



THE STONEHENGE
SCHOOL

FREEDOM OF INFORMATION POLICY
2026

Statutory Document	No
Review Frequency	Every 3 Years
Approving Authority	Head Teacher
Published On School Website	Yes

ACTION	DATE	COMMENT
Last Approved	Feb 2026	
Next Due Review	Feb 2029	

Freedom Of Information Policy 2026

1. Introduction

The Stonehenge School is committed to openness, transparency, and accountability in its dealings with the public. The School recognises its obligations under:

- The **Freedom of Information Act 2000 (FOIA)**
- The **Environmental Information Regulations 2004 (EIR)**
- The **UK General Data Protection Regulation (UK GDPR)** and the **Data Protection Act 2018 (DPA 2018)**

This policy sets out how the School will meet its legal duties to provide access to recorded information while protecting personal data and other exempt information.

The underlying principle of this policy is that members of the public have a right to access recorded information held by the School, subject only to lawful exemptions. The School will proactively publish information wherever possible and will handle requests fairly, consistently, and lawfully.

2. Background

Freedom of Information Act 2000

FOIA provides a general right of access to recorded information held by public authorities. Requests must normally be responded to within 20 working days, subject to exemptions.

The Act is fully retrospective and applies to all recorded information held at the time of a request, regardless of when it was created.

Section 19 of FOIA requires the School to adopt and maintain an ICO-approved Publication Scheme, setting out information routinely made available to the public.

Environmental Information Regulations 2004

EIR provide access rights to environmental information and allow requests to be made verbally or in writing. Responses must normally be provided within 20 working days, extendable to 40 working days for complex requests.

Data Protection Legislation

Individuals have the right to access their own personal data under UK GDPR and the Data Protection Act 2018 (Subject Access Requests).

The Information Commissioner's Office (ICO) regulates and enforces all three information access regimes.

3. Timescales

Type of Request	Statutory Timescale
FOIA requests	20 working days
EIR requests	20 working days (up to 40 if complex)
Subject Access Requests (UK GDPR)	1 calendar month
Education records (pupils)	As set out in Education (Pupil Information) (England) Regulations

Note: School holidays are counted as working days for FOIA and EIR purposes, in line with ICO guidance.

4. Responsibilities

The Governing Body has overall responsibility for ensuring compliance with information access legislation.

The Headteacher has day-to-day responsibility for implementation of this policy.

The School Business Manager acts as the Freedom of Information Officer, responsible for:

- Coordinating responses
- Advising staff
- Maintaining records of requests

All staff are responsible for:

- Identifying information requests
- Promptly forwarding them to the FOI Officer
- Preserving records once a request is received

5. Scope

This policy applies to all recorded information held by the School relating to its functions and activities, including:

- Information created and held by the School
- Information held on the School's behalf by third parties
- Information supplied by third parties relating to School business
- Information relating to Governors in their official capacity

This policy does not apply to:

- Personal communications unrelated to School business

Personal data is governed by the School's Data Protection Policy.

6. Requesting Information

6.1 How Requests Can Be Made

- FOIA: Written requests (including email)
- EIR: Written or verbal requests
- UK GDPR: Verbal or written Subject Access Requests

The School will provide reasonable advice and assistance to applicants, including helping them clarify or refine their request.

6.2 Charges

- **FOIA/EIR:** Charges may be applied for copying, printing, and postage only, in line with regulations.
- Requests exceeding the £450 cost limit may be refused or narrowed.
- **Subject Access Requests:** No fee will normally be charged.

If a charge applies, the applicant will be notified in writing before the information is supplied.

Information already publicly available may be provided by directing applicants to the relevant source.

6.3 Publication Scheme

The School maintains an ICO Model Publication Scheme, available on its website.

Information within the scheme will be:

- Published proactively
- Kept up to date
- Made available in accessible formats

The School will not publish personal data without a lawful basis and will ensure documents do not contain hidden personal data or metadata.

7. Withholding Information

Information will only be withheld where a lawful exemption or exception applies.

FOIA Exemptions

- **Absolute exemptions:** Applied without a public interest test
- **Qualified exemptions:** Subject to a public interest test

The School will:

- Apply exemptions narrowly
- Release non-exempt information where possible
- Clearly explain refusals and rights of appeal

Requests may be refused where they are:

- Vexatious or repeated (FOIA)
- Manifestly unreasonable (EIR)

8. Releasing Third-Party Information

Where information relates to a third party, the School will consider:

- Confidentiality obligations
- Data protection requirements
- Fairness and lawful basis for disclosure

Personal data will be disclosed only where permitted under UK GDPR and DPA 2018.

Staff acting in an official capacity may expect a lower level of privacy, but private matters (e.g. disciplinary records) will normally be withheld.

Third parties may be consulted where appropriate, but the School will make the final decision.

9. Information Held Within Contracts

Information held within contracts is subject to FOIA and EIR.

The School will:

- Avoid unnecessary confidentiality clauses
- Include FOIA/EIR compliance clauses in contracts
- Only agree confidentiality where legally justified

Commercially sensitive information may be withheld where an exemption applies and the public interest favours non-disclosure.

10. Complaints Procedure

Applicants may request an internal review if dissatisfied.

Complaints should be made in writing to the Chair of Governors by contacting admin@stonehenge.wilts.sch.uk. The School will aim to respond within 20 working days.

If unresolved, applicants may complain to the Information Commissioner's Office.

The ICO is contactable at:

www.ico.org.uk

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Telephone: 0303 123 1113

11. Requests Made Under Data Protection Legislation

Subject Access Requests will be handled in accordance with UK GDPR and the Data Protection Act 2018.

Information will be provided unless an exemption applies. Where third-party data cannot be removed without rendering the response meaningless, a balancing test will be applied.

Advice will be sought from the FOI Officer or Data Protection Officer where necessary.

12. Illegal Actions

It is a criminal offence to alter, conceal, destroy, or falsify information after a request has been received, with intent to prevent disclosure.