CROWTHORNE CHURCH OF ENGLAND PRIMARY SCHOOL

Freedom of Information Policy

Status of Policy	Date
Reviewed	Every 2 years
Ratified by governors	July 2026
Review date:	July 2028

Our School Vision:

Inspiring and enabling our school community to live to the full, promoting excellence and nurturing respect, compassion, honesty, resilience and collaboration.

Jesus sad, "I have come that they might have live and have it to the full" John 10 v 10

This is Crowthorne Church of England Primary School's Publication Scheme on information available under the Freedom of Information Act 2000

The governing body is responsible for maintenance of this scheme.

1. Introduction: what a publication scheme is and why it has been developed

One of the aims of the Freedom of Information Act 2000 (which is referred to as FOIA in the rest of this document) is that public authorities, including all maintained schools, should be clear and proactive about the information they will make public.

To do this we must produce a publication scheme, setting out:

- *The classes of information which we publish or intend to publish;*
- *The manner in which the information will be published; and*
- *Whether the information is available free of charge or on payment.*

All information in our publication scheme is available either in paper form from the school office or on our website for you to download and print off.

Some information which we hold may not be made public, for example personal information.

Where requests fall outside the remits of this policy, please refer to Appendix 2, Model Freedom of Information Policy, from Data Protection Education LTD (The School's DPO).

2. Aims and Objectives

The school aims to:

- enable every child to fulfil their learning potential, with education that meets the needs of each child,
- help every child develop the skills, knowledge and personal qualities needed for life and work,

and this publication scheme is a means of showing how we are pursuing these aims.

3. Categories of information published

The publication scheme guides you to information which we currently publish (or have recently published) or which we will publish in the future. This is split into categories of information known as 'classes'. These are contained in section 6 of this scheme.

The classes of information that we undertake to make available are organised into seven broad topic areas:

- *Who we are and what we do* – organisational information, structures, locations and contacts
- *What we spend and how we spend it* – financial information relating to projected and actual income and expenditure, procurement, contracts and financial audit
- *What our priorities are and how we are doing* – strategies and plans, performance indicators, audits, inspections and reviews
- *How we make decisions* – decision-making processes and records of decisions

- *Our policies and procedures* – current written protocols, policies and procedures for delivering our services and responsibilities

- *Lists and registers* – currently maintained lists and registers only

- *The services we offer* - information about the services we offer, including leaflets, guidance and newsletters.

4. How to request information

If you require a paper version of any of the documents within the scheme, please contact the school by telephone, email, fax or letter. Contact details are set out below.

Email: **secretary@crowthornecofe.co.uk**
Contact Address: **Dukes Ride, Crowthorne, RG45 6ND**

Website: www.crowthornecofe.co.uk

To help us process your request quickly, please clearly mark any correspondence **"PUBLICATION SCHEME REQUEST**" (in CAPITALS please)

If the information you're looking for isn't available via the scheme you can still contact the school to ask if we have it.

5. Paying for information

Information published on our website is free, although you may incur costs from your Internet service provider. If you don't have Internet access, you can access our website using a local library.

Single copies of information covered by this publication are provided free unless stated otherwise in section 6. If your request means that we have to do a lot of photocopying or printing, or pay a large postage charge, or is for a priced item such as some printed publications or videos we will let you know the cost before fulfilling your request.

6. Classes of Information Currently Published

Please see Appendix 1.

7. Feedback and Complaints

We welcome any comments or suggestions you may have about the scheme. If you want to make any comments about this publication scheme or if you require further assistance or wish to make a complaint then initially this should be addressed to:

Clerk to the Governors, Crowthorne C. E. Primary School, Dukes Ride, Crowthorne RG45 6ND.

If you are not satisfied with the assistance that you get or if we have not been able to resolve your complaint and you feel that a formal complaint needs to be made then this should be addressed to the Information Commissioner's Office. This is the organisation that ensures compliance with the Freedom of Information Act 2000 and that deals with formal complaints. Information can be found on the ICO website https://ico.org.uk Report a Concern. Helpline: 0303 123 1113.

Appendix 1

GUIDE TO INFORMATION AVAILABLE FROM CROWTHORNE C OF E PRIMARY SCHOOL UNDER THE PUBLICATION SCHEME

Information to be published	**How the information can be obtained**
Class 1 – Who we are and what we do (Organisational information, structures, locations and contacts) This will be current information only	(hard copy and/or website)
Who's who in the school	Website
Who's who on the governing body and the basis of their appointment	Website
Instrument of Governance	Website
Contact details for the Headteacher and for the governing body (named contacts where possible with telephone number and email address (if used)	Website
School prospectus	Hard copy/website
Staffing structure	Hard copy
School session times and term dates	Website
Class 2 – What we spend and how we spend it (Financial information relating to projected and actual income and expenditure, procurement, contracts and financial audit)	
Annual budget plan and income and financial statements	Hard copy
Capital Funding allocated to the school together with information on related building projects.	Hard copy
Procurement and contracts	Hard copy
Pay policy	Hard copy
Staffing and grading structure	Hard copy
Governors' allowances	Hard copy

Class 3 – What our priorities are and how we are doing (Strategies and plans, performance indicators, audits, inspections and reviews)	
School website Government supplied performance data The latest Ofsted Report The latest SIAMS Report	 Hard copy Website Website
Performance management policy and procedures adopted by the governing body.	Hard copy
Schools future plans	Hard copy
Class 4 – How we make decisions (Decision making processes and records of decisions) Current and previous three years as a minimum	
Admissions policy/decisions (not individual admission decisions)	Link to LA website
Agendas of meetings of the governing body and its sub-committees	Hard copy
Minutes of meetings (as above) – excludes information that is properly regarded as private to the meetings.	Hard copy
Class 5 – Our polices and procedures (Current written protocols, policies and procedures for delivering our services and responsibilities) The school has a large number of policies that are available to view in the school office.	Hard copy or website
Pupil and curriculum policies, including: - Teaching and Learning - Relationships and Sex Education - Special Education Needs & Disability - Accessibility - Equality - Behaviour	 Website Website Website Website Website Website
Records management and personal data policies, including - Data protection (including information sharing policies)	 Website

Class 6 – Lists and Registers Currently maintained lists and registers only	Hard copy or website; some information may only be available by inspection.
Any information the school is currently legally required to hold in publicly available registers (This does not include the Attendance Register).	Hard copy
Class 7 – The services we offer (Information about the services we offer, including leaflets, guidance and newsletters produced for the public and businesses) Current information only	Hard copy or website; (some information may only be available by inspection).
Extra-curricular activities	Hard copy
School publications	Website/hard copy
School newsletters	Website / Hard Copy

Contact details: Crowthorne C of E Primary School, Dukes Ride, Crowthorne, Berkshire RG45 6ND

Telephone: 01344 772089

Email: secretary@crowthornecofe.co.uk

If you require a paper version of the documents within the scheme, please contact the school by email or letter.

To help us process your request quickly, please mark any correspondence 'Publication Scheme Request'.

SCHEDULE OF CHARGES This describes how the charges have been arrived at and should be published as part of the guide.

TYPE OF CHARGE	DESCRIPTION	BASIS OF CHARGE
Disbursement cost	Photocopying/printing @ 5p per sheet (black and white)	5p per sheet
	Photocopying/printing @ 10p per sheet (colour)	10p per sheet
	Postage	Actual cost of Royal Mail standard 2nd class
Statutory Fee		In accordance with the relevant legislation (quote the actual statute)

Appendix 2

Crowthorne C of E Primary School
Freedom of Information Policy

[Version 2025 v1.3]

If you are reading a printed version of this document you should check the Information Management pages on [the organisation network] to ensure that you have the most up-to-date version.

If you would like to discuss anything in this policy, please contact:
Data Protection Officer: Data Protection Education Ltd.
Telephone: 0800 0862018
Email: dpo@dataprotection.education

If you would like a copy of any documentation please contact the organisation office:

Contact details:	Crowthorne C of E Primary School, Dukes Ride, Crowthorne, Berkshire RG45 6ND
Telephone:	01344 772089

Document version

Version	Author	Date	Approved by	Effective from
1.0	DPE - AS	19.05.19		
1.1	DPE - JW	11.06.19		
1.2	DPE-VH	12.08.24		
1.3	DPE-VH	22.08.25		

POLICY OBJECTIVES

The Freedom of Information Act 2000 ("FOIA") sets out a public "right to know" in relation to public bodies. The FOIA also sets out certain exemptions to those rights.

The purpose of this Freedom of Information Policy is to outline Crowthorne C of E Primary School's approach to its FOIA obligations to create a climate of openness and dialogue.

ABOUT THIS POLICY

This policy sets out how Crowthorne C of E Primary School will respond to a request under the FOIA. This policy applies to the information held by Crowthorne C of E Primary School or held by other parties on behalf of Crowthorne C of E Primary School that is governed by the FOIA. To promote a culture of openness and accountability, and to comply with the FOIA, we have a responsibility to ensure that this information is either routinely made available or provided on request, unless there is a legitimate reason for withholding it.

THE FREEDOM OF INFORMATION ACT

The FOIA provides public access to information held by public authorities.
It does this in two ways:

- public authorities are obliged to publish certain information about their activities; and
- members of the public are entitled to request information from public authorities.

FOIA covers any recorded information that is held by a public authority in England, Wales and Northern Ireland, and by UK-wide public authorities based in Scotland. Information held by Scottish public authorities is covered by Scotland's own Freedom of Information (Scotland) Act 2002. Recorded information includes printed documents, computer files, letters, emails, photographs, and sound or video recordings.
For a request to be dealt with according to the Freedom of Information Act, the requester must:

- contact the relevant authority directly;
- make the request in writing, for example in a letter or an email. They can make a verbal or written request for environmental information;
- give their real name; and
- give an address to which the authority can reply. This can be a postal or email address.

A requester does not have to:

- mention the Freedom of Information Act;
- know whether the information is covered by the Freedom of Information Act; or
- say why they want the information.

FREEDOM OF INFORMATION PRINCIPLES

The main principle behind freedom of information legislation is that people have a right to know about the activities of public authorities, unless there is a good reason for them not to.
This means that:

- everybody has a right to access official information. Disclosure of information should be the default – in other words, information should be kept private only when there is a good reason and it is permitted by FOIA;
- an applicant (requester) does not need to give you a reason for wanting the information. On the contrary, you must justify refusing them information;
- you must treat all requests for information equally, except under some circumstances relating to vexatious requests and personal data
- The information someone can get under FOIA should not be affected by who they are. You should treat all requesters equally, whether they are journalists, local residents, public authority employees, or foreign researchers; and
- because you should treat all requesters equally, you should only disclose information under FOIA if you would disclose it to anyone else who asked. In other words, you should consider any information you release under FOIA as if it were being released to the world at large.

APPLICATION OF EXEMPTIONS

The Freedom of Information Act (FOIA) recognises that some information should not be disclosed. While many exemptions exist, in practice only a small number are commonly relevant to schools. These exemptions fall into two categories:

- **Absolute exemptions** – information can be withheld without applying the public interest test.
- **Qualified exemptions** – information can be withheld only if, after applying the public interest test, the public interest in withholding outweighs disclosure.

Absolute Exemptions commonly used:

- **Section 21 – Information accessible by other means**
  If the information is already published (e.g. on the school website, in the prospectus, or in statutory reports), there is no need to provide it again. Instead, the requester can be directed to the source.
- **Section 40(1) – Personal data of the requester**
  If someone asks for their own personal information (e.g. a parent requesting records about themselves), this should be handled under the Data Protection Act / Subject Access Request process, not FOIA.
- **Section 40(2) – Personal data of third parties**
  Information that would identify a pupil, parent, or staff member cannot be disclosed if doing so would breach UK GDPR principles. For example, releasing exam results that identify individual pupils, or disciplinary records about staff, would usually be exempt.
- **Section 41 – Information provided in confidence**
  Where information was obtained in confidence and disclosure would be an actionable breach of confidence. For example, safeguarding reports from social services, or confidential references provided to the school.

Qualified Exemptions commonly used:

- **Section 36 – Prejudice to the effective conduct of public affairs**
  Used if disclosure would inhibit free and frank discussion, advice, or the ability of staff/governors to make decisions. For example, disclosing draft minutes of governing body discussions while decisions are still being debated.

- **Section 38 – Health and safety**
  Applied if disclosure would endanger the physical or mental health or safety of an individual. For example, details of evacuation procedures that could create a security risk if misused.
- **Section 40(2) – Personal data (qualified application)**
  In some cases, a balancing exercise may be needed to assess whether disclosure is fair (e.g. senior staff salaries). Routine publishing of pay bands is encouraged, but disclosure of identifiable details below senior level would usually be unfair.
- **Section 43 – Commercial interests**
  Used to protect sensitive information about the financial or contractual interests of the school or its suppliers. For example, revealing details of a live procurement process or bids from contractors could prejudice fair competition.

GUIDANCE FOR STAFF

When considering exemptions:

- Always start from the assumption that information should be disclosed unless a valid exemption applies.
- Consider whether only part of the information is exempt, and release the remainder where possible (with redaction if necessary).
- Where a qualified exemption is applied, a documented **public interest test** must be carried out (see below).
- Only withhold the minimum necessary.
- Complex or borderline cases should be referred to the Data Protection Officer for advice.

A full list of exemptions is available on the Information Commissioner's Office (ICO) website.

APPLYING THE PUBLIC INTEREST TEST

For qualified exemptions, the organisation will apply the public interest test. This requires balancing the public interest in disclosure against the public interest in withholding the information.
Step 1: Confirm that the exemption is engaged (i.e., the information falls within the scope of the exemption).
Step 2: Assess whether the public interest in maintaining the exemption outweighs the public interest in disclosure.

Factors in favour of disclosure may include:

- Promoting transparency and accountability of public authorities.
- Furthering public debate on important issues.
- Promoting better public understanding of decisions and spending.
- Enhancing public confidence in decision-making.

Factors in favour of withholding may include:

- Protecting sensitive commercial or financial interests.
- Preserving the confidentiality of legal or policy advice.
- Avoiding prejudice to the effective conduct of public affairs.
- Safeguarding the rights and interests of individuals.

Principles:

- There is a general presumption in favour of disclosure.

- Each request must be considered on a case-by-case basis.
- The reasoning behind the public interest test must be documented and retained for accountability.

REFUSAL NOTICES

Where a request for information is refused in full or in part, a refusal notice must be issued to the requester within **20 working days** of receipt of the request.
The refusal notice must include:

1. A clear statement that the request has been refused (in whole or in part).
2. The specific exemption(s) being relied upon.
3. A meaningful explanation of why the exemption applies.
4. Where relevant, an explanation of how the public interest test has been considered.
5. Information on the requester's right to request an internal review.
6. Information on the right to complain to the ICO if dissatisfied with the outcome of the internal review.

BREACH OF POLICY AND STANDARDS

Disciplinary action may be taken in accordance with the Crowthorne C of E Primary School's disciplinary procedures against any employee who knowingly or recklessly:

- Alters, defaces, blocks, erases, destroys or conceals any record held by the [insert name of organisation], with the intention of preventing the disclosure of all, or any part, of the information that has been requested as part of a Freedom of Information request;
- Contravenes any instruction contained in, or following from, this Policy and Standards.

We expect that similar disciplinary procedures will be applied by any of our contractors which deal with the [insert name of organisation]'s information and data on the [insert name of organisation]'s behalf.

COMPLAINTS PROCEDURE

Where a request for information is refused for any reason, we will notify the applicant and give the reasons. For exemptions we will state which exemption has been claimed, and unless apparent, why that exemption applies, specifying the public interest factors (for and against disclosure) if applicable. We will not simply repeat the wording of the exemption unless the explanation would involve the disclosure of information which would itself be exempted information.
When communicating any decision made in relation to a request under FOIA's general right of access, we will notify the applicant of their rights of complaint. A person dissatisfied with the way in which their request has been handled may ask for an internal review of the way in which their request was dealt with, and, if still dissatisfied, may apply directly to the Information Commissioner for a decision.

PUBLICATION OF INFORMATION

The organisation maintains and publishes a publication scheme on its website outlining classes of information that will be made routinely available, including policies and procedures.
Classes of information specified in the publication scheme will be made available quickly and easily on request.
The organisation will not publish any personal information, including photos, on its website without the permission of the affected individual.

When uploading information to the organisation website, staff will be considerate of any metadata or deletions which could be accessed in documents and images on the site.

CHANGES TO THIS POLICY

We may change this policy at any time. Where appropriate, we will notify data subjects of those changes.

This Policy was approved by the board of Governors on 8th July 2026. It will be reviewed annually.