



Freedom of Information Policy and Publication Scheme

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Freedom of Information Policy and Publication Scheme

This policy has been adopted by the Mulberry Schools Trust and will be applied to all schools which belong to the Mulberry Schools Trust.

Introduction and Aims

The Mulberry Schools Trust is committed to openness, transparency, and accountability. We recognise our obligations under the Freedom of Information Act 2000 (FOIA) to provide public access to information held by the Trust and our schools.

This document outlines:

- **Part A: Freedom of Information Policy:** The procedures for receiving and responding to new FOI requests.
- **Part B: The Publication Scheme:** A list of information the Trust proactively publishes or intends to publish.

This policy applies to all staff, trustees, and governors across the Trust.

Roles and Responsibilities

Trust Board

- The Trust Board has overall responsibility for ensuring the Trust complies with FOIA and related regulations.
 - **Email:** clerk@mulberryschoolstrust.org
 - **Address:** Mulberry School for Girls, Richard St, Commercial Rd, London, E1 2JP

Director of Operations

- Central oversight of all FOI requests.
- Ensures requests are logged, tracked, acknowledged, and responded to within statutory timeframes.
- Coordinates with schools to locate and retrieve information.
- Consults with the DPO when professional advice is required.

Data Protection Officer (Satswana Ltd)

- Provides guidance on complex requests involving personal or sensitive data.
- Advises on whether requests fall under FOIA or data protection legislation.
- Ensures that responses comply with statutory requirements and best practice.

Headteachers

- Support the Director of Operations in identifying and providing requested information held at their school.
- Ensure school staff understand the process for handling FOI requests.

School Staff

- Forward any FOI requests received immediately to the Director of Operations.
- Copy in the Headteacher to ensure local leadership is aware.
- Assist in retrieving information where requested by the Director of Operations or Headteacher.

Receiving FOI Requests

FOI requests may be received via:

1. **Schools:** Requests come through school administrators or staff. These must be forwarded without delay to the Director of Operations.
2. **Trust:** Requests received directly via the Clerk to the Trust Board must also be forwarded without delay to the Director of Operations.
 - **Email:** clerk@mulberryschoolstrust.org
 - **Address:** Mulberry School for Girls, Richard St, Commercial Rd, London, E1 2JP

All requests must be logged centrally, including the date received, the requestor's details, and the nature of the request.

Responding to FOI Requests

- The Director of Operations is responsible for coordinating responses to ensure they are:

- a) Accurate
- b) Complete
- c) Provided within the statutory timeframe (usually 20 working days)
- The DPO must be consulted for requests involving sensitive personal data, legal exemptions, or complex disclosures.
- Responses will be issued centrally to maintain consistency and compliance.

Exemptions and Advice

Certain requests may not need to be fulfilled if exemptions apply under FOIA, for example:

- Information already publicly available
- Personal data where disclosure would breach data protection law
- Commercially sensitive information

The DPO will provide guidance on exemptions and advise on cases where legal advice is necessary.

Logging and Record-Keeping

- All FOI requests and responses must be recorded in a central register maintained by the Trust.
- Records should include:
 - a) Request details
 - b) Date received
 - c) Staff involved in providing information
 - d) Date of response
 - e) Any advice sought from the DPO

Complaints

If a requester is dissatisfied with the response, they may:

1. Request an internal review via the Mulberry Schools Trust
2. Escalate the complaint to the Information Commissioner's Office (ICO)

Training and Awareness

- All staff must be aware of this policy and the procedures for handling FOI requests.
- Regular training will be provided to ensure staff, trust executives and governors understand FOIA obligations, including recognising requests that require DPO involvement.

This policy will be reviewed annually or earlier if there are legislative changes or operational requirements.

Part A: Freedom of Information Policy & Procedure

This part outlines how the Trust handles requests for information that is *not* already available in our Publication Scheme.

Making a Request

A request for information under the FOIA must be:

- In writing (this includes email, letter, or fax).
- State the name of the applicant and an address for correspondence.
- Clearly describe the information requested.

Verbal requests will not be treated as FOI requests. However, we have a legal duty to provide advice and assistance to requesters. If an individual is unable to make a written request, staff will assist them in doing so.

All requests should be directed to: **clerk@mulberryschoolstrust.org**.

Timescale for Response

The Trust will respond to all requests promptly and no later than **20 working days** from the date the request is received.

The time limit may be extended in specific circumstances, such as:

- If clarification is needed from the requester (the 20-day clock stops until clarification is received).
- To consider the public interest test for a qualified exemption.

Handling a Request

Upon receiving a request, the Director of Operations will:

1. Log the request and confirm its receipt.
2. Identify if the information is held by the Trust or any of its schools.
3. Liaise with Headteachers or central staff to retrieve the information.
4. Review the information and consult with the DPO [aswhere](#) necessary to determine if it can be released or if any exemptions apply.

Charging for Information (Fees and Appropriate Limit)

The Trust will not charge a fee for staff time spent locating and retrieving information up to the "appropriate limit."

For academies and schools, this limit is £450, which equates to 18 hours of staff time (calculated at £25 per hour).

- If a request costs **less than £450** to process: The information will be provided, but we may charge for "disbursements" such as photocopying (at 10p per sheet) and postage.
- If a request costs **more than £450** to process: We are not legally obliged to fulfil the request. In this instance, we will:
 1. Issue a refusal notice.
 2. Provide advice and assistance to the requester on how they can narrow the scope of their request to bring it within the £450 limit.

Exemptions (Withholding Information)

We will provide all requested information unless a legal "exemption" under the FOIA applies. If we withhold information, we will send a refusal notice that clearly states which exemption applies and why.

Common exemptions include:

- Releasing information would breach the UK GDPR or Data Protection Act 2018.
- Releasing it would prejudice the commercial interests of the Trust or a third party.
- Information Intended for Future Publication.
- Requests that are designed to be 'vexatious' causing disruption or distress.

Complaints and Internal Review

If a requester is dissatisfied with our response, or how their request was handled, they have the right to request an Internal Review.

1. The requester must make a written complaint to the Trust within 40 working days. This should be addressed to the CEO of the Trust.
2. The CEO will delegate the Internal Review to a senior person not involved in the original request.
3. The Trust will aim to complete the review and respond within 20 working days.
4. If the requester remains dissatisfied after the Internal Review, they have the right to appeal to the Information Commissioner's Office (ICO).

Part B: The Publication Scheme

This Publication Scheme describes the seven classes of information the Mulberry Schools Trust proactively publishes, in line with the model scheme for schools approved by the ICO. All information listed is available on the Trust website: **www.mulberryschoolstrust.org**

Information is available free of charge unless otherwise stated.

Class 1: Who We Are and What We Do

- Trust name, contact address, and telephone number

- Roles and responsibilities of the Trust and its schools
- Names of the Headteacher (for each school) and the Chair of the Trust Board
- Governance structure, including the names of Trustees and Local Governors
- The Trust's Articles of Association and Funding Agreement

Class 2: What We Spend and How We Spend It

- Annual audited accounts and financial statements
- Executive pay (as required by the Academy Trust Handbook)
- Charging and Remissions Policies
- Details of expenditure (e.g. services and supplier payments over £25,000)

Class 3: What Our Priorities Are and How We Are Doing

- The Trust's statement of ethos and values
- Ofsted reports for the Trust and each school
- Performance tables and school-level assessment results
- The Trust's strategic plan and improvement plans

Class 4: How We Make Decisions

- Admissions policies and arrangements for each school
- Agendas and non-confidential minutes of Trust Board and committee meetings
- The Trust's scheme of delegation

Class 5: Our Policies and Procedures

- Child Protection and Safeguarding Policy
- Health and Safety Policy
- Equality Policy and objectives
- Special Educational Needs (SEN) Policy
- Complaints Procedure
- Behaviour and Anti-Bullying Policies
- Staff Conduct, Discipline, and Grievance Policies
- Charging and Remissions Policies
- Data Protection Policy (GDPR)

Class 6: Lists and Registers

- Trustees' and Governors' Register of Business Interests
- Register of pupils (held by each school; not publicly available due to personal data exemption)

Class 7: The Services We Offer

- School Prospectuses
- Information on the curriculum provided at each school
- School session times and term dates
- Collective worship arrangements

Part C: Feedback and Complaints

We welcome feedback on this policy and publication scheme. If you wish to make comments or a complaint about the scheme, please contact the Clerk to the Trust Board at the address in '*roles and responsibilities*' section of this policy.

If you are not satisfied with the response from the Trust, you can contact the Information Commissioner's Office (ICO).

- **Address:** Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF
- **Helpline:** 0303 123 1113
- **Website:** www.ico.org.uk

