Bowker Vale Primary School

Freedom of Information Policy

Policy Updated	September 2026
To be reviewed	Autumn Term 2027
Owner	Nicola Richardson SBM

1. Introduction: What Is the Freedom of Information Act?

The Freedom of Information Act 2000 (FOIA) is a law passed by the UK Parliament that gives people the right to access recorded information held by public authorities, including schools. The FOIA is designed to promote openness and accountability amongst the public sector.

The FOIA provides the public with the right to request and receive information held by the school as a public authority; this is referred to as making a FOIA request. For transparency, the school must also take a proactive approach to publishing information about our key policies and decision making.

This policy provides a clear framework for how the school comply with the requirements of the FOIA.

2. Associated Legislation

The ICO is the governing body for information based legislation within the UK. Alongside the FOIA, the ICO are also responsible for governance with the following:

- UK General Data Protection Regulation (UK-GDPR) (and associated Data Protection Act, 2018)
- Environmental Information Regulations (EIR)

It is important to note that information requests can also be made under these legislations too. It is therefore important to differentiate between each:

Legislation	What Information Can Be Requested?	Who Can Make a Request?	Response Timeframe
Freedom of Information Act (FOIA)	Recorded information held by public authorities (e.g. policies, meeting minutes, financial data, reports, correspondence)	Anyone	20 working days
UK General Data Protection Regulation (UK-GDPR)	Personal data relating to the individual making the request (subject access request)	The individual to whom the data relates (or their authorised representative)	One month (can be extended by two further months for complex requests)
Environmental Information Regulations (EIR)	Information about the environment (e.g. air, water, soil, land, flora and fauna, emissions, policies and plans affecting the environment)	Anyone	20 working days (can be extended to 40 working days for complex or voluminous requests)

Any individual wanting to make a request to access their own or their child's personal data should submit a ‘subject access request’ under the UK-GDPR and not a FOIA request. Please refer to our **Data Protection Policy** for further information. Personal data will not typically be released under a FOIA request.

Any requests received under the FOIA to access personal data should be referred to the Headteacher and / or schools Data Protection Officer (DPO).

3. Scope of the Policy

The FOIA applies to all recorded information collated and held by the school, regardless of format. This includes documents such as:

- Policies and procedures
- Meeting minutes
- Financial information
- Inspection reports
- School performance data
- Governance records
- Correspondence (where it is held as an official record)

Some information may also be collated and held by third-parties such as contractors carrying out official duties on our behalf.

4. Responsibilities

The governing body has an overall responsibility to ensure that this policy is implemented effectively and that adequate resources are available for the school to meet their FOIA obligations.

The Headteacher is responsible for ensuring that the provisions set out in this policy are met on a routine basis and communicated to all staff.

The School Business Manager, with support from the Headteacher and data protection officer where appropriate will manage requests for information under the FOIA.

All staff have a duty to inform the School Business Manager (or Headteacher) if they receive a request for information under the FOIA or any associated legislation. The school has a limited period in which to provide a response to requests and ask that any staff in receipt of a request forward it without undue delay.

Any requests made in writing by letter can be handed in or posted to the school office for the attention of the School Business Manager.

Staff should not respond to FOIA requests without the approval of the School Business Manager.

Depending upon the nature of the request, staff may be required to support the school in fulfilling requests. For instance, collating information to provide to the requester.

Staff should contact the School Business Manager in the first instance if there are any questions about this policy or concerns that the FOIA is not being adhered to.

5. Publication Scheme

In order to support compliance with the FOIA, the Information Commissioners Office (ICO) provides a structured framework (known as a publication scheme) that guides schools in proactively publishing the information that they hold to help achieve transparency.

The scheme sets out the categories of information schools should make routinely available, such as policies, procedures, financial data, and decisions that impact pupils and the wider community. By adopting the ICO model publication scheme, schools provide a clear roadmap for what information is accessible, how it can be obtained, and any associated costs, making it easier for the public to access vital details without needing to submit formal requests.

A copy of the publication scheme can be found in the appendix of this policy. Most of the information contained in the publication scheme can be accessed free of charge on the school website or via the school office. We have however outlined any items that are subject to a fee.

Further information regarding the ICO's model publication scheme is available here: https://ico.org.uk/for-organisations/foi/publication-schemes-a-guide/

In addition to the publication scheme, the Department for Education (DfE) requires the school to publish a list of items on its website to support transparency: https://www.gov.uk/guidance/what-maintained-schools-must-publish-online

6. Making a FOIA Request

The FOIA states that requests must be made in writing and include the following information:

- Name of the requester
- Contact details of the requester
- Details of the information requested

Requesters can also stipulate the format in which they would like to receive the information. In instances where the school cannot fulfil a desired format, an alternative will be offered.

The school ask that any requests are sent to the school office, addressed for the attention of the School Business Manager.

Using AI to help generate a request

AI tools can be helpful, but they can also introduce errors or create overly complex requests that increase the burden on public bodies and cost to the taxpayer. Guidance from the Information Commissioners Office (ICO), the public regulator for the FOIA in England, Wales & NI can be found here: https://ico.org.uk/for-organisations/foi/freedom-of-information-foi-and-artificial-intelligence/

7. Managing a FOIA Request: General

Upon receiving a request, the school will ascertain whether or not the requested information is already available in the public domain (via the publication scheme or other means). In the event that the information is readily available and accessible to the requester, a response will be provided outlining the location.

In instances in which the requested information requires a search of school records, the business manager will perform a review to ascertain if the information is held, whether or not it's held in the requested format and if any exemptions or charges are likely to apply. The Headteacher and data protection officer will support with this process where necessary.

The school may contact the requester for further clarification if the request is very general in nature. It is important to note that the school is not expected to create new information to fulfil a request; the FOIA focuses on records already held.

A written response **will** be provided to the requester within 20 school days whether or not the school can fulfil the request or not. If all or part of a request cannot be met, a clear explanation must be provided as part of the response outlining the relevant exemption where appropriate.

As part of any response, the school must inform the requester or their right to ask for an internal review followed by their right to complain to the Information Commissioners Office (ICO).

8. Refusing a Request

The FOIA recognises that there are instances in which it may not be appropriate for the school to comply with a request, namely if:

- The request is likely to cause a disproportionate burden on the school and its resources (it exceeds the appropriate cost limit)
- The request clearly intends to be disruptive, repetitive or unreasonable causing an unnecessary burden on the school (vexatious)

Refusal: Appropriate Cost Limit

The school is not expected to comply with any request that exceeds the 'appropriate cost limit' set out in the FOIA. This limit exists to ensure that requests do not place an unreasonable financial or administrative strain on the school's resources and public functions.

The current appropriate cost limit is £450 which equates to 18 x hours of staffing time at £25 per hour.

Dependent upon the nature of the requested information, the school may:

- provide the requester with the opportunity to limit or reduce the scope of their request
- provide the requester with an opportunity to pay a reasonable fee for the school to fulfil any work that exceeds the appropriate cost limit (dependent upon the schools resources)

The appropriate cost limit will not be used as a blanket reason to refuse requests; the school must be able to demonstrate that sourcing, sorting and formulating the requested data will likely exceed the stated limit.

Refusal: Vexatious Requests

The school is not required to comply with FOIA requests that are considered vexatious. According to guidance from the Information Commissioner's Office (ICO), vexatious requests may be characterised by their intent to cause disruption, their repetitive or obsessive nature, or the imposition of an unreasonable burden on the school's resources.

Such requests might include those that are harassing, lack any serious purpose or value, or are designed to overwhelm staff with excessive demands. In these cases, the school reserves the right to refuse the request to ensure that resources remain focused on educational priorities and essential public functions.

Any expressions of dissatisfaction from the requester regarding the school's decision to refuse a request should be reviewed by the school and instructions provided to the requester on how they can make a complaint to the ICO if the school cannot resolve the complaint.

The decision-making process should be clearly documented.

9. Exemptions

The FOIA provides a number of exemptions to withhold records in certain circumstances. Examples include, but are not limited to the following:

- Personal data protected under the Data Protection Act and UK GDPR

- Information provided in confidence
- Information that could endanger the safety or well-being of pupils or staff
- Commercially sensitive information
- Information which, if disclosed, would be prejudicial to the effective conduct of the school

If an exemption under the FOIA is applicable to any part of the requested information, the school will formally notify the requester in writing, clearly outlining the reasons for withholding the material and referencing the relevant exemption. The requester will also be informed of their right to challenge the decision through an internal review or by contacting the Information Commissioner's Office (ICO) if they remain dissatisfied.

10. Charges

The FOIA does not permit the school to charge a flat fee for information requests but it does allow the school to recover more operational costs such as photocopying, printing, and postage. A list of charges is available in the appendix.

Normally, the school cannot charge for staff time spent searching for information. However, if complying with a request exceeds the appropriate cost limit, the school **may** offer to provide the information and recover all actual costs (including staff time), instead of refusing the request.

If a fee is applicable to any part of a request, the school will issue a fees notice prior to processing the request and providing any information. In the event that the school does not receive the fee within 3months, further correspondence will be issued to notify the requester that their request has been closed.

11. Responding to Requests

The school will respond to all requests for information under the FOIA within 20 school days. Each request will be reviewed on a case-by-case basis and a written response will be provided that confirms firstly whether or not the school holds the requested information.

The written response must confirm whether the school:

- Is able to meet the request in full
- Is able to meet the request in part
- Is unable to meet the request at all

Responses to requests that cannot be met in full must include:

- The reason(s) the request cannot be met in full.
- A confirmation of any exemptions applied, stating the relevant section from the FOIA.
- Details of any public interest or prejudice tests applied when making a decision to refuse all or part of the request.
- Details on how the requester can make a complaint or appeal to the school if they are unhappy with the refusal notice.
- Details on the right to escalate a complaint to the ICO if the requester remains dissatisfied

The school will keep the requester updated if the response is likely to take longer than 20 working days, an expected date for the response will be provided.

12. Internal Review

If a requester is dissatisfied with the school's response to a Freedom of Information request, they may ask for an internal review. The school will ensure that this review is overseen by a qualified person who was not involved in the original decision, in order to maintain impartiality. The process will be conducted in a fair and transparent manner, considering all aspects of the original request and response. The school will aim to conclude the review promptly and keep the requester informed of progress, providing a clear explanation of the final outcome and any further rights of appeal.

13. Use of Information

The FOIA allows access to information, but it does not give the requester permission to re-use that information for commercial gain. Therefore, the requester may reproduce the school's copyright protected information free of charge, without specific permission, provided it is not being reproduced for profit, material or financial gain.

The material must be reproduced accurately and must not be used in a misleading context. If the requester is publishing the material or issuing it to others, they must acknowledge the source of the information, its copyright status and the date of publication, if known.

This permission to reproduce copyright protected material does not extend to any material that is identified as being the copyright of a third party. Under those circumstances, the enquirer must seek authorisation to reproduce the material from the copyright holder concerned.

14. Record Keeping

Maintaining thorough records of all requests is essential for ensuring transparency and accountability. Accurate and detailed logs allow the school to demonstrate compliance and provide a clear audit trail should any concerns arise. In cases where a request is refused, it is particularly important to record the rationale and key steps in the decision-making process, as this information may be scrutinised through internal reviews or external complaints. Proper record keeping ensures that the school can respond effectively and fairly to any subsequent challenges or appeals, thereby safeguarding its reputation and upholding public trust.

15. Review and Monitoring of the Policy

This policy will be reviewed on an annual basis or sooner should a change in legislation or processes occur.

16. Appendix: Information Available Under the ICO Model Publication Scheme

Information:	How the information can be obtained:	Cost:
Class 1: Who we are and what we do?		
Organisational information, structure, locations and contacts.	Website: https://www.bowkervale.manchester.sch.uk/ Any further information availableBowker Vale Primary School from school office.	NA
Who's who in the school.	Website: https://www.bowkervale.manchester.sch.uk/page/meet-our-staff/165026	NA

Who's who in the governing body and the basis of their appointment.	Website: https://www.bowkervale.manchester.sch.uk/page/meet-our-governors/165194	NA
Instrument of government and articles of association.	School Office	See schedule of charges for paper copies
Contact details for the Headteacher and the governing body (named contacts where possible).	School Office	NA
School prospectus (where applicable).	Website: https://www.bowkervale.manchester.sch.uk (about us section)	NA
Annual report (where applicable).	School Office	See schedule of charges for paper copies
School session times and term dates.	Website: https://www.bowkervale.manchester.sch.uk/school-information/sep-2014-july-2015/2025-2026	NA
Address of the school and contact details, including email address.	Website: https://www.bowkervale.manchester.sch.uk	NA
Class 2: What we spend and how we spend it?		
Annual budget plan and financial statements	School Office	See schedule of charges for paper copies
Capital funding.	School Office	See schedule of charges for paper copies
Financial audit reports	School Office	See schedule of charges for paper copies
Details of expenditure items over £2000	School Office	See schedule of charges for paper copies

Procurement and contracts the school has entered into.	School Office	See schedule of charges for paper copies
Pay Policy	School Office	See schedule of charges for paper copies
Staff allowances that can be incurred or claimed with totals paid to individual senior staff members (basic annual salary £60K +) by reference to categories.	School Office	See schedule of charges for paper copies
Staffing, pay and grading structure; salary range for more junior staff and in bands of £10K for senior staff.	School Office	See schedule of charges for paper copies
Governor's allowances that can be incurred or claimed, and a record of total payments made to individual governors.	School Office	See schedule of charges for paper copies
Class 3: What our priorities are and how we are doing?		
Strategies and plans, performance indicators, audits, inspections and reviews.	School Office	See schedule of charges for paper copies
Performance data supplied to the government & latest Ofsted report	Ofsted Website: https://reports.ofsted.gov.uk/provider/21/105397	NA
Performance management policy and procedures	School Office	See schedule of charges for paper copies

adopted by governing body.		
The schools' future plans; proposals for and any consultation on the future of the school, such as a change in status.	School Office	See schedule of charges for paper copies
Safeguarding and child protection.	Website: https://www.bowkervale.manchester.sch.uk/page/safeguarding/165061	NA
Inclusion & SEND	Website: https://www.bowkervale.manchester.sch.uk/page/inclusion-and-send/165058	NA
Equality, Diversity & Inclusion	Website: https://www.bowkervale.manchester.sch.uk/page/equality-diversity-inclusion/165030	NA
Class 4: How we make decisions?		
Decision making processes and records of decisions; current and previous three years as a minimum.	School Office	See schedule of charges for paper copies
Admissions policy / decisions (not individual decisions)	Website: https://www.bowkervale.manchester.sch.uk/page/admissions/165028	NA
Agendas and minutes of meetings of the governing body and its committees (excluding information regarded as private)	School Office	See schedule of charges for paper copies
Class 5: Our policies and procedures		
Current written protocols and procedures for delivering	Statutory Policies: https://www.bowkervale.manchester.sch.uk/page/school-policies/165063	See schedule of charges for paper copies

services and responsibilities. As a minimum statutory policies and procedures.	Any further policies can be requested from the school office	
Class 6: Lists and registers.		
Disclosure logs of FOI requests	School Office	See schedule of charges for paper copies
Asset Register	School Office	See schedule of charges for paper copies
Any information the school is currently legally required to hold in publicly available registers.	Contact School Office	See schedule of charges for paper copies
Class 7: The services we offer		
Out of hours club	Website: https://www.bowkervale.manchester.sch.uk/page/breakfast-club/165044	NA
Services for which the school is entitled to recover a fee, together with those fees.	Contact School Office	See schedule of charges for paper copies
School publications, leaflets, books and newsletters.	Website: https://bowkervale.edublogs.org/	NA

The following describes how the charges for any items listed have been arrived at:

Type of charge	**Description**	**Basis of charge**
Disbursement cost	Photocopying/printing @ 1p per sheet (black & white)	Actual cost *
	Photocopying/printing @ 2p per sheet (colour)	
	Postage (as per Royal Mail costs) Actual cost of postage will be charged if above standard size.	Actual cost of Royal Mail standard 2nd class Cost of envelope

	Envelope 50p	
Statutory Fee		In accordance with the relevant legislation
Other		

*The actual cost incurred by the public authority