



**FREEDOM OF INFORMATION
POLICY**

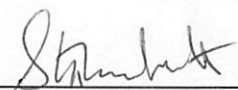
CHANGE CONTROL

<i>Date</i>	<i>Issue</i>	<i>Details of change</i>
01.07.2017	0.a	Initial Draft
18.10.2017	1.0	Changes agreed and policy approved at Trust Board Meeting on 17 th October 2017
	1.a	Amendments to Policy made
26.06.2019	2.0	Policy updated following Board Approval at meeting on 26.06.2019
22.06.2021	2.a	Policy updated following review
30.06.2021	3.0	Policy updated following Board Approval at meeting on 30.06.2021
Summer 2023	3.a	Policy updated following review
Summer 2023	4.0	Policy updated following Board Approval at meeting on 14 th June 2023

AUTHORISATION

Approved at Trust Board Meeting on 14th June 2023

Signed:



14-6-23

Chair of Board

Date

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Freedom of Information Policy

This policy pertains to all employees and, as appropriate, Governors, Trustees, Members, contractors, visitors and volunteers connected to Insight Multi-Academy Trust (IMAT).

1. **Introduction**

1.1 The Freedom of Information (FOI) Policy is part of the Trust's suite of Information Security Policies. The FOI Policy must be read in conjunction with the **Information Security Policy** and its constituent Policies listed below:

- Data Protection Policy
- Records Management policy
- Staff Code of Conduct
- Safeguarding Policy
- Student Code of Conduct
- Complaints Policy
- E-safety Policy

1.2 The Trust has a duty to ensure that information is correctly and professionally managed in the interests of:

- Confidentiality
- Integrity
- Availability

1.3 Under the Freedom of Information Act 2000 (FOIA), any person has a legal right to ask for access to information held by the Trust. They are entitled to be told whether the Trust holds the information, and to receive a copy, subject to certain exemptions. Each academy is under a duty to provide advice and assistance to individuals making requests under the FOIA. The Act is fully retrospective, so that any past records which the Trust holds are covered by the Act. It is an offense to wilfully conceal, damage or destroy information in order to avoid responding to an enquiry.

2. **Aims**

2.1 The Trust is responsible for ensuring that all its Academies are compliant with the FOIA.

2.2 This policy sets out how the Trust is meeting the requirements under the FOIA by adopting the model scheme (schedule 1) for schools and academies approved by the Information Commissioner.

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- 2.3 While the Act assumes openness, it recognises that certain information is sensitive and there are exemptions to protect this information.

3. **Scope**

- 3.1 This policy **applies to all recorded information** produced in the course of the MAT Academies' work to which the public have a right of access. Requests for other information are dealt with in accordance with statutory guidance.
- 3.2 Requests for personal data (Subject Access Requests) are covered by the Data Protection Act and are outside the scope of this policy. The Trust's Data Protection Policy gives further guidance on the process that must be followed.
- 3.3 The information which the Trust routinely makes available to the public is included in the FOIA Publication Scheme (Appendix 1) and is available on the Trust's and its Academies websites.

4. **Requesting Information**

- 4.1 If the information you are looking for is not available via our Freedom of Information Publication Scheme (Appendix 1) or the website, then you can make a Freedom of Information (FOI) request.
- 4.2 Requests under the FOIA should be addressed to the Headteacher of the relevant academy, and should be clearly marked **Freedom of Information Request**. The request must:
- Be in writing (letter, email)
 - Include the requester's real name or the name of the person or organisation they are acting on behalf of
 - Include an address for correspondence (e.g. a residential or work postal or email address)
 - Describe the information requested, even if this description is broad or unclear
- 4.3 All FOI requests must be responded to by us within 20 school days or 60 working days from the date of receiving the request (or receiving the clarification needed to answer the request), whichever occurs first. If a request is delayed for any reason, the relevant person will keep the enquirer informed of the progress and where possible provide an expected date for a response.

5. **Non-Disclosure of Requested Information**

- 5.1 Information will not be disclosed if one or more of the following applies:
- An exemption to disclosure (Absolute or Qualified)
 - The information sought is not held
 - Requests are considered vexatious or repeated

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- The cost of compliance exceeds the threshold (£450)

Absolute exemptions include request for information:

- That is already reasonably accessible
- In court records
- That includes personal data of living third parties where there is no lawful basis identifiable for sharing it
- Given by someone else where disclosure could lead to a breach of confidence

Qualified exemptions include request for information:

- Intended for future publication
- Related to criminal investigations
- That could prejudice law enforcement activities
- That could endanger anyone's physical or mental health or safety
- Covered by legal professional privilege
- That could prejudice commercial interests

Under a qualified exemption, the Trust will apply the public interest test to determine whether the public interest in applying the exemption outweighs the public interest in disclosing it.

6. Charges

- 6.1 Most information will be freely available through academy websites and enquirers will be directed there if the information they request is available on it.
- 6.2 The Trust may charge a fee for complying with a FOI request if significant costs will be incurred. The Trust will let the requester know the cost before fulfilling the request and payment may be requested prior to provision of the information.

7. Feedback

- 7.1 We welcome any comments or suggestions you may have regarding this scheme. If you require further assistance then please contact the Headteacher in the first instance using the contact details found on individual academy websites.
- 7.2 If you are not satisfied with the assistance that you have received 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:

Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF
Tel: 01625 545700

Web: www.informationcommissioner.gov.uk

8. Monitoring and Evaluation

The IMAT Board will formally review this policy according to the policy schedule or more frequently if circumstances or legislation suggest it is appropriate.

Schedule 1 - Freedom of Information Publication Scheme

FREEDOM OF INFORMATION PUBLICATION SCHEME FOR ACADEMIES

This model publication scheme has been prepared and approved by the Information Commissioner. It has been adopted without modification by the Trust and will be valid until further notice.

This publication scheme commits the Trust to make information available to the public as part of its normal business activities. The information covered is included in the classes of information mentioned below, where this information is held by the Trust or a member academy. Additional assistance is provided to the definition of these classes in sector specific guidance manuals issued by the Information Commissioner.

The scheme commits the Trust:

- To proactively publish or otherwise make available as a matter of routine, information, including environmental information, which is held by the academy and falls within the classifications below.
- To specify the information which is held by the academy 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 this 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 academy makes available under this scheme.
- To produce a schedule of any fees charged for access to information which is made proactively available.
- To make this publication scheme available to the public.
- To publish any dataset held by the academy that has been requested, and any updated versions it holds, unless the academy 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 academy 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.

CLASSES OF INFORMATION

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, inspections 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.

The classes of information will not generally include:

- 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.
- 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.

THE METHOD BY WHICH INFORMATION PUBLISHED UNDER THIS SCHEME WILL BE MADE AVAILABLE

Appendix 1 indicates clearly what information is covered by this scheme and how it can be obtained.

Where it is within the capability of a academy, 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, a academy 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.

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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.

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 authority 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 specified by Parliament.

Charges may be made for actual disbursements incurred such as:

- Photocopying
- Postage and packaging
- The 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, they are in all the circumstances, including the general principles of the right of access to information held by public authorities, justified and are in accordance with a published schedule or schedules of fees which is readily available to the public.

Charges may also be made for making datasets (or parts of datasets) that are relevant copyright works available for re-use. These charges will be in accordance with the terms of the Re-use of Public Sector Information Regulations 2015, where they apply, or with regulations made under section 11B of the Freedom of Information Act, or with other statutory powers of the public authority.

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

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Appendix 1

Guide to information available from the Trust Academies under the Freedom of Information Publication Scheme

INFORMATION TO BE PUBLISHED	HOW THE INFORMATION CAN BE OBTAINED	COST
CLASS 1: WHO WE ARE AND WHAT WE DO		
Who's who in the academy	Hard Copy	No Charge
Governing body, basis of their appointment and method of contact	Academy Website	Free
Articles of Association	Academy Website	Free
Academy Prospectus and Sixth Form Prospectus	Academy Website	Free
Academy session times and term dates	Academy Website	Free
Location and key contact information	Academy Website	Free
CLASS 2: WHAT WE SPEND AND HOW WE SPEND IT		
Annual budget plan	Hard Copy	See Charges
Audited financial statements	Academy Website	Free
Capital funding	Hard Copy	See Charges
Additional funding	Hard Copy	See Charges
Pupil Premium Report	Academy Website	Free
Procurement and contracts	Hard Copy	See Charges
Pay policy	Hard Copy	See Charges
Staffing and grading structure	Hard Copy	See Charges

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CLASS 3: WHAT OUR PRIORITIES ARE AND HOW WE ARE DOING		
Government supplied performance data	Hard Copy	See Charges
Latest Ofsted report, including full report	Academy Website	Free
Performance management policy and procedures adopted by the governing body	Academy Website	Free
CLASS 4: HOW WE MAKE DECISIONS		
Admissions policy	Academy Website	Free
Minutes of meetings of Trust Board	Hard Copy	See Charges
Minutes of meetings of full governing body	Hard Copy	See Charges
Committee terms of reference	Hard Copy	See Charges
CLASS 5: OUR POLICIES AND DECISIONS		
Trust and Academy policies (other)	Academy website	Free
Pupil and curriculum policies	Academy website	Free
Record management & data policies	Academy website	Free
Equity and diversity	Academy website	Free
Policies and procedures for recruitment of staff	Hard Copy	See Charges
Charging regimes and policies	Academy Website	Free
CLASS 6: LIST AND REGISTERS		
Curriculum circulars and statutory instruments	Department of Education website	
CLASS 7: THE SERVICES WE OFFER		
Academy publications	Website	Free

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Services for which the academy is entitled to recover a fee, together with those fees	Academy Website	Free
Extra curricular activities and after academy clubs	Academy Website	Free
Leaflets and newsletters	Hardcopy or website	Free

Schedule of Charges

Types of Charge	Description	Basis of Charge
Disbursement cost	Photocopying/printing at 5p per sheet (black & white)	Actual Cost
	Photocopying/printing at 15p per sheet (colour)	Actual Cost
	Postage	Actual cost of Royal Mail standard 2nd class
Statutory Fee		In accordance with the relevant legislation

Please note that some information might be confidential or otherwise exempt from publication by law – we cannot therefore publish this.

PAYING FOR INFORMATION

Information published on the academy website is free. Single copies of information covered by this publication are provided free unless stated otherwise. However, there may be a charge if the request:

- Requires a lot of printing or photocopying
- Incurs a large postage charge
- Requires a priced item e.g. some printed publication or video.

In such instances, you will be notified in advance.