



Freedom of Information Policy & Publication Scheme

December 2025

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Endorsed by [committee]:	N/A
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Next review	Autumn 2027

1. Introduction

Any person has a legal right to make a request in writing to an education provider for access to information held by that organisation.

There are five reasons for not complying with a valid request of information under Freedom of Information (FOI) request:

- The information is not held
- It would cost too much or take too much staff time to deal with the request – (the current threshold is £450)
- The request is considered vexatious or repeated
- If personal data is released contrary to GDPR or DPA 2018
- One or more of the exemptions apply

2. Legislative Framework

2.1 The Trust will follow the Independent Commissioners' Office (ICO) and DfE guidelines in establishing the requirement to comply with any requests.

2.2 Further information on reasons for refusing to disclose information, including the application of exemptions is available on the [ICO website](#).

3. Scope

3.1 Requests for information may be covered under three categories:

1. Requests for personal data under the General Data Protection Act (GDPR) 2018.
2. Environmental Information Regulations (EIR) enquiries relating to air, water, land, natural sites, built environmental, flora, fauna, health and any associated decisions and activities.
3. FOI enquiries concerned with all other information and the reasoning behind decisions and policies.

3.2 A valid FOI request should be in writing with the enquirer's name and address (email address is acceptable) with sufficient description of information requested. Verbal enquiries are not covered under the Freedom of Information Act (FOIA), however, there is an exception to requests relating to environmental regulations which can be verbal.

3.3 The Trust must hold the information which is related to the business of the Trust, College or schools.

3.4 If the information requested is already in the public domain, this will be signposted to the enquirer.

4. Responsibilities

4.1 The Trust has no obligation to comply with vexatious requests; these may be designed to cause inconvenience, harassment or expense rather than to obtain information,

and would require a substantial diversion of resources or would otherwise undermine the work of the Trust.

- 4.2 If the information is held by another body, the enquirer will be advised accordingly.
- 4.3 Third parties may be consulted if their interests could be affected by the release of the information requested. Third party personal information is exempt from release and may be redacted.
- 4.4 If there are real concerns about disclosing the information, an exemption may be appropriate; there are more than 20 exemptions which are mainly intended to protect sensitive or confidential information. Once an exemption has been identified, the public interest test must be applied to determine whether upholding the exemption outweighs the public interest in disclosing it. Unless it is in the public interest to withhold the information it must be released.
- 4.5 Personal information is exempt under FOIA. However, if the person making the request is the subject of that personal information, they will be entitled to receive it under the terms of the Data Protection Act by a Subject Access Request (SAR).
- 4.6 The Trust will respond to straightforward enquiries free of charge but may issue charges if significant costs will be involved. In this instance a notice of fees will be issued to the enquirer to be paid prior to complying with the request (as included in the Publication Scheme). There is no obligation to respond to the request if the cost will exceed the appropriate limit.
- 4.7 Compliance with a request will be within 20 working days (excluding non-term time days). The 20 days starts from the receipt of any additional details of the request.
- 4.8 A refusal of a request will be notified in a detailed refusals' notice.
- 4.9 Requests made under the Data Protection Act or Environmental Information Regulations will be responded to in accordance with the relevant regulations.
- 4.10 All enquirers will be informed of the right to appeal to the ICO.
- 4.11 All requests are directed to the DPO who logs details and monitors the responses before they are sent.

5. Related Documentation

This policy links to the following policies and procedures:

- Data Protection Policies and SAR Procedures
- Retention Management Policy

HLA Publication Scheme

The ICO have published a [model publication scheme](#) which forms the basis of this document. The Publication Scheme commits HLA to:

- Proactively publish or otherwise make available as a matter of routine, information, including environmental information, which is held by the Trust and falls within the classifications below.
- Specify the information which is held by the Trust and falls within the classifications below.
- Proactively publish or otherwise make available as a matter of routine, information in line with the statements contained within this scheme.
- Produce and publish the methods by which the specific information is made routinely available so that it can be easily identified and accessed by members of the public.
- Review and update on a regular basis the information the Trust makes available under this scheme.
- Produce a schedule of any fees charged for access to information which is made proactively available.
- Make this publication scheme available to the public.
- Publish any dataset held by the Trust that has been requested, and any updated versions it holds, unless the Trust is satisfied that it is not appropriate to do so; to publish the dataset, where reasonably practicable, in an electronic form that is capable of re-use; and, if any information in the dataset is a relevant copyright work and the Trust is the only owner, to make the information available for re-use under the terms of the Re-use of Public Sector Information Regulations 2015, if they apply, and otherwise under the terms of the Freedom of Information Act section 19

(The term 'dataset' is defined in section 11(5) of the Freedom of Information Act. The term 'relevant copyright work' is defined in section 19(8) of that Act).

Classes of information

Who we are and what we do

Organisational information, locations and contacts, constitutional and legal governance.

What we spend and how we spend it

Financial information relating to income and expenditure, tendering, procurement and contracts.

What our priorities are and how we are doing

Strategy and performance information, plans, assessments, inspections and reviews.

How we make decisions

Decision making processes, internal criteria and procedures, consultations, and records of decisions.

Our policies and procedures

Current written protocols for delivering our services and responsibilities.

Lists and registers

Information held in registers required by law and other lists and registers relating to the services of the Trust.

The services we offer

A description of the services offered. Advice and guidance, booklets and leaflets, transactions and media releases.

Non-disclosure of information

The classes of information will not generally include:

- Information the disclosure of which is prevented by law or exempt under the FOIA or is otherwise properly considered to be protected from disclosure.
- Information in draft form.
- 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.

The method by which information published under this scheme will be available

HLA will indicate what information is covered by this scheme and how it can be obtained. Where possible, information will be provided on a website. Where it is impracticable to make information available on a website or when an individual does not wish to access the information by the website, the Trust will indicate how information can be obtained by other means and provide it by those means.

In exceptional circumstances some information may be available only by viewing in person. Where this manner is specified, contact details will be provided. An appointment to view the information will be arranged within a reasonable timescale.

Information will be provided in the language in which it is held or in such other language that is legally required. Where the Trust is legally required to translate any information, it will do so.

Obligations under disability and discrimination legislation and any other legislation to provide information in other forms and formats will be adhered to when providing information in accordance with this scheme.

Charges which may be made for information published under this scheme

The purpose of this scheme is to make the maximum amount of information readily available at minimum inconvenience and cost to the public. Charges made

by the Trust for routinely published material will be justified and transparent and kept to a minimum.

Material which is published and accessed on a website will be provided free of charge. Charges may be made for information subject to a charging regime specified by Parliament. Charges may be made for actual disbursements incurred.

Charges may also be made for information provided under this scheme where they are legally authorised, they are in all the circumstances, including the general principles of the right of access to information held by public authorities, justified and are in accordance with a published schedule or schedules of fees which is readily available to the public.

Charges may also be made for making datasets (or parts of datasets) that are relevant copyright works available for re-use. These charges will be in accordance with the terms of the Re-use of Public Sector Information Regulations 2015 (PSRI), where they apply, or with regulations made under section 11B of the FOIA, or with other statutory powers of the public authority.

Schedule of charges

Type of charge	Cost	Basis of charge
Photocopying	5p per page black & white/10p per page colour A4	Total costs
Postage	Actual cost of 2nd class mail	Total costs
Admin	£25	Statutory fees

If a charge is to be made, confirmation of the payment due will be given before the information is provided. Payment may be requested prior to provision of the information.

Written requests

Information held by the Trust that is not published under this scheme can be requested in writing, when its provision will be considered in accordance with the provisions of the FOIA.

Requests should be sent to the Chief Financial and Operating Officer (CFOO) at Horsham Learning Alliance, 82 Hurst Road, Horsham West Sussex, RH12 2EJ

Information on websites HLA website: www.hla.education

The College and schools' websites can be accessed via this website.

**Guide to information available from Horsham Learning Alliance
under this Publication Scheme**

INFORMATION TO BE PUBLISHED	HOW THE INFORMATION CAN BE OBTAINED	COST
Class 1 - Who we are and what we do		
Members of the Trust Board and their appointments including Register of Business Interests	HLA website	No charge
Funding Agreements and Articles of Association	Companies House, HLA and College/schools websites	No charge
Contact details for HLA and Partnership Schools	HLA and College/schools websites	No charge
Corporate details: registered office; directors; members;	Companies House website: www.gov.uk/government/organisations/companies-house	No charge
Governance structure	HLA website	No charge
Members of Local Governance Boards (LGBs) and their appointments including Register of Business Interests	College/schools websites	No charge
School prospectus and profiles	College/schools websites	No charge
Term dates, holidays and school session times	College/schools websites	No charge
HLA staffing names of key personnel	HLA website	No charge
Curriculum outline	College/schools websites	No charge
Gender Pay Gap	HLA website	No charge
Class 2 – What we spend and how we spend it		
Statutory accounts	Published on HLA website	No charge

Procurement – policy and opportunities	By written request	Schedule of charges
Financial Statements	By written request	Schedule of charges
Capital Funding and information on capital projects	By written request	Schedule of charges
Additional sources of funding	By written request	Schedule of charges
Trustee and Governor Expenses Policy	By written request	Schedule of charges
Trade Union Facility Time Reporting	HLA Website	No charge
Pupil Premium Funding	School websites	No charge
Class 3 - What our priorities are and how we are doing		
School Improvement Plans	By written request	Schedule of charges
Plans for future development	By written request	Schedule of charges
DfE performance data	DfE website and College/schools websites	No charge
Latest Ofsted reports	College/schools websites and Ofsted website	No charge
Newsletters	College/schools websites	No charge
Performance management information	HLA website	No charge
Risk Assessments	By written request	Schedule of charges
Class 4 - How we make decisions		
Local Governance Board Terms of Reference	HLA website	No charge
Minutes of meetings of the HLA Board of Trustees and its Committees including LGBs (Information that is properly regarded as confidential will be excluded)	HLA and College/schools websites	No charge
Admissions' Policy and Arrangements	College/schools websites	No charge
Admissions' Appeals process	College/schools website	No charge

Class 5 - Our policies and procedures		
Child Protection & Safeguarding Policy and procedures	College/schools websites	No charge
Health & Safety Policy	HLA and College/schools websites	No charge
Complaints procedure	HLA and College/schools websites	No charge
Pay Policy	By written request	No charge
Equality and Diversity Policies	HLA and College/schools websites	No charge
Curriculum statements	College/schools websites	Schedule of charges
Data Protection Policy and associated publications	HLA website	No charge
HR recruitment and retention policies	By written request	Schedule of charges
Careers programme	College/schools websites	No charge
Charging regimes and policies	HLA website	No charge
Class 6 - Lists and Registers		
Any lists and registers that HLA is required to keep	By written request	Schedule of charges
Class 7 - The services we offer		
Prospectuses	College/schools websites or by written request	No charge
Out of hours clubs & extra-curricular activities (where applicable)	College/schools websites or by written request	No charge
Lettings opportunities	By written request	No charge
Any other published material	By written request	No charge