Freedom of Information &
Subject Access Requests Policy

Version:	**v5**		
Ratified by:	**Board of Trustees**	**Date:**	**22nd October 2025**
Next Review date:	**July 2027**		

1. PURPOSE

1.1. One of the aims of the Freedom of Information Act 2000 (FOIA) is that public authorities, including all academies, should be clear and proactive about the information they will make public.

1.2. This policy and the model publication scheme that we adopt in full from the ICO sets out:
- 1.2.1. the types of information which we publish or intend to publish;
- 1.2.2. the manner in which the information will be published and how it can be obtained

1.3. Our intention is to be proactive in publishing or otherwise making available as a matter of routine, information that the public ought to expect to see and which is not of a personal nature.

1.4. The scheme covers information already published and information which is to be published in the future. Most of the information in our publication scheme is available on our Trust website or individual academy websites.

1.5. Some information which we hold may not be made public, for example personal information relating to students/pupils or staff.

1.6. Policy Review: The next review date of this policy will be July 2027 to ensure continued alignment with the latest ICO guidance, the Academy Trust Handbook, and the Data (Use and Access) Act 2025.

2. POLICY GUIDELINES

2.1. Categories of information published

The publication scheme guides you to information which we currently publish or which we will publish in the future. This covers information on the following:

2.1.1. Who we are and what we do: Organisational information, locations and contacts, constitutional and legal governance.
2.1.2. What we spend and how we spend it: Financial information relating to projected and actual income and expenditure, tendering, procurement and contracts.
2.1.3. What our priorities are and how we are carrying them out: Strategy and performance information, plans, assessments, inspections and reviews.
2.1.4. How we make decisions: Policy proposals and decisions, decision-making processes, internal criteria and procedures, consultations.
2.1.5. Our policies and procedures: Current written protocols for delivering our functions and responsibilities.
2.1.6. Lists and registers: Information held in registers required by law and other lists and registers relating to the functions of the authority.
2.1.7. The services we offer: Advice and guidance, booklets and leaflets, transactions and media releases.

2.2. We are unlikely to be able to provide the following information:
2.2.1. The disclosure of information which is prevented by law, or exempt under the FOIA, or is otherwise properly considered to be protected from disclosure.
2.2.2. Information in draft form.
2.2.3. 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.

3. HOW TO REQUEST INFORMATION

3.1. First, please check our websites. It is likely that the information you are looking for is readily available in those locations in commonly accessible forms (PDF, Microsoft Office, Google documents).

3.2. If you require any of the documents within the scheme that are unavailable on the websites above or have no means of accessing documents electronically, please contact the Trust by email, or letter. Contact details are set out below.

Email: admin@sussexlearningtrust.co.uk
Contact address: Sussex Learning Trust, Broad Street, Cuckfield, West Sussex, RH17 5DP

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

3.4. If the information you're looking for isn't available via the scheme and isn't on the websites above, you can still contact the Trust to ask if we have it. We will send any information to you within the 20 working days specified by the Office of the Information Commissioner. We count term time days as working days.

4. PAYING FOR INFORMATION

4.1. Information published on the websites mentioned above 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 or an Internet café.

4.2. Single copies of information covered by this publication scheme are provided at 0.10p per sheet to cover the costs of printing and £25 per hour to cover the costs of administration. There is an additional minimum postage and handling charge of £5.00. We will let you know the cost/hours before fulfilling your request. Payment is required in advance.

5. SUBJECT ACCESS REQUESTS (SARs)

5.1. Individuals have the right to access the personal data and supplementary information SLT holds about them. This allows them to be aware of, and verify the lawfulness of, us processing this data.

5.2. This right applies to everyone whose personal data we hold, including staff, Trustees, Governors, volunteers, parents/carers and pupils. We must provide the information **free of charge** and normally comply within **1 month** (see 5.6).

5.3. Data protection officers (DPOs) should deal with all SARs in schools.

5.4. Requests should be made verbally or in writing (including email).

5.5. Individuals may submit requests to any staff member (i.e. not solely DPO), and therefore the DPO will ensure:

- staff know to forward requests to the DPO and Headteacher if they receive any; and
- staff members know how to identify a request. For example, parents/carers might not use the term 'subject access request' but might ask to see their child's behaviour record, which counts as personal data.

5.6. On receiving a request the academy DPO will contact the individual via phone or email to verify that they made the request and:

- if there are any doubts about the identity of the person making the request, request ID (normally 2 forms of ID, though not always necessary if the individual is already known to the academy);
- log the details and deadline of the request; we must fulfil the request within 1 calendar month. Where identity or clarification is needed, the statutory timeframe pauses until the additional information is received[1]*.

5.7. "Working Days" for Subject Access Requests: The 1-month (or 3-month for complex/numerous requests) timescale refers to calendar days, not term time days or

[1] If the request is complex or numerous, we can extend by up to a further 2 months, but we must inform the individual within the original 1-month period and explain why the extension is necessary

working days. This includes weekends and school holidays. The Trust will ensure processes and DPO availability accommodate this requirement to avoid breaches.

5.8. Requests by or on behalf of children: Children of any age may submit SARs. The school will consider whether the child has sufficient maturity and understanding to exercise this right. Generally, children aged 13 or over will be regarded as having capacity unless there is evidence otherwise. Where parents make requests on behalf of children, the Trust will consider whether disclosure is in the child's best interests and, where appropriate, seek the child's views.

5.9. Reasonable and proportionate searches: The Trust will make every effort to identify and locate relevant personal data but is not required to carry out searches that would be unreasonable or disproportionate. This applies to archived systems, excessive backups, or unstructured data that cannot reasonably be accessed.

5.10. Manifestly unfounded or excessive requests: The Trust may refuse to comply with, or may charge a reasonable fee for SARs that are manifestly unfounded or excessive. Any refusal will be explained within one month, including the right to complain to the ICO.

5.11. Right to Erasure (Right to be Forgotten): Individuals have the right to request the deletion or removal of personal data where there is no compelling reason for its continued processing. This right is not absolute and only applies in certain circumstances (e.g., where the data is no longer necessary for the purpose for which it was collected, or consent is withdrawn). The DPO will assess such requests in line with ICO guidance, considering the school's legal obligations to retain certain records.

5.12. Data Minimisation and Accuracy: The Trust commits to ensuring that personal data collected and held is adequate, relevant, and limited to what is necessary in relation to the purposes for which it is processed. We will take all reasonable steps to ensure that personal data is accurate and, where necessary, kept up to date. Processes will be in place for individuals to request correction of inaccurate data.

5.13. Data Retention: Personal data obtained through SARs and other related processes will be retained only for as long as necessary to fulfil the purposes for which it was collected, and in accordance with the Trust's data retention schedule and ICO guidance. Secure deletion will be ensured once the retention period expires.

5.14. Format and delivery of responses: Responses will be provided in the same format as requested where reasonably possible. If a request is made verbally, a verbal response may be given, but the Trust will record this. Data will be provided securely (e.g. encrypted files, secure post) and in accessible formats where required.

5.15. Record keeping and audit trail: The Trust will maintain an internal log of all SARs including date received, clarifications sought, ID verification, systems searched, redactions made, and date of response. This will ensure compliance and provide an audit trail in case of complaints or ICO queries.

Document Version Control

Date	Version	Comment	Ratified by	Reviewer
03.2016	1	Original version adopted on conversion	CEO	C. Granlund
24.4.19	2	Review	CEO Board of Trustees (22.5.19)	J. Morris
24.3.20	3	Review and addition of **SAR requests**	CEO Board of Trustees (01.04.20)	J. Morris
11.5.21	3.1	Regular Review. No changes other than minor language changes and formatting.	Board of Trustees (26.05.21)	J. Morris Exec Team
31.5.23	4	Clarification of classes of information, link to model publication scheme and changes to charges and clarification of timescales related to requests	Board of Trustees (7.06.23)	D. Thomas/A. Drury
16.9.25	5	Update based on ICO, Academy Trust Handbook, and DUA 2025 guidance (SAR timescales, right to erasure, children's rights, proportionality of searches, refusal grounds, secure delivery, and record keeping).	Considered by Finance. Risk and Audit Committee (23.09.25) for recommendation to the Board. Board of Trustees (22.10.25)	Chief Operating Officer