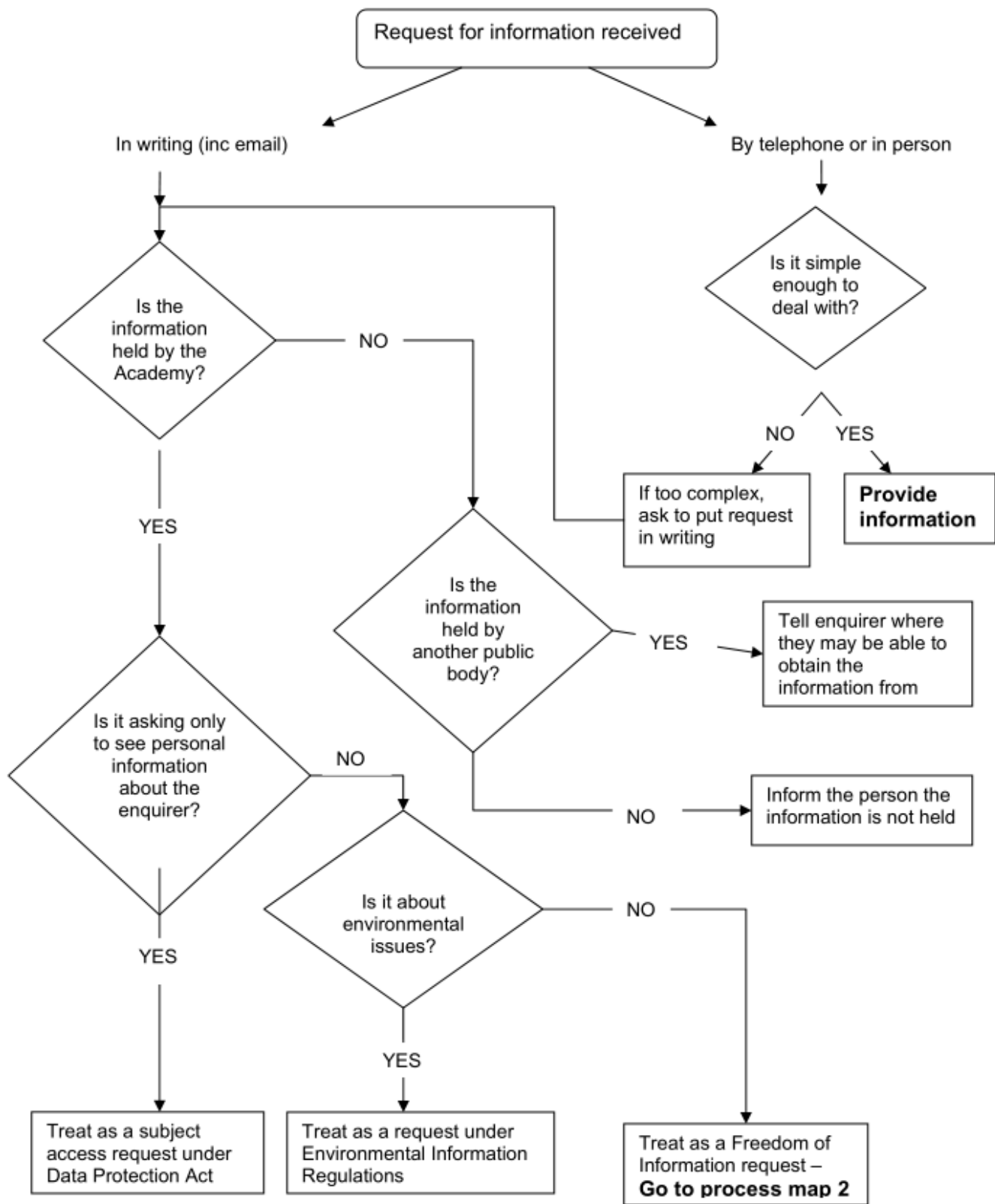
Staff allowances and expenses (Please note data protection regulations will override the release of individual personal information)	Electronic copy by request Paper copy by request	Free 10p per page (black & white)
Staff grading and structure (Please note data protection regulations will override the release of individual personal information)	Electronic copy by request Paper copy by request	Free 10p per page (black & white)
Trustee and governor expenses and allowances (please note data protection regulations will override the release of individual personal information)	Electronic copy by request Paper copy by request	Free 10p per page (black & white)
Gifts, anti-bribery and hospitality policy	Agape Trust or individual school websites Paper copy by request	Free 10p per page (black & white)
Premiums or other forms of financial support	Agape Trust website or Companies House website Paper copy by request	Free 10p per page (black & white)
Trade Union facility time reporting	Agape Trust website or Companies House website (in statutory accounts) Paper copy by request	Free 10p per page (black & white)
Teacher and support staff pay policies	Electronic copy by request Paper copy by request	Free 10p per page (black & white)
Trustee and governor expenses and allowances policy	Agape Trust or individual school websites Paper copy by request	Free 10p per page (black & white)
<p align="center">Class 3: What are our priorities are and how we are doing it Strategy and performance information, plans, assessments, inspections and reviews Current information as a minimum</p>		
Performance data supplied to the Government	Electronic copy by request Paper copy by request	Free 10p per page (black & white)
Latest Ofsted report	Ofsted website & individual school websites Paper copy by request	Free 10p per page (black & white)
Latest SIAMS report	Individual school websites Paper copy by request	Free 10p per page (black & white)
Appraisal policy (teachers)	Electronic copy by request Paper copy by request	Free 10p per page (black & white)
Appraisal policy (support staff)	Electronic copy by request Paper copy by request	Free 10p per page (black & white)
Agape Trust School's future plans/School Improvement plans	Individual school websites Paper copy by request	Free 10p per page (black & white)
Exam & assessment results	Individual school websites Paper copy by request	Free 10p per page (black & white)
Performance tables	Compare the performance of schools and colleges in England - GOV.UK	Free
Agape Trust's strategic plan	Agape website	Free

	Paper copy by request	10p per page (black & white)
Pupil premium strategy statement	Individual school websites Paper copy by request	Free 10p per page (black & white)
PE & sports funding statement (Primary phase of Piggott only)	Individual school websites Paper copy by request	Free 10p per page (black & white)
SEND local offer	Individual school websites Paper copy by request	Free 10p per page (black & white)
<p align="center">Class 4: How we make decisions</p> <p align="center">Policy proposals and decisions, decision making processes, internal criteria and procedures, consultations</p> <p align="center">Current and previous 3 years as a minimum</p>		
Admissions policy and decisions (not individual decisions)	Agape Trust or Individual school websites Paper copy by request	Free 10p per page (black & white)
Admission consultations	Electronic copy by request Paper copy by request	Free 10p per page (black & white)
Trust Board (and their committee) agendas and minutes (this will exclude Part II confidential minutes)	Electronic copy by request Paper copy by request	Free 10p per page (black & white)
Local Governing Committee (and their subcommittees) agendas and minutes (this will exclude Part II confidential minutes)	Electronic copy by request Paper copy by request	Free 10p per page (black & white)
Agenda and minutes of the AGM (this will exclude Part II confidential minutes)	Electronic copy by request Paper copy by request	Free 10p per page (black & white)
Remote decision policy	Agape Trust or Individual school websites Paper copy by request	Free 10p per page (black & white)
<p align="center">Class 5: Our policies and procedures</p> <p align="center">Current written protocols for delivering our functions and responsibilities</p> <p align="center">Current information as a minimum</p>		
Child protection & safeguarding policy	Agape Trust or Individual school websites Paper copy by request	Free 10p per page (black & white)
Prevent Policy	Agape Trust or Individual school websites Paper copy by request	Free 10p per page (black & white)
Complaints policy	Agape Trust or Individual school websites Paper copy by request	Free 10p per page (black & white)
Pupil & Curriculum policies including: <ul style="list-style-type: none"> ○ Accessibility ○ Anti-bullying ○ Behaviour ○ Collective worship ○ Early years Foundation Stage (Primary phase of Piggott school only) ○ Exclusion 	Individual school websites Paper copy by request	Free 10p per page (black & white)

<ul style="list-style-type: none"> ○ Medical needs ○ Online safety (Primary Phase of Piggott only) ○ PSHE ○ Provider access ○ RE ○ Relationships and sexual education ○ School Uniform ○ Special educational needs ○ 16-19 bursary 		
Records management and data policies including: <ul style="list-style-type: none"> ○ Acceptable use of IT ○ CCTV ○ Data protection policy (including data breach and protection of biometric information) ○ Freedom of information policy schedule ○ Privacy notices ○ Retention of records 	Individual school websites Agape Trust (data protection, freedom of information, privacy notices and retention of records only) Paper copy by request	Free 10p per page (black & white)
Equality policy including objectives	Individual school websites Agape Trust (Trust equality objectives only) Paper copy by request	Free 10p per page (black & white)
Health and safety	Agape Trust or Individual school websites Paper copy by request	Free 10p per page (black & white)
HR policies including: <ul style="list-style-type: none"> ○ Anti-bullying & anti-harassment ○ Capability ○ Code of conduct ○ Disciplinary ○ ECT ○ Grievance ○ Managing change ○ Safer recruitment ○ Support staff probation ○ Wellbeing & managing absence ○ Guide to support individuals through the menopause ○ Maternity & paternity guide 	Electronic copy by request Paper copy by request	Free 10p per page (black & white)
Finance policies including: <ul style="list-style-type: none"> ○ Charging & Remissions ○ Employer discretions ○ Finance ○ Risk 	Electronic copy by request Paper copy by request Agape or individual schools website (Charging & Remissions only)	Free 10p per page (black & white) Free

<p align="center">Class 6: Lists and registers</p> <p align="center">Information held in registers required by law and other lists and registers relating to our functions</p> <p align="center">Currently maintained lists and registers only. This does not include our pupil register.</p>		
Asset Register	Electronic copy by request Paper copy by request	Free 10p per page (black & white)
Any information we are legally required to hold in publicly available registers	Electronic copy by request Paper copy by request	Free 10p per page (black & white)
<p align="center">Class 7: The services we offer</p> <p align="center">Advice & guidance, booklets and leaflets, transactions and media releases. A description of the services offered.</p> <p align="center">Current information only</p>		
Co-curricular activities	Individual school websites Paper copy by request	Free 10p per page (black & white)
School trips	Individual school websites Paper copy by request	Free 10p per page (black & white)
Wrap around care provision	Individual school websites Paper copy by request	Free 10p per page (black & white)
School publications	Individual school websites Paper copy by request	Free 10p per page (black & white)
Leaflets and school newsletters	Individual school websites Paper copy by request	Free 10p per page (black & white)
Catering including menus and payment information	Individual school websites Paper copy by request	Free 10p per page (black & white)

Appendix 2: PROCESS MAP FOR RECEIVING REQUESTS FOR INFORMATION



Appendix 3: PROCESS MAP FOR HANDLING FOI ENQUIRIES

