

Freedom of Information Policy

Together We Make The Difference



Meaningful
Collaboration



Evidence Informed
Practice



Our family of schools
shape the direction

Respect Responsibility Resilience Kindness Fairness Empathy

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Changing Lives in Collaboration Trust (referred to hereafter as the Trust) takes seriously its duties, and the duties of its employees, under the General Data Protection Regulation (GDPR), the Data Protection Act 2018 and the Freedom of Information Act 2000. This policy sets out how the Trust meets its obligations when dealing with freedom of information requests and publicising information.	1
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1. Introduction

Changing Lives in Collaboration Trust (referred to hereafter as the Trust) takes seriously its duties, and the duties of its employees, under the General Data Protection Regulation (GDPR), the Data Protection Act 2018 and the Freedom of Information Act 2000. This policy sets out how the Trust meets its obligations when dealing with freedom of information requests and publicising information.

2. The Trust considers the following as public information:

2.1. School Websites

The statutory contents of the school website, as follows:

- Information about the implementation of the governing body’s policy on pupils with special educational needs (SEN).

- A description of the policies relating to disabled pupils, including facilities to improve access and the accessibility plan.

2.2. Governing Body

The names, and contact details of the governors should be available and the basis on which they have been appointed.

2.3. School session times and term dates

Details of school session times and dates of school terms and holidays.

2.4. Location and contact information

The address, telephone number and website for the school together with the names of key personnel.

2.5. What we spend and how we spend it

Financial information about projected and actual income and expenditure, procurement, contracts and financial audit. The minimum we would expect is that financial information for the current and previous two financial years should be available.

2.6. Annual budget plan and financial statements

Details of the Individual Schools Budget distributed by the EFA and Local Authority and the school's annual income and expenditure returns.

2.7. Capital funding

Details of the capital funding allocated to the school together with information on related building projects and other capital projects.

2.8. Additional Funding

Income generation schemes and other sources of funding. (Specialist secondary schools may have additional government funding and arrangements with private sector sponsors).

2.9. Procurement and contracts

Details of procedures used for the acquisition of goods and services. Details of contracts that have gone through a formal tendering process.

2.10. Pay policy

The statement of the school's policy and procedures regarding teachers' pay. **Staffing and grading structure**

2.11. Governors' allowances

Details of allowances and expenses that can be claimed or incurred.

2.12. What our priorities are and how we are doing

Strategies and plans, performance indicators, audits, inspections and reviews.

Below is a list of the type of information that we would expect schools to have readily available for publication. Any other reports or recorded information showing the school's planned or actual performance should normally be included.

2.13. School profile

- Government-supplied performance data
- Summary of latest Ofsted report*
- The required narrative sections covering areas such as: successes during the year; areas of improvement; efforts to meet the individual needs of every child; pupil's health, safety and support; post-Ofsted action plan; and links with parents and the community (* the full Ofsted report should also be available.)

2.14. Performance management information

Performance management policy and procedures adopted by the governing body.

2.15. Schools' future plans

Any major proposals for the future of the school involving, for example, consultation or a change in school status.

2.16. Child protection

The policies and procedures that are in place to ensure that functions are exercised with a view to safeguarding and promoting the welfare of children in compliance with any guidance issued by the Secretary of State.

2.17. Admissions policy / decisions

The school's admission arrangements and procedures, together with information about the right of appeal. Individual admission decisions would not be expected to be published, but information on application numbers/patterns of successful applicants (including criteria on which applications were successful) should be if this information is held by the school.

2.18. Minutes of meetings of the Governing body and its sub-committees

Minutes, agendas and papers considered at such meetings should be published as soon as practicable, with the exception of information that is properly considered to be private to the meeting.

2.19. Our policies and procedures

Current written protocols, policies and procedures for delivering our services and responsibilities.

2.19.1 School policies

This will include school policies and procedures together with other information related to the school such as charging and remissions policy, health and safety and risk assessment, complaints procedure, staff conduct policy, discipline and grievance policies, pay policy, staffing structure implementation plan. It will also include policies and procedures for handling information requests.

2.19.2 Pupil and Curriculum policies

This will include such policies as home-school agreement, curriculum, sex education, special educational needs, accessibility, race equality, collective worship, and pupil discipline.

2.19.3 Records management and personal data policies

This will include information security policies, records retention, destruction and archive policies, and data protection (including data sharing) policies.

2.19.4 Equality and diversity

This will also include policies, schemes, statements, procedures and guidelines relating to equal opportunities.

2.19.5 Policies and procedures for the recruitment of staff

If vacancies are advertised as part of recruitment policies, details of current vacancies will be readily available.

2.19.6 Charging regimes and policies

Details of any statutory charging regimes should be provided. Charging policies should include charges made for information routinely published. They should clearly state what costs are to be recovered, the basis on which they are made, and how they are calculated.

2.20. The services we offer

Information about the services the school provides including leaflets, guidance and newsletters.

Generally, this is an extension of part of the first class of information and may also relate to information covered in other classes. Examples of services that could be included here are:

- Extra-curricular activities

- Out of school clubs
- School publications
- Services for which the school is entitled to recover a fee, and fees
- Leaflets, booklets and newsletters

2.21. Lists and registers

We expect this to be information in currently maintained list and registers only.

2.22. Curriculum circulars and statutory instruments

Statutory Instruments (for example Regulations), departmental circulars and administrative memoranda sent to the Head Teacher/Governing Body concerning the curriculum.

2.23. Disclosure logs

If a school produces a disclosure log indicating the information provided in response to requests, it should be readily available. Disclosure logs are recommended as good practice.

2.24. Asset register

We would expect some information from capital asset registers to be available, if such registers are held.

2.25. Information the school is legally required to hold in publicly available registers

3. Handling FOI Requests

3.1 Role of Everyone:

Before releasing information, the Trust will be satisfied they have the necessary authority to do so without breaching other legislation or policy.

Any request will be passed on directly to the person who has the authority to release information and deal with the request. The Trust understands the 20-working day period starts when the request is received by a public authority, not when it reaches the "right" desk.

3.2 Role of Executive Headteacher:

It is very important to consider the possibility that releasing (or withholding) information in response to a request could have wider implications. The Executive Headteacher will therefore be informed about the request and make the decision on the appropriate person to handle it.

At this stage the Executive Headteacher will inform the Chair of Board of Directors.

If the information requested requires the involvement of more than one section, or if it involves information provided to the public authority by a third party (maybe a contractor, another public authority), it will usually be necessary to consult all those concerned.

3.3 Role of Governors:

If the information to be disclosed (or the fact that information is being withheld) is, contentious or in any other way likely to be newsworthy the Chair of the Board of Trustees and the Chair of any Local Governing Body will be informed prior to its release.

3.4 Role of FOI Handler:

The FOI needs to explore the request and consult with others both within the public authority and externally, seeking views on the disclosure of information and the balance of public interest. The IOC Flow Chart will be used to decide appropriate action. The outcome of this will be shared with the EP and Governors.

Once the decision has been made to disclose information all work on retrieving information will be recorded (see appendix 1)

The legislation gives an entitlement to information rather than documents, often information requested will consist of a whole document. It is not necessary to create new information in order to answer a request. The Trust should provide the requestor with advice and assistance so that they may understand what information is held and could be requested.

Both the FOI Act and the EIRs allow applicants to express a preference about the form in which information is communicated. Where practicable and reasonable to do so, the Trust will meet any such request or provide an explanation.

If whole documents are released the whole content will be sensitively reviewed and considered in light of the specific request. Redactions or removal of sections of a document will be recorded and kept. If redaction would make the document incomprehensible or if the relevant information is contained within a small section of a document or dispersed throughout several documents, the Trust will assemble into a readable format such as a digest.

Caution in redaction will be taken, with only pdf files or scanned documents being sent out and it redactions are made with a marker pen the effectiveness will be tested once photocopied.

4. Unclear Requests

There is a requirement under both the FOI Act and the EIRs for applicants to describe the information they want. If the Trust needs to it will seek clarification of the promptly and in any event no later than 20 working days. The day after the clarification is received by the public authority the 20-working day period begins.

The Trust will, where possible explain what information is readily available, or to explore ways in which a request could be made more specific. Conversation records, emails and letters with the applicant will be retained.

5. Costs for FOI Requests

The FOI Act say that requests should be processed without any charge unless the cost involved exceeds £450. The range of activities that can be taken into consideration in determining the cost will be limited to:

- time involved in identifying, retrieving and searching for the requested information
- time taken to extract the information from a document containing it,

Time associated with deciding whether information should be released or withheld will not be charged.

Where the time will exceed the £450 limit will mean the Trust has no requirement to proceed with a request, but it will assist the applicant to narrow the scope of the request.

Under the EIRs there is no “cost limit” for dealing with requests but requests that cost a disproportionate amount can be refused on the basis that they are manifestly unreasonable, subject to a public interest test.

The Trust’s charges imposed must be reasonable, and published.

6. Refusing A Request

The reasons for withholding information will be explained to the applicant, beyond the statement “prejudicial to the effective conduct of public affairs”.

The Trust will identify a specific exemption/exception as the basis for withholding information and explain why it applies.

The Trust will set out the “public interest” factors for and against disclosure that were considered.

The only exception to providing the reasons for withholding information is if this action would in itself involve disclosure of information that is exempt.

The Trust will determine whether the exemption or exception genuinely applies to all of the information requested.

When information is refused, the Trust will inform the applicant of the right to appeal, initially via the Trust’s internal review process and then to the Information Commissioner.

The Board of Directors will deal with disclosure, related complaints and internal reviews without the person that handled the original request.

7. Appeals to a Refusal to Information

The applicant can complain to the Information Commissioner, who can issue a Decision Notice. That Decision Notice can either order the public authority to disclose some or all of the information, or decide that information was correctly withheld.

Appendix 1 – Freedom of Information Request Handling Sheet

Date received:	Deadline for response:	
Date to EP:	Assigned Handler:	
Date to Chair of Board:	Date to Local Chair(s):	
Name of Applicant:		
Email of Applicant:		
Phone Number of Applicant:		
Address of Applicant:		
Checks made to establish if it is appropriate to release information:		
No	Question	Is this information that can easily be retrieved? From where.
Q1		
Q2		
Q3		

Recording the Retrieval of information

No	Person retrieving info	Times and Dates
Q1		
Q2		
Q3		

Documents to be Released

	Name of Doc	Signed off by EP	Copy taken
1			
2			
3			
Documents sent to:			Date Sent:

This information will be retained along with copies of the materials released.