REDHILL ACADEMY TRUST

Equality and Achievement

FREEDOM OF INFORMATION POLICY and PUBLICATION SCHEME

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1. Introduction

For the avoidance of doubt, where this policy states 'the Trust' this also refers to the individual academies within the Redhill Academy Trust.

The Freedom of Information Act (FOI) 2000 provides public access to information held by public authorities, including Multi-Academy Trusts and schools. The Redhill Academy Trust has two main obligations under the Act:

- to publish certain information proactively – detailed in a Publication Scheme – see Appendix 1 for more details, and
- to respond to written requests for information within 20 school days.

Any person has a legal right to ask for access to information held by the Trust and its academies. They are entitled to be told whether the Trust holds the information and to receive a copy, subject to certain exemptions.

2. Scope

The FOI Act and therefore this policy deals with **non-personal data** held by the Trust. Requests for **personal data** are covered by the General Data Protection Regulations (GDPR) and must be dealt with under the GDPR strategy as a Subject Access Request.

This policy also covers requests for information under the Environmental Information Regulations 2004 (EIR). This includes information that relates to air, water, land, natural

sites, built environment, flora and fauna, health and any decisions and activities affecting any of these.

3. Aims

The aims of this policy are to ensure that:

- the Trust complies with its duties under the FOI Act and handle requests in the appropriate manner
- the Trust has a system in place which results in the proactive publication of information
- Trust staff will be able to recognise and respond appropriately to a valid request for information
- Individuals know how to make a request for information and to whom the request should be addressed.

4. Publication Scheme

The model publication scheme issued by the Information Commissioner's Office commits an authority (including Trusts, Academies and schools) to make information available to the public as part of its normal business activities. The information covered is included in the classes of information detailed below, where this information is held by the Redhill Academy Trust and/or its academies.

4.1 The scheme commits an authority (The Trust):

- 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.
- To specify the information which is held by the Trust and falls within the classifications below.
- To proactively publish or otherwise make available as a matter of routine, information in line with the statements contained within the scheme.
- To 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.
- To review and update on a regular basis the information the Trust makes available under the scheme.
- To produce a schedule of any fees charged for access to information which his made proactively available.
- To make this publication scheme available to the public.
- To 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 public authority 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.

4.2 Classes of Information included:

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 projected and actual income and expenditure, tendering, procurement and contracts.

What our priorities are and how we are doing.

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

How we make decisions.

Policy proposals and decisions. Decision making processes, internal criteria and procedures, consultations.

Our policies and procedures.

Current written protocols for delivering our functions and responsibilities.

Lists and registers.

Information held in registers required by law and other lists and registers relating to the functions of the authority.

The services we offer.

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

4.3 Classes of Information not generally included:

- Information, the disclosure of which is prevented by law, or except under the Freedom of Information Act, 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.

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

As the authority, the Redhill Academy Trust and its academies must clearly indicate to the public what information is covered by this scheme and how it can be obtained.

Where it is within the capability of the Redhill Academy Trust, 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 an authority 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.

4.5 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 detailed in Appendix 2 below.

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.

4.6 Written requests

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

5. FOI Requests

Any request for information will be considered as a request under the Freedom of Information Act 2000 and will be checked to see if it meets the criteria of the FOI Act, whether this is specified in the request or not.

Certain day to day routine requests for information (for example, a parent requesting a copy of a policy) will be dealt with outside of the provision of the FOI Act.

5.1 Making a request

Requests for information should be addressed to the Data Protection Lead within individual academies or, for information requests from the Redhill Academy Trust, they should be addressed to the Data Protection Officer DPO@redhillacademytrust.org.uk. Please clearly mark your communication 'FOI Request'.

Please indicate your name, address and telephone number and your preferred method of response within your request. In order for us to consider your request it would be helpful if you could state why you are requesting the information.

5.2 Time limits for FOI requests

Your request will be acknowledged upon receipt, and you will be advised when you may expect to receive the information from us. Please see our charging schedule (Appendix 2). We will inform you if a charge is likely to be payable to ascertain if you would like to continue with your request. All requests will be responded to within the statutory limit of 20 school days or 60 working days, whichever is the sooner.

5.3 Refusing a request

There may be times when requested information cannot be supplied. We will write to you if this applies to your request. This may be because:

- The time required to deal with your request is likely to exceed the 18 working hours maximum allowed (you will be notified as soon as possible if this is likely to apply)
- The request is considered to be vexatious
- The request is a repeat of a previous request from the same person
- The request meets FOI exemption criteria.

5.4 Exemptions

Common exemptions within the Freedom of Information Act include:

• Section 40 (1) – the request is for the applicant's personal data. This must be dealt with under the subject access regime in the UK GDPR, see the Data Protection Policy and Privacy Notices.

• Section 40 (2) – compliance with the request would involve releasing third party personal data, and this would be in breach of the UK GDPR principles as set out in Data Protection Policy.

• Section 41 – information that has been sent to the Trust/academy (but not the Trust / academy's own information) which is confidential.

• Section 21 – information that is already publicly available, even if payment of a fee is required to access that information.

• Section 22 – information that the Trust/academy intends to publish at a future date.

• Section 43 – information that would prejudice the commercial interests of the Trust /academy and / or a third party.

• Section 38 – information that could prejudice the physical health, mental health or safety of an individual (this may apply particularly to safeguarding information).

• Section 31 – information which may prejudice the effective detection and prevention of crime – such as the location of CCTV cameras.

• Section 36 – information which, in the opinion of the Chair of the Executive Board, would prejudice the effective conduct of the Trust. There is a special form for this on the ICO's website to assist with the obtaining of the chair's opinion.

Information within these exemptions must be considered and weighed up about the general principal that information should be disclosed wherever applicable.

6. Complaints

If you are not satisfied with the way your FOI request has been dealt with, you should firstly contact the Data Protection Officer at the Redhill Academy Trust via DPO@redhillacademytrust.org.uk who will try to assist. If you then remain dissatisfied

with the response, your complaint can then be considered under the formal Complaints Procedure, which is published on the Trust and academy websites.

Once your request has been processed through the formal process, you have the right to contact the Information Commissioners Office via this link Make a complaint | ICO or write to:

Information Commissioners Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Telephone - 0303 123 1113

7. Review

This policy will be reviewed every 3-years by the Trust Data Protection Officer (unless there is a major change to regulations when amendments may be made sooner) and presented to the Trust Audit Committee for approval.

Appendix 1 - Classes of Information published and how the information can be obtained.

Information to be published	How the information can be obtained
Information, Structure, location and contacts	
Who's who in the Redhill Academy Trust and its Academies (Including the Executive and Senior Leadership Teams)	Redhill Academy Trust & individual Academy websites
Who's who on the Trust Executive Board and Local Academy Board	Trust and individual Academy websites.
Locations and contact details including telephone numbers and email addresses	Trust and individual Academy websites
Terms of Reference for Local Academy Boards	Trust website
Instrument of Governance: Funding Agreements	DfE and Trust website
Articles of Association	Trust website
School Session times, term dates and holidays	Individual Academy websites
Academy Prospectus (where produced)	Academy websites (hard copy on request)
Curriculum	Academy website
School SENCO	Academy website
School Designated Safeguarding Lead	Academy website
School Uniform	Academy website (hard copy on request)

Information to be published	How the information can be obtained
Financial information relating to projected and actual income and expenditure, procurement, contracts and financial audit.	
Statutory Annual Report and Accounts	Trust and Companies House website. (Link on Academy websites)
Approved capital projects for the current year	Electronic copy via TrustOffice@theredhillacademy.org.uk
Procurement subject to the commercial and confidential public interest test.	Electronic copy via TrustOffice@theredhillacademy.org.uk
Governor Expenses Policy	Electronic copy via TrustOffice@theredhillacademy.org.uk
Executive Pay	Trust website
Charging and Remissions Policy	Individual Academy websites
Staffing and Grading structure	Electronic copy via TrustOffice@theredhillacademy.org.uk
Gender Pay Gap Information	Trust website

Pay Policy	Electronic copy via TrustOffice@theredhillacademy.org.uk
Additional funding – income generation schemes and other sources of funding	Electronic copy via TrustOffice@theredhillacademy.org.uk

Information to be published	**How the information can be obtained**
Strategies and plans, performance indicators, audits, inspections and reviews	
School Profile/Government Data	DfE website/electronic copy on request from individual academies
Ofsted Report	Academy websites
Strategic plan	Electronic copy via TrustOffice@theredhillacademy.org.uk or from the individual academy
Performance Management policy and procedures	Electronic copy on request via TrustOffice@theredhillacademy.org.uk
Child Protection – policies and procedures on safeguarding and promoting the welfare of children	Academy websites
Values and Ethos	Trust and academy websites

Information to be published	**How the information can be obtained**
Decision making processes and records of decisions	
Admissions Policy Information on application numbers and number of successful applicants by each oversubscription criteria	Individual academy websites Electronic copy on request from individual academies.
Trustee meeting agendas and non confidential minutes	Electronic copy via TrustOffice@theredhillacademy.org.uk
Meetings of Local Academy Board agendas and non-confidential minutes	Electronic copy available from individual academies
Scheme of Delegation	Trust website

Information to be published	**How the information can be obtained**
Current written protocols, policies and procedures for delivering our services and responsibilities	
School policies including: Charging and Remissions policy Health and Safety	 Academy websites Academy websites

Complaints Procedure	Trust and academy websites
Discipline and Grievance Policies	Electronic copy on request via TrustOffice@theredhillacademy.org.uk
Equality Information & strategy	Trust and academy websites
Curriculum	Academy websites
Relationship and Sex Education	Academy websites
Special Educational Needs	Academy websites
Accessibility	Academy websites
Behaviour Policy	Academy websites
Whistleblowing	Trust and academy websites
Staff code of conduct	Electronic copy on request via TrustOffice@theredhillacademy.org.uk
Safer Recruitment Policy	Trust and academy websites
Data Protection Policy	Trust and academy websites
Data Records and Retention Policy	Trust and academy websites
Freedom of Information Policy	Trust and academy websites
Privacy Notices	Trust and academy websites
Pupil Premium Statement	Academy websites
Exclusions Policy	Academy websites
Careers Programme Information	Academy websites
Ant-bullying Policy	Academy websites
Risk Management Policy	Electronic copy on request via TrustOffice@theredhillacademy.org.uk

Information to be published	How the information can be obtained
Lists and registers	
Asset register	Electronic copy on request via TrustOffice@theredhillacademy.org.uk ad from individual academies
Register of Business Interests	Trust and academy websites
Register of Members and Trustees	Trust and academy websites
Information the Trust is legally required to hold in publicly available registers	Specific information available upon request via TrustOffice@theredhillacademy.org.uk

Information to be published	How the information can be obtained
The services we offer	
Extra-Curricular activities	Academy websites
School publications and newsletters	Academy websites
Out of school clubs and events	Academy websites
Services for which the school is entitled to recover a fee together with those fees	Academy websites
Parent and pupil guidance and information	Academy websites

Appendix 2 - Schedule of charges

Type of Charge	Description	Basis of Charge
Disbursement cost	Photocopying/printing @ XX p per sheet (black and white)	Actual cost
	Postage	Actual cost of Royal Mail standard second class or special deliver where required or requested.
	Packaging	Actual cost where packaging other than envelopes are required.

Appendix 3 - Website Links

Redhill Academy Trust	Redhill Academy Trust - Home
Brookfield Community School	Brookfield Community School - Home (brookfieldcs.org.uk)
Colonel Frank Seely Academy	Welcome to Colonel Frank Seely Academy - Colonel Frank Seely (cfsacademy.org.uk)
Hall Park Academy	Hall Park Academy - Home
Park Vale Academy	Welcome to Park Vale Academy - Park Vale
Redhill Academy	Outstanding Secondary Academy in Nottinghamshire | Timely Updates, Achievements & Resources (theredhillacademy.org.uk)
South Nottinghamshire Academy	South Nottinghamshire Academy - Home
The Bolsover School	The Bolsover School - Home
The Carlton Academy	The Carlton Academy - Home (theacademycarlton.org.uk)
The Oakwood Academy	The Oakwood Academy - Home
Tupton Hall Academy	Home - Tupton Hall School
Carlton Junior Academy	The Carlton Junior Academy - Nottingham
Carling Infant Academy	Home (thecarltoninfantacademy.org.uk)
North Wingfield Primary & Nursery	North Wingfield Primary and Nursery Academy - Chesterfield
Robert Mellors Academy	Home - Robert Mellors Primary School - Nottingham
Scarcliffe Primary School	Scarcliffe Primary School - Home
Tupton Primary and Nursery Academy	Home - Tupton Primary and Nursery Academy - Nottingham (tpna.org.uk)