Freedom of Information Policy

Version 2.0

2026-27

1. About this policy

As a public authority under the Freedom of Information Act 2000 (FOIA), Pele Trust must publish certain information proactively and respond to requests for the information it holds. This policy explains how the Trust and its schools meet those duties, and how requests for environmental information are handled under the Environmental Information Regulations 2004 (EIR). It applies to requests made to the Trust and to individual schools. The Chief Operating Officer is the responsible officer for FOIA and EIR compliance; requests for internal review are considered by the Chief Executive.

2. Publication scheme

The Trust has adopted the ICO model publication scheme and publishes as much as possible proactively on the Trust and school websites, including: who we are and how we are governed; what we spend; our priorities and performance; how we make decisions; our policies and procedures; lists and registers we are required to hold; and the services we offer. Published material is free of charge online; charges for hard copies are limited to disbursements such as printing and postage and are confirmed before any charge is incurred. Datasets requested under FOIA are published where appropriate in a re-usable electronic form in accordance with the Re-use of Public Sector Information Regulations 2015.

3. Valid requests

A FOI request must be in writing (including email and messages to official social media accounts), state the requester's real name and an address for correspondence, and describe the information sought. Requests do not need to mention FOI(A). Requests in a foreign language will be politely returned with a request for an English version. Requests for the requester's own personal data are handled as subject access requests under the Subject Access Request Procedure; requests mixing the two are split across both regimes. Requests for explanations or comment rather than recorded information are answered through normal channels rather than under FOIA.

4. Timescales and responses

The Trust confirms or denies whether it holds the requested information and provides it within 20 school days, or 60 working days where that is shorter, from the day after receipt. Where a qualified exemption requires a public interest test, the deadline may be extended by a reasonable period, normally no more than a further 20 school days, and the requester is told which exemption applies and when they will receive a response. Information is provided in the format the requester prefers where practicable, and reasonable adjustments are made under equality legislation.

Staff must not alter, deface, block, erase, destroy or conceal information after a request has been received; doing so is a criminal offence under section 77 of FOIA.

5. Exemptions, costs and vexatious requests

Information may be withheld where a FOIA exemption applies; the refusal notice states the exemption and, for qualified exemptions, the public interest reasoning, and explains the right to internal review and to complain to the ICO. The Trust is not obliged to comply where the cost of locating and extracting the information would exceed the appropriate limit of £450, calculated at £25 per hour; related requests received within 60 working days from the same person, or from people acting in concert, are aggregated. Before refusing on cost grounds the Trust helps the requester narrow the request. Vexatious and repeated requests may be refused under section 14, with an evidence log kept of the correspondence relied on. Fees notices, where issued, must be paid within three months, and the response clock restarts on payment.

6. Advice and assistance

The Trust helps requesters as far as is reasonable: explaining what information is held and in what formats, helping to focus or reframe requests, noting requests over the telephone for confirmation where a requester cannot make a written request, signposting information that is available elsewhere or due for publication, and keeping requesters informed of progress. Requesters are allowed two months to provide clarification, after which the request is treated as closed; a refined request is treated as a new request.

7. Environmental information (EIR)

Requests for environmental information, for example about the school estate, planning and development, energy use, air quality, contamination or waste, are handled under the EIR rather than FOIA. The main differences staff must know are: EIR requests are valid in any form, including verbal requests, which are logged and confirmed with the requester; the deadline is 20 working days (extendable to 40 for complex requests); there is a presumption in favour of disclosure, and the exceptions differ from FOIA exemptions with all except one subject to a public interest test; and charging rules differ, although website material remains free. Any request that appears to concern environmental information is referred to the Chief Operating Officer's office to be handled under the correct regime.

8. Internal review and complaints

A requester dissatisfied with the handling of a FOI or EIR request may ask for an internal review, which is conducted by the Chief Executive or a senior leader not involved in the original decision, normally within 20 working days. If still dissatisfied, the requester may complain to the ICO: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF; www.ico.org.uk; 0303 123 1113.

Document control

Version	2.0
Status	Issued September 2026
Next review	September 2027
Policy owner	Chief Operating Officer
Approved by	Board of Directors

Version	Date	Details
2.0	September 2026	New section on the Environmental Information Regulations 2004; responsible officer and internal review route named; drafting corrections; publication scheme consolidated against the ICO model scheme.
1.0	July 2024	Freedom of Information Policy issued (updated).