



SIKH ACADEMIES TRUST

Faith Inspired Education

# **SAT Freedom of Information Policy**

Date reviewed: Autumn 2026

Date of next review: Autumn 2026

## **SCOPE OF THE POLICY**

This policy applies to all schools in Sikh Academies Trust (SAT). This policy has been updated to be in line with the March 2025 and June 2025 DfE guidance.

### **1. How does FOIA apply to SAT?**

Trusts and their academy schools are all public authorities under FOIA. SAT may receive FOI requests from parents wanting to access information they feel should be disclosed.

### **2. How we recognise a freedom of information request**

- A freedom of information request (FOI Request) is any written request from a member of the public which asks to have access to information that we hold and includes the requester's real name and an address for correspondence.
- Anyone has the right to make a FOI request. The request does not have to mention FOIA or direct their request to a designated member of staff for it to be valid.
- It is important to remember that if a person is asking for their own personal data it should be dealt with as a data subject access request rather than a FOI request.
- Similarly, if a person is asking for environmental information, the request would be covered by the Environmental Information Regulations 2004 rather than FOIA.

### **3. How we respond to a FOI request?**

- When we receive a FOI Request, we tell the requester whether we hold any information that falls within the scope of their request and provide that information to them unless there is a good reason not to.
- Schools have 20 school to respond to a FOI Request. The timescale for responding starts when SAT receives the request, not when it reaches the relevant member of staff who will deal with it. In certain circumstances, the timeline may be extended if we need more time to assess the public interest balance of a request. In such cases, the Trust will justify the reason for the extension.
- The ICO have published a request handling flowchart which can be accessed [here](#) which sets out the steps to consider when a FOI request is received.

### **4. What information is covered?**

- FOIA only covers recorded information SAT holds. SAT does not have to make up an answer or find out information from elsewhere if we don't already have the relevant information in a recorded form.
- We can't refuse to provide the information on the basis that it is out of date, incomplete or inaccurate.
- We will normally disclose the information in the format we hold it at the time the request was made.
- It is a criminal offence to make changes or deletions to the information as a result of the request being received.

### **5. Can SAT refuse to answer?**

- SAT can refuse an entire request if it would cost too much or take too much staff time to deal with the request, the request is vexatious or the request repeats a previous request from the same person.
- If we are refusing all or any part of a request, we will send the requester a written refusal notice. We will send a refusal notice if we are refusing to say whether we hold information at all, or where we confirm that we hold information is held but refuse to release it.

## **6. Are there any exemptions?**

There are a number of exemptions that allow us to withhold information from a requester. These are limited and apply to very specific circumstances.

The following exemptions may be relevant to information you hold:

- section 21 - information already reasonably accessible;
- section 22 - information intended for future publication;
- section 40(2) - personal information of others;
- section 42 - legal professional privilege; or
- section 43 - prejudice to commercial interests.

## **7. Why is it important to get it right?**

- If an individual is not happy with our response to their FOI request or if we fail to respond, they can complain to the ICO.
- The ICO may resolve any complaint informally, but they do have the power to issue a legally binding decision notice, an enforcement notice, an information notice or practice recommendation.
- Notwithstanding this, the ICO is unlikely to issue a fine for any non-compliance. This is due to their current strategic approach to the fining of public authorities in the current economic climate. However, any action that the ICO takes is likely to be published on its website which can be picked up by news outlets and may negatively impact your reputation.

## **8. When responding to requests we will**

- Communicate with requests clearly and transparently.
- Double check that we have included the correct documents and the information being released does not contain unnoticed personal data or other sensitive details which we did not intend to disclose. This has been an issue for some public authorities and has resulted in a personal data breach.
- If we are redacting documents before responding, ensure the redaction is not reversible.
- Seek specialist legal advice as soon as possible.

## **9. Publication Scheme on information available under the Freedom of Information Act 2000:**

The Trustees are responsible for maintenance of this scheme.

## **10. How to Request Information**

If you require any of the documents within the scheme, please contact [b.riddell@sikhacademiestrust.com](mailto:b.riddell@sikhacademiestrust.com)

## **11. FOI Information requests timeline**

We will endeavour to respond to FOI requests within 20 working days.

## **12. FOI information payment**

Requests for information may be charged depending on the amount of photocopying, posting and administration costs incurred. This could include the costs of materials, (for example, tape or black ink) or the use of specialist equipment for the specific activity of redaction.

Typical costs would be £30:

- Photocopying 200 sheets @ 10p per sheet totalling £20.
- Postage @ £10.

For requests of a copy of your child's records you will be required to deposit a payment of £30 in reception for photocopying, postage, and administration.

Your child's records will be posted within the statutory timeframes (once the payment has been received). *An example of the timeframe: An applicant makes a request on 1 July. The school issues payment required notice on 9 July. The applicant pays the amount on July 15. The school has used 6 of the 20 working days allowed for a response and so it has 14 days after the day on which the applicant has paid (or 14 days after the cheque has cleared) to respond to the request.*

## **13. Feedback and Complaints**

We welcome any comments or suggestions you may have about this scheme. If you want to make a comment about this publication scheme or if you require further assistance or wish to make a complaint, then initially this should be addressed to the Executive Headteacher at the school.

If you are not satisfied with the assistance that you get or if we have not been able to resolve your complaint about a Freedom of Information request and you wish to take your complaint further, then this should be addressed to the Information Commissioner's Office. This is the organisation that ensures compliance with the Freedom of Information Act 2000.

They can be contacted at: Information Commissioner, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF.

## **14. Our data retention policy provides information on the data we hold**

Our data retention policy explains how long we need to keep information. It set out:

- the lawful basis for processing and keeping the data
- if we will pass this data on and, if so, if we need to keep it once you have passed it on
- the steps we will take when you destroy any personal data

Our retention policy includes how long we will keep data items within the different areas of school administration. For example, we need to keep pupil names in our safeguarding system longer than in our catering system.

### Carry out a personal data audit

We will carry out an audit of all the personal data we hold each year to check it is up to date and still needed. We will not keep any data longer than is necessary. As part of our audit, we include pupil and

staff data in paper records, databases, online systems and videos and photos. Reviewing the personal data helps us to identify what data we need to keep, destroy, change from a paper format to an electronic format and keep for research or litigation purposes

We group our data items about pupils into these areas: admissions, attainment, attendance, behaviour, exclusions, personal identifiers, contacts and pupil characteristics, identity management and authentication, catering and free school meal management, trips and activities, medical information and administration, safeguarding and special educational needs.

We use guidance on [how to create a record of processing activity](#). We share the results of our audit with our school leaders, governors and trustees. They are responsible for making sure the school is compliant with the Data Protection Act 2018 and only keeps data it needs.

### Depersonalise personal data

As data becomes older, there are steps we take to keep data about pupils for analytical purposes. Before deleting the data completely, we remove names and personal identifiers. This removes some of the risks around personal data. It also allows us to use it for long-term analysis of trends.

### Dispose of personal data

When records have reached the end of their retention period, data must be disposed of securely and confidentially. The ICO has guidance on [practical methods for destroying records that are no longer needed](#). All records containing personal information or sensitive policy information must be made either unreadable or so you cannot reconstruct it.

Our data retention policy includes the procedures for safely destroying personal data:

We do not dispose of records with the regular waste or in a skip. We dispose of records as follows:

- shred paper records using a cross-cutting shredder or get an external company to shred them
- destroy storage media and hard disks to particles no larger than 6mm
- dismantle and shred audio and video tapes

### The external company:

- shreds all records on-site in the presence of an employee
- is able to prove that the records have been destroyed and provide a certificate of destruction
- have trained its staff in the handling of confidential documents

The Freedom of Information Act 2000 requires SAT to maintain a list of records that have been destroyed and who authorised their destruction. Staff must have approval from a senior leader for the record to be destroyed.

Staff must document the destruction. Record a brief description of the data, the number of files and who authorised the destruction.

Further guidance is available on [record keeping and retention for academies and academy trusts](#).

### **Data retention schedule**

The following records have statutory retention periods.

## *Pupil records*

<i>Primary school pupil records</i>	Until the pupil leaves the school.	Transfer to secondary school or other primary school when the pupil leaves.	
<i>Secondary school pupil records</i>	Until the pupil's 25th birthday.	Dispose of records securely. If the pupil leaves to go to another school, transfer the records to that school.	
<i>Special educational needs and disabilities (SEND), including reviews and education, health, and care (EHC) plans</i>	6 years from the cessation of the EHC plan.	Dispose of records securely, unless the document is subject to a legal hold. If the pupil leaves to go to another school, transfer the records to that school.	

## **Child protection records**

<i>Child protection files</i>	Until the child's 25th birthday. If the file relates to child sexual abuse, retain until the child's 75th birthday.	Dispose of records securely. Child protection files should be passed on to any new school a child attends. This should be transferred as separately from the main pupil file. Should be stored either as a separate file or in a sealed envelope in the pupil file. The Report of the Independent Inquiry into Child Sexual Abuse (IICSA) recommendation on access to records	
<i>Allegations of child protection against a member of staff, including unfounded allegations</i>	Until the staff member's normal retirement age, or 10 years from the date of the allegation, whichever is later.	Dispose of records securely.	

## **Finance records**

<i>Contracts</i>	6 years from the last payment on the contract.	Dispose of records securely. Section 2 of the Limitation Act 1980	
<i>Debtor's records</i>	6 years from end of the financial year.	Dispose of records securely. Section 2 of the Limitation Act 1980	
<i>VAT records</i>	6 years from finance year end.	Dispose of records securely. May include invoices, budgets, bank statements and annual accounts.	
		Record keeping (VAT Notice 700/21)	

### ***Governance records***

<i>Document type</i>	Retention period	Action at end of retention period	Further information
<i>Admissions</i>	6 years from the admission date.	Dispose of records securely.	Regulation 7 of the School Attendance (Pupil Registration) (England) Regulations 2024.
<i>Attendance registers</i>	6 years from the date of entry.	Dispose of records securely.	Regulation 7 of the School Attendance (Pupil Registration) (England) Regulations 2024.
<i>Annual governors' report</i>	10 years.	Dispose of records securely.	The Education (Governors' Annual Reports) (England) (Amendment) Regulations 2002.  Retain as detailed in section 2 of the Limitation Act 1980.
<i>Curricular record</i>	At least 1 year.	Dispose of records securely.	The Education (School Records) Regulations 1989.  Regulation 3 of the Education (Pupil Information) (England) Regulations 2005.
<i>Directors – disqualification</i>	15 years from the date of disqualification.	Dispose of records securely.	The Education (Company Directors Disqualification Act 1986: Amendments to

			Disqualification Provisions) (England) Regulations 2004.
<i>Records of educational visits</i>	10 years from the date of the visit. If there was an incident on the visit, retain the permission slips for all pupils and the incident report in the pupil record.	Dispose of records securely.	Health and safety on educational visits.  Retain as detailed in section 2 of the Limitation Act 1980.
<i>School vehicles</i>	6 years from the disposal of the vehicle.	Dispose of records securely.	Section 2 of the Limitation Act 1980.
<i>Statutory registers and compliance</i>	Retention periods vary, for example:  Memorandums of understanding should be retained for the life of the academy plus 6 years.  Annual reports should be retained for 10 years from the date of the report.  Board meeting records should be retained for 10 years from the date of the meeting.	Dispose of records securely.	May include annual reports and governance records.  Companies Act 2006 contains information on which statutory registers to keep.  Compliance guidance in the maintained schools governance guide.  Compliance guidance in the academy trust governance guide.  Academy trust handbook.
<b><i>Health and safety records</i></b>			
<i>Accessibility plans</i>	Life of plan plus 6 years.	Dispose of records securely.	Retain as detailed in section 2 of the Limitation Act 1980.
<i>Accident records</i>	3 years from the date of the accident.	Dispose of records securely.	Accidents involving pupils should be retained in the pupil record.
			Regulation 25 of the Social Security (Claims and Payments) Regulations 1979.
<i>Monitoring exposure to substances hazardous to health, including asbestos</i>	5 years.	Dispose of records securely.	The Control of Substances Hazardous to Health Regulations 2002.



<i>Health surveillance records</i>	40 years.	Dispose of records securely.	The Control of Substances Hazardous to Health Regulations 2002.  Health surveillance - Record keeping.
<i>Other health records of staff</i>	While the worker is employed in your school.	Dispose of records securely.	The Control of Substances Hazardous to Health Regulations 2002.  HSE guidance on Health surveillance - Record keeping.
<i>Fire assessments</i>	Life of the risk assessment plus 6 years.	Dispose of records securely.	Fire Service Order 2005.  Retain as detailed in section 2 of the Limitation Act 1980.
<i>Property records</i>			
<i>Document type</i>	Retention period	Action at end of retention period	Further information
<i>Maintenance records</i>	6 years from finance year end.	Dispose of records securely.	Record keeping (VAT Notice 700/21).
<i>Title deeds</i>	12 years from end of deed.	Dispose of records securely.	Section 2 of the Limitation Act 1980.
<b><i>Staff records</i></b>			
<i>Document type</i>	Retention period	Action at end of retention period	Further information
<i>Copies of DBS certificates</i>	6 months from date of recruitment.	Dispose of records securely.	Keeping children safe in education.
<i>Maternity pay records</i>	3 years after the end of the tax year in which the maternity pay period ends.	Dispose of records securely.	The Statutory Maternity Pay (General) Regulations 1986.
<i>Pay records</i>	3 years from the end of the tax year they relate to.	Dispose of records securely.	PAYE and payroll for employers: Keeping records.
<i>Personnel files</i>	6 years from termination of employment.	Dispose of records securely.	Section 2 of the Limitation Act 1980.
<i>Retirement benefits</i>	A minimum of 6 years from the end of the year	Dispose of records securely.	Regulation 15 of the Retirement Benefits Schemes

in which the accounts were signed.		(Information Powers) Regulations 1995.
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**Compliance and review of your retention schedule**

We ensure your staff are trained in the secure and timely disposal of records. We conduct yearly audits on your retention schedule and regularly review our policies to align with changes in legislation.