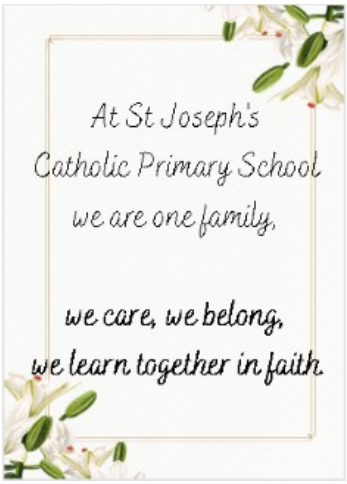
St Joseph's Catholic Primary School

Frizington

Freedom of Information Policy

including our Publication Scheme, Guide to Information and Schedule of Charges

Diocese of Lancaster



"We care, we belong, we learn together in faith."

Version 1.0 • Approved November 2026

Policy Information

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	Chair of Governors	**Headteacher**
Name	**Alex Farrell**	**Annette Savage**
Signature		
Date	**November 2026**	**November 2026**
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Version history

Version	Date	Summary of changes
1.0	October 2026	New school-specific policy for St Joseph's, replacing any previous publication scheme document. Reflects FOIA 2000, EIR 2004, UK GDPR, DPA 2018 as amended by the Data (Use and Access) Act 2025, current ICO guidance for schools and the ICO model publication scheme.

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1. Our Mission and Policy Statement

In the faithful care of St Joseph, Jesus prospered. We care, we belong, we learn together in faith.

St Joseph's is a Catholic primary school; we are one family. Our Gospel values of honesty, respect and care for one another shape how we work with parents, parishioners, our local community and anyone who asks us for information. Being open about how our school is run, how decisions are made and how public money is spent is part of the trust that our families and community place in us.

The Governing Body of St Joseph's Catholic Primary School is a public authority under the Freedom of Information Act 2000. It is committed to:

- responding to requests for information openly, helpfully and within the legal time limits;
- publishing information proactively through the Information Commissioner's model publication scheme;
- protecting the personal information of our pupils, families, staff and governors; and
- withholding information only where the law allows it and there is a genuine reason to do so.

2. Purpose and Aims

This policy explains how St Joseph's Catholic Primary School meets its duties under the Freedom of Information Act 2000 (FOIA) and the Environmental Information Regulations 2004 (EIR). It is written to be practical for a small school, where the Headteacher holds several operational responsibilities and is supported by the school office.

The policy aims to:

- make sure everyone in our school community knows what an information request is and what to do when one arrives;
- set out a clear and realistic procedure that the school office and Headteacher can follow;
- explain the statutory time limits, exemptions, charges and the right to complain;
- distinguish clearly between FOI requests, environmental information requests and requests for personal information; and
- set out our publication scheme, guide to information and schedule of charges (Appendices C to E).

3. Legislative and Guidance Framework

This policy has regard to the following legislation and guidance, as in force in October 2026:

Legislation or guidance	Relevance to this policy
Freedom of Information Act 2000 (FOIA)	General right of access to recorded information held by public authorities (section 1); duty to adopt a publication scheme (section 19); exemptions (Part II); complaints to the regulator (section 50). The governing body of a maintained school is a public authority under Schedule 1.
Freedom of Information (Time for Compliance with Request) Regulations 2010	Allow maintained schools to respond to FOI requests within 20 school days, subject to a maximum of 60 working days.
Freedom of Information and Data Protection (Appropriate Limit and Fees) Regulations 2004	Set the cost limit for schools at £450 (18 hours at £25 per hour) and the rules on charging.

Legislation or guidance	Relevance to this policy
Environmental Information Regulations 2004 (EIR)	Separate right of access to environmental information, with its own time limits, exceptions, charging rules and a mandatory internal review.
UK General Data Protection Regulation (UK GDPR) and Data Protection Act 2018	Govern the handling of personal information, including subject access requests and the disclosure of third-party personal data under FOIA section 40 and EIR regulations 12(3) and 13.
Data (Use and Access) Act 2025	Amends UK GDPR and the DPA 2018 (for example, "reasonable and proportionate" searches for subject access requests, "stopping the clock" to seek clarification, and a duty to have a data protection complaints process). It also replaced the Information Commissioner with the Information Commission from 30 September 2026; the regulator continues to be known as the ICO.
Education (Pupil Information) (England) Regulations 2005	Give parents of pupils at maintained schools a separate right to see or have a copy of their child's educational record.
Freedom of Information Code of Practice (section 45 Code, 2018)	Good practice on advice and assistance, clarification, consultation with third parties, internal reviews and transparency.
ICO guidance	Including "Advice for schools on the FOIA and responding to requests for information", the Guide to managing an FOI request, the model publication scheme, and the definition document for schools in England (version 4.0).

4. Scope and Key Definitions

This policy applies to all recorded information **held** by the school, in any format, including paper files, emails, electronic documents, databases, photographs, CCTV, text messages and messages sent through apps, where they relate to school business. Information held on the school's behalf by another organisation (for example a payroll or IT provider) is also covered. Information about school business held on a personal device or personal account may also be within scope.

The policy applies to all staff, governors, volunteers and contractors working for the school.

Term	Meaning in this policy
Request	Any request for recorded information that is not a routine enquiry dealt with in the normal course of business. A request does not need to mention FOIA or the EIR to be valid.
Requester	Any person or organisation, anywhere in the world, making a request. Requests are treated in the same way whoever makes them and whatever their reason (requests are "applicant and motive blind").
Held	Information the school holds for its own purposes, whether created by the school or received from others. FOIA does not require the school to create new information or to give opinions or explanations that are not already recorded.
School day	Any day on which there is a session at St Joseph's (in other words, a day when pupils are taught). Weekends, school holidays and staff training (INSET) days are not school days.
Working day	Any day other than a Saturday, Sunday, Christmas Day, Good Friday or a bank holiday in England. School holidays are working days.

Term	Meaning in this policy
FOI Lead	The Headteacher, who has day-to-day responsibility for FOI and EIR compliance (see section 6).
ICO	The UK regulator for information rights. Since 30 September 2026 this is the Information Commission, which continues to use the name ICO.

5. Types of Request: FOI, EIR and Personal Information

Different laws apply depending on what information is requested. Identifying the correct regime at the start is essential, because the time limits and rules differ. A single request may need to be handled under more than one regime.

	Freedom of Information (FOIA)	Environmental Information (EIR)	Personal information (UK GDPR / Pupil Information Regulations)
What it covers	Recorded information about the school that is not environmental and not the requester's own personal data, e.g. budgets, contracts, policies, governor minutes, staffing structures.	Information about the environment and things affecting it, e.g. school buildings and grounds, building materials (such as RAAC or asbestos), energy use, traffic and parking, noise, construction works.	A person's own personal data (subject access request), or a parent's request for their child's educational record.
Form of request	Must be in writing (including email) with a name and an address for correspondence.	Can be made in writing or verbally, including by telephone or in person.	Can be made verbally or in writing. Identity may need to be verified.
Time limit	20 school days, but no later than 60 working days.	20 working days (school holidays count). Up to 40 working days if complex and voluminous.	SAR: one month (extendable by up to two further months in limited cases). Educational record: 15 school days.
Cost limit	£450 (18 hours). The school may refuse requests above this.	No cost limit, but a request can be "manifestly unreasonable".	Normally free. A request may be refused or charged for if manifestly unfounded or excessive.
Internal review	Good practice; normally within 20 working days.	Mandatory; within 40 working days.	Handled through our data protection complaints process.

> **Practical rule:** if someone asks for information about **themselves** (or their child), treat it under our Data Protection Policy, not as an FOI request. If the information concerns the **school buildings, grounds or environment**, treat it under the EIR. Everything else is normally FOI. If in doubt, ask the Headteacher or our Data Protection Officer.

6. Roles and Responsibilities

As a small school, we keep responsibilities simple and clear. The Headteacher acts as FOI Lead, supported by the school office.

6.1 The Governing Body

The Governing Body is the public authority under FOIA and has overall legal responsibility for compliance. It will:

- approve this policy, the publication scheme, the guide to information and the schedule of charges;
- make sure that the school has adequate arrangements and capacity to respond to requests on time;
- nominate a governor (normally the Chair) to carry out internal reviews where the Headteacher made the original decision;
- receive an annual summary of requests received and how they were handled (see section 21); and
- forward any request received by an individual governor to the school office immediately.

6.2 The Chair of Governors

- Acts as the "qualified person" for the purposes of section 36 FOIA (prejudice to the effective conduct of public affairs). Section 36 may only be used where the qualified person has personally given a reasonable opinion, which must be recorded. For maintained schools, the qualified person is the Chair of the Governing Body.
- Normally carries out internal reviews (section 19). If the Chair was involved in the original decision, another governor who was not involved will carry out the review.

6.3 The Headteacher (FOI Lead)

- Has day-to-day responsibility for FOI and EIR compliance and for this policy.
- Decides what information is held, whether any exemption or exception applies, and approves every response.
- Seeks advice from the Data Protection Officer, Cumberland Council, the Diocese of Lancaster or other advisers where a request is complex, sensitive or involves personal data.
- Makes sure that staff and governors are briefed on this policy and know how to recognise a request.
- Makes sure the publication scheme and guide to information are kept up to date.
- Where the Headteacher is absent for an extended period, Emily Halligan will act as FOI Lead so that statutory deadlines are still met.

6.4 The School Office

- Receives requests, records them in the Information Request Log on the day of receipt, and calculates the response deadline.
- Sends an acknowledgement, normally within three school days.
- Gathers information requested by the Headteacher and prepares draft responses.
- Monitors deadlines and alerts the Headteacher if a deadline is at risk.
- Checks the school email inbox, including "spam" and "junk" folders, regularly. During school holidays, the office will follow the holiday arrangements in section 9.4 because EIR and data protection deadlines continue to run.
- Provides publication scheme information promptly on request (Appendix D).

6.5 The Data Protection Officer (DPO)

The school's DPO is Miss Annette Savage (Headteacher), who can be contacted through the school office. The DPO advises on requests involving personal data, on subject access requests and on the disclosure of third-party personal information. The DPO does not make decisions on FOI requests but should be consulted where personal data may be released or withheld.

6.6 All Staff, Governors and Volunteers

- Recognise that any written request for information may be an FOI request, and that any request (including verbal) about environmental matters may be an EIR request.
- Pass every request to the school office **on the same day** it is received. The legal time limit starts on the day after the school receives the request, not when it reaches the right person.
- Do not reply to requests themselves, and never delete, alter, hide or destroy information that has been requested. Doing so with the intention of preventing disclosure is a criminal offence under section 77 FOIA.
- Remember that emails, notes and messages about school business may be disclosable. Write professionally and factually.

7. How to Make a Request

Much of the information people ask for is already available through our publication scheme (Appendix D). We encourage people to check this first, or simply to contact the school office, who will help wherever they can.

7.1 Freedom of Information requests

An FOI request must:

- be in writing – this includes letters, emails and messages sent to an account the school monitors, such as an official social media account;
- give the requester's real name and an address for correspondence (a postal or email address); and
- describe the information requested.

Requests should be sent to:

> **The Headteacher (FOI Lead), St Joseph's Catholic Primary School, Yeathouse Road, Frizington, Cumbria, CA26 3PX**
>
> Telephone: 01946 810702
>
> Email: admin@st-josephsrc.cumbria.sch.uk
>
> Please mark correspondence "Information Request". A request is still valid if it is sent to any member of staff or any governor.

7.2 Environmental information requests

Requests for environmental information may also be made verbally, in person or by telephone. Staff will write down the request, read it back to the requester to check it is accurate, take contact details and pass it immediately to the school office.

7.3 Requests for personal information

Requests for a person's own personal data, or a parent's request for their child's educational record, are handled under our Data Protection Policy and are not FOI requests (see section 16).

7.4 Help with making a request

Under section 16 FOIA and regulation 9 EIR we have a duty to provide reasonable advice and assistance. If someone needs help to make or clarify a request, for example because of a disability or because English is not their first language, the school office will help. Requesters may say how they would like to receive information (for example by email, on paper, or by viewing it at school) and we will meet that preference where reasonably practicable.

8. Our Procedure for Handling Requests

The following steps are designed to be realistic for our small school. A one-page quick guide is in Appendix A and a checklist and log template are in Appendix B.

Step 1 – Receive and log (school office, same day)

- Date-stamp the request. Record it in the Information Request Log with a reference number (e.g. FOI-2026-01).
- Identify which regime applies (FOI, EIR, subject access or educational record – see section 5).
- Calculate and record the deadline (section 9). Tell the Headteacher the same day.

Step 2 – Acknowledge (within three school days)

- Send an acknowledgement confirming the date received, the reference number and the date by which the requester can expect a response (Appendix F).
- If the information is already published, the response can simply direct the requester to it (section 21 FOIA) and the request can be closed.

Step 3 – Clarify if necessary

- If it is not clear what is being asked for, contact the requester promptly to ask for clarification and offer help. The time limit does not start until the clarification is received. If no clarification is received within three months, the request may be closed and the requester told.

Step 4 – Locate the information

- The Headteacher decides where the information is likely to be held. The office searches paper and electronic records and keeps a short note of where was searched and how long it took.
- If the cost of finding, retrieving and extracting the information would exceed £450 (18 hours), go to section 11.3 and offer advice on narrowing the request.
- If the information is not held, the requester must be told. If another public authority (for example Cumberland Council or the Diocese) is likely to hold it, the requester should be told who to contact.

Step 5 – Consider exemptions, third parties and personal data

- Read the information and decide whether any of it should be withheld (section 11). Check for personal data (section 16) and information supplied by others (section 17).
- For qualified exemptions and all EIR exceptions, carry out and record the public interest test (section 12).
- Seek advice from the DPO or other advisers where needed. Do this early: time spent seeking advice does not extend the deadline.

Step 6 – Prepare and approve the response

- The office prepares the response, with any redactions clearly marked. The Headteacher checks and approves it before it is sent.
- Where information is withheld, the response must be a refusal notice that explains which exemption or exception applies and why, the outcome of any public interest test, and the requester's right to an internal review and to complain to the ICO (section 17 FOIA; regulation 14 EIR).

Step 7 – Send, record and learn

- Send the response by the deadline, in the requester's preferred format where reasonably practicable.
- Complete the log, file a copy of the request, response and any working notes, and consider whether the information should be added to the publication scheme or a disclosure log.

9. Statutory Response Times

9.1 Summary of time limits

Type of request	Time limit
FOI request	Promptly, and no later than the 20th school day after receipt or the 60th working day after receipt, whichever comes first.
FOI – extra time for the public interest test	Where a qualified exemption applies, the school may take a reasonable extension to consider the public interest. The requester must be told within the normal time limit which exemption is being considered and when a decision is expected. In line with the section 45 Code and ICO guidance, any extension should normally be no more than a further 20 working days.
EIR request	As soon as possible and no later than 20 working days after receipt. This may be extended to 40 working days only if the request is both complex and voluminous, and the requester must be told within the first 20 working days. The school-day rule does not apply to the EIR.
Subject access request (SAR)	Without undue delay and within one calendar month of receipt (or of receiving identity verification or necessary clarification). May be extended by up to two further months where requests are complex or numerous; the requester must be told within the first month.
Parent's request for an educational record	Within 15 school days of receipt of a written request.
Internal review (FOI)	Within 20 working days of receipt of the request for review; in exceptional cases no more than 40 working days.
Internal review (EIR)	As soon as possible and within 40 working days (a legal requirement).

9.2 How to count the days

- Day 1 is the first school day (FOI) or working day (EIR) **after** the request is received. A request received at the weekend, in a school holiday or after the office has closed is treated as received on that day; counting starts from the next school or working day as appropriate.
- For FOI, work out both the 20th school day and the 60th working day. **The earlier date is the deadline.** In practice the 20 school day limit will usually apply; the 60 working day limit acts as a backstop where the school is closed for a long period.
- The clock is paused while the school waits for clarification, or for a fee to be paid following a fees notice.
- These are maximum limits. The school will always aim to respond as quickly as possible.

9.3 Worked example

9.4 School holidays

Because EIR and data protection deadlines continue to run during school holidays, the school will make the following arrangements:

- the school email inbox and post will be checked at least fortnightly during holidays by the school office (Mrs Kiri Skelton) and the Headteacher (Miss Annette Savage);
- an automatic email reply during holidays will explain when the office will reopen and that requests are still being logged; and
- any EIR request or SAR received will be passed to the Headteacher so that the deadline can be met.

10. Information We Will Disclose

Anyone making a request is entitled to be told in writing whether the school holds the information (the duty to confirm or deny) and, if it does, to have it communicated to them, unless an exemption or exception applies.

- Our starting point is openness. Information will be released unless there is a lawful and good reason to withhold it.
- Disclosure under FOIA or the EIR is treated as disclosure **to the world**, not just to the requester. We consider what the effect would be of the information being made public.
- Where only part of a document is exempt, we will release the rest with the exempt parts removed (redacted), and explain why.
- We will not create new information to answer a request, but simple compilations from information we hold (for example a total or a list) may be expected.
- We may provide information informally and outside FOIA, for example where a parent asks a routine question that can be answered easily.
- Datasets released in response to a request will, where reasonably practicable, be provided in an electronic, re-usable format and, where the school owns the copyright, made available for re-use under the Open Government Licence.
- Information released may still be protected by copyright. Re-use for commercial purposes may need the permission of the copyright owner.

11. Exemptions and Refusing Requests

11.1 Absolute and qualified exemptions

FOIA contains exemptions from the duty to disclose. **Absolute** exemptions do not require a public interest test. **Qualified** exemptions apply only if the public interest in withholding the information outweighs the public interest in disclosing it (section 12). The exemptions most likely to be relevant to a primary school are:

Exemption	Type	Typical school example
s.21 Information accessible by other means	Absolute	Policies or Ofsted reports already published on the school or government websites.
s.22 Intended for future publication	Qualified	A report or set of minutes that is due to be published shortly.
s.31 Law enforcement	Qualified	Security arrangements, or information that would assist crime or fraud.
s.36 Prejudice to effective conduct of public affairs	Qualified (requires opinion of the qualified person)	Free and frank discussions by governors on a sensitive proposal, where disclosure would inhibit future discussion.
s.38 Health and safety	Qualified	Information that could endanger the physical or mental health or safety of any person, e.g. detailed site security information.
s.40(1) Requester's own personal data	Absolute	Handled as a subject access request instead.

Exemption	Type	Typical school example
s.40(2) Third-party personal data	Absolute where disclosure would breach data protection law	Information about individual pupils, parents or staff.
s.41 Information provided in confidence	Absolute	Information given to the school in confidence where disclosure would be an actionable breach of confidence.
s.42 Legal professional privilege	Qualified	Legal advice received by the school or governors.
s.43 Commercial interests	Qualified	Pricing information in a tender that would harm a supplier or the school's ability to obtain value for money.
s.44 Prohibitions on disclosure	Absolute	Where another law prevents disclosure.

This is not a full list. The Headteacher will take advice before relying on any exemption that is less commonly used. In some cases, simply confirming or denying whether information is held could itself cause harm; in those cases the school may "neither confirm nor deny" where the relevant exemption allows it.

11.2 EIR exceptions

The EIR contain their own exceptions (regulations 12 and 13), such as requests that are manifestly unreasonable, material still in the course of completion, internal communications, and adverse effects on confidentiality, the course of justice, intellectual property or the environment. Under the EIR there is a **presumption in favour of disclosure**, and nearly all exceptions are subject to the public interest test. Personal data is handled under regulation 13.

11.3 Requests that exceed the cost limit

- The school is not obliged to comply with an FOI request if it estimates that the cost of determining whether information is held, and of locating, retrieving and extracting it, would exceed £450 (18 hours of staff time at £25 per hour) (section 12 FOIA).
- Time spent reading information, considering exemptions or redacting cannot be counted.
- Requests from the same person, or from people acting together, for similar information within 60 working days may be aggregated.
- The estimate must be reasonable and recorded. The school will advise the requester how they could narrow the request to bring it under the limit.
- The cost limit does not apply to the EIR, although a request requiring a grossly disproportionate amount of work may be "manifestly unreasonable".

11.4 Vexatious and repeated requests

Under section 14 FOIA the school need not comply with a request that is vexatious, or one that is identical or substantially similar to a previous request from the same person where a reasonable interval has not passed. Case law sets a high bar. The focus is on the request and its impact, not on the person making it. A parent who has been through the complaints process is still entitled to make requests. Any decision to treat a request as vexatious will be taken by the Headteacher after seeking advice, and recorded.

11.5 Refusal notices

When refusing all or part of a request, the school will issue a refusal notice within the normal time limit which:

- states that the information is being withheld and specifies the exemption or exception relied on;
- explains why it applies (unless this would itself disclose exempt information);
- where relevant, explains the public interest arguments considered and the outcome; and
- explains how to ask for an internal review and the right to complain to the ICO.

12. The Public Interest Test

Where a qualified exemption or an EIR exception applies, the school must decide whether, in all the circumstances, the public interest in maintaining it outweighs the public interest in disclosure. If the arguments are equally balanced, the information must be released.

Factors that may favour disclosure	Factors that may favour withholding
Transparency and accountability for decisions and the use of public money. Helping the public understand and take part in decisions affecting the school and community. Showing that the school is acting fairly and lawfully. Safety and environmental concerns.	Protecting the safety and wellbeing of pupils and staff. Protecting the school's ability to obtain value for money. Allowing safe space for decisions still being made. Protecting legal advice and confidential information.

The following are **not** relevant: that the information might be embarrassing to the school or governors, might be misunderstood, or that the requester's motives are unknown. The Headteacher will record the factors considered and the reasons for the decision.

13. Fees and Charges

St Joseph's aims to provide information free of charge wherever possible. Any charge will be made in line with the law and our published Schedule of Charges (Appendix E). If we intend to charge, we will tell the requester in advance and will not provide the information until the fee is paid.

13.1 FOI requests below the cost limit

- The school may charge only for communication costs ("disbursements") such as photocopying, printing and postage. Staff time **cannot** be charged.
- Information sent by email will normally be free.
- If a charge is to be made, a fees notice will be issued. The time limit is paused until the fee is paid. If the fee is not paid within three months, the school does not have to comply.

13.2 FOI requests above the cost limit

The school will normally refuse such requests under section 12 and offer advice on narrowing them. Exceptionally, the Governing Body may decide to provide the information and charge for it under section 13 FOIA, in which case staff time may be charged at £25 per hour plus disbursements. A fees notice would be issued first.

13.3 EIR requests

A reasonable charge may be made for supplying environmental information, in line with the published schedule. There is no charge for viewing information in person at the school or for access to any public register. A requester may be asked to pay in advance.

13.4 Publication scheme information

Information on our website is free. Charges for hard copies of publication scheme information are set out in Appendix E.

13.5 Personal information

Subject access requests are normally free. A reasonable fee may be charged only where a request is manifestly unfounded or excessive, or for further copies. For educational records, the school may charge no more than the cost of supplying a copy; viewing the record is free.

14. Publication Scheme and Guide to Information

Section 19 FOIA requires every public authority to adopt and maintain a publication scheme approved by the ICO. St Joseph's has adopted the **ICO model publication scheme** (version 1.2) without amendment; the full text is reproduced in Appendix C. The ICO states that the model scheme should not be changed.

Alongside the scheme the school maintains:

- a **Guide to Information** (Appendix D), listing the information we publish under each of the seven classes, how it can be obtained and whether a charge applies. It is based on the ICO definition document for schools in England (version 4.0); and
- a **Schedule of Charges** (Appendix E).

The scheme, guide and schedule will be made available on the school website and in hard copy from the school office. The Headteacher will:

- make sure that information is added to the guide promptly when created, and superseded information is replaced;
- check at least annually that every website link listed in the guide works and that each document listed as available is in fact available;
- publish redacted versions of governing body minutes where parts are exempt; and
- publish any dataset that has been requested, and any updated version, unless it is not appropriate to do so.

Information that is not listed in the guide can still be requested under FOIA or the EIR.

15. Environmental Information Requests

Environmental information is broadly defined. For our school it is likely to include information about:

- the school buildings and grounds, including building materials (for example asbestos or RAAC), maintenance, repairs and building works;
- energy and water use, heating, waste and recycling;
- traffic, parking, drop-off arrangements and travel plans;
- trees, wildlife, outdoor learning areas and land use; and
- reports, plans, contracts and costs relating to any of the above.

Environmental requests follow the same procedure as FOI requests (section 8) with these important differences:

- requests can be made verbally;
- the time limit is **20 working days**, including school holidays (section 9);
- there is no cost limit, but a reasonable charge may be made in line with Appendix E;
- there is a presumption in favour of disclosure and almost all exceptions are subject to the public interest test; and

- an internal review is a legal requirement and must be completed within 40 working days.

16. Personal Information and Data Protection

FOIA and the EIR do not give anyone the right to see personal information about other people simply because they ask. St Joseph's treats the protection of pupils' and families' personal information with great care.

16.1 Requests for your own information

- Requests by individuals for their own personal data are subject access requests under Article 15 UK GDPR, handled under our Data Protection Policy. The school will carry out reasonable and proportionate searches and may pause the time limit while it seeks clarification that is reasonably required.
- Parents may make a subject access request on behalf of their child where the child is not mature enough to exercise their own rights, or where the child has authorised it. The child's best interests will always be considered.
- Parents of pupils at maintained schools also have a separate right under the Education (Pupil Information) (England) Regulations 2005 to see or receive a copy of their child's educational record within 15 school days.

16.2 Third-party personal information under FOIA and the EIR

- Personal data about other people will only be disclosed if doing so would be lawful, fair and transparent under UK GDPR. In practice, information about individual pupils and families will almost never be disclosed.
- Information about staff and governors acting in their professional roles may sometimes be disclosed, particularly for senior roles. The more senior the role, the more likely disclosure will be reasonable. Information about private lives, health, disciplinary matters or performance will not normally be released.
- Where numbers are small (for example class or year group figures), care will be taken that individuals cannot be identified. As a small school with low pupil numbers, we will consider carefully whether statistics could identify individual children before releasing them.

16.3 Data protection complaints

As required by the Data Protection Act 2018 as amended, the school has a process for handling complaints about the use of personal data. This is set out in our Data Protection Policy.

17. Third-Party and Confidential Information

- Where a request covers information supplied by, or about, another organisation (for example Cumberland Council, the Diocese of Lancaster, a supplier or a contractor), the school may consult that organisation about disclosure, in line with the section 45 Code of Practice. The final decision rests with the school and consultation does not extend the time limit.
- The school will not accept confidentiality clauses in contracts that seek to prevent disclosure of information that would normally be disclosable under FOIA, and will make suppliers aware that information may be disclosed.
- Where a request is for information held only by another public authority, the school will tell the requester and, where possible, provide contact details.

18. Records Management and Retention

Good records management makes it possible to find information quickly and to respond within the law. The school will:

- keep records in an organised way so that information can be located and retrieved efficiently;
- retain and dispose of records in line with our records retention schedule, which follows the Information and Records Management Society (IRMS) Toolkit for Schools (current version);
- ensure that, once a request is received, no relevant information is deleted or destroyed, even if it is due for routine disposal, until the request (and any review or complaint) is finished;
- keep a record of each request, the response, any working notes and the reasons for decisions, for the period set out in the retention schedule;
- make sure that staff and governors use school email accounts and approved systems for school business; and
- keep information secure, including when information is sent to requesters (for example checking email addresses and redactions before sending).

It is a criminal offence under section 77 FOIA (and regulation 19 EIR) to alter, deface, block, erase, destroy or conceal any record with the intention of preventing its disclosure once a request has been received.

19. Complaints and Internal Review

Anyone who is unhappy with how their request has been handled may ask the school to review its decision. This is called an internal review. It is separate from the school's general complaints procedure.

19.1 How to ask for an internal review

- Write to the Chair of Governors, c/o the school office (address in section 7.1), within **40 working days** of the date of the school's response, explaining what you are unhappy with. For EIR requests, the 40 working day period is set by law.
- The school office will log and acknowledge the request for review.

19.2 How the review will be carried out

- The review will be carried out by the Chair of Governors or another governor who was not involved in the original decision, with advice from the DPO or another adviser where appropriate. In a small school this ensures that the review is genuinely independent of the Headteacher's original decision.
- The reviewer will look afresh at the request, the information and the original decision, including whether the time limit was met and whether advice and assistance were given.
- The outcome will be sent in writing within **20 working days** (no more than 40 working days in exceptional cases) for FOI requests, and within **40 working days** for EIR requests.
- If the review finds that information should have been released, it will be released as soon as possible. The response will explain the right to complain to the ICO.

20. Complaints to the Information Commission (ICO)

If a requester remains dissatisfied after the internal review, or if the school has not responded, they may complain to the regulator under section 50 FOIA (and regulation 18 EIR). Since 30 September 2026 the regulator has been the Information Commission, which continues to be known as the ICO.

- The ICO normally expects people to have asked for an internal review first.
- The ICO asks that complaints are made within six weeks of the school's final response or last substantive contact.

- The ICO may issue a decision notice requiring the school to take action. Either party may appeal a decision notice to the First-tier Tribunal (General Regulatory Chamber – Information Rights).

Information Commission (ICO)

Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Helpline: 0303 123 1113 Website: www.ico.org.uk

21. Training, Monitoring and Review

21.1 Training

- All staff and governors will be briefed on this policy and Appendix A at induction and reminded periodically. ICO training materials (including "FOI in 90 seconds" and the ICO's training videos) may be used.
- The Headteacher and the school office staff who handle requests will receive more detailed training.

21.2 Monitoring

The school office maintains the Information Request Log. The Headteacher will report to the Governing Body annually on:

- the number and type of requests received (FOI, EIR, SAR, educational record);
- the percentage answered within the time limit;
- the number of refusals, the exemptions used, internal reviews and any ICO complaints; and
- any lessons learned, including information that could be added to the publication scheme.

21.3 Policy review

This policy will be reviewed by the Headteacher and approved by the Governing Body. It is recommended that it is reviewed at least every two years, or sooner if there are changes to legislation, ICO guidance or the model publication scheme. The Guide to Information (Appendix D) and Schedule of Charges (Appendix E) will be checked at least annually.

22. Related Policies and Documents

This policy should be read alongside the following school documents:

- Data Protection Policy (including subject access requests and data protection complaints)
- Records Management Policy and Retention Schedule
- Complaints Procedure
- Charging and Remissions Policy
- Child Protection Policy and Procedures
- Online Safety Policy and Procedures
- Privacy notices for pupils, parents, staff and governors

Appendix A – Staff and Governor Quick Guide

What to do if you receive a request for information

1. Recognise it. Any written request for information could be an FOI request – it does not need to mention FOI. A request about the school buildings, grounds or environment can be made verbally. A request about someone's own information is a subject access request.

2. Pass it on today. Forward it to the school office on the same day. The legal clock is already running. Check your spam/junk folder.

3. Do not answer it yourself unless it is a routine question you would normally answer.

4. Do not delete or change anything that has been asked for. This could be a criminal offence.

5. If someone asks verbally about environmental matters, write down exactly what they want, read it back, take their name and contact details, and pass it to the office.

6. Ask if unsure. Speak to the Headteacher or the school office.

Key deadlines	
FOI	20 school days or 60 working days – whichever is sooner
Environmental information (EIR)	20 working days – holidays count
Subject access request	One calendar month
Parent request for educational record	15 school days

Appendix B – Request Handling Checklist and Log

B1. Checklist for each request

Action	Done / date
Request date-stamped and logged with reference number	
Regime identified: FOI / EIR / SAR / educational record	
Deadline calculated (FOI: earlier of 20th school day and 60th working day)	
Headteacher informed	
Acknowledgement sent (within 3 school days)	
Clarification sought? If yes, date received	
Already published? (if yes, signpost and close)	
Search carried out and recorded (where searched, time taken)	
Cost limit considered (FOI only: £450 / 18 hours)	
Personal data checked; DPO consulted if needed	
Third parties consulted if needed	
Exemptions/exceptions considered and public interest test recorded	
Section 36 opinion obtained from qualified person (if relevant)	
Redactions checked by a second person	
Response approved by Headteacher	
Response sent, including review and ICO rights where information withheld	
Log completed; consider adding to publication scheme/disclosure log	

B2. Information Request Log – suggested headings

The log can be kept as a simple spreadsheet. The ICO publishes a free FOI and EIR request-tracking template which may be used.

Ref.	Date received	Requester (name)	Summary	Regime	Deadline	Date sent	Outcome
FOI-2026-01							

Outcome: released in full / released in part / refused / not held / clarification not received / withdrawn. Also note any internal review and ICO complaint.

Appendix C – ICO Model Publication Scheme

The Governing Body of St Joseph's Catholic Primary School has adopted the Information Commissioner's Office model publication scheme, reproduced in full below without amendment. The ICO states that the model scheme should not be altered. What the school publishes under each class is set out in our Guide to Information (Appendix D), and our charges are set out in Appendix E.

Scheme	ICO Model publication scheme, Version 1.2 (23 October 2015)
Adopted by	Governing Body of St Joseph's Catholic Primary School, Frizington
Date adopted	November 2026
Official source	ico.org.uk – "Publication schemes: a guide" (Model publication scheme, PDF)

Note: from 30 September 2026 the functions of the Information Commissioner transferred to the Information Commission, which continues to be known as the ICO. The scheme text below is reproduced exactly as published by the ICO, so it still refers to the Information Commissioner.

Model publication scheme

Freedom of Information Act

This model publication scheme has been prepared and approved by the Information Commissioner. It may be adopted without modification by any public authority without further approval and will be valid until further notice.

This publication scheme commits an authority to make information available to the public as part of its normal business activities. The information covered is included in the classes of information mentioned below, where this information is held by the authority. Additional assistance is provided to the definition of these classes in sector specific guidance manuals issued by the Information Commissioner.

The scheme commits an authority:

- To proactively publish or otherwise make available as a matter of routine, information, including environmental information, which is held by the authority and falls within the classifications below.
- To specify the information which is held by the authority and falls within the classifications below.
- To proactively publish or otherwise make available as a matter of routine, information in line with the statements contained within this scheme.
- To produce and publish the methods by which the specific information is made routinely available so that it can be easily identified and accessed by members of the public.
- To review and update on a regular basis the information the authority makes available under this scheme.
- To produce a schedule of any fees charged for access to information which is made proactively available.
- To make this publication scheme available to the public.
- To publish any dataset held by the authority that has been requested, and any updated versions it holds, unless the authority is satisfied that it is not appropriate to do so; to publish the dataset, where reasonably practicable, in an electronic form that is capable of re-use; and, if any information in the dataset is a relevant copyright work and the public authority is the only owner, to make the information available for re-use under the terms of the Re-use of Public Sector Information Regulations 2015, if they apply, and otherwise under the terms of the Freedom of Information Act section 19.

The term 'dataset' is defined in section 11(5) of the Freedom of Information Act. The term 'relevant copyright work' is defined in section 19(8) of that Act.

Classes of information

Who we are and what we do.

- Organisational information, locations and contacts, constitutional and legal governance.

What we spend and how we spend it.

- Financial information relating to projected and actual income and expenditure, tendering, procurement and contracts.

What our priorities are and how we are doing.

- Strategy and performance information, plans, assessments, inspections and reviews.

How we make decisions.

- Policy proposals and decisions. Decision making processes, internal criteria and procedures, consultations.

Our policies and procedures.

- Current written protocols for delivering our functions and responsibilities.

Lists and registers.

- Information held in registers required by law and other lists and registers relating to the functions of the authority.

The services we offer.

- Advice and guidance, booklets and leaflets, transactions and media releases. A description of the services offered.

The classes of information will not generally include:

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

The method by which information published under this scheme will be made available

The authority will indicate clearly to the public what information is covered by this scheme and how it can be obtained.

Where it is within the capability of a public authority, information will be provided on a website. Where it is impracticable to make information available on a website or when an individual does not wish to access the information by the website, a public authority will indicate how information can be obtained by other means and provide it by those means.

In 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 an authority is legally required to translate any information, it will do so.

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 scheme.

Charges which may be made for information published under this scheme

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

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

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

Charges may be made for actual disbursements incurred such as:

- photocopying
- postage and packaging
- the costs directly incurred as a result of viewing information

Charges may also be made for information provided under this scheme where they are legally authorised, they are in all the circumstances, including the general principles of the right of access to information held by public authorities, justified and are in accordance with a published schedule or schedules of fees which is readily available to the public.

Charges may also be made for making datasets (or parts of datasets) that are relevant copyright works available for re-use. These charges will be in accordance with the terms of the Re-use of Public Sector Information Regulations 2015, where they apply, or with regulations made under section 11B of the Freedom of Information Act, or with other statutory powers of the public authority.

If a charge is to be made, confirmation of the payment due will be given before the information is provided. Payment may be requested prior to provision of the information.

Written requests

Information held by a public authority that is not published under this scheme can be requested in writing, when its provision will be considered in accordance with the provisions of the Freedom of Information Act.

Source: Information Commissioner's Office, Model publication scheme, Version 1.2, 20151023. Contains public sector information licensed under the Open Government Licence v3.0.

Appendix D – Guide to Information

This guide lists the information St Joseph's Catholic Primary School makes available under the ICO model publication scheme. It is based on the ICO definition document for the governing bodies of maintained and other state-funded schools in England (version 4.0). It covers only information we hold.

How to obtain information

W – on the school website (free) **O** – hard copy or by email on request from the school office **E** – on an external website (link provided) **V** – available to view at school by appointment

Contact: School Office, St Joseph's Catholic Primary School, Yeathouse Road, Frizington, CA26 3PX. Tel: 01946 810702. Email: admin@st-josephsrc.cumbria.sch.uk.

Hard copies are subject to the charges in Appendix E. Information can be provided in other formats on request.

Information	Availability	Cost
Class 1 – Who we are and what we do (current information only)		
Instrument of Government	O	Free by email; hard copy per App. E
School prospectus (if any) and outline of the curriculum	W / O	Free online; hard copy per App. E
Names of governors, their category of appointment, term of office and how to contact them via the school; register of governors' business interests and attendance	W	Free
School session times, term dates and holidays	W / O	Free
Address, telephone, email and website; names of key personnel; names and roles of staff and how to contact them via the school	W / O	Free
Gender pay gap report	Not applicable (fewer than 250 staff)	–
Class 2 – What we spend and how we spend it (current and previous two financial years)		
Annual budget plan, sources of funding and income and expenditure returns, including the Schools Financial Value Standard (SFVS) return	O	Per App. E
Items of expenditure over £5,000, including costs, supplier and transaction information (published at least annually)	O	Per App. E
Capital funding and major building or capital projects	O	Per App. E
Financial audit reports	O	Per App. E
Procurement procedures and contracts that have been through a formal tendering process (including information held by Cumberland Council or the Diocese on our behalf)	O / E	Per App. E
Staff pay and grading structures (senior staff salaries in bands of £5,000; other posts by salary range)	O	Per App. E

Information	Availability	Cost
Staff allowances and expenses that can be claimed, and totals paid to senior staff	O	Per App. E
Governors' allowances and expenses, and total payments made to individual governors	O	Per App. E
Pupil premium funding received and how it is spent (pupil premium strategy statement)	W	Free
PE and sport premium funding and how it is spent	W	Free
Number of staff paid £100,000 or more (currently none) and link to the DfE financial benchmarking service	W	Free
Trade union facility time	Not applicable (fewer than 50 employees)	–
Class 3 – What our priorities are and how we are doing (current information)		
School improvement/development plan (summary)	O	Per App. E
Latest Ofsted report	W / E	Free
Latest Catholic Schools Inspectorate (section 48) inspection report	W / E	Free
Performance data supplied to the government; Key Stage 2 results and other statutory assessment results (published with care where cohorts are small)	W / E	Free
Link to the DfE school performance tables ("Compare school and college performance")	W / E	Free
Performance management (appraisal) policy and procedures	O	Per App. E
Future plans, e.g. consultations on changes to the school	W / O	Free
Data protection impact assessments and equality impact assessments (in full or summary), as appropriate	O	Per App. E
Careers programme information	Not applicable (primary school)	–
Class 4 – How we make decisions (current and previous three years)		
Admissions policy and arrangements (the Governing Body is the admission authority for this voluntary aided school), including the right of appeal	W	Free
Admission statistics: application numbers and patterns of successful applicants (not individual decisions)	O	Per App. E
Agendas, minutes and papers of Governing Body meetings and committees (redacted where an exemption applies)	O / V	Per App. E
Class 5 – Our policies and procedures (current information only)		
Policies required by statute or recommended by the DfE (e.g. behaviour, anti-bullying, online safety, SEND information report and policy, accessibility plan, charging and remissions, relationships and health education)	W / O	Free

Information	Availability	Cost
Safeguarding and child protection policy	W	Free
Equality information and objectives (public sector equality duty)	W	Free
Pay policy	O	Per App. E
Health and safety policy	O	Per App. E
Recruitment and HR policies; current vacancies	O / E	Free
Complaints procedure	W	Free
Records management, information security, retention and data protection policies, and privacy notices	O	Free by email; hard copy per App. E
This Freedom of Information Policy, publication scheme, guide to information and schedule of charges	W / O	Free
Charging and remissions policy, including charges for information	W	Free
Religious education and Catholic life policies (e.g. Prayer and Liturgy Policy)	O	Free by email; hard copy per App. E
Class 6 – Lists and registers (currently maintained only)		
Curriculum circulars and statutory instruments sent to the Headteacher or Governing Body	V / O	Per App. E
Locations of overt CCTV cameras	Not applicable (the school does not use CCTV)	–
Disclosure log of FOI/EIR responses	O	Free
Information from the capital asset register	V / O	Per App. E
Any information the school is legally required to hold in publicly available registers (the admission register and attendance register are not public)	V	Free
Class 7 – The services we offer		
Extra-curricular activities and out-of-school clubs	W / O	Free
School publications, leaflets and newsletters	O	Free
Services for which the school charges, and the fees (see Charging and Remissions Policy)	W / O	Free

Appendix E – Schedule of Charges

This schedule explains when the school will charge for providing information and how charges are calculated. **Actual cost** means the cost the school actually incurs. Where information is available on the website or can be sent by email, it is normally free.

Type of charge	Description	Basis of charge
Disbursement – printing/photocopying	Black and white, A4: 10p per sheet	Actual cost
Disbursement – printing/photocopying	Colour, A4: 30p per sheet	Actual cost
Disbursement – postage	Royal Mail second class (or recorded delivery where needed to protect the information)	Actual cost of postage
Disbursement – other media	Other formats requested (e.g. USB device)	Actual cost
Small charges	The school will not normally charge where total disbursements are less than £5	Governing Body discretion
FOI requests over the cost limit (only if the Governing Body decides to comply)	Staff time at £25 per hour, plus disbursements	Section 13 FOIA and the Freedom of Information and Data Protection (Appropriate Limit and Fees) Regulations 2004
EIR requests	Reasonable charge for supplying information, based on the disbursement rates above. No charge for viewing information at school.	Regulation 8, Environmental Information Regulations 2004
Educational records (copy)	No more than the cost of supply. Viewing the record is free.	Education (Pupil Information) (England) Regulations 2005
Subject access requests	Free, unless manifestly unfounded or excessive, or for further copies (reasonable fee based on administrative cost)	Article 12 and 15 UK GDPR
Viewing information at school	Free	–
Re-use of datasets	Free under the Open Government Licence where the school owns the copyright	Section 19 FOIA

If a charge applies, the school will send a fees notice before supplying the information. The time limit for responding is paused until payment is received. Payment can be made by arrangement with the school office.

Appendix F – Template Wording for Responses

These templates may be adapted by the school office and approved by the Headteacher. Text in brackets should be replaced.

F1. Acknowledgement

> Dear [name],
>
> Thank you for your request for information, which we received on [date]. We are dealing with it under the [Freedom of Information Act 2000 / Environmental Information Regulations 2004]. Your reference number is [ref].
>
> We will respond as soon as possible and no later than [deadline date]. If we need to clarify your request, or if a charge applies, we will contact you.
>
> Yours sincerely,
>
> School Office, St Joseph's Catholic Primary School

F2. Request for clarification

> Thank you for your request of [date]. So that we can find the information you need, please could you clarify [specific point]? For example, [suggestion]. We will start dealing with your request as soon as we receive your reply. If we have not heard from you by [date], we will assume you no longer wish to proceed.

F3. Standard closing paragraph (all responses where information is withheld)

> If you are unhappy with how we have dealt with your request, you may ask for an internal review by writing to the Chair of Governors, c/o the School Office, St Joseph's Catholic Primary School, Yeathouse Road, Frizington, CA26 3PX, within 40 working days of the date of this letter.
>
> If you remain dissatisfied after the internal review, you may complain to the Information Commission (ICO), Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF (www.ico.org.uk, telephone 0303 123 1113).

F4. Refusal notice – content checklist

- State that information is held but is being withheld (in whole or part), or that the school will neither confirm nor deny.
- Name the exemption(s) or exception(s), including the subsection.
- Explain why the exemption applies (unless this would reveal exempt information).
- For qualified exemptions and EIR exceptions, set out the public interest factors and the conclusion.
- For section 12 refusals, give advice on how the request could be narrowed.
- Include the standard closing paragraph (F3).

Appendix G – Useful Contacts

Organisation	Contact details
St Joseph's Catholic Primary School	Yeathouse Road, Frizington, Cumbria, CA26 3PX. Tel: 01946 810702. Email: admin@st-josephsrc.cumbria.sch.uk. Website: www.stjosephs-catholicprimaryfrizington.co.uk
Data Protection Officer	Miss Annette Savage, Headteacher. Contact via the school office: 01946 810702, admin@st-josephsrc.cumbria.sch.uk
Cumberland Council (local authority)	Information Governance Team, Cumberland Council, Civic Centre, Rickergate, Carlisle, CA3 8QG. www.cumberland.gov.uk
Diocese of Lancaster Education Service	Education Centre, Cathedral Building, Balmoral Road, Lancaster, LA1 3BT. Email: educationservice@lancasterrcdiocese.org.uk
Information Commission (ICO)	Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF. Helpline: 0303 123 1113. www.ico.org.uk
First-tier Tribunal (General Regulatory Chamber)	Appeals against ICO decision notices. Details on GOV.UK.