



# Freedom of Information Policy

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| <b>Approved by</b>      | <b>CEO</b>           |
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| <b>Policy owner</b>     | <b>DPO</b>           |
| <b>Location</b>         | <b>Trust Website</b> |

## **1. Introduction**

The Freedom of Information Act (FOIA) 2000 provides public access to information held by public authorities. It does this in the following ways:

- Public authorities are obliged to publish certain information about their activities, and
- Members of the public are entitled to request information from public authorities.

Staffordshire University Academies Trust's (SUAT's) Freedom of Information Policy is inclusive of the Guide to Information and Charging Scheme which is based on the ICO's Model Publication Scheme on information available under the Freedom of Information Act 2000.

SUAT adopts the Information Commissioner Office's Model Publication Scheme which sets out:

- The classes of information which we publish or intend to publish;
- The manner in which the information will be published; and
- Whether the information is available free of charge or on payment.

The scheme covers information already published and information which is to be published in the future. Information can be requested from an individual Academy or Staffordshire University Academies Trust and is accessible in paper or electronic forms. Some information held may not be made public, for example, personal information, in compliance with the UK GDPR and Data Protection Act 2018. Further detail regarding when SUAT will refuse a request for information under the Freedom of Information Act 2000 is provided in section eight of this policy document.

SUAT's Senior Leadership Team are accountable to the Board of Trustees and are responsible for providing assurance that the requirements of the FOIA are being complied with. Headteachers / Principals are responsible for ensuring compliance in each Academy, and the Local Academy Councils (LACs) should scrutinise the arrangements in academies as part of the assurance process.

## **2. Aims and Objectives**

Each Academy and the Trust aims to:

- Enable every child to fulfil their learning potential, with education that meets the needs of each child.
- Help every child develop the skills, knowledge and personal qualities needed for life and work.

Individuals have the right to request information; SUAT and the Academies have duties to undertake when responding to these requests, which include:

- Informing the applicant whether SUAT / the academies hold any information falling within the scope of their request; and
- To provide that information where it is compliant to do so or where the data is not exempt.

SUAT is committed to openness and transparency, ensuring compliance with the relevant statutory framework by:

- Responding adequately to a request for information;
- Not deliberately withholding information;
- Adopting the model publication scheme, providing the correct information; and by
- Releasing the information that falls within the scope of the request, without undue delay.

The purpose of the Freedom of Information Policy is to ensure that effective procedures and arrangements are in place to manage a request for information to enable SUAT and the Academies to demonstrate compliance with the FOIA and other legal and statutory duties relating to providing public access to information.

## **3. Categories of information published**

The publication scheme guides you to information which we currently publish (or have recently published) or which we will publish in the future. This is split into categories of information known as 'classes'. These are contained in section seven of this policy.

The classes of information that we undertake to make available are organised into the following areas, which align to the Model Publication Scheme:

- *Organisational information, locations and contacts, constitutional information*
- *Academy Prospectus and a description of the services we offer*
- *Governors' Documents, LAC Documents*
- *Pupils and Curriculum*
- *SUAT Policies and Procedures*
- *Financial information*
- *Strategy and performance information*
- *Information required by law*

What academies, free schools and colleges should publish online and any requirements relating to the publication of information contained in the latest version of the Academy Trust Handbook are also managed and published in accordance with the designated guidance.

#### **4. How to request information**

Individuals have a legal right to ask for access to certain kinds of information held by SUAT / the Academies. They are entitled to be told whether the information is held, and to receive a copy, subject to certain exemptions. The ICO has guidance regarding making FoI requests, which can be found [here](#). ICO guidance should also be followed if there is a need to withhold the information; using the ICO guidance which can be found [here](#).

To make a request for information under the FoIA 2000, from an Academy or the Trust, based on the documents specified within the Publication Scheme, individuals can contact the relevant setting by telephone, email or letter. Contact details are displayed on each Academy's website.

To make a request for information about the Trust, please contact the Trust directly via the contact information displayed on the Trust website – [www.suatrust.co.uk](http://www.suatrust.co.uk).

If the information that individuals may be looking for is not available via the scheme or on the website/s, individuals can still contact the Academy or the Trust to ask if we have it.

The Act does not give people access to their own personal data (information about themselves). If a member of the public or staff wants to access personal information that SUAT / the academies hold about them, they should make a Subject Access Request (SAR) in accordance with the Data Protection Act 2018, as outlined in SUAT's Data Protection Policy. Please also refer to the [ICO guidance](#) regarding the right of access.

Where possible and practical, information will be made available on SUAT's and the Academies' websites. Where it is impracticable to make information available on a website or when an individual does not wish to access the information via the website, individuals should contact the Trust / Academies via the above means to request the information. Any information held that is not published under this scheme can be requested in writing and will be considered in accordance with the provisions of the FoIA.

In exceptional circumstances some information may be available only by viewing in person. Where this manner is specified in response to a request, further details will be provided and 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 if there is a legal requirement to 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.

## **5. Managing a Request**

For a request to be valid under the FoIA it must be in writing, but requesters do not have to mention the FoI Act 2000 or direct their request to a designated member of staff. Any letter or email asking for organisational information should be considered as a request for recorded information under the FoI Act 2000.

On receipt of a request within SUAT, the Data Protection Officer (DPO) should be notified. The DPO will liaise with the Data Protection Lead (DPL) / Headteacher / Principal at the Academy or Academies which have data that falls within the scope of the request and consider whether the request requires a local or a central response. This will depend on the nature of the request and whether it relates to local or centrally managed information.

All requests will be acknowledged upon receipt with an indication as to the timescales for responding. All requests will be responded to within the 20 day (school day) statutory time limit and responses will be provided having regard to the procedures and guidance outlined by the Information Commissioner's Office (ICO) Guide to freedom of information. A log will be retained of all requests.

Requests will be managed according to ICO guidance, using the following flow chart - [https://ico.org.uk/media/for-organisations/documents/1167/flowchart\\_of\\_request\\_handling\\_under\\_foia.pdf](https://ico.org.uk/media/for-organisations/documents/1167/flowchart_of_request_handling_under_foia.pdf)

There may be times when requested information cannot be supplied. Whenever a request is refused the requester must be notified and if the requester is unhappy with the outcome, SUAT's Complaints Policy should be followed. Any requests to review the decision and information provided should be made in writing and if, after following the complaints procedure outlined in the Complaints Policy, the requester is still dissatisfied, then they can pursue their concerns directly to the ICO.

Whenever a request is refused the requester should always be informed about their right to complain to the ICO. The ICO has a general duty to investigate complaints from members of the public who believe that an authority has failed to respond correctly to a request for information.

The ICO can be contacted by email at [www.ico.org.uk](http://www.ico.org.uk) or by writing to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, or enquiry/information line: 0303 123 1113.

Staff responsible for managing FoI requests will be aware of FoI Request response processes and this policy document. Staff who have the potential to receive an FoI Request will be made aware of the procedure for referring the request to the designated staff member in their setting, and DPO.

## **6. Charges for information**

Information published on our websites is free, although individuals may incur costs from their Internet service provider. If individuals do not have internet access, they can access our website using a local library or an internet café.

Charges may be made for actual disbursements incurred such as:

- Photocopying
- Postage and packaging
- Costs directly incurred as a result of viewing information

Charges may also be made for information provided under this scheme where they are legally authorised and justified and are in accordance with a published schedule or schedules of fees which is readily available to the public on the ICO website: [ICO Charging for information in a publication scheme.](#)

Single hard copies of information covered by this publication are provided free unless your request means that we have to do a lot of photocopying or printing, pay a postage charge, or is for a priced item such as some printed publications or videos.

Where a charge for providing the information is applicable, we will let you know the cost before fulfilling your request. Charges will be transparent and kept to a minimum. If a charge is to be made, confirmation of the payment due will be given before the information is provided. Payment will be requested prior to provision of the information.

## 7. Classes of Information Currently Published

**Organisational Information** – this section sets out information published about the Trust and Academies.

| Class                             | Description  |
|-----------------------------------|--|
| <b>Organisational Information</b> | <ul style="list-style-type: none"> <li>Structures</li> <li>Locations</li> <li>Key contact details including telephone number and email address</li> <li>Articles of Association</li> <li>The name of the Academy</li> <li>The category of the Academy</li> <li>The name of the governing body</li> <li>The manner in which the governing body is constituted</li> <li>The term of office of each category of governor if less than 4 years</li> <li>The name of anybody entitled to appoint any category of governor</li> <li>Details of the Trust and central team</li> <li>If the Academy has a religious character, a description of the ethos</li> <li>The date the instrument takes effect</li> <li>Constitutional information</li> </ul> |

**Academy Prospectus** – this section sets out information published in the Academy prospectus.

| Class                     | Description   |
|---------------------------|---|
| <b>Academy Prospectus</b> | <p>The statutory contents of the Academy prospectus are as follows; (other items may be included in the prospectus at the Academy's discretion):</p> <ul style="list-style-type: none"> <li>The name, address and telephone number of the Academy</li> <li>The names of the Principal, the Chair of the Local Academy Council and the Chair of the Trust Board</li> <li>Information on the Academy policy on admissions</li> <li>A statement of the Academy's ethos and values</li> <li>Parents right to withdraw their child from religious education and collective worship and the alternative provision for those pupils</li> <li>Information about the Academy's policy on providing for pupils with special educational needs</li> <li>Number of pupils on roll and rates of pupil's and unauthorised absences</li> <li>National Curriculum assessment results for appropriate Key Stages, with national summary figures</li> </ul> |

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|--|---|
|  | <ul style="list-style-type: none"> <li>• GCSE/GNVQ results in the Academy, locally and nationally</li> <li>• A summary of GCE A/AS level results in the Academy and nationally</li> <li>• The number of pupils studying for and percentage achieving other vocational qualifications</li> <li>• The destinations of school leavers*</li> <li>• The arrangements for visits to the Academy by prospective parents</li> </ul> |
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**Trust Board Annual Report and other information relating to the governing body** – this section sets out information published in the Trust's Annual Report and in other governing body documents.

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| <b>The Governing Body and its committees</b> | <ul style="list-style-type: none"> <li>• Agreed minutes of meetings of the governing body and its committees</li> <li>• Agreed minutes of meetings of the Local Academy Council and its committees</li> </ul>    |
| <b>Local Academy Councils</b>                | <ul style="list-style-type: none"> <li>• Names of Local Academy Council and Trust Board Members</li> <li>• Basis of appointment</li> <li>• Details of how to contact members via the Academy or Trust</li> </ul> |

**Pupils and Curriculum Policies** – This section gives access to information about policies that relate to pupils and the curriculum.

| <b>Class</b>                   | <b>Description</b>  |
|--------------------------------|---|
| Home – Academy agreement       | Statement of the Academy's aims and values, the Academy's responsibilities, the parental responsibilities and the Academy's expectations of its pupils for example homework arrangements.           |
| Curriculum Policy              | Statement on following the policy of the secular curriculum subjects and religious education and schemes of work and syllabuses currently used by the Academy.                                      |
| Sex Education Policy           | Statement of policy with regard to sex and relationship education   |
| Special Education Needs Policy | Information about the Academy's policy on providing for pupils with special educational needs.  |
| Accessibility Plans            | Plan for increasing participation of disabled pupils in the Academy's curriculum, improving the accessibility of the physical environment and improving delivery of information to disabled pupils. |
| Race Equality Policy           | Statement of policy for promoting race equality.  |
| Anti-Bullying                  | Statement of procedures for managing bullying and supporting pupils/students subject to bullying.   |
| Attendance                     | Statement of procedures for managing pupil attendance in the Academy setting.   |
| Behaviour                      | Statement of behavioural expectations and procedures for managing and supporting pupil/student behaviour.   |
| Admissions                     | Statement confirming admissions arrangements for the current and following academic years, including procedures and the right to appeal.  |

**SUAT Policies and other information relating to the Academies** – This section gives access to information about policies that relate to the Academies in general.

| <b>Class</b> | <b>Description</b> |
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| Published reports of Ofsted referring expressly to the Academy | Published report of the last inspection of the Academy and the summary of the report and where appropriate inspection reports of religious education in those designated as having a religious character.                  |
| Post-Ofsted inspection action plan                             | A plan setting out the actions required following the last Ofsted inspection and where appropriate an action plan following inspection of religious education where designated as having a religious character.            |
| Charging and Remissions Policies                               | A statement of the Academy's policy with respect to charges and remissions for any optional extra or board and lodging for which charges are permitted, for example school publications, music tuition, educational visits |
| Academy session times and term dates                           | Details of Academy term dates, INSET days, holidays, session times   |
| Information surrounding additional services delivered          | Extra-curricular activities, out of school clubs, publications, newsletters, events  |
| Health and Safety Policy                                       | Statement of Health and Safety arrangements in the academy setting, including specific roles and responsibilities  |
| Complaints procedure   | Statement of procedures for dealing with complaints  |
| Performance Management of Staff                                | Statement of procedures adopted by the governing body relating to the performance management of staff and the annual report of the Principal on the effectiveness of appraisal procedures                                  |
| Staff Conduct, Discipline and Grievance                        | Statement of procedure for regulating conduct and discipline of school staff and procedures by which staff may seek redress for grievance.   |
| Curriculum circulars and statutory instruments                 | Any statutory instruments, departmental circulars and administrative memoranda sent by the Department of Education and Skills to the head teacher or governing body relating to the curriculum                             |
| Collective Worship   | Statement of arrangements for the required daily act of collective worship   |
| Careers Education Policy                                       | Statement of the programmes of careers education provided for Key Stage 4  |
| Safeguarding   | Statement of arrangements for safeguarding in accordance with Keeping Children Safe in Education 2019. Policy for safeguarding and promoting welfare of pupils at the Academy (from March 2004)                            |
| Prevent  | Statement of procedures in relation to promoting welfare and wellbeing by preventing extremism and radicalisation, including the radicalisation / violent extremism referral process.                                      |
| E-Safety   | Statement of procedures in relation to keeping users of ICT systems safe online and protecting SUAT technological infrastructures, including responsibilities.   |
| Business Continuity Plan                                       | Statement of procedures, emergency contact information, contingency plans and records in the event of an emergency.  |
| Pupil Premium  | Statement of information surrounding the use of funding and assurance that learning opportunities meets the needs of all students/pupils.  |

**Trust Policies and Documentation** – information relating to current written policies and procedures for delivering services and responsibilities.

| <b>Class</b>  | <b>Description</b>   |
|---|--|
| Health and Safety                                     | Statement of arrangements for the management of health and safety across the Trust and within each individual Academy setting including key operational aspects of asbestos management, fire safety management, security, first aid, management of hazardous substances, business continuity planning.   |
| Human Resources                                       | Statement of procedures for managing and supporting staff including absence, disciplinary, induction, code of conduct, attendance, performance, recruitment, appraisals, confidentiality, performance management, return to work, violence and aggression, drug and alcohol misuse, accident and incident reporting and investigating.   |
| Data Protection                                       | Statement of procedures for the management, security and retention of records pertaining personal information, including privacy notices, code of conduct, risk register specific to data protection, information for stakeholders.  |
| Equality and Diversity, including equality objectives | Statement of Trust and Academy commitment to tackling inequality. Guidelines and procedures relating to equal opportunities  |
| Gender Pay Gap  | Information surrounding Gender Pay Gap reporting, and accompanying statements.   |
| Scheme of Delegation                                  | Information regarding how duties and responsibilities are delegated, what authority the board has delegated to committees, other volunteers, or to its staff under the powers of its governing document. It will also mention where further details of the delegations are found. Statement of arrangements for financial management across the Trust and Academies, including roles and responsibilities in relation to the management of the budget. |
| Vision and values                                     | Information regarding Trust vision, values and ethos, including strategy to achieve the vision   |
| Governance  | Statement of arrangements for Local Academy Councils and Trust Boards including code of conduct, election arrangements, strategic plans, link visits protocol, skills reviews, declarations of interest, term of office.   |

Any further compliance information is also included.

**Financial Information** – This section gives access to details relating to financial processes and policies.

| <b>Class</b>                                       | <b>Description</b>  |
|--|---|
| Audit reports, annual reports and audited accounts | Statement of outcomes of financial audits   |
| Finance manual                                     | Statement of Trust processes in relation to financial regulation including roles and responsibilities                       |
| Financial policies in relation to staff            | Statement of arrangements in relation to staff allowances, expenses, pay, using own vehicles for work                       |
| Premises policies and asset management plans       | Plan for the use of capital funding based on academy condition reports, in accordance with the SUAT Statement of Priorities |
| Procurement  | Statement of procedures in relation to procurement thresholds and practice across the Trust                                 |



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| Financial statements                         | Information regarding sources of income and details of expenditure  |
| Local Academy Council and Trustee Allowances | Details of allowances and expenses that can be incurred and claimed by Local Academy Council members and Trustees |
| Fixed Assets                                 | Statement regarding the management of Fixed Assets.   |
| Master Funding Agreement                     | Copy of the SUAT Master Funding Agreement   |

## 8. Declining Requests

The Trust and Academies will publish information under the FoIA 2000 unless:

- We do not hold the information
- The information is exempt under one of the FoI exemptions or EIR exemptions, or its release is prohibited under another statute
- The information is archived, out of date or otherwise inaccessible
- It would be impractical or resource intensive to prepare the material for routine release

A request may be refused under the following circumstances;

- It would cost too much or take too much staff time to deal with the request, which exceeds the cost limit for complying with the request
- The request is vexatious
- The request repeats a previous request from the same person
- Releasing the data would be contrary to the UK General Data Protection Regulation or the Data Protection Act 2018
- Harm would arise or would likely arise from disclosure
- Where an exemption applies.

The public interest test may be applied in such circumstances.

Where a request is refused, the requester will be informed by a written refusal notice from the Academy or the Trust in accordance with who the request was originally made with.

## 9. Review

We welcome any comments or suggestions you may have about the scheme. If you want to make any comments about the Trust Guide to Information or Publication Scheme, or if you require further assistance or wish to make a complaint then initially this should be addressed to Staffordshire University Academies Trust. Contact information can be found on the SUAT website – [www.suatrust.co.uk](http://www.suatrust.co.uk).