Good Shepherd Trust

Life in all its fullness

Freedom of Information Policy

Version Number	Version Description	Date of Revision/Review
1	Original policy	Jan 2012
2	Reformatted only	Feb 2014
3	Updated to comply with ICO current version of this document	April 2019
4	Updated to reflect ICO Freedom of Information Act 2000: Guide to Information provided by schools under the model publication scheme, Version 4.0 Oct 2021. Schools are advised to consider the template carefully and remove sections which do not apply to their type of setting.	March 2022
5	Reviewed – no changes or amendments	Sept 2024
6	**Next review due Sept 2026**	

Values

In keeping with our Trust vision, every member of the Trust family of schools will be valued and encouraged to fulfil their potential. In our Trust we believe:

- Everyone has something to offer
- Trust, honesty, empathy and social responsibility are the Christian values that frame our work
- We are here for the whole person, spiritually, morally, educationally and socially
- In working with transparency and openness

1. Introduction

The Freedom of Information Act 2000 (FOIA) was introduced to promote greater openness and accountability across the public sector and requires all schools, including academies, to be clear and proactive about the information they will make public.

The Trust is committed to conducting its affairs in a transparent manner, enabling public access to its information wherever this is appropriate, whilst ensuring the integrity of its information and protecting the privacy of its pupils, staff, volunteers, parents and other individuals. The Good Shepherd Multi Academy Trust has adopted the ICO 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.

2. The Aims of the Trust

The Trust aims to:

- provide all children with excellent educational provision within a caring and supportive ethos that is rooted in Christian values.
- to promote the provision of facilities for wider learning including recreation or other leisure time occupations for the benefit of the communities in the areas served by our academies.

We believe that every child has a right to educational excellence through high quality schooling. The success of pupils, in the broadest sense, lies at the heart of what we do.

This publication scheme is a means of showing how we are pursuing these aims.

3. Publication Scheme including Categories of Information Published

One of the main aims of a publication scheme is to indicate clearly to the public what information is covered by the scheme and how to obtain it.
The publication scheme therefore provides a guide to the information which is currently published. This is split into categories of information known as ‘classes’. A full list of the available information can be seen in our Publication Scheme in Appendix 1.

The classes of information that is available is organised into the following area:
Class 1: Who we are and what we do
Organisational information, locations and contacts, constitutional and legal governance.

Class 2: What we spend and how we spend it
Financial information relating to projected and actual income and expenditure, tendering, procurement and contracts.

Class 3: What our priorities are and how we are doing
Strategy and performance information, plans, assessments, inspections and reviews.

Class 4: How we make decisions
Policy proposals and decisions. Decision making processes, internal criteria and procedures, consultations.

Class 5: Our policies and procedures
Current written protocols for delivering our functions and responsibilities.

Class 6: Lists and registers
Information held in registers required by law and other lists and registers relating to the functions of the authority.

Class 7: The services we offer
Advice and guidance, booklets and leaflets, transactions and media releases. A description of the services offered.

Where possible the Trust will endeavor to make the information available through either the central Trust website and/ or the individual school websites, depending on the nature of the information. This is to enable free of charge access. Some of the information is available in paper form (hard copy), with a small amount of the information available only by viewing in person. How the information can be accessed is detailed in the publication scheme in Appendix 1.

Some information which we hold may not be made public, for example, personal information.

4. How to Request Information

If a paper version of any of the documents within the scheme is required, the publication scheme request must be made in writing by email or letter to the central Trust office or direct to the individual school concerned, giving clear details of the information requested. To help us process your request quickly, please clearly mark any correspondence “PUBLICATION SCHEME REQUEST”

If the information required is not evident via the scheme or on the Trust or individual school websites, then a Freedom of Information (FOI) request is needed. FOI requests must be in writing and must contain the requestor’s name and contact details and either postal address or email address for the response to be sent to.

The FOI request should be sent in writing to the Trust Data Protection Officer giving clear details of the information requested.

Send an email to: katespence@thegoodshepherdmat.co.uk

or letter to The Data Protection Officer, The Good Shepherd Multi Academy Trust,
19-24 Friargate, Penrith, Cumbria CA11 7XR

To help us process your request quickly, please clearly mark any correspondence “FOI REQUEST”

The Trust will aim to respond to all requests promptly and within the statutory response period of 20 working days following receipt of a valid request. It should be noted that school closures during holiday periods may impact on the response time, but the requestor will be kept informed at all times of the progress.

This policy does not cover Subject Access Requests (requests for access to information about a living individual which could identify them). These requests are exempt from the FOI and will be processed in accordance with the GDPR regulations and the Trust Data Protection Policy.

5. Managing Requests

All FOI requests, however and wherever they are received will be dealt with by a designated member of staff (the Trust Business Manager) in conjunction with the Trust Data Protection Officer. The designated member of staff will be responsible for ensuring requests are fulfilled within the statutory response period.

The Trust will keep a record of all requests received for monitoring purposes, noting:

- the date the request was received,
- name and contact details of the person or organisation making the request,
- the date the request was fulfilled or refused,
- the reason for any exemption being applied,
- the reason for any failure to meet the 20 day deadline.

A template log for recording FOI requests can be found in Appendix 2.

A copy of the data supplied will be retained for two years from the date the FOI request was completed.

In identifying a designated member of staff, the Trust will ensure that they are appropriately supervised and trained to understand, follow and be responsible for good information management practise.

6. Withholding Information

The FOI Act contains 23 exemptions whereby information can be withheld. There are two categories: absolute and non-absolute. We will only withhold information if it falls within the scope of one or more of these exemptions. Complete files or documents will not be withheld just because part of the information is covered by an exemption, though they may be subject to redaction.

An exemption will only be applied where we have reason to believe that prejudice might occur to the interest protected by the exemption. In addition, wherever a “public interest” exemption is being considered, we will only withhold that information which it can demonstrate that the public interest will be best served by withholding. When considering withholding information under a non-absolute exemption we will take into account whether the release of the information would:

- promote further understanding of current issues of public debate;
- promote the accountability of decisions taken by us and the spending and allocation of public money;
- bring to light matters of public safety;
- allows the public to understand and challenge decisions made by the Trust;
- be otherwise in the public interest.

Where information is withheld under an exemption in most cases, the reason behind the decision will be made clear to the applicant, citing the exemption under which the information is being withheld.

The Trust also reserves the right to refuse any vexatious or repetitious requests

The Trust has a legal duty to protect personal data. The Trust will therefore carefully consider its responsibilities under Data Protection Regulations before disclosing any personal data requested as part of the FOI requested.

7. Paying for Information

7.1 Finding the information: We will make no charge for finding the information for requests which cost less than £450. The right to access information needs to be balanced by our need to carry out our core regulatory duties economically, efficiently and effectively. The Act allows us to decline to comply with requests for information where the cost of finding the information would be over the cost limit. The cost of £450 will be calculated at £25 per person per hour for the time taken to:

- determine whether the information is held,
- locate and retrieve it, and
- extract the information from a document (s) containing it.

We will not take into account any time spent:

- deciding whether information should be released; or
- applying exemptions; or
- considering the public interest test.

If a request is considered to exceed £450, where possible we will help you try to refine your request so that it falls within the cost threshold set out above.

7.2 Postage and copying: Where the cost of postage, printing or photocopying is below £10 we will not make a charge. Where it is over £10, we will charge the full estimated cost of postage and copying and will tell you how much that will be before we produce the information. If you decide not to pay then we will not release the information.

If you decide that you wish to refine the request so that the cost is within the £10, we are happy to discuss that with you.

7.3 Aggregating requests: Where two or more requests are received from the same person, or from different persons appearing to us to be acting in concert or as part of a campaign, the cost of complying with any one of them may be taken to be the cost of complying with all of them jointly.

For example if three related requests costing £400 each are received, we can treat them as costing a total of £1,200, and we are entitled to refuse to process the requests. If that appears to be the case, we will explain to you why that is so.

8. Feedback and Complaints

We welcome any comments or suggestions you may have about the scheme. If you want to make any comments about this publication scheme or if you require further assistance or wish to make a complaint regarding information you have received or been refused then initially this should be addressed to the Data Protection Officer

If you are not satisfied with the assistance that you get or if we have not been able to resolve your complaint and you feel that a formal complaint needs to be made then this should be addressed to the Information Commissioner’s Office (ICO). This is the

organisation that ensures compliance with the Freedom of Information Act 2000 and that deals with formal complaints.

They can be contacted at:
Information Commissioner's Office,
Wycliffe House,
Water Lane,
Wilmslow,
Cheshire
SK9 5AF
Phone: 0303 123 1113 (local rate) or 01625 545 745
Email: casework@ico.org.uk.

Appendix 1 - Publication Scheme – (using ICO model).

Class 1 - Who we are and what we do ~ (Organisational information, structures, locations and contacts - current information only).		**How the information can be obtained**
Central Trust	**Individual Schools**	Hard copy (HC) and/or website (W)
Who's who in the Trust	Who's who in the school	W
Who's who on the Board of Directors and members of the Trust	Who's who on the Local Governing Body (LGB) and the basis of their appointment	W
Memorandum and Articles of Association	N/A	HC
Names of the CEO and Chair of the Board of Directors, with contact details for via the Trust.	Names of the Headteacher and LGB Chair, with contact details via the school.	W
Trust Prospectus	School Prospectus (if any)	HC & W
Trust Annual Report and Accounts	Annual Report for each individual school is within the Trust Annual Report and Accounts	W – can also be found on Companies House website
Central Trust Staffing Structure (if appropriate)	School Staffing structure (if appropriate)	HC
N/A	School session times and term dates	W
Address of Trust and contact details, including email address.	Address of school and contact details, including email address.	W

Class 2 – What we spend and how we spend it. (Financial information relating to projected and actual income and expenditure, procurement, contracts and financial audit - current and previous financial year information only)		**How the information can be obtained**
Central Trust	**Individual Schools**	Hard copy (HC) and/or website (W)
Annual budget plan and financial statements	Annual budget plan and financial statements	HC
Capital funding	Capital funding	HC
Financial audit reports	Financial audit of schools is part of the Trust Annual Report and Accounts	W - see Trust Annual Report and Accounts

Procurement and contracts – details of procedures used for the acquisition of goods and services	See Trust website	W – procedure is within Finance manual on Trust website
Details of contracts that have gone through formal tendering process		HC
Teachers Pay Policy incl grading structure Support Staff Pay Policy incl grading structure	See Trust website	W HC
Expenses policy for staff, directors, LGB members and volunteers	See Trust website	W - procedure is within Finance manual on Trust website
Record of total expenses payments made to individual directors.	See Trust website	See Trust Annual Report and Accounts

Class 3 – What our priorities are and how we are doing (Strategies and plans, performance indicators, audits, inspections and reviews – current information only)		**How the information can be obtained**
<u>Central Trust</u>	**<u>Individual Schools</u>**	Hard copy (HC) and/or website (W)
N/A	School profile (if any) • Performance data supplied to the Government or a direct link to the data • The latest Ofsted report - Summary - Full report • Post-inspection action plan	 W W HC
Appraisal Procedure for Teachers Appraisal Process for Support Staff	See Trust website See Trust website	W W
Trust future plans, plus any proposed changes at Trust schools – as appropriate	The school's future plans – as appropriate	W &/or HC as appropriate
Safeguarding & Child Protection Policy - template	Safeguarding and Child Protection Policy – school version	W

Class 4 – How we make decisions (Decision making processes and records of decisions - current and previous three years information only)		**How the information can be obtained**
Central Trust	**Individual Schools**	Hard copy (HC) and/or website (W)
Overarching Admissions Policy	School Admissions Policy	HC W
Agendas and minutes of meetings of the Board and its committees.	Agendas and minutes of meetings of the Local Governing Body and its committees.	HC

Class 5 – Our policies and procedures (Current written protocols, policies and procedures for delivering our services and responsibilities - current information only) *As a minimum these must include policies, procedures and documents that the school is required to have by statute or by its funding agreement or equivalent.*		**How the information can be obtained**
Central Trust	**Individual Schools**	Hard copy (HC) and/or website (W)
Trust Complaints Policy	Trust Complaints Policy	W
Overarching Equality Policy	School Equality Objectives	W
Trust H&S Policy	School H&S Policy	HC
Records management and personal data policies: • Online Safety Policy • Records Management Policy • Data Protection Policy • FOI Policy incl. Publication Scheme	See Trust website	HC HC HC W
Charging and Remissions Policy N/A	Charging and Remissions Policy Behaviour Policy	W W

Class 6 – Lists and Registers Currently maintained lists and registers only (this does not include the attendance register).		**How the information can be obtained**
Central Trust	**Individual Schools**	Hard copy (HC) and/or website (W). NB Some information may only be available by inspection (I)
N/A	Curriculum circulars and statutory instruments	I
Disclosure logs (FOI requests)	N/A	I
Asset register	Asset register	I
Any information the Trust is currently legally required to hold in publicly available registers	Any information the school is currently legally required to hold in publicly available registers	I

Class 7 – The services we offer (Information about the services we offer, including leaflets, guidance and newsletters produced for the public and businesses – current information only)		**How the information can be obtained**
Central Trust	**Individual Schools**	Hard copy (HC) and/or website (W). NB Some information may only be available by inspection (I)
N/A	Extra-curricular activities	W
N/A	Out of school clubs	W
N/A	Services for which the school is entitled to recover a fee, together with those fees	W
Trust publications, leaflets, books and newsletters	School publications, leaflets, books and newsletters	W &/or HC as appropriate

APPENDIX 2 – LOG OF FOI REQUESTS RECEIVED

Date request received.	Where and how request was received	Case number	Name & contact details of the person or organisation making the request	Date the request was fulfilled or refused	Reason for any exemption being applied	Reason for any failure to meet the 20 day deadline