



## The Olympus Academy Trust Freedom Of Information

### Document Summary

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### Amendment History

| Version | Amendment Date              | Author               | Amendment Summary |
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| 1.0     | 16 <sup>th</sup> April 2026 | Data Protection Lead | New policy        |
|         |                             |                      |                   |

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## 1. Purpose of this policy

The Olympus Academy Trust is committed to openness and transparency in the way it conducts its business. This policy explains how the Trust responds to requests for information made under the Freedom of Information Act 2000 (FOIA).

The policy aims to:

- ensure information is provided lawfully, fairly and consistently
- support public confidence through transparency
- provide clarity for staff, parents and members of the public
- meet statutory obligations under the Freedom of Information Act 2000

The Trust also seeks to make information routinely available through its Publication Scheme, reducing the need for formal requests where possible.

## 2. Scope of this policy

This policy applies to:

- Olympus Academy Trust
- all Trust schools
- all staff, leaders, governors and trustees

It covers:

- Freedom of Information requests made under FOIA

It does **not** cover:

- Subject Access Requests (personal data requests under data protection legislation)
- Environmental Information Regulations (EIR) requests
- Complaints, which are managed under the Trust Complaints Policy

Where a request is better handled under another policy, the requester will be advised accordingly.

## 3. What is Freedom of Information?

The Freedom of Information Act gives anyone the right to request recorded information held by public authorities, including academy trusts.

Requests:

- can be verbal or in writing
- must include the requester's name and a contact address (such as an email or postal address) so that a response can be provided.
- do not need to explain why the information is wanted
- relate only to recorded information already held

## 4. Key principles

The Trust will:

- deal with requests openly and promptly
- provide information unless a lawful exemption applies

- treat requesters fairly and without discrimination
- support staff to recognise and escalate requests correctly
- keep clear records of requests and responses

The Trust will apply exemptions carefully and proportionately, balancing transparency with the need to protect sensitive information.

## 5. How to make a Freedom of Information request

Anyone can make a Freedom of Information request. Requests do not have to mention the FOIA and do not need to explain why the information is being requested.

Requests may be made verbally or in writing, provided that the request is clear enough for the Trust to identify the information being sought.

To help ensure requests are understood and processed efficiently, the Trust encourages requests to be made in writing where possible.

All requests, however received, should be forwarded promptly to the Trust's central FOI contact point in line with Appendix A.

To avoid delay, it would be preferable to forward your requests in the first instance to [gdpr@olympustrust.co.uk](mailto:gdpr@olympustrust.co.uk)

## 6. Timescales

The Trust will:

- acknowledge requests promptly
- respond within **20 school days** of receipt

Where clarification is required, the timescale will pause until clarification is received.

Requests made during school holidays are treated as received on the first school day after the holiday.

Where a response cannot be issued within the statutory timescale, the Trust will notify the requester and explain why.

For the purposes of this policy, 'school days' means days when the school is open to learners during term time. This does not include INSET days or school holidays.

## 7. Exemptions and refusals

Some information may be withheld where exemptions apply. Common examples include:

- personal data
- commercially sensitive information
- information intended for future publication
- information where disclosure would prejudice effective conduct

Where information is withheld, the Trust will:

- explain which exemption applies
- issue a refusal notice where required
- explain review and appeal rights

## **8. Charging and cost limits**

Most FOI requests are free of charge.

The Trust may:

- refuse requests that exceed the statutory cost limit
- charge for disbursements where permitted

Requesters will be informed in advance where charges apply.

## **9. Repeated, vexatious or unreasonable requests**

Requests may be refused where they are:

- repeated without reasonable interval
- vexatious or manifestly unreasonable

Any such decision will be taken carefully, documented, and communicated clearly to the requester.

## **10. Reviews and complaints**

If a requester is dissatisfied with the handling of a request, they may request an internal review. If still dissatisfied, they may complain to the Information Commissioner's Office (ICO).

Details are set out in Appendix D.

## **11. Record-keeping and confidentiality**

The Trust keeps records of:

- all FOI requests received
- responses provided
- exemptions applied

Records are managed in line with data protection law and the Trust's retention schedule.

## **12. Accessibility and publication**

This policy is published on Trust and school websites and is available in alternative formats on request.

The Trust maintains and reviews a Publication Scheme to make commonly requested information publicly available.

### **13. Links to other policies**

- [Data Protection Policy](#)
- [Subject Access Request Procedure](#)
- [Complaints Policy](#)
- [Records Management and Retention Policy](#)

### **14. Diversity, Equity and Inclusion Statement**

We are committed to fostering a diverse, equitable, and inclusive environment where every individual is valued and respected. Our policies reflect our dedication to creating a workplace that embraces differences and promotes fairness. We believe that diversity enriches our organisation and drives innovation, and we strive to ensure that all employees have equal opportunities to succeed and thrive.

## Appendix A - Staff Guidance: Recognising and Handling Freedom of Information Requests

This appendix provides practical guidance for staff on how to recognise and handle Freedom of Information (FOI) requests.

### What is an FOI request?

A Freedom of Information request is a request for recorded information held by the Trust or a school.

A request may be an FOI request if it:

- asks for information rather than an explanation or opinion
- relates to how the Trust or a school operates
- is made by any individual or organisation
- does not have to mention the Freedom of Information Act

FOI requests do not need to be in writing. They can be made:

- verbally (for example, in person or by phone)
- by email
- via social media
- through a website contact form

If in doubt, staff should assume a request may be an FOI request and escalate it.

### What to do if you receive a request

If you receive a request for information:

1. Do not respond directly  
Staff should not provide information or make decisions about disclosure themselves.
2. Make a brief record (if verbal)  
If the request is made verbally:
  - note what information has been requested
  - clarify the request if necessary
  - confirm your understanding with the requester where possible
  - ensure you collect contact details, preferably an email address or postal address to send the information to
3. Forward it promptly  
Send the request as soon as possible to the Trust's FOI contact point:
  - [gdpr@olympustrust.co.uk](mailto:gdpr@olympustrust.co.uk)
4. Do not delay
5. The 20-school-day response period starts from the day the Trust receives the request, regardless of how or where it was first received.

### What staff should not do

Staff must not:

- refuse a request because it was not made in writing
- ignore or delay forwarding a request

- request identification or justification from the requester
- disclose information without authorisation

### **Support and advice**

If you are unsure whether something is an FOI request, or how to record or forward it, contact the Trust FOI lead via [gdpr@olympustrust.co.uk](mailto:gdpr@olympustrust.co.uk) for advice.

## Appendix B – Freedom of Information, Subject Access Requests and Environmental Information

### What's the difference?

The Trust receives different types of information requests. It is important that they are handled under the correct legal framework.

This table provides a simple comparison.

|                                       | <b>Freedom of Information (FOI)</b>                | <b>Subject Access Request (SAR)</b>                                      | <b>Environmental Information (EIR)</b>       |
|---------------------------------------|----------------------------------------------------|--------------------------------------------------------------------------|----------------------------------------------|
| <b>What is being requested?</b>       | Recorded information held by the Trust or a school | Personal data about the individual making the request                    | Information about the environment            |
| <b>Who can make a request?</b>        | Anyone                                             | The individual the data is about (or their authorised representative)    | Anyone                                       |
| <b>Does it have to be in writing?</b> | No – can be verbal or written                      | No – can be verbal or written                                            | No – can be verbal or written                |
| <b>Typical examples</b>               | Policies, spending data, governance information    | Pupil records, staff HR data, incident records relating to the requester | Energy use, land use, environmental policies |
| <b>Timescale for response</b>         | 20 school days                                     | 1 calendar month                                                         | 20 school days                               |
| <b>Can information be withheld?</b>   | Yes – where lawful exemptions apply                | Yes – where lawful exemptions apply                                      | Yes – where exceptions apply                 |
| <b>Relevant law</b>                   | Freedom of Information Act 2000                    | UK GDPR and Data Protection Act 2018                                     | Environmental Information Regulations 2004   |
| <b>Which policy applies?</b>          | Freedom of Information Policy                      | Data Protection / SAR Procedure                                          | Environmental Information guidance           |

### If a request could fall under more than one category

Where a request involves both personal data and other information:

- personal data will be handled under data protection legislation
- other information may be handled under FOI or EIR

The Trust will determine the correct route and advise the requester where necessary.

### If you are unsure

If you are uncertain which process applies:

- do not reject the request
- escalate it to the Trust's central team for assessment

Using the correct process ensures requests are handled lawfully and fairly.

## **Appendix C – Guide to information available from The Olympus Academy Trust under the Publication Scheme**

The Olympus guide to information available under the Publication Scheme can be found by following the link below:

[Guide to information available from the Trust under the Publication Scheme - May 23.pdf](#)

The Trust keeps the information published under the Publication Scheme under review and updates it as required.

## Appendix D – Reviews and escalation

This appendix explains what to do if a requester is dissatisfied with how a Freedom of Information request has been handled.

### Internal review

If a requester is unhappy with:

- a decision to withhold information
- the application of an exemption
- the timeliness or handling of their request

they may ask the Trust to carry out an internal review.

Requests for an internal review should:

- be made within 40 school days of the response
- explain why the requester remains dissatisfied

Requests should be sent to:

Freedom of Information Reviews

Olympus Academy Trust

Email: [gdpr@olympustrust.co.uk](mailto:gdpr@olympustrust.co.uk)

### What happens during an internal review

The internal review will:

- be carried out by a person not involved in the original decision
- reconsider how the request was handled
- review the application of any exemptions
- consider whether the original decision was reasonable and lawful

The Trust will normally complete an internal review within:

- 20 school days, or
- 40 school days where the matter is particularly complex

The outcome of the review will be confirmed in writing and will explain:

- whether the original decision is upheld or varied
- the reasons for the outcome
- the right to escalate the matter to the Information Commissioner's Office (ICO)

### Escalation to the Information Commissioner's Office (ICO)

If a requester remains dissatisfied after completing the Trust's internal review, they may complain to the Information Commissioner's Office (ICO).

The ICO is the independent regulator responsible for overseeing:

- the Freedom of Information Act
- the Environmental Information Regulations
- data protection legislation

The ICO cannot usually consider a complaint unless the Trust's internal review process has been completed.

## **How to contact the ICO**

Information about making a complaint to the ICO can be found at:  
<https://www.ico.org.uk>

The ICO can be contacted by:

- online complaint form
- telephone
- post

Details are available on the ICO website.

## **The Trust's approach to review and escalation**

The Trust views requests for review and escalation as an opportunity to:

- ensure compliance with legislation
- reflect on decision-making
- improve transparency and practice where appropriate

Requesters will not be treated differently for requesting a review or for raising concerns with the ICO.

## **Relationship to other Trust processes**

Freedom of Information reviews:

- are not complaints about staff conduct
- are not handled under the Trust's Complaints Policy
- relate specifically to compliance with information rights legislation

Where correspondence raises issues beyond FOI handling, the Trust will advise on the appropriate process to follow.

## Appendix E – Roles and responsibilities

This appendix sets out the roles and responsibilities of those involved in handling Freedom of Information (FOI) requests across the Trust. It is intended to support consistency, transparency and legal compliance.

### 1. The requester

The requester is responsible for:

- making their request clear enough for the Trust to identify the information being sought
- providing contact details so a response can be issued
- engaging constructively with requests for clarification where required

Requesters are not required to:

- explain why they want the information
- phrase their request in any particular way
- make the request in writing

### 2. All staff

All staff are responsible for:

- being alert to requests for information that may fall under the Freedom of Information Act
- treating requests seriously and respectfully
- forwarding FOI requests promptly to the Trust FOI lead
- avoiding informal disclosure of information

Staff should not:

- refuse a request because it was made verbally
- provide information or apply exemptions themselves
- delay forwarding a request

### 3. School-based staff and leaders

Headteachers and school-based leaders are responsible for:

- ensuring staff understand how to recognise FOI requests
- ensuring requests received at school level are escalated promptly
- supporting the Trust's central team by identifying relevant information held locally
- ensuring local records are accurate and accessible

Schools should not issue FOI responses independently unless authorised by the Trust Data Protection Leads.

### 4. Trust Data Protection Lead

The Trust Data Protection Lead is responsible for:

- logging all FOI requests
- confirming receipt and managing statutory timescales
- assessing whether requests fall under FOI, SAR or EIR
- coordinating information searches across schools and Trust teams
- applying exemptions where appropriate
- issuing responses and refusal notices

- maintaining accurate records of requests and outcomes

The Trust Data Protection Lead is also responsible for:

- providing advice and support to staff
- overseeing internal reviews
- monitoring compliance and trends

## **5. Review officer (internal review)**

The internal review officer is responsible for:

- conducting an impartial review independent of the original decision
- reassessing how the request was handled and how exemptions were applied
- considering whether the outcome was lawful and reasonable
- issuing a clear written outcome explaining the review decision and next steps

## **6. Trustees and governors**

Trustees and governors are responsible for:

- ensuring the Trust has an effective and compliant Freedom of Information policy
- receiving assurance that FOI obligations are being met
- overseeing transparency and governance arrangements

Trustees and governors must not:

- become involved in handling individual FOI requests
- make informal decisions about disclosure