KEYS
Academy Trust

Freedom of Information (FOI) Policy

KEYS Academy Trust
Unlocking the future

Version control summary and overview details

TKAT Statutory Policy

- All schools require a policy on this area.
- There should be no changes to the core text.
- LGBs will minute that they have noted Trust approval and will adopt the policy effective immediately.
- This is a Trust policy to be implemented by all schools within The Keys Academy Trust to ensure a consistent approach for all.

Version control

Version 2

- Updated by Fusion to incorporate updated guidance. Additions include social media accounts and accessibility requirements for requests.

Reviewed by (Trust Officer)	Hester Wooller, CEO
Approved by TKAT Trustee Committee:	Trust Board
Trust date of approval:	June 26
Trust date of next review:	June 27

TKAT vision

We are a family of distinctive schools at the heart of the diverse communities we serve. In line with our Christian ethos, we aspire to excellent learning and pastoral care for pupils and staff and are committed to being open and welcoming to all.

Key areas of note

Please note the following, which will be applicable throughout the policy:

- Any reference to 'headteacher' should read as whatever title is relevant to the school using the policy (i.e. Executive Headteacher/Head of School or Headteacher). Anything else will be explicitly referenced within the policy.
- Any reference to 'everyone' to staff, trustees, local governors and pupils.
- Any reference to 'we' should be read as The Keys Academy Trust.
- Any reference to 'parents' should be read as 'parents, carers and guardians'.

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1. Statement of Intent

1.1 The Keys Academy Trust has an obligation to publish a freedom of information statement, outlining how we will meet our duties under the Freedom of Information Act 2000 and associated regulations. The development and effective implementation of this policy fulfils that requirement.

1.2 More specifically, this policy outlines the Trust's policy and procedures for the following:

- The release and publication of information held by the Trust, including information covered by the Freedom of Information Act 2000 and the Environmental Information Regulations 2004.
- Providing applicants with advice and assistance throughout the duration of their requests.

1.3 This policy also clarifies our position regarding the appropriate limit to the costs incurred by the school in obtaining any requested information, and on charging fees for its provision.

2. Legal Framework

2.1 This policy has due regard to the following legislation:

a) The General Data Protection Regulation
b) The Data Protection Act 2018
c) The Freedom of Information Act 2000
d) The Freedom of Information and Data Protection (Appropriate Limit and Fees) Regulations 2004
e) Environmental Information Regulations 2004 (EIR).

2.2 This policy also has due regard to guidance including, but not limited to, the following:

a) Cabinet Office (2018) 'Freedom of Information Code of Practice'
b) ICO (2013) 'Definition document for the governing bodies of maintained and other state-funded schools in England'
c) ICO (2015) 'Model publication scheme'
d) ICO (2016) 'Duty to provide advice and assistance (section 16)'
e) ICO (2015) 'Time limits for compliance under the Freedom of Information Act (section 10)'
f) ICO (2023) 'Requests where the cost of compliance exceeds the appropriate limit'

2.3 This policy will be viewed in conjunction with the TKAT Data Protection Policy.

2.4 All schools in England that are subject to the Freedom of Information Act (FOIA) 2000, including academies and free schools, are required to complete a 'guide to information' explaining where certain information can be found and what charge can be expected. Schools are expected to make the information outlined below available unless one of the following conditions applies:

a) They do not hold the information
b) The information is exempt under one of the FOIA exemptions or Environmental Information Regulations 2004 (EIR) exceptions, or its release is prohibited under another statute
c) The information is readily and publicly available from an external website (such information may have been provided either by the school or on its behalf); in such cases, the school must provide a direct link to that information
d) The information is archived, out of date or otherwise inaccessible
e) It would be impractical or resource-intensive to prepare the material for routine release.

If this information is only held by another public authority, the school should provide details of where to obtain it.

2.5 As a minimum, the ICO expects schools to make available information that is required by statute, by the DfE or by a funding agreement.

3. Accepting requests for Information

3.1 The Trust will only accept a request for information which meets all of the following criteria:

a) It is in writing (this includes requests sent to the school's official social media accounts – see below in this list)
b) It states the name of the applicant (not a pseudonym) and an address for correspondence
c) It adequately describes the information requested
d) Requests received through official social media accounts will only be valid where they meet these requirements and can be retained for subsequent reference.

3.2 A request will be treated as made in writing if it meets all of the following requirements:

a) It is transmitted by electronic means
b) It is received in legible form
c) It is in English (see 3.3)
d) It is capable of being used for subsequent reference
e) The Trust will accept requests in formats accessible to disabled persons (including braille and large print).

3.3 Where a request is submitted in a foreign language, the Trust will ask the applicant to provide sufficient clarification in English to enable the request to be processed.

3.4 The Trust will publish details of its procedures for dealing with requests for information on the Trust website, which includes the following:

a) A contact address and email address
b) A telephone number
c) A named individual to assist applicants with their requests.

3.5 This policy does not cover enquiries or subject access requests under the Data Protection Act where the enquirer asks to see what personal information the Trust holds about them. These enquiries will be dealt with under the Data Protection Policy.

4. General rights of access to information held by the school

4.1 Provided that the request meets the requirements set out in section 3 of this policy, the school will comply with its duty to:

- Confirm or deny to any person making a request for information to the Trust, whether it holds information of the description specified in the request.
- Provide the documentation, if the Trust confirms that it holds the requested information.

4.2 The duties outlined in 4.1 will be completed no later than 20 school days from receipt of the request. Where information is to be provided under the Environmental Information Regulations, this will be provided within 20 school days.

4.3 Where a fee is required as outlined in the charges section, this will be communicated to the applicant. Then, the timeframe within which the school has to respond to the request begins from the day the fee is received.

4.4 When additional information is required, this will be this will be communicated to the applicant. Then, the timeframe within which the school has to respond to the request begins from the day the additional information is received.

4.5 The Trust will not comply with section 4.1 of this policy where the following apply:

a) The Trust reasonably requires further information to meet a freedom of information request, has informed the applicant of this requirement, but was not subsequently supplied with that further information.
b) The information 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.
c) A request for information is exempt under section 2 of the Freedom of Information Act 2000. The exemptions that may be relevant depend on the request that has been made, but common exemptions include data protection, prejudice to the effective conduct of public affairs and information intended for future publication.
d) The cost of providing the information exceeds the appropriate limit.
e) The request is vexatious.
f) The request is a repeated request from the same person made within 60 consecutive working days of the initial one.
g) A fee notice was not honoured.
h) The requested information is not held by the Trust for the purposes of the Trust's business.

4.6 Where information is (or is thought to be) exempt, the Trust will, within 20 school days, give notice to the applicant of the following:

- States that fact.
- Specifies the exemption in question.

4.7 If information falls within scope of a qualified exemption and the Trust needs additional time to consider the public interest test, the Trust may extend the deadline. In most cases, the extension will exceed no more than a further 20 school days; however, the actual length of the extension will be decided on a case-by-case basis.

4.8 Where a public interest test extension is required, the Trust will write to the applicant to inform them of this, stating the following information:

- Which exemption(s) the extension relies on and why
- A revised deadline for when the applicant will receive their response.

4.9 Where a deadline has to be further extended, the Trust will write to the applicant again, stating the information outlined in 4.7.

4.10 Requests for information that is not recorded by the Trust (e.g. requests for explanations, clarification of policy and comments on the Trust's business) will not be considered valid requests. In these cases, the applicant will be provided with an explanation of why their request will not be treated under the Freedom of Information Act 2000 and the Trust will respond to the applicant through other channels as appropriate.

4.11 The information provided to the applicant will be in the format that they have requested, where possible.

4.12 Where it is not possible to provide the information in the requested format, the Trust will assist the applicant by discussing alternative formats in which it can be provided.

4.13 The information provided will also be in the language in which it is held, or another language that is legally required. This will typically be English.

4.14 If, under relevant disability and discrimination regulations, the Trust is legally obliged to provide the information in other forms and formats, it will do so.

4.15 In some cases, a request may be dealt with under more than one access regime, e.g. if the request involves both information about the Trust and personal information, it will be dealt with under the Freedom of Information Act 2000 and the Data Protection Act 2018.

4.16 Staff are made aware that it is a criminal offence to alter, deface, block, erase, destroy or conceal any information held by the Trust with the intention of preventing disclosure following a request.

4.17 Where information is withheld, the refusal notice will cite the relevant exemption/s, explain why they apply, and inform the applicant of any internal review procedure and their right to complain to the ICO.

5. The appropriate limit

5.1 The Trust will not comply with any freedom of information request that exceeds the statutorily imposed appropriate limit of £450.

5.2 When determining whether the cost of complying with a freedom of information request is within the appropriate limit, the school will take account only of the costs we reasonably expect to incur in relation to the following:

a) Determining whether it holds the information.
b) Locating the information, or a document which may contain the information.
c) Retrieving the information, or a document which may contain the information.
d) Extracting the information from a document containing it.
e) Costs related to the time spent by any person undertaking any of the activities outlined in section 4.2 of this policy on behalf of the Trust. Time costs will be estimated at £25 per person per hour, in accordance with the Regulations.

5.3 The Trust is not required to search for information in scope of a request until it is within the cost limit.

5.4 If responding to one part of a request would exceed the cost limit, the school does not have to respond to any other parts of the request. In this case, it will be communicated to the applicant.

5.5 Where multiple requests for information are made to the school within 60 consecutive working school days of each other, either by a single person or by different persons who appear to be acting in concert, the estimated cost of complying with any of the requests is to be taken to be the total costs to the Trust of complying with all of them.

6. Charging Fees

6.1 The Trust may give the applicant written notice that a fee is to be charged, and the time for compliance is paused until the fee is received.

6.2 Charges may be made for disbursements, such as the following:

- Production expenses, e.g. printing and photocopying
- Transmission costs, e.g. postage
- Complying with the applicant's preferences about the format in which they would like to receive the information (e.g. putting on a memory stick).

6.3 Fees charged will not exceed the total cost to the Trust of the following:

a) Informing the person making the request whether we hold the information.
b) Communicating the information to the person making the request.

6.4 Where a fee is to be charged, the Trust will not comply with section 3 of this policy, unless the requested fee is paid within a period of three months, beginning with the day on which the fees notice is given to the applicant.

6.5 Fees will only be accepted via bank transfer; we will not accept cash or cheques.

6.6 Once a fee is received, the school will inform the applicant of the response deadline, as outlined in 4.2.

6.7 Where the Trust has underestimated the cost to be charged to an applicant, the Trust will bear the additional costs.

6.8 The Trust will not take into account any costs which are attributable to the time spent by persons undertaking any of the activities mentioned in section 6.3 above.

6.9 When calculating the 20th school day in which to respond to a freedom of information request, the period beginning the day on which the fee notice is given to the applicant and ending with the day on which the fee is received will be disregarded.

6.10 See the appendix within this policy for the list of charges.

7. Means of communication

7.1 Where, on making a request for information, the applicant expresses a preference for communication by any one of the following means, the Trust will, as far as is practicable, give effect to that preference:

a) The provision to the applicant of a copy of the information in permanent form or in another form acceptable to the applicant.
b) The provision to the applicant of a reasonable opportunity to inspect a record containing the information.
c) The provision to the applicant of a digest, or summary of the information, in permanent form or in another form acceptable to the applicant.

7.2 Where a preference is not stated by the applicant, the Trust will communicate by any means which are reasonable under the circumstances. For example, where an applicant uses social media to make a request, the school may respond via an alternative medium to that social media platform, as there may be restrictions within that social media platform.

8. Providing advice and assistance

8.1 The Trust will meet its duty under section 16 of FOIA to provide advice and assistance, as far as is reasonable, to any person who proposes to make, or has made, requests for information to the school.

8.2 The Trust may offer advice and assistance in the following circumstances:

a) If an individual requests to know what types of information the Trust holds and the format in which it is available, as well as information on the fees regulations and charging procedures.
b) If a request has been made, but the school is unable to regard it as a valid request due to insufficient information, leading to an inability to identify and locate the information.

c) If a request has been refused (e.g. due to an excessive cost), and it is necessary for the school to assist the individual who has submitted the request.

8.3 The Trust will provide assistance for each individual on a case-by-case basis; examples of how the Trust will provide assistance include the following:

- Informing an applicant of their rights under the Freedom of Information Act 2000
- Assisting an individual in the focus of their request, e.g. by advising of the types of information available within the requested category
- Advising an applicant if information is available elsewhere and how to access this information
- Keeping an applicant informed on the progress of their request.

8.4 Where the Trust wishes to ask a different public authority to deal with a request by transferring it to them, this will only be done with the agreement of the applicant.

8.5 In order to provide assistance as outlined above, the Trust will engage in the following good practice procedures:

- Make early contact with an individual and keep them informed of the process of their request.
- Adhere to the Trust's Policy which outlines the steps included within the code.
- Accurately record and document all correspondence concerning the clarification and handling of any request.
- Give consideration to the most appropriate means of contacting the applicant, taking into account their individual circumstances.
- Discuss with the applicant whether they would prefer to receive the information in an alternative format, in cases where it is not possible to provide the information requested in the manner originally specified.
- Remain prepared to assist an applicant who has had their request denied due to an exemption.

8.6 The Trust will give particular consideration to what level of assistance is required for an applicant who has difficulty submitting a written request.

8.7 In circumstances where an applicant has difficulty submitting a written request, the Trust will ensure the following:

- Make a note of the application over the medium by which the applicant has communicated and then send the note to the applicant to confirm and return – the statutory time limit for a reply would begin here.
- Direct the individual to a different agency that may be able to assist with framing their request.
- The Trust will proactively support vulnerable or disabled applicants to make requests and will provide reasonable adjustments where necessary.

NB. This list is not exhaustive, and the Trust may decide to take additional assistance measures that are appropriate to the case.

8.8 Where an applicant's request has been refused either because the information is accessible by other means, or the information is intended for future publication or research, the school, as a matter of good practice, will provide advice and assistance to support the applicant (where practicable).

8.9 The Trust will advise the applicant how and where information can be obtained, if it is accessible by other means.

8.10 Where there is an intention to publish the information in the future, the Trust will advise the applicant of when this publication is expected.

8.11 If the request is not clear, the Trust will ask for more detail from the applicant in order to identify and locate the relevant information, before providing further advice and assistance.

8.12 If the Trust believes the applicant has not provided their real name, the Trust will inform the applicant that the request will not be responded to until further information is received from the applicant.

8.13 If the Trust is able to clearly identify the elements of a request, it will respond following usual procedures and will provide advice and assistance for the remainder of the request.

8.14 If any additional clarification is needed for the remainder of a request, the Trust will ensure there is no delay in asking for further information.

8.15 Applicants are given two months to provide any requested clarification. If an applicant decides not to follow the Trust's advice and assistance and fails to provide clarification, the Trust is under no obligation to contact the applicant again.

8.16 If the Trust is under any doubt that the applicant did not receive the advice and assistance, the school will re-issue it.

8.17 The Trust is not required to provide assistance where an applicant's request is vexatious or repeated, as defined under section 14 of the Freedom of Information Act 2000.

8.18 Where the school has already sent a refusal request in relation to a previous vexatious request, the Trust is not obliged to send another notice for future vexatious requests.

8.19 An ongoing evidence log is kept, recording relevant correspondence or behaviour that has been taken into account when a request has been classed as vexatious.

8.20 The Trust is not required to provide information where the cost of complying with a request exceeds the limit outlined in the Freedom of Information Act 2000. Where a request is refused (as outlined in this policy), the Trust will provide advice and assistance to help the applicant narrow or focus the request so that it may fall within the cost limit.

8.21 If a request is refined, it will be treated as a new request.

8.22 A record will be kept by the Trust central office of all the advice and assistance provided.

9. Consultation with third parties

9.1 The Trust may need to consult third parties about information held in scope of a request to consider whether it would be suitable to disclose the information. Situations where third parties may need to be consulted include the following:

- When requests relate to persons or bodies who are not the applicant and/or the Trust
- When the disclosure of information is likely to affect the interests of persons or bodies who are not the applicant or the Trust.

9.2 The Trust will consider if a third party needs to be directly consulted about a request, particularly, if there are contractual obligations that require consultation before information is disclosed.

9.3 Third parties will also be consulted where the Trust is proposing to disclose information relating to them or information that is likely to affect their business or private interests.

9.4 The views of third parties will be given appropriate weighting when deciding how to respond to a request. For example, if the third party created or provided the information, they may have a better understanding of its sensitivity.

9.5 The Trust will make the final decision on disclosure, taking account of any consultation responses and relevant legal advice.

9.6 Where the Trust decides to release information following consultation with a third party, the third party will be informed in advance that the information is going to be disclosed.

9.7 Where the Trust intends to release information that relates to a large number of third parties, the Trust will consider whether it would be more appropriate to contact a representative organisation who can express views on behalf of the third parties, rather than contacting each party individually. If no representative organisation exists, the Trust may also consider only notifying or consulting a sample of the third parties relating to the disclosure.

9.8 Decisions made in line with 9.7 will be made on a case-by-case basis.

10. Internal reviews

10.1 When responding to requests for information, the details of the Trust's internal review process will be set out, including information about how applicants can request an internal review. Applicants will also be informed of their right to complain to the ICO if they are still dissatisfied following the outcome of the Trust's internal review.

10.2 Requests for an internal review should be made in writing to the Trust.

10.3 For a request for an internal review to be accepted, it must be made within 40 school days from the date the Trust issued an initial response to the request.

10.4 **Application response timings**

10.4.1 Upon receipt of an internal review application, the Trust will acknowledge an application and inform the applicant of the intended response date. Responses to review applications will usually be delivered within 20 school days of receipt of the application.

10.4.2 If an internal review is complex, requires consultation with third parties or the relevant information is of high volume, the Trust may need to extend the usual response timeframe. In these cases, the school will inform the applicant and provide an alternative response date. In most cases, the extension will exceed no more than a further 20 school days; however, the actual length of the extension will be decided on a case-by-case basis.

10.4.3 Where clarification is needed from an applicant regarding the review, the normal response period will not begin until clarification is received.

10.5 The review will be carried out by a more senior member of staff who was not involved in the original decision, and the outcome will explain the reasons for upholding, varying, or overturning the original response.

10.6 During a review, the Trust will evaluate the handling of the request; particular attention will be paid to concerns raised by the applicant.

10.7 The applicant will be informed of the outcome of the review and a record will be kept of such reviews and the final decision that is made.

10.8 If the outcome of the review is to disclose information that was previously withheld, the information will be provided to the applicant at the same time they are informed of the response to the review, where possible. If this is not possible, the applicant will be informed of when the information will be provided.

10.9 Within the response to a review, the applicant will be informed again of their right to complain to the ICO.

11. Publication scheme and policy

11.1 The Trust will adopt and maintain the ICO-approved model publication scheme and make it available on the school's website.

11.2 The publication scheme will be reviewed and, where necessary, updated on an annual basis.

11.3 This policy will be reviewed annually, or sooner in light of any changes to relevant legislation, guidance, or operational need.

11.4 This model publication scheme is detailed in the appendices and the text will be taken and directly placed on the Trust's website.

12. Contracts and outsourced services

12.1 The Trust will make clear what information is held by third party contractors on behalf of the school.

12.2 Where a contractor holds information relating to a contract held with the Trust on behalf of the Trust, this information is considered in the same way as information held by a public authority and so is subject to the Freedom of Information Act 2000.

12.3 When entering into a contract, the Trust and contractor will agree what information the Trust will consider to be held by the contractor on behalf of the Trust, this will be indicated in the contract.

12.4 Appropriate arrangements will be put in place for the Trust to gain access to information held by the contractor on the Trust's behalf, in the event that a freedom of information request is made. These arrangements will be set out in a contract, and will cover areas including the following:

- How and when the contractor should be approached for information and who the points of contact are
- How quickly information should be provided to the school
- How any disagreement about disclosure between the Trust and contractor will be addressed
- How requests for internal reviews and appeals to the ICO will be managed
- The contractor's responsibility for maintaining record keeping systems in relation to the information they hold on behalf of the Trust

- The circumstances under which the Trust must consult with the contractor about disclosure and the process for doing so
- The types of information which should not be disclosed and the reasons for this confidentiality, where appropriate.

12.5 In some situations, the Trust may offer or accept confidentiality arrangements that are not set out within a contract with a third party. The Trust and the third party will both be aware of the legal limits placed on the enforceability of expectations of confidentiality and the public interest in transparency.

12.6 Such expectations outlined in 12.5 will only be created where it is appropriate to do so.

12.7 Contractors must comply with requests from the Trust for access to information they hold on behalf of the Trust.

12.8 Requests for information held by a contractor on behalf of the Trust will be responded to by the Trust. If a contractor receives a request, this will be passed onto the Trust for consideration.

Appendix A: Model publication scheme

1. Introduction

This scheme follows the model approved by the ICO and commits our Trust to make information available to the public as part of its normal business activities. We will ensure the following in our schools:

a) Proactively publish or otherwise make available information as a matter of routine (including environmental information), which is held by the school and falls within the classifications below in section 2.
b) Specify the information which is held by the school and falls within the classifications below.
c) Proactively publish or otherwise make available as a matter of routine, information in line with the statements contained within this scheme.
d) 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.
e) Review and update on a regular basis the information the school makes available under this scheme.
f) Produce a schedule of any fees charged for access to information which is made proactively available.
g) Make this publication scheme available to the public.
h) Publish any dataset held by the school that has been requested, and any updated versions it holds, unless the school 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 school 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 section 19 of the Freedom of Information Act 2000. The terms 'dataset' and 'relevant copyright work are defined in sections 11(5) and 19(8) of the Freedom of Information Act 2000 respectively.

2. Classes of information

Information that is available under this scheme includes the following:

a) Who we are and what we do: Organisational information, locations and contacts, information on constitutional and legal governance.
b) What we spend and how we spend it: Financial information relating to projected and actual income and expenditure, tendering, procurement and contracts.
c) What our priorities are and how we are doing: Strategy and performance information, plans, assessments, inspections and reviews.
d) How we make decisions: Policy proposals and decisions, decision-making processes, internal criteria and procedures, consultations.
e) Our policies and procedures: Current written protocols for delivering our functions and responsibilities.
f) Lists and registers: Information held in registers required by law and other lists and registers relating to the functions of the Trust.
g) The services we offer: Advice and guidance, booklets and leaflets, transactions and media releases. A description of the services offered.

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

a) Information the disclosure of which is prevented by law, or exempt under the Freedom of Information Act 2000, or is otherwise properly considered to be protected from disclosure.
b) Information in draft form or notes, documents in older versions, emails or other correspondence.
c) 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.

3. How information published under this scheme will be made available

Information covered by this scheme will, as far as possible, be published on the school website. Where this is impracticable, or you do not wish to access the information via the school website, information covered by this scheme can also be obtained by contacting our DPO (details can be located on our website).

Requested information under this scheme will be delivered electronically, but paper copies can also be provided.

There may be information that is only available to be viewed in person. This will be communicated to applicants upon response to receipt of their FOI request.

Where you wish to view any of information that can only be viewed in person, you will be asked to request an appointment by contacting our DPO.

Information will be provided in the language in which it is held or in such other language(s) that is legally required. Where we are legally required to translate any information, we will do so. Information can be translated into accessible formats where possible.

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.

To enable us to process your request quickly, please mark correspondence: "PUBLICATION SCHEME INFORMATION REQUEST".

4. Freedom of information requests

Information that is not covered by this scheme can be requested in writing, where its provision will be considered under the Freedom of Information Act 2000.

To enable us to process freedom of information requests within statutory timeframes, please mark all correspondence: "FREEDOM OF INFORMATION REQUEST"

5. Charges

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 has been published and accessible on the Trust website is available free of charge.

Charges may be made for information subject to a charging regime specified by Parliament.

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 the school, justified and are in accordance with a published schedule or schedule of fees – this is available via our 'Guide to information'.

Where paper copies of the information covered by this scheme are requested, a small charge may be made to cover disbursements incurred such as the following:

- Photocopying.
- Postage and packaging.
- The costs directly incurred as a result of viewing information.

Where 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.

Where a request is made to re-use all, or part, of a copyrighted dataset, a charge may be made – this will be in accordance with the terms of the Re-use of Public Sector Information Regulations 2015, where applicable, with regulations made under section 11B of the Freedom of Information Act 2000, or with any other statutory powers held by the Trust/ school.

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

6. Feedback
We welcome any comments or suggestions you may have regarding this scheme. Please contact the local governing board using the contact details on the website.

Appendix B: FOI Request Evidence Log

This can be cut from the policy and placed on a school's headed paper and kept internally for each school.

Date of request	Format (e.g. email or in writing?)	Location (Where is the correspondence stored?)	Applicant	Repeated request? (Yes/No)	Deemed vexatious or repeated? (Yes/No)	Comments

Appendix C: Table of charges

Class 1: Who we are and what we do
Our organisational information, structures, locations and contacts.

Information to be published	How the information can be obtained	Cost
Who's who in the school	School website	Free
Who is on the LGB, and the basis of their appointment	School website	Free
Articles of Association	The Keys Academy Trust website	Free
Contact details for the headteacher	School website	Free
Contact details for the governing board	School website	Free
The school prospectus	School website	Free
The school's staffing structure	School website	Free
School session times and term dates	School website	Free
The school's address	School website	Free
The school's contact details	School website	Free
The school's email address	School website	Free
The school website	School website	Free
The names of key personnel	School website	Free

Class 2: What we spend and how we spend it
Our financial information concerning the school's projected and actual income and expenditure, procurement, contracts and financial audit – including the current and previous financial year.

Information to be published	How the information can be obtained	Cost
Annual budget plan and financial statements	Hard copy	See charges
Capital funding	Hard copy	See charges
Financial audit reports	Hard copy	See charges
Details of expenditure items over £5000 including costs, supplier and transaction information.	Hard copy	See charges

Procurement and contracts the school has entered into, or information relating to information held by an organisation which has entered into procurement or contracts on the school's behalf, for example, the LA	Hard copy	See charges
The pay policy	Hard copy	See charges
Staff allowances and expenses that can be incurred or claimed, with totals paid to individual senior staff members by reference to categories	Hard copy	See charges
The staffing, pay and grading structure	Hard copy	See charges
Governors' allowances that can be incurred or claimed, and a record of total payments made to individual governors	Hard copy	See charges

Class 3: What our priorities are and how we are doing
Our strategies and plans, performance indicators, audits, inspections and reviews.

Information to be published	How the information can be obtained	Cost
Performance data supplied to the government	Hard copy	See charges
The latest Ofsted summary	School website	Free
The latest Ofsted full report	School website	Free
The latest post-inspection action plan	Hard copy	See charges
The performance management policy and procedures	Hard copy	See charges
The latest performance data	Hard copy	See charges
The school's future plans	Hard copy	See charges
The safeguarding and child protection policies and procedures	School website	Free

Class 4: How we make decisions
Our decision-making processes and records of the decision we have made – including the current year and the previous three years.

Information to be published	How the information can be obtained	Cost
Admissions policy	School website	Free
Information pertaining to admissions decisions [Not individual admission decisions].	Hard copy	See charges
The governing board and its committees' agendas and meeting minutes [This excludes information that is regarded as private to the meetings].	Hard copy	See charges

Class 5: Our policies and procedures
Our current written protocols, policies and procedures for delivering our services and responsibilities.

Information to be published	How the information can be obtained	Cost
Capability of staff policy	Hard copy	See charges
Charging and remissions policy	Hard copy	See charges
School behaviour policy	School website	Free
Sex education policy	School website	Free
Special educational needs (SEN) – SEN information report	School website	Free
Data protection policy	School website	Free
Health and safety policy	School website	Free

Admissions arrangements	School website	Free
Accessibility plan	School website	Free
Central record of recruitment and vetting checks	Hard copy	See charges
Complaints procedure statement	School website	Free
Freedom of information procedures	School website	Free
Local governing body and committee meeting minutes, and papers considered at meetings	Hard copy	See charges
Premises management documents	Hard copy	See charges
Equality information and objectives statement for publication	School website	Free
Register of pupils' admission to school	Hard copy	See charges
Register of pupils' attendance	Hard copy	See charges
Register of business interests of headteachers and governors	School website	Free
Staff discipline, conduct and grievance (procedures for addressing)	Hard copy	See charges
Child protection policy and procedures	School website	Free
Early years foundation stage (EYFS) policy and procedures	School website	Free
Statement of procedures for dealing with allegations of abuse against staff	Hard copy	See charges
Supporting pupils with medical conditions policy	School website	Free
Any records management and personal data policies and procedures held in addition to the data protection policy and FOI procedures, including the following: • Information security policies • Records retention, destruction and archive policies • Information sharing policies	Hard copy	See charges
Charging and Remissions Policy	Hard copy	See charges

Class 6: Lists and registers
Our currently maintained lists and registers – this does not include our attendance registers.

Information to be published	How the information can be obtained	Cost
Curriculum circulars and statutory instruments	Hard copy	See charges
Disclosure logs	Hard copy	See charges
Asset register	Hard copy	See charges
Any information the school is currently legally required to hold in publicly available registers	Hard copy	See charges

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.

Information to be published	How the information can be obtained	Cost
Extra-curricular activities	School website	Free
Out of school clubs	School website	Free
Services for which the school is entitled to recover a fee (and details of the fees)	Hard copy	See charges
School publications, leaflets, books and newsletters	School website	Free

Appendix D: Schedule of charges

This schedule of charges provides a breakdown of how we have determined our charges.

Type of charge	Description	Basis of charge
Disbursement cost	Photocopying/printing charged at 20p per sheet (black and white)	The actual cost incurred by the school
	Photocopying/printing charged at 50p per sheet (colour)	The actual cost incurred by the school
	Postage	Actual costs of Royal Mail standard 2nd class
Statutory fee		In accordance with the relevant legislation