



Freedom of Information Policy & Publication Scheme

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Introduction

The Freedom of Information Act (FOIA) came into force in 2005; The act seeks to promote a culture of openness and accountability amongst public sector bodies, and therefore improve public understanding of how public bodies carry out their duties, why they make the decisions they do, and how they spend public money. As a public sector organisation, Vantage Academy Trust (herein referred to as the Trust) must comply with the FOIA and this policy outlines how we do this.

Legislation

The Information Commissioners Office (ICO) are the governing body for the FOIA and other information-based legislations including:

- The Data Protection Act (DPA) 2018 (personal data)
- The UK General Data Protection Regulation (UK-GDPR) 2021 (personal data)
- The Environmental Information Regulations (EIRs) 2004 (environmental data)

The FOIA is often misinterpreted with the above legislation relating to personal data; those individuals looking to access personal information about themselves, or their child can find more information on the Trust's Data Protection Policy and respective Privacy Notices that are located on the website or accessible via school offices. The FOIA focuses upon access to information and reasoning behind public decisions and policies made by the Trust.

Publication Scheme

Information covered by the FOIA is normally readily available and accessible via the Trust and respective school websites. As part of the Trust's obligations to comply with the FOIA, a 'Publication Scheme' must be published. The scheme contains a list of the typical information made public by the school and where that information can be found or accessed. The Trust's publication scheme can be found in the appendix to this policy and sets out:

- The classes of information which published or intended to be published.
- The manner in which the information will be published.
- Whether the information is available free of charge or subject to a fee.

Our publication scheme conforms to the model scheme for public authorities approved by the ICO and collated in line with the statutory categories of information that academies must publish.

Responsibilities

The Trust have set a schedule of roles and responsibilities for those staff and third parties that are a key part of the data protection team. A copy of which can be sourced on the website or by contacting the Data Protection Officer (DPO).

In addition, the Trust ask that all staff (including volunteers and contractors) comply with the provisions set out in this policy when dealing with information covered under the FOIA. Breaches of this policy may result in disciplinary action.

The Trust ask that all individuals that process personal data on behalf of the Trust contact the DPO in the following circumstances:

- If there are questions relating to this policy and associated data protection law
- If they have concerns that this policy is not being followed
- If they receive a request relating to public information

Requests for Information

It is a legal right for any person(s) or organisation to ask for access to information held by the Trust under the FOIA. Although the FOIA presumes openness, it recognises the need to protect sensitive information in certain circumstances and provides a number of exemptions that will be applied by the Trust where necessary.

Any requests for information under the FOIA should be made in writing to the Trust's DPO using the following details:

Miss Danielle Eadie - E: dpo@vantageacademies.co.uk

The FOIA states (in section 8) that all requests should be written and include:

- Applicants name
- Address and contact details
- Details of what is being requested

The requester can also state in what format they would like to receive the information. Where possible, these wishes will be complied with, or an alternative method provided if the Trust is unable to meet the desired format.

In most cases, the information requested is likely to be accessible in the public domain for instance on the Trust prospectus or school websites. If this is the case, the Trust will direct the individual to the 'Publication Scheme' which identifies where the desired information can be obtained.

Information that is not readily available and in the public domain will be reviewed by the DPO and relevant Trust staff in line with this policy. If a request is very general in nature, the Trust may contact the requester to seek clarification on what is being sought.

Should Trust staff receive a request for information, any immediate response should be avoided. All requests should be forwarded immediately to the DPO for review. Staff may wish to acknowledge that the request has been received.

Responding to Requests for Information

The DPO will review the request supported by the relevant staff members to decide the nature of the response including whether the Trust is able to:

- Meet the request in full
- Meet the request in part
- Unable to meet the request

If the Trust is unable to meet any requests in full, an explanation should be provided as part of any response including any relevant exemptions. The DPO will assign the responsibility of collating and providing the response to a senior manager once key outcomes have been ascertained.

A response will be provided to the requester within 20 working days of the request being made; this excludes weekends and school holidays. If the response is likely to take longer than 20 days, the Trust will inform the requester and keep them up to date with any progress and an expected date for response.

Responses to requests will be provided electronically via email unless an alternative format is specified by the requester.

Refusing a Request

Under the FOIA, the requester is entitled to be told whether the Trust holds the information (the duty to confirm or deny) except where certain exemptions apply. Should a request be refused (under section 36), any response will state the relevant exemption which has been applied. Refusals should always be approved by a qualified person within the Trust who can provide reasonable opinions on whether disclosure would or would not be likely to cause the types of prejudices or inhibition listed in the FOIA. The decision-making process must be documented.

The FOIA states that requests should not cause a drain on the Trusts time, resources and finances to the extent that the request negatively affects normal public functions. This is determined to be in excess of 3.5 days. The Trust reserves the right to refuse a request if sourcing, sorting and editing the information is likely to be in excess of this period. An opportunity will be provided for the requester to refine the request.

The Trust understand that wilfully concealing, damaging or destroying information in order to avoid answering a request is an offence and that penalties for doing so may be applied.

Any expressions of dissatisfaction from the requester regarding the Trust's decision to refuse a request should be reviewed by the Trust and instructions provided to the requester on how they can make a complaint to the Information Commissioner's Office (ICO). In addition, any refusal notice should include information on the appeals process outlined in section 8 below.

Vexatious Requests

The Trust reserve the right to refuse any requests that are deemed repeated or vexatious in nature; several requests from the same individual, a series of requests intended to disrupt work etc. The Trust will issue a refusal notice in line with the provisions set out in section 6.

Under section 14 of the FOIA, if the trust receives several requests from the same person, or a series of requests that appear intended to disrupt its work, these may be treated as repeated or vexatious. In this case the school may refuse to provide the information requested but would issue a refusal notice within 20 school days from receipt of the request to the enquirer to explain the decision and reasons for withholding the information (Note: this must include information regarding the appeals process).

Appeals & Complaints

Upon notification of a refusal to meet the request (either in part or in whole), the requester for information may appeal the decision. Any such appeal will be considered by the DPO along with relevant staff members where necessary.

Following a review, the Trust will issue a response within 20 working days outlining whether the appeal has been successful, and details of the information requested. If the appeal has been unsuccessful, the requester will be informed.

If the requester is still not satisfied with the outcome, they can commence the complaints process to the ICO. The complaint should be submitted within 6 months of the outcome of the internal review. The requester must provide supporting information and evidence along with the completed complaints form.

This can be done via email to: casework@ico.gsi.gov.uk

or by post to:

First contact team
Information Commissioner's Office,
Wycliffe House,
Water Lane,
Wilmslow SK9 5AF

Use of Information Provided

The FOIA allows access to information, but it does not give the requester permission to re-use that information for commercial gain. Therefore, the requester may reproduce the school's copyright protected information free of charge, without specific permission, provided it is not being reproduced for profit, material or financial gain.

The material must be reproduced accurately and must not be used in a misleading context. If the requester is publishing the material or issuing it to others, they must acknowledge the source of the information, its copyright status and the date of publication, if known.

This permission to reproduce copyright protected material does not extend to any material that is identified as being the copyright of a third party. Under those circumstances, the enquirer must seek authorisation to reproduce the material from the copyright holder concerned.

Record Keeping

Records will be entered into a "Freedom of Information Requests Log" kept by the DPO of the Trust. Details of the request and data disclosed shall be entered into the disclosure log which is accessible to the Data Protection Team. The log will include the following details where applicable:

- The party making the request for information

- The date upon which the request was received and to whom it was addressed
- If relevant, the date upon which the request was subsequently referred (internal/external)
- The nature of the information requested
- The name of the relevant reporting member of senior staff if not the DPO
- The outcome of deliberations, including summary reasons for a refusal (in whole or in part) to meet the information request.
- The response made to the party requesting the information, including the person nominated to implement the response, the date and format of the response and the details of the information provided
- Any subsequent appeal made by the requester
- The date and time of any meeting convened by the DPO and Governors where applicable.
- The outcome of the appeals committee's deliberations, including summary reasons for a refusal (in whole or in part) to meet the information request.
- The response made by the appeals committee to the party making the appeal, including the person nominated to implement the response, the date and format of the response and the details of the information provided.

Charges

Under FOI legislation, the Trust is permitted to charge a fee for any work that exceeds a period of 18 hours. The fee charged will be £25 per hour, per person involved in fulfilling the request; this fee should not exceed £450. All requests for information will be subject to charges where appropriate to cover the costs of photocopying and postage.

The fee must be received in order for the Trust to issue the requested information; if payment is not received within 3 months of issuing a fee notice, the Trust will not respond to the request.

Training

All staff and governors are provided with data protection training as part of their induction process.

Data protection will also form part of continuing professional development, where changes to legislation, guidance or the school's processes make it necessary.

Monitoring

This policy will be reviewed by the DPO and Trust on an annual basis or sooner should a significant change in legislation or processes occur.

The policy should be reviewed and approved by the full governing board.

Freedom of Information Publication Scheme

Guide to information available from the Vantage Academies Trust under the model publication scheme. This scheme has been collated with guidance from the Information Commissioners Office (ICO) model publication scheme for schools and statutory guidance from the government on what information academy trusts must publish:

<https://www.gov.uk/guidance/what-academies-free-schools-and-colleges-should-publish-online#annual-reports-and-accounts>

The scheme sets out the classes of information which we publish or intend to publish, where this information is available and whether or not the information is subject to a fee.

Published information.	Where to find it?	Applicable charges?
General		
Trust / School Key Details: - Name, address & contact details	Trust / School Website Trust / School Offices	N
Name and contact details of key school staff for correspondence purposes: - General pupil, parent & public enquiries - Headteacher - Chair of governing body - Special Educational Needs Coordinator (SENCO)	Trust / School Website Trust / School Offices	N
School opening hours to include: - Opening & closing times plus the total time this amounts to in a typical week. - Compulsory opening times; official start and end of the school day.	School Websites School Offices	N
School session times and term dates	School Websites School Offices	N
Remote education – details and instructions on remote learning for pupils	School Websites School Offices	N
Values & ethos	Trust / School Website	N

	Trust / School Offices	
Admission arrangements – schools (subject to school's admissions code and appeal code)		
How the school consider applications for each relevant age groups	School Websites School Offices	N
Application instructions for parents & carers	School Websites School Offices	N
Selection process for applications / places	School Websites School Offices	N
Oversubscription criteria (process if there are more applicants than places available)	School Websites School Offices	N
In year applications process	School Websites School Offices	N
In year application instructions	School Websites School Offices	N
Admission appeals timetable that includes: <ul style="list-style-type: none"> - Deadline for lodging appeal - Deadlines for submitting additional evidence from the parent or carer, admissions authority and clerks 	School Websites School Offices	N
School Uniforms (subject to statutory guidance on cost of school uniforms)		
Uniform Policy that includes whether or not an item is: <ul style="list-style-type: none"> - optional or compulsory - seasonal or required all year round - general or must be branded to the school 	School Websites School Offices	N

- available widely or must be purchased from a specific retailer		
Exams & Assessments		
Key stage 4 (secondary school) performance measures including: <ul style="list-style-type: none"> - Progress 8 score - Attainment 8 score - Attainment in English & Maths (% of pupils receiving a grade 5 and above) - English Baccalaureate (EBacc) average points score. 	School Websites School Offices	N
Link to performance measures website	https://www.gov.uk/school-performance-tables	N
Curriculum		
Content of curriculum in each academic year for every subject (including mandatory subjects)	School Websites School Offices	N
Instructions for parents / carers to find out more about the curriculum.	School Websites School Offices	N
What courses and qualifications are available to: <ul style="list-style-type: none"> - Pupils at KS4 includes GCSE subjects available. 	School Websites School Offices	N
Careers Programme Information (Year 7 to 13 / 11 to 16year olds)		
Names & contact details of careers leaders	School Websites School Offices	N
Summary of the careers programme & instructions on how to access it.	School Websites	N

	School Offices	
Review date for the careers provision	School Websites School Offices	N
Special educational needs and disabilities (SEND)		
Report on the implementation of the Trust's policy for pupils with SEN including: <ul style="list-style-type: none"> - SEN information including statutory guidance. - Arrangements for admission of disabled pupils - Steps taken to prevent disabled pupils from being treated less favourably. - Disabled access facilities 	School Websites School Offices	N
Accessibility plans (based on Equalities Act) including: <ul style="list-style-type: none"> - Increasing extent to which disabled pupils can participate in curriculum - Improvements to physical environment - Improving the delivery to disabled pupils of information that is readily accessible to pupils who are not disabled 	School Websites School Offices	N
Pupil Premiums		
Pupil premium strategy statement (how pupil premium is being spent & the achieved outcomes for pupils)	School Websites School Offices	N
PE & sport premium includes: <ul style="list-style-type: none"> - Amount of premium received - Breakdown of how it is spent - Impact on pupil participation & attainment - How improvements are sustainable 	School Websites School Offices	N

Key Policies & Statements		
Public sector equality duty information (eliminating discrimination, harassment & victimisation etc) includes: <ul style="list-style-type: none"> - How Trust schools comply with the public sector equality duty - Equality objectives 	Trust / School Website Trust / School Offices	N
Behaviour policy and anti-bullying strategy	School Websites School Offices	N
Complaints policy including arrangements for complaints from SEN parents / carers	Trust / School Website Trust / School Offices	N
Whistleblowing policy	Trust / School Website Trust / School Offices	N
Charging policy: <ul style="list-style-type: none"> - Activities or cases where parents / carers will be charged - Circumstances where the school will make an exception on a payment usually expected to be received as part of charging policy 	Trust / School Website Trust / School Offices	N
Governance & Finance		
A copy of the latest Ofsted report	School website or office (if report not published on website, a link to Ofsted will be available).	N
Annual reports and accounts including: <ul style="list-style-type: none"> - Audited annual reports and accounts - Memorandum & articles of association - Names of trustees & members 	Trust website	Hard copies subject to a fee

- Funding agreement		
Governance statement including information on what the board has delegated to committees & local governing bodies	Trust / School Website Trust / School Offices	N
Executive pay (no of staff with a gross annual salary & benefits of £100,000 or more)	Trust website	N
Trustee information and duties: Governance arrangements including: <ul style="list-style-type: none"> - Structure & remit of members, board of trustees, committees & local governing bodies (scheme of delegation); includes name of chair of each Details of trust members, trustees and governors including: <ul style="list-style-type: none"> - Names - Date of appointment & date stepped down (if applicable) - Relevant business & pecuniary interests - Governance roles in other educational institutions - Attendance records at meetings in the last academic year Sixth form only: <ul style="list-style-type: none"> - Governing body structure & responsibilities - Details of committees - Names of all governors including chair 	Trust / School Website Trust / School Offices	N
Governance (trustee, local governing bodies & committees) meeting information including: <ul style="list-style-type: none"> - Agenda - Approved minutes 	Trust / School Website Trust / School Offices	N

- Any reports, document or other paper considered at each meeting		
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Schedule of Charges – Publication Scheme

The following describes how the charges for any items listed have been arrived at:

Type of charge	Description	Basis of charge
Disbursement cost	Photocopying/printing @ 1p per sheet (black & white)	Actual cost *
	Photocopying/printing @ 2p per sheet (colour)	
	Postage (as per Royal Mail costs) Actual cost of postage will be charged if above standard size Envelope 50p	Actual cost of Royal Mail standard 2 nd class Cost of envelope
Statutory Fee		In accordance with the relevant legislation
Other		

*The actual cost incurred by the public authority

Exemptions

Information which **will not** be made available under this scheme includes:

- Information the disclosure of which is prevented by law, or exempt under the Freedom of Information Act, or is otherwise properly considered to be protected from disclosure.
- Information in draft form, or notes, documents in older versions, emails or other correspondence.
- 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.

How to request information

Requested documents under this scheme will be delivered electronically where possible, but paper copies can be provided by contacting the relevant school within the Trust.

The Trust ask that all requests regarding the categories of information outlined in the scheme are marked '**Freedom of Information Request**' and are submitted to the DPO.

Documents can be translated under disability legislation into accessible formats where possible.

Charges

Most documents contained in this scheme are free to view on the Trust websites.

Single paper copies are also available free of charge to parents/carers and prospective parents/carers of the school.

There may be a charge for certain documents as outlined in the publication scheme and schedule of charges above.

Feedback

We welcome any comments or suggestions you may have regarding this scheme. Please contact the DPO using the following contact details:

Miss Danielle Eadie - E: dpo@vantageacademies.co.uk