



# Castleford Academy Trust

## Freedom of Information Publication Scheme

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## 1. Introduction and Aims

Any person has a legal right to ask for access to information held by Castleford Academy Trust (the Trust) or its academies under the Freedom of Information Act 2000 (FOIA). They are entitled to be told whether we hold information and to receive a copy, subject to exemptions. To meet this requirement the Trust has produced a Publication Scheme, setting 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 receipt of payment.

Some information which we hold is sensitive data and not required to be made public, for example personal information.

This Publication Scheme conforms to the Model Scheme for Schools approved by the Information Commissioner.

As the FOIA is retrospective, an appendix has been added to this policy (Appendix A) showing a Retention Schedule (adopted from the Information & Records Management Society) which is a guide as to how long our organisation is required to keep school records. It is important to note that some of the documents detailed in this Schedule are not accessible under the FOIA, but may be available via the Data Protection Act 2018 (DPA) for which a Subject Access Request is required.

Requests under the FOIA should be made in writing, including email, addressed to the Trust Data Protection Officer, stating what information is required. Individuals requesting the information are not obliged to say why they want the information.

The Trust has a duty to respond to all requests advising whether or not we hold the information requested and supply the information (except where exemptions apply as outlined in Appendix B). The Trust will comply with the time limit of twenty days (excluding school holidays) to respond to the request.

## 2. Internal Responsibilities

The ultimate and overall responsibility for data protection and freedom of information lies with the Trust Board. The day-to-day responsibility in regards to co-ordinating and processing enquiries lies with the Trust Data Protection Officer who is the main point of reference for advice and training.

## 3. Holding and Providing of Information

'Holding' information means information relating to the business of the Trust which:

- we have created;
- we have received from another body or person; or
- is held by another body on our behalf.

'Information' means both hard copy and digital information, including email.



If we do not hold the information we do not have to create or acquire it in order to answer an enquiry, although a reasonable search will be made before denying that we have information which we might be expected to hold.

We are not obliged to comply with “vexatious” requests for information. This is taken to mean a request which is designed to cause inconvenience, harassment or expense rather than to obtain information, and would require substantial resources or would otherwise undermine the work of the Trust. We will also not be obliged to answer repeated, identical or substantially similar requests from the same applicant unless a “reasonable” interval has elapsed between requests. This does not however provide us with reason not to undertake good record management.

Procedures for handling Freedom of Information requests are outlined in Appendix C.

#### 4. Classes of Information Published

The Publication Scheme gives information which we currently publish (or have recently published) or which we will publish in the future. This is split into categories of information known as ‘classes’. These are contained in Appendix D of this Policy.

The classes of information that we undertake to make available are organised into the following classes:

- Class 1 Who we are and what we do
- Class 2 What we spend and how we spend it
- Class 3 What our priorities are and how we are doing
- Class 4 How we make decisions
- Class 5 Our policies and procedures
- Class 6 Lists and registers

#### 5. How to Request Information

If you require a paper version of any information, or want to ask whether information is available, please contact the relevant academy by telephone, email or letter. Contact details are set out below.

##### **Airedale Infant Academy**

Email: [aihead@aia.castlefordtrust.co.uk](mailto:aihead@aia.castlefordtrust.co.uk)

Telephone: 01977 519281

Contact Address: Airedale Infant Academy, Poplar Avenue, Townville, Castleford WF10 3QJ

Website: [www.airedaleinfants.com](http://www.airedaleinfants.com)

##### **Airedale Junior Academy**

Email: [aja-office@aja.castlefordtrust.co.uk](mailto:aja-office@aja.castlefordtrust.co.uk)

Telephone: 01977 556946

Contact Address: Airedale Junior Academy, Fryston Road, Castleford WF10 3EP

Website: [www.airedalejuniorschool.co.uk](http://www.airedalejuniorschool.co.uk)



**Castleford Park Junior Academy**

Email: [enquiries@pjademy.net](mailto:enquiries@pjademy.net)

Telephone: 01977518959

Contact Address: Castleford Park Junior Academy, Medley Street, Castleford, WF10 4BB

Website: [www.pjademy.net](http://www.pjademy.net)

**Glasshoughton Infant Academy**

Email: [admin@glasshoughtoninfant.com](mailto:admin@glasshoughtoninfant.com)

Telephone: 01977 516343

Contact Address: Glasshoughton Infant Academy, Newfield Ave, Castleford, WF10 4BH

Website: [www.glasshoughtoninfant.com](http://www.glasshoughtoninfant.com)

**Oyster Park Primary Academy**

Email: [opoffice@oppa.castlefordtrust.co.uk](mailto:opoffice@oppa.castlefordtrust.co.uk)

Telephone: 01977 515994

Contact Address: Oyster Park Primary Academy, Watling Rd, Castleford, WF10 3SN

Website: [www.oysterpark.co.uk](http://www.oysterpark.co.uk)

**Three Lane Ends Academy**

Email: [admin@tleacademy.co.uk](mailto:admin@tleacademy.co.uk)

Telephone: 01977 524483

Contact Address: Three Lane Ends Academy, Methley Road, Castleford, WF10 1PN

Website: [www.tleacademy.co.uk](http://www.tleacademy.co.uk)

**Airedale Academy**

Email: [aainfo@aa.castlefordtrust.co.uk](mailto:aainfo@aa.castlefordtrust.co.uk)

Telephone: 01977 664555

Contact Address: Airedale Academy, Crewe Rd, Castleford, WF10 3JU

Website: [www.airedaleacademy.com](http://www.airedaleacademy.com)

**Castleford Academy**

Email: [dpo@castlefordacademytrust.com](mailto:dpo@castlefordacademytrust.com)

Telephone: 01977 605060

Contact Address: Castleford Academy, Ferrybridge Road, Castleford, WF10 4JQ

Website: [www.castlefordacademy.com](http://www.castlefordacademy.com)



## Crofton Academy

Email: [dpo@castlefordacademytrust.com](mailto:dpo@castlefordacademytrust.com)

Telephone: 01924 862985

Contact address: Crofton Academy, High Street, Crofton, Wakefield, WF4 1NF

Website: [www.croftonacademy.org.uk](http://www.croftonacademy.org.uk)

Provided that the request complies with this Policy, we will comply with our duty to:

- Confirm or deny whether we hold the information.
- Provide the documentation within twenty working days if we confirm that we hold the requested information.

We will not comply where:

- We reasonably require further information to meet a FOI request and advise the applicant of this requirement, who does not subsequently respond to our request.
- The information is no longer easily available as it is contained in files that have been placed in archive storage or is difficult to access for similar reasons.
- A request for information is exempt under Part 2 of the Freedom of Information Act.
- The cost of providing the information exceeds the appropriate limit.
- The request is vexatious.
- The request is repeated from the same person made within sixty consecutive working days of the initial one.
- A fee notice was not honoured.

Where information is, or is thought to be exempt, we will give notice to the applicant stating this fact, specifying the exemption and stating why the exemption applies. This notice will be given within twenty working days of receiving the request.

## 6. Charging

The Trust reserves the right to refuse to supply information where the cost of doing so exceeds the statutory maximum which is currently £450.

Information available via our website is free of charge. Single copies of information are provided free unless otherwise advised. If the request requires a significant photocopying or printing; payment of a large postage charge; or is for an item such as printed publications or videos; we will advise of the cost before fulfilling a request. (Where there is a charge this will be indicated by a £ sign in the description box – see Section 14).

If a charge is to be made, confirmation of payment due will be given before the information is provided. Payment may be requested prior to the provision of any information.

When determining whether the cost of complying with a FOI request is within the appropriate limit, we will only consider the costs we reasonably expect to incur in relation to:

- determining whether we hold the information;



- locating the information or document which may contain the information;
- retrieving the information or document;
- extracting the information from a document containing it.

When multiple requests for information are made to an academy or the Trust within sixty consecutive working days of each other, either by a single person or by different persons who appear to be acting collaboratively, the estimated cost of complying with any of the requests is to be taken to be the total costs to Trust in order to comply with them all.

## 7. Environmental Information Regulations

Requests for information about air, water, land, natural resources, health and safety, etc are covered by the Environmental Information Regulations (EIR) and will be responded to in line with the EIR (Appendix E).

## 8. Feedback and Complaints

We welcome any comments or suggestions individuals may have. If individuals want to make any comments about this Policy or require further assistance or wish to make a complaint then initially this should be directed to: [dpo@castlefordacademytrust.com](mailto:dpo@castlefordacademytrust.com) or addressed to the Trust Data Protection Officer, Castleford Academy Trust, Ferrybridge Road, Castleford, WF10 4JQ.

If individuals are not satisfied with the assistance provided, or if we have not been able to resolve their complaint and they feel that a formal complaint needs to be made then this should be addressed to the Information Commissioner's Office. This is the organisation that ensures compliance with the Freedom of Information Act and that deals with formal complaints. They can be contacted at: [www.ico.org.uk/global/contact-us/](http://www.ico.org.uk/global/contact-us/).

## 9. Appendix A: Records Management and Retention of Documents Schedule

The Trust recognises that the efficient management of its records is necessary to comply with its legal and regulatory obligations and to contribute to the effective overall management of the institution. This appendix provides the policy framework through which this effective management can be achieved and audited. It covers:

- Scope
- Responsibilities
- Relationships with existing policies

### Scope of the Schedule

This schedule applies to all records created, received or maintained by staff of the Trust and its academies (collectively referred to as the Trust) in the course of carrying out its functions.

Records are defined as all those documents which facilitate the business carried out by the Trust and which are thereafter retained (for a set period) to provide evidence of its transactions or activities. These records may be created, received or maintained in hard copy or electronically.

A small percentage of the Trust's records will be selected for permanent preservation as part of the institution's archives and for historical research.



### **Responsibilities**

The Trust has a corporate responsibility to maintain its records and record keeping systems in accordance with the regulatory environment. Overall responsibility for this Policy is the Crofton Academy Trust Board of Trustees.

The Trust Data Protection Officer will provide guidance for good records management practice and promote compliance with this policy so that information is retrieved easily, appropriately and timely.

Individual staff and employees will ensure that records for which they are responsible are accurate, and are maintained and disposed of in accordance with the Trust's records management guidelines.

### **Retention of Documents**

The following is a section from the Information & Records Management Society for Schools which outlines specific documents that we may hold and the retention period and action required in respect of disposals and which the Trust has adopted.



**Retention Guidelines for Academies as per the Information and Records Management Society of Great Britain (as at 2019)**

AREA	REF	BASIC FILE DESCRIPTION	DP ISSUES	STATUTORY PROVISION	RETENTION PERIOD	ACTION AT END
<b>1.1 GOVERNANCE OF THE ACADEMY TRUST</b>	1.1.1	Governance Statement	N		Life of governance statement + 6 years	Secure disposal
	1.1.2	Articles of Association	N		Life of the Academy	Permanent
	1.1.3	Memorandum of Association	N		This can be disposed of once the Academy has been incorporated	Secure disposal
	1.1.4	Memorandum of Understanding of Shared Governance among Schools	N	Companies Act 2006 Section 355	Life of Memorandum of Understanding + 6 years	Secure disposal
	1.1.5	Constitution	N		Life of the Academy	Permanent
	1.1.6	Special Resolutions to amend the Constitution	N		Life of the Academy	Permanent
	1.1.7	Written Scheme of Delegation	N	Companies Act Section 355	Life of Written Scheme of Delegation + 10 years	Secure disposal
	1.1.8	Directors - Appointment	N		Life of appointment + 6 years	Secure disposal
	1.1.9	Directors – Disqualification	N	Company Directors Disqualification Act 1986	Date of disqualification + 15 years	Secure disposal
	1.1.10	Directors – Termination of Office	N		Date of termination + 6 years	Secure disposal
	1.1.11	Annual Report – Trustees Report	N	Companies Act 2006 Section 355	Date of report + 10 years	Secure disposal
	1.1.12	Annual Report and Accounts	N	Companies Act 2006 Section 355	Date of report + 10 years	Secure disposal
	1.1.13	Annual Return	N	Companies Act 2006 Section 355	Date of report + 10 years	Secure disposal
	1.1.14	Appointment of Trustees and Governors and Directors	Y		Life of appointment + 6 years	Secure disposal
	1.1.15	Statement of Trustees Responsibilities	N		Life of appointment + 6 years	Secure disposal
	1.1.16	Appointment and Removal of Members	N		Life of appointment + 6 years	Secure disposal
	1.1.17	Strategic Review	N		Data of the review + 6 years	Secure disposal
	1.1.18	Strategic Plan (also known as School Development Plans)	N		Life of Plan + 6 years	Secure disposal
	1.1.19	Accessibility Plan	P	Limitation Act 1980 (Section 2)	Life of Plan + 6 years	Secure disposal



AREA	REF	BASIC FILE DESCRIPTION	DP ISSUES	STATUTORY PROVISION	RETENTION PERIOD	ACTION AT END
<b>1.2 BOARD OF DIRECTORS, MEMBERS MEETINGS &amp; GOVERNING BODY</b>	<b>Board of Directors</b>					
	1.2.1	Board Meeting Minutes	P	Companies Act 2006 section 248	Minutes must be kept for at least 10 years from the date of the meeting	Offer to Archives
	1.2.2	Board Decisions	P		Data of the meeting + a minimum of 10 years	Offer to Archives
	1.2.3	Board Meeting – Annual Schedule of Business	N		Current Year	Secure disposal
	1.2.4	Board Meeting – Procedures for conduct of meeting	N	Limitation Act (section 2)	Date procedures superseded + 6 years	Secure disposal
	<b>Committees</b>					
	1.2.5	Minutes relating to any committees set up by the Board of Directors	P		Data of the meeting + a minimum of 10 years	Offer to Archives
	<b>General Members' Meeting</b>					
	1.2.6	Records relating to management of General Members' Meetings	P	Companies Act 2006 section 248	Minutes must be kept for at least 10 years from the date of the meeting	Offer to Archives
	1.2.7	Records relating to the management of the Annual General Meeting	P	Companies Act 2006 section 248	Minutes must be kept for at least 10 years from the date of the meeting	Offer to Archives
	<b>Governors</b>					
	1.2.8	Agendas for Governing Body Meetings	P		One copy should be retained with the master set of minutes. All other copies can be disposed of.	Secure disposal
	1.2.9	Minutes of, and papers considered at, meetings of the Governing Body and Committees – Principal Set (signed)	P		Life of Academy	Permanent
		Minutes of, and papers considered at, meetings of the Governing Body and Committees – Inspection Copies	P		Data of meeting + 3 years	Secure disposal
1.2.10	Reports presented to the Governing Body	P		Reports should be kept for a minimum of 6 years. However, if the minutes refer directly to individual reports, then the reports should be kept for the life of the Academy.	Secure disposal or retain with the signed set of minutes	
1.2.11	Meeting papers relating to the annual parents' meeting held under Section 33 of the Education Act 2002	Y		Data of the meeting + a minimum of 6 years	Secure disposal	
1.2.12	Trusts and Endowments management by the Governing Body	N		Permanent	Permanent	



	1.2.13	Records relating to complaints dealt with by the Governing Body	Y		Date of the resolution of complaint + a minimum of 6 years then review for further retention in case of contentious disputes	Secure disposal
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AREA	REF	BASIC FILE DESCRIPTION	DP ISSUES	STATUTORY PROVISION	RETENTION PERIOD	ACTION AT END
	1.2.14	Annual Reports created under the requirements of the Education (Governor's Annual Reports) (England) (Amendment) Regulations 2002	N	Education (Governor's Annual Reports) (England) (Amendment) Regulations 2002 SI 2002 No 1171	Date of report + 10 years	Secure disposal
	<b>Statutory Registers</b>					
	1.2.15	<b>Register of Directors</b>	Y	Companies Act 2006	Life of the Academy + 6 years	Secure disposal
	1.2.16	Register of Directors' interests (not a statutory register)	Y		Life of the Academy + 6 years	Secure disposal
	1.2.17	Register of Directors' residential addresses	Y	Companies Act 2006	Life of the Academy + 6 years	Secure disposal
	1.2.18	Register of gifts, hospitality and entertainments		Companies Act 2006	Life of the Academy + 6 years	Secure disposal
	1.2.19	Register of members	Y	Companies Act 2006	Life of the Academy + 6 years	Secure disposal
	1.2.20	Register of secretaries	Y	Companies Act 2006	Life of the Academy + 6 years	Secure disposal
	1.2.21	Register of Trustees' interests	Y		Life of the Academy + 6 years	Secure disposal
	1.2.22	Declaration of Interests Statements (Governors) (this is not a statutory register)	N		Life of the Academy + 6 years	Secure disposal
<b>1.3 FUNDING AND FINANCE</b>	<b>Strategic Finance</b>					
	1.3.1	Statement of financial activities for the year	N		Current financial year + 6 years	Secure disposal
	1.3.2	Financial planning	N		Current financial year + 6 years	Secure disposal
	1.3.3	Value for money statement	N		Current financial year + 6 years	Secure disposal
	1.3.4	Records relating to the management of VAT	N		Current financial year + 6 years	Secure disposal
	1.3.5	Whole of government accounts returns	N		Current financial year + 6 years	Secure disposal
	1.3.6	Borrowing powers	N		Current financial year + 6 years	Secure disposal
	1.3.7	Budget plan	N		Current financial year + 6 years	Secure disposal



	1.3.8	Charging & Remissions Policy	N		Date of Policy superseded + 3 years	Secure disposal
	<b>Audit Arrangements</b>					
	1.3.9	Audit Committee and appointment of responsible officers	N		Life of the Academy	Secure disposal
	1.3.10	Independent Auditor's report on regularity	N		Financial year report relates to + 6 years	Secure disposal
	1.3.11	Independent Auditor's report on financial statements	N		Financial year report relates to + 6 years	Secure disposal
	<b>Funding Agreements</b>					
	1.3.12	Funding Agreement with Secretary of State and supplemental funding agreements 11	N		Date of last payment of funding + 6 years	Secure disposal
	1.3.13	Funding Agreement – Termination of the Funding Agreement	N		Date of last payment of funding + 6 years	Secure disposal
<b>AREA</b>	<b>REF</b>	<b>BASIC FILE DESCRIPTION</b>	<b>DP ISSUES</b>	<b>STATUTORY PROVISION</b>	<b>RETENTION PERIOD</b>	<b>ACTION AT END</b>
	1.3.14	Funding Records - Capital Grant	N		Date of last payment of funding + 6 years	Secure disposal
	1.3.15	Funding Records – Earmarked Annual Grant (EAG)	N		Date of last payment of funding + 6 years	Secure disposal
	1.3.16	Funding Records – General Annual Grant (GAG)	N		Date of last payment of funding + 6 years	Secure disposal
	1.3.17	Per pupil funding records	N		Date of last payment of funding + 6 years	Secure disposal
	1.3.18	Exclusions agreement	N		Date of last payment of funding + 6 years	Secure disposal
	1.3.19	Funding records	N		Date of last payment of funding + 6 years	Secure disposal
	1.3.20	Gift Aid and Tax Relief	N		Date of last payment of funding + 6 years	Secure disposal
	1.3.21	Records relating to loans	N		Date of last payment on loan + 6 years if the loan is under £10,000 or date of last payment on loan + 12 years if the loan is over £10,000	Secure disposal
	<b>Payroll and Pensions</b>					
	1.3.22	Maternity pay records	Y	Statutory Maternity Pay (General) Regulations 1996	Current year +3 years	Secure disposal



				(S1986/1960), revised 1999 (S1999/567)		
1.3.23	Records held under Retirement Benefits Schemes (Information Powers) Regulations 1995	Y		Regulation 15 Retirement Benefits Schemes (Information Powers) Regulations 1995 (S1995/3103)	From the end of the year in which the accounts were signed for a minimum of 6 years	Secure disposal
1.3.24	Management of the Teachers' Pensions Scheme	Y			Date of last payment on the pension + 6 years	Secure disposal
1.3.25	Records relating to pensions registrations	Y			Date of last payment on the pension + 6 years	Secure disposal
1.3.26	Payroll records	Y			Date of payroll run + 6 years	Secure disposal
<b>Risk Management and Insurance</b>						
1.3.27	Insurance policies	N			Date the policy expires + 6 years	Secure disposal
1.3.28	Records relating to the settlement of insurance claims	N			Date claim settled + 6 years	Secure disposal
1.3.29	Employer's Liability Insurance Certificate	N			Closure of school + 40 years	Secure disposal

AREA	REF	BASIC FILE DESCRIPTION	DP ISSUES	STATUTORY PROVISION	RETENTION PERIOD	ACTION AT END
	<b>Endowment Funds and Investments</b>					
	1.3.30	Investment policies	N		Life of investment + 6 years	Secure disposal
	1.3.31	Management of Endowment Funds	N		Life of the fund + 6 years	Secure disposal
	<b>Accounts and Statements</b>					
	1.3.32	Annual Accounts	N		Current year + 6 years	Standard disposal
	1.3.33	Loans and grants managed by the school	N		Date of last payment on the loan + 12 years then review	Secure disposal
	1.3.34	Student Grant applications	Y		Current year + 3 years	Secure disposal
	1.3.35	All records relating to the creation and management of budgets, including the annual budget statement and background papers	N		Life of the budget + 3 years	Secure disposal
	1.3.36	Invoices, receipts, order books and requisitions, delivery notices	N		Current financial year + 6 years	Secure disposal
	1.3.37	Records relating to the collection and banking of monies	N		Current financial year + 6 years	Secure disposal



	1.3.38	Records relating to the identification and collection of debt	N		Current financial year + 6 years	Secure disposal
<b>Contract Management</b>						
	1.3.39	All record relating to the management of contracts under seal	N	Limitation Act 1980	Last payment on the contract + 12 years	Secure disposal
	1.3.40	All records relating to the management of contracts under signature	N	Limitation Act 1980	Last payment on the contract + 6 years	Secure disposal
	1.3.41	Records relating to the monitoring of contracts	N		Current year + 2 years	Secure disposal
<b>Asset Management</b>						
	1.3.42	Inventories of furniture and equipment	N		Current year +6 years	Secure disposal
	1.3.43	Burglary, theft and vandalism report forms	N		Current year +6 years	Secure disposal
	1.3.44	Records relating to the leasing of shared facilities such as sports centres	N		Current year +6 years	Secure disposal
	1.3.45	Land and building valuations	N		Data valuation superseded + 6 years	Secure disposal
	1.3.46	Disposal of assets	N		Date asset disposed of + 6 years	Secure disposal
	1.3.47	Community school leases for land	N		Date lease expires + 6 years	Secure disposal
	1.3.48	Commercial transfer arrangements	N		Date of transfer + 6 years	Secure disposal
	1.3.49	Transfer of land to Academy Trust	N		Life of land ownership then transfer to new owner	Secure disposal
	1.3.50	Transfers of freehold land	N		Life of land ownership then transfer to new owner	Secure disposal
<b>School Fund</b>						
	1.3.51	School Fund – Cheque books	N		Current year + 6 years	Secure disposal
	1.3.52	School Fund – Paying in books	N		Current year + 6 years	Secure disposal
	1.3.53	School Fund – Ledger	N		Current year + 6 years	Secure disposal
	1.3.54	School Fund – Invoices	N		Current year + 6 years	Secure disposal
	1.3.55	School Fund – Receipts	N		Current year + 6 years	Secure disposal

AREA	REF	BASIC FILE DESCRIPTION	DP ISSUES	STATUTORY PROVISION	RETENTION PERIOD	ACTION AT END
	1.3.56	School Fund – Bank statements	N		Current year + 6 years	Secure disposal
	1.3.57	School Fund – Journey books	N		Current year + 6 years	Secure disposal
<b>School Meals</b>						
	1.3.58	Free school meals register	Y		Current year + 6 years	Secure disposal
	1.3.59	School meals register	Y		Current year + 3 years	Secure disposal
	1.3.60	School meals summary sheets	N		Current year + 3 years	Secure disposal



<b>1.4 POLICIES, FRAMEWORKS &amp; OVERARCHING REQUIREMENTS</b>	1.4.1	Data Protection Policy including data protection notification	N		Date policy superseded + 6 years	Secure disposal
	1.4.2	Freedom of Information Policy	N		Date policy superseded + 6 years	Secure disposal
	1.4.3	Information Security Breach Policy	N		Date policy superseded + 6 years	Secure disposal
	1.4.4	Special Educational Needs Policy	N		Date policy superseded + 6 years	Secure disposal
	1.4.5	Complaints Policy	N		Date policy superseded + 6 years	Secure disposal
	1.4.6	Risk and Control Framework	N		Life of framework superseded + 6 years	Secure disposal
	1.4.7	Rules and Bylaws	N		Date rules and bylaws superseded + 6 years	Secure disposal
	1.4.8	Home School Agreements	N		Date agreement revised + 6 years	Secure disposal
	1.4.9	Equality Information and Objectives (public sector equality duty) Statement for publication	N		Date of statement + 6 years	Secure disposal
<b>2.1 RECRUITMENT</b>	2.1.1	All records leading up to the appointment of a Headteacher	Y		Date of appointment + 6 years	Secure disposal
	2.1.2	All records leading up to the appointment of a new member of staff – unsuccessful candidates	Y		Date of appointment of successful candidate + 6 months	Secure disposal
	2.1.3	All records leading up to the appointment of a new member of staff – successful candidates	Y		All relevant information should be added to the Staff Personal File and all other information retained for 6 months	Secure disposal
	2.1.4	Pre-employment vetting information (DBS checks)	Y	DBS Update Service Employer Guide June 2014	The organisation should take a copy of the DBS certificate when it is shown to them by the individual and should be added to the Staff Personal File	Secure disposal
	2.1.5	Proofs of identity collected as part of the process of checking “portable” enhanced DBS disclosure	Y		Where possible these should be checked and a note kept of what was seen and what has been checked. If it is felt necessary to keep copy documentation, then this should be added to the Staff Personal File.	Secure disposal



AREA	REF	BASIC FILE DESCRIPTION	DP ISSUES	STATUTORY PROVISION	RETENTION PERIOD	ACTION AT END
	2.1.6	Pre-employment vetting information – Evidence proving the right to work in the United Kingdom	Y	An employer’s guide to right to work checks (Home Office May 2015)	Where possible, these documents should be added to the Staff personal File, but if they are kept separately, then the Home Office requires that the documents are kept for termination of employment plus not less than 2 years	Secure disposal
	2.1.7	Records relating to the employment of overseas teachers	Y		Where possible, these documents should be added to the Staff personal File, but if they are kept separately, then the Home Office requires that the documents are kept for termination of employment plus not less than 2 years	Secure disposal
	2.1.8	Records relating to the TUPE process	Y		Date last member of staff transfers or leaves the organisation + 6 years	Secure disposal
<b>2.2 OPERATIONAL STAFF MANAGEMENT</b>	2.2.1	Staff Personal File, including employment contract and staff training records	Y	Limitation Act 1980 (Section 2)	Termination of employment + 6 years	Secure disposal
	2.2.2	Timesheets	Y		Current year + 6 years	Secure disposal
	2.2.3	Annual appraisal/assessment records	Y		Current year + 4 years	Secure disposal
	2.2.4	Records relating to the agreement of pay and conditions	N		Date pay and conditions superseded + 6 years	Secure disposal
	2.2.5	Training needs analysis	N		Current year + 1 year	Secure disposal
<b>2.3 MANAGEMENT OF DISCIPLINARY AND GRIEVANCE PROCESSES</b>	2.3.1	Allegation which is child protection in nature against a member of staff, including where the allegation is unfounded	Y	“Keeping children Safe in Education Statutory Guidance for Schools and Colleges September 2018”; “Working Together to Safeguard Children. A guide to inter-agency working to safeguard and promote the	Until the person’s normal retirement age or 10 years from the date of the allegation (whichever is longer) then review.	Secure disposal – must be shredded



				welfare of children 2018”		
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AREA	REF	BASIC FILE DESCRIPTION	DP ISSUES	STATUTORY PROVISION	RETENTION PERIOD	ACTION AT END	
	2.3.2	Disciplinary proceedings	Y				
		<ul style="list-style-type: none"> <li>Oral warning</li> </ul>	Y		Date of warning + 6 months	Secure disposal	
		<ul style="list-style-type: none"> <li>Written warning – level one</li> </ul>	Y		Date of warning + 6 months	Secure disposal	
		<ul style="list-style-type: none"> <li>Written warning – level two</li> </ul>	Y		Date of warning + 12 months	Secure disposal	
		<ul style="list-style-type: none"> <li>Final warning</li> <li>Case not found</li> </ul>	Y		Date of warning + 18 months	Secure disposal	
					If incident is child protection related then see above; otherwise dispose of at the conclusion of the case.	Secure disposal	
<b>2.4 HEALTH &amp; SAFETY</b>	2.4.1	Health & Safety policy statements	N		Life of policy + 3 years	Secure disposal	
	2.4.2	Health & Safety risk assessments	N		Life of risk assessment + 3 years	Secure disposal	
	2.4.3	Records relating to accident/injury at work	Y		Date of incident + 12 years in the case of serious accidents, a further retention period will need to be applied	Secure disposal	
	2.4.4	Accident reporting		Y	Social Security (Claims and Payments) Regulations 1979 Regulation 25 Social Security Administration Act 1992 Section 8. Limitation Act 1980	The official Accident Book must be retained for 3 years after the last entry in the book. The book may be in paper or electronic format.  The incident reporting form may be retained as below.	Secure disposal
			<ul style="list-style-type: none"> <li>Adults</li> </ul>			Date of incident + 6 years	Secure disposal
			<ul style="list-style-type: none"> <li>Children</li> </ul>			Date of birth of child + 25 years	Secure disposal
	2.4.5	Control of Substances Hazardous to Health (COSHH)	N			Current year + 10 years.	Secure disposal
2.4.6	Process of monitoring areas where employees and persons are likely to have come into contact with asbestos	N			Last action + 40 years	Secure disposal	
2.4.7	Process of monitoring of areas where employees and persons are likely to have come in contact with	N			Last action + 50 years	Secure disposal	



		radiation. Maintenance records of controls, safety features and PPE.				
	2.4.8	Fire precautions logbook	N		Current year + 6 years	Secure disposal
	2.4.9	Fire risk assessments	N	Fire Service Order 2005	Life of the risk assessment + 6 years	Secure disposal
	2.4.10	Incident reports	Y		Current year + 20 years	Secure disposal

AREA	REF	BASIC FILE DESCRIPTION	DP ISSUES	STATUTORY PROVISION	RETENTION PERIOD	ACTION AT END
<b>3.1 ADMISSIONS</b>	3.1.1	All records relating to the creation and implementation of the School Admissions' Policy	N	School Admissions Code Statutory Guidance for admission authorities, governing bodies, local authorities, schools' adjudicators and admission appeals panels December 2014	Life of the policy + 3 years then review	Secure disposal
	3.1.2	Annual Admissions if admission is successful	Y	School Admissions Code Statutory Guidance for admission authorities, governing bodies, local authorities, schools' adjudicators and admission appeals panels December 2014	Individual student information becomes part of their student record. Date of birth of pupils + 25 years.	Secure disposal
	3.1.3	Admissions if appeal is unsuccessful or where pupil is included as a new starter, but who transfer to another organisation following a successful appeal with them	Y	School Admissions Code Statutory Guidance for admission authorities,	Resolution of case + 1 year	Secure disposal



				governing bodies, local authorities, schools' adjudicators and admission appeals panels December 2014		
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AREA	REF	BASIC FILE DESCRIPTION	DP ISSUES	STATUTORY PROVISION	RETENTION PERIOD	ACTION AT END
	3.1.4	Register of admissions	Y	School attendance: Departmental advice for maintained schools, academies, independent schools and local authority October 2014	Every entry in the admission register must be preserved for a period of 3 years after the date on which the entry was made	Review Schools may wish to consider keeping the admission register permanent, as often school receive enquiries from past pupils to confirm the dates they attended the school or to transfer these records to the appropriate Country Archives Service
	3.1.5	Admissions secondary school casual/in-year	Y		Individual student information becomes part of their student record. Date of birth of pupils + 25 years.	Secure disposal
	3.1.6	Proofs of address supplied by parents as part of the admissions process	Y	School Admissions Code Statutory Guidance for admission authorities, governing bodies, local authorities, schools' adjudicators and admission appeals	Current year + 1 year	Secure disposal



				panels December 2014		
	3.1.7	Supplementary information form including additional information such a religion, medical conditions etc	Y			
		<ul style="list-style-type: none"> <li>For successful admissions for successful admissions</li> </ul>	Y		This information should be added to the pupil file	Secure disposal
		<ul style="list-style-type: none"> <li>For unsuccessful admissions</li> </ul>	Y		Until appeals process completed	Secure disposal
<b>3.2 HEADTEACHER &amp; SENIOR MANAGEMENT TEAM</b>	3.2.1	Log books of activity in the school maintained by the Headteacher	P		Date of last entry in the book + 6 years then review	These could be of permanent historical value and should be offered to the County Archives if appropriate
	3.2.2	Minutes of SMT and the meetings of other internal administrative bodies	P		Date of meeting + 3 years then review	Secure disposal
	3.2.3	Reports created by headteacher or management team	P		Date of meeting + a minimum of 3 years then review	Secure disposal
	3.2.4	Records created by headteachers, deputy headteachers, heads of year and other members of staff with administrative responsibilities	P		Current academic year +6 years then review	Secure disposal

AREA	REF	BASIC FILE DESCRIPTION	DP ISSUES	STATUTORY PROVISION	RETENTION PERIOD	ACTION AT END
	3.2.5	Correspondence created by headteachers, deputy headteachers, heads of year and other members of staff with administrative responsibilities	P		Date of correspondence + 3 years then review	Secure disposal
	3.2.6	Professional development plans	Y		Life of the plan + 6 years	Secure disposal
<b>3.3 OPERATIONAL ADMINISTRATION</b>	3.3.1	Management of complaints	Y		Date complaint resolved + 3 years	Secure disposal
	3.3.2	Records relating to the management of contracts with external providers	N		Date of last payment on contract + 6 years	Secure disposal
	3.3.3	Records relating to the management of software licences	N		Date licence expires + 6 years	Secure disposal
	3.3.4	General file series	N		Current year + 5 years, then review	Secure disposal
	3.3.5	Records relating to the creation and publication of the school brochure or prospectus	N		Current academic year +3 years	Standard disposal
	3.3.6	Records relating to the creation and distribution of circulars to staff, parents or pupils	N		Current academic year +1 year	Standard disposal



	3.3.7	Newsletters and other items with a short operational use	N		Current academic year +1 year	Standard disposal
	3.3.8	Visitor books and signing-in sheets	Y		Last entry in the visitors book +6 years then review	Secure disposal
	3.3.9	Records relating to the creation and management of Parent Teacher Associations and/or Old Pupils Association	N		Current year +6 years then review	Secure disposal
<b>4.1 PROPERTY MANAGEMENT</b>	4.1.1	Title deeds of properties belonging to the school	N		These should follow the property, unless the property has been registered with the Land Registry.	Permanent
	4.1.2	Plans of property belonging to the school	N		These should be retained whilst the building belongs to the school and should be passed onto any new owners if the building is leased or sold.	Permanent
	4.1.3	Leases or property leased by or to the school	N		Expiry of lease + 6 years	Secure disposal
	4.1.4	Record relating to the letting of school premises	N		Current year + 6 years	Secure disposal
	4.1.5	Business continuity and disaster recovery plans	N		Date the plan superseded + 3 years	Secure disposal
<b>4.2 MAINTENANCE</b>	4.2.1	All records relating to the maintenance of the school carried out by contractors	N		Current year + 6 years	Secure disposal
	4.2.2	All records relating to the maintenance of the school carried out by school employees, including maintenance log books	N		Current year + 6 years	Secure disposal
<b>4.3 FLEET MANAGEMENT</b>	4.3.1	The process of acquisition and disposal of vehicles through lease or purchase e.g. contracts/leases, quotes, approvals	N	Limitation Act 1980 (Section 2)	Disposal of the vehicle + 6 years	Secure disposal
	4.3.2	The process of managing allocation and maintenance of vehicles e.g. lists of who was driving the vehicles and when, maintenance	N	Limitation Act 1980 (Section 2)	Disposal of the vehicle + 6 years	Secure disposal

AREA	REF	BASIC FILE DESCRIPTION	DP ISSUES	STATUTORY PROVISION	RETENTION PERIOD	ACTION AT END
	4.3.3	Service logs and vehicle logs	N	Limitation Act 1980 (Section 2)	Life of the vehicle then either to be retained for 6 years by school or to be returned to lease company	Secure disposal
	4.3.4	GPS tracking data relating to the vehicles	N	Limitation Act 1980 (Section 2)	Date of journey + 6 years	Secure disposal



<p><b>5.1 PUPIL MANAGEMENT</b></p>	<p>5.1.1</p>	<p>Pupil's Educational Record required by The Education (Pupil Information) (England) Regulations 2005</p>	<p>Y</p>			
		<ul style="list-style-type: none"> <li>• Primary</li> </ul>	<p>Y</p>		<p>Retain for time which the pupil remains at the primary school</p>	<p>The file should follow the pupil when they leave the primary school. This will include:</p> <ul style="list-style-type: none"> <li>▪ To another primary school</li> <li>▪ To a secondary school</li> <li>▪ To a pupil referral unit</li> </ul> <p>If the pupil dies whilst at primary school, the file should be returned to the LA to be retained for the statutory retention period. If the pupil transfers to home schooling or leaves the country, the file should be returned to the LA to be retained for the statutory retention period Primary school do not ordinarily have sufficient storage space to store records for pupils who have not transferred in the normal way. It</p>



					makes more sense to transfer the record to the LA, as it is more likely that the pupil will request the record from the LA.
	<ul style="list-style-type: none"> <li>Secondary</li> </ul>	Y	Limitation Act 1980 (Section 2)	Date of Birth of pupil + 25 Years	Secure disposal
5.1.2	Records relating to the management of exclusions	Y		Information is part a student's record. Date of Birth of the pupils involved + 25 years	Secure disposal

AREA	REF	BASIC FILE DESCRIPTION	DP ISSUES	STATUTORY PROVISION	RETENTION PERIOD	ACTION AT END
	5.1.3	Management of examination registrations	Y		The examination board will usually mandate how long these records need to be retained	Secure disposal
	5.1.4	Examination Results – pupil copies	Y			
		<ul style="list-style-type: none"> <li>Public</li> </ul>	Y		This information should be added to the pupil file. All uncollected certificates should be returned to the examination board after reasonable attempts to contact the pupils have failed.	
		<ul style="list-style-type: none"> <li>Internal</li> </ul>	Y		Information should be added to the pupil file. Date of Birth of the pupils involved + 25 years	
<b>5.1 PUPIL'S EDUCATIONAL RECORD</b>	5.1.5	Child Protection information held on individual pupil file (all pupils including in-year transfers to other schools)	Y	"Keeping Children Safe in Education Statutory guidance for schools and colleges 2018"; working together to safeguard children. A guide to inter-agency working to	Date of birth of the child +25 years then review. Files for pupils moving to other schools/colleges are securely transfer at the time of the move.	Secure disposal – must be shredded



				safeguard and promote welfare of children 2018”		
	5.1.6	Child protection information held in separate files	Y	“Keeping Children Safe in Education Statutory guidance for schools and colleges 2018”; working together to safeguard children. A guide to inter-agency working to safeguard and promote welfare of children 2018”	Date of birth of the child +25 years then review. This retention period was agreed in consultation with the Safeguarding Children in Group on the understanding that the principal copy of this information will be found on the LA Social Services Record.	Secure disposal – must be shredded

AREA	REF	BASIC FILE DESCRIPTION	DP ISSUES	STATUTORY PROVISION	RETENTION PERIOD	ACTION AT END
<b>5.2 ATTENDANCE</b>	5.2.1	Attendance registers	Y	School attendance: Departmental advice for maintained schools, academies, independent schools and local authority October 2014	Every entry in the attendance register must be preserved for a period of 3 years after the date on which the entry was made	Secure disposal
	5.2.2	Correspondence relating to any absence (authorised or unauthorised)	Y	Education Act 1996 Section 7	Current academy year + 2 years	Secure disposal
<b>5.3 SPECIAL EDUCATIONAL NEEDS</b>	5.3.1	Special Educational Needs files, reviews and Individual Education Plans.	Y	Limitation Act 1980 (Section 2)	Date of birth +25 years Retention period is minimum retention period that any pupil file should be kept. Some schools to keep SEN files for a longer period of time in order to defend themselves in a “failure to provide a sufficient education” case. There is an element of business risk analysis involved in	Secure disposal



					any decision to keep the records longer than the minimum retention period – this should be documented.	
	5.3.2	Statement maintained under section 234 of the education Act 1990 and any amendments made to the statement	Y	Education Act 1996 Special Educational Needs and Disability Act 2001 Section 1	Date of birth + 25 years (this would normally be retained on the pupil file)	Secure disposal unless document is subject of a legal hold
	5.3.3	Advice and information provided to parents regarding educational needs	Y	Special Educational Needs and Disability Act 2001 Section 2	Date of birth + 25 years (this would normally be retained on the pupil file)	Secure disposal unless document is subject of a legal hold
	5.3.4	Accessibility Strategy	Y	Special Educational Needs and Disability Act 2001 Section 2	Date of birth + 25 years (this would normally be retained on the pupil file)	Secure disposal unless document is subject of a legal hold

AREA	REF	BASIC FILE DESCRIPTION	DP ISSUES	STATUTORY PROVISION	RETENTION PERIOD	ACTION AT END
<b>6.1 STATISTICS &amp; MANAGEMENT INFORMATION</b>	6.1.1	Curriculum returns	N		Current year + 3 years	Secure disposal
	6.1.2	Examination results (school copy)	Y		Current Year + 6 years	Secure disposal
		SATS records <ul style="list-style-type: none"> <li>▪ results</li> </ul>	Y		The STS result should be recorded on the pupil' educational file and will therefore be retained until the pupil reaches the age of 25 year. The school may wish to keep a composite record of all the whole year SATs results. These could be kept for current year + 6 year to allow suitable comparison.	Secure disposal
		SATS records <ul style="list-style-type: none"> <li>▪ examination papers</li> </ul>	Y		The examination papers should be kept until any appeals/validation process is complete.	Secure disposal
	6.1.3	Published Admissions Number (PAN)	Y		Current year + 6 years	Secure disposal
	6.1.4	Value added and contextual data	Y		Current year + 6 years	Secure disposal
	6.1.5	Self-evaluation forms	Y		Current year + 6 years	Secure disposal
<b>6.2</b>	6.2.1	Schemes of work	N		Current year + 1 year. It may be appropriate to review these records	Secure disposal



<b>IMPLEMENTATION OF CURRICULUM</b>					at the end of each year and allocate a new retention period.	
	6.2.2	Timetable	N		Current year + 1 year. It may be appropriate to review these records at the end of each year and allocate a new retention period.	Secure disposal
	6.2.3	Class record books	Y/N		Current year + 1 year. It may be appropriate to review these records at the end of each year and allocate a new retention period.	Secure disposal
	6.2.4	Mark books	Y/N		Current year + 1 year. It may be appropriate to review these records at the end of each year and allocate a new retention period.	Secure disposal
	6.2.5	Record of homework set	Y/N		Current year + 1 year. It may be appropriate to review these records at the end of each year and allocate a new retention period.	Secure disposal
	6.2.6	Pupils' work	Y		Where possible work should be returned to the pupil at the end of the academic year, then current year + 1 year.	Secure disposal

AREA	REF	BASIC FILE DESCRIPTION	DP ISSUES	STATUTORY PROVISION	RETENTION PERIOD	ACTION AT END
<b>7.1 EDUCATIONAL VISITS OUTSIDE THE CLASSROOM</b>	7.1.1	Records created by schools to obtain approval to run education visit outside the classroom, primary schools	N	Outdoor Education Advisers' Panel Guidance website <a href="http://oeapng.info">http://oeapng.info</a> specifically Section 3 – "Legal Framework and Employer Systems" and Section 4 – "Good Practice"	Date of visit + 14 years	Secure disposal
	7.1.2	Records created by schools to obtain approval to run an educational visit outside the classroom, secondary schools	N	Outdoor Education Advisers' Panel Guidance website	Data of visit + 10 years	Secure disposal



				<a href="http://oeapng.info">http://oeapng.info</a> specifically Section 3 – “Legal Framework and Employer Systems” and Section 4 – “Good Practice”		
	7.1.3	Parental consent forms for school trips where there has been no major incident	Y		Conclusion of the trip Although the consent form could be retained from date of birth +25 years the requirement for them being needed is low and most schools do not have the storage capacity to retain every single consent form issued by the school for this period of time.	
	7.1.4	Parental consent forms for school trips where there has been a major incident	Y	Limitation Act 1980 (Section 2)	Date of birth of the pupil involved in the incident + 25 years. The permission slips for all the pupils on the trip need to be retained to show that the rules had been followed for all pupils.	Secure disposal

AREA	REF	BASIC FILE DESCRIPTION	DP ISSUES	STATUTORY PROVISION	RETENTION PERIOD	ACTION AT END
	7.1.5	Records relating to residential trips	Y		Date of birth of youngest pupil involved + 25 years	Secure disposal
<b>7.2 WALKING BUS</b>	7.2.1	Walking bus register	Y		Date of register + 3 years This takes into account that fact that if there is an incident requiring an accident report, the register will be submitted with the accident report and kept for the retention time for accident reporting	Secure disposal (if any records are retained electronically any back up copies should be destroyed at the same time)
<b>8.1 LOCAL AUTHORITY</b>	8.1.1	Secondary transfer sheets (primary)	Y		Current year + 2 years	Secure disposal
	8.1.2	Attendance returns	Y		Current year + 1 year	Secure disposal
	8.1.3	School census returns	N		Current year + 5 years	Secure disposal
<b>8.2</b>	8.2.1	OFSTED Reports and papers	N		Life of report then review	Secure disposal



CENTRAL GOVERNMENT	8.2.2	Returns made to Central Government	N		Current year + 6 years	Secure disposal
	8.2.3	Circulars from Central Government	N		Operational Use	Secure disposal



## 10. Protective Markings and Applying Exemptions

When considering if an exemption to disclosure should apply, bear in mind that the presence of a protective marking (Restricted, Confidential or Secret, with or without descriptors such as Staff, Management, Commercial etc) does not constitute an exemption and is not in itself sufficient grounds on which to prevent disclosure. Each case must be considered on its merits.

### Timing

Where information has previously been withheld, it must not be assumed that any subsequent requests for the same information will also be refused. Sensitivity of information decreases with age and the impact of any disclosure will be different depending on when the request is received. Therefore, for each request, it will be necessary to consider the harm that could result at the time of the request and, while taking into account any previous exemption applications, each case should be considered separately.

### Next Steps

In all cases, before writing to the enquirer, the Trust will have ensured that the case has been properly considered, and that the reasons for refusal are found.

### 10.1. Public Interest Test

#### Background

Having established that a qualified exemption(s) definitely applies to a particular case, you must then carry out a public interest test to identify if the public interest in applying the exemption outweighs the public interest in disclosing it. Therefore, unless it is in the public interest to withhold the information, it has to be released. Although precedent and a developed case law plays a part, individual circumstances will vary and each case will need to be considered on its own merits.

#### Carrying out the Test

What is in the public interest is not necessarily the same as that which may be of interest to the public. It may be irrelevant that a matter may be the subject of public curiosity. In most cases it will be relatively straightforward to decide where the balance of the public interest in disclosure lies. However, there will inevitably be cases where the decision is a difficult one. Applying such a test depends to a high degree on objective judgement and a basic knowledge of the subject matter and its wider impact in the school and possibly wider. Factors that might be considered when weighing the public interest include:



FOR DISCLOSURE	AGAINST DISCLOSURE
Is disclosure likely to increase access to information held by the school?	Is disclosure likely to distort public reporting or be misleading because it is incomplete?
Is disclosure likely to give the reasons for a decision or allow individuals to understand decisions affecting their lives or assist them in challenging those decisions?	Is premature disclosure likely to prejudice fair scrutiny, or release sensitive issues still on the internal agenda or evolving?
Is disclosure likely to improve the accountability and transparency of the school in the use of public funds and help to show that it obtains value for money?	Is disclosure likely to cause unnecessary public alarm or confusion?
Is disclosure likely to contribute to public debate and assist the understanding of existing or proposed policy?	Is disclosure likely to seriously jeopardise the school's legal or contractual position?
Is disclosure likely to increase public participation in decision-making?	Is disclosure likely to infringe other legislation e.g. Data Protection Act?
Is disclosure likely to increase public participation in political processes in general?	Is disclosure likely to create a controversial precedent on the release of information or impair your ability to obtain information in the future?
Is disclosure likely to bring to light information affecting public safety?	Is disclosure likely to adversely affect the school's proper functioning and discourage openness in expressing opinions?
Is disclosure likely to reduce further enquiries on the topic?	If a large amount of information on the topic has already been made available, would further disclosure shed any more light or serve any useful purpose?

Note also that:

- potential or actual embarrassment to, or loss of confidence in, the school, staff or governors is NOT a valid factor;
- the fact that the information is technical, complex to understand and may be misunderstood may not of itself be a reason to withhold information;
- the potential harm of releasing information will reduce over time and should be considered at the time the request is made rather than by reference to when the relevant decision was originally taken;
- the balance of the public interest in disclosure cannot always be decided on the basis of whether the disclosure of particular information would cause harm, but on certain higher order considerations such as the need to preserve confidentiality of internal discussions;
- a decision not to release information may be perverse i.e. would a decision to withhold information because it is not in the public interest to release it, itself result in harm to public safety, the environment or a third party.

We will record the answers to these questions and the reasons for those answers. Deciding on the public interest is not simply a matter of adding up the number of relevant factors on each side, we will decide how important each factor is in the circumstances and go on to make an overall assessment.



### **For Disclosure**

Where the balance of the public interest lies in disclosure, the enquiry should be dealt with and the information required should be made available. Where the factors are equally-balanced, the decision should usually favour disclosure whilst considering third bullet point above.

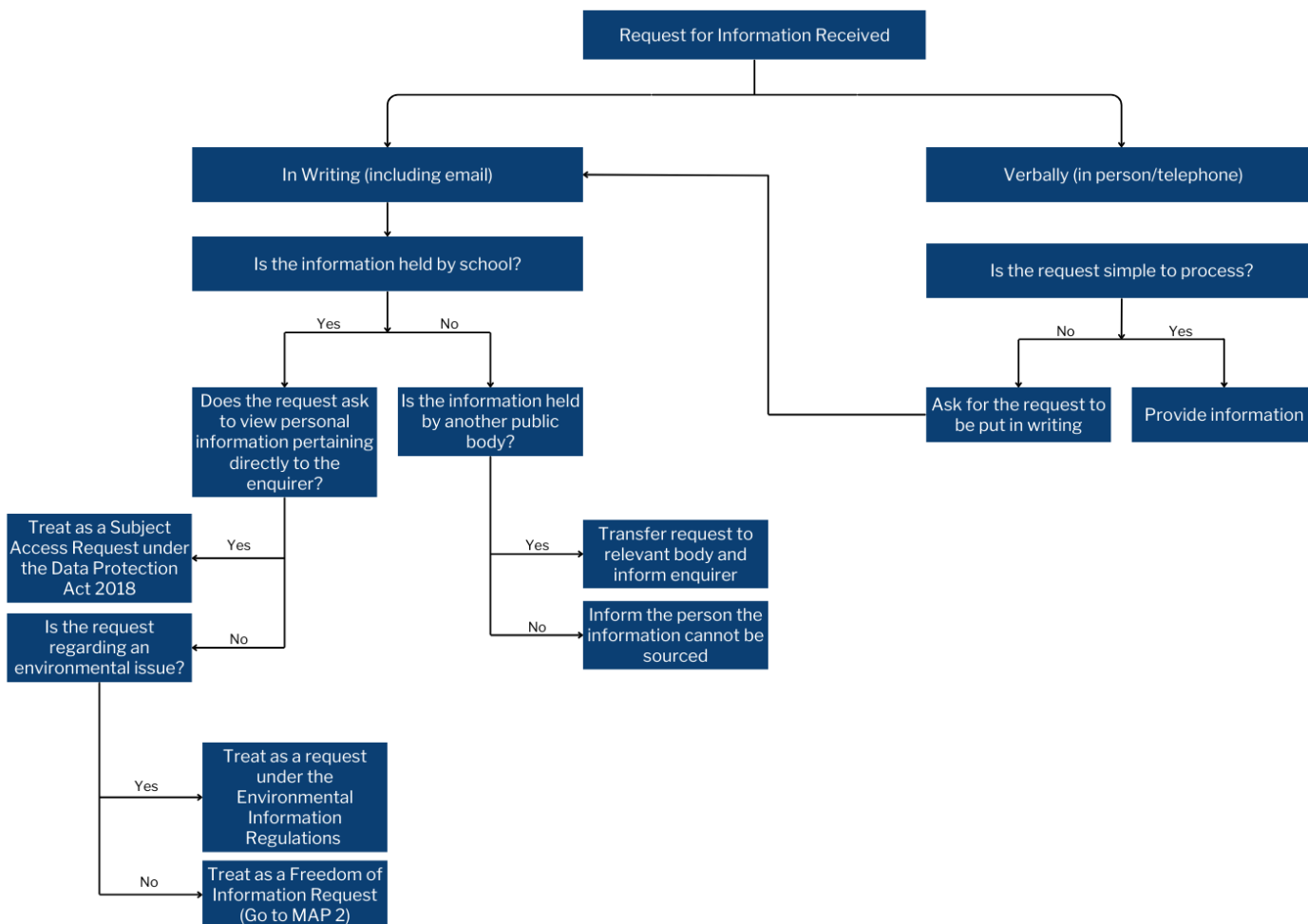
### **Against Disclosure**

After carrying out the public interest test, if it is decided that the exemption should still apply, we will proceed to reply to the request.

There will be occasions when it has been decided that a qualified exemption applies, but consideration of the public interest test may take longer. In such a case, we will contact the enquirer within 20 (twenty) working days stating that a particular exemption applies, but including an estimate of the date by which a decision on the public interest test will be made. This will be within a “reasonable” time (in practice, it is recommended this decision is made and communicated within the 20 (twenty) days, but where not possible it is suggested that no more than 10 (ten) working days beyond the 20 (twenty) days should be allowed).

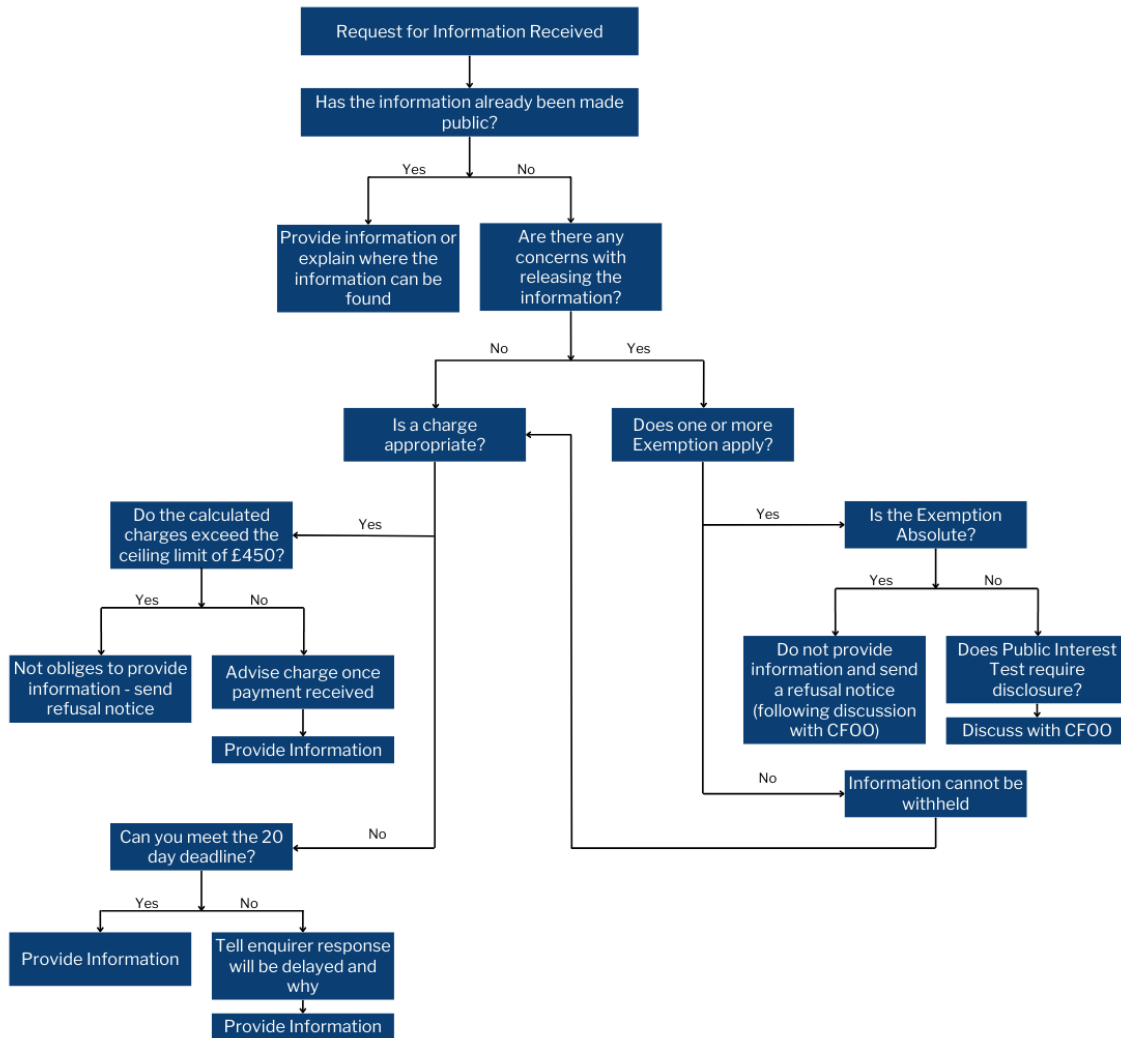


### 11. Appendix C: Process Map for Handling Requests for Information





## 12. Appendix D: Process Map for Handling Freedom of Information Requests



## 13. Classes of Information Currently Published

The Freedom of Information Act (2000) (FOIA) requires the Trust, as a Public Authority, to produce a register of the types of information we routinely make available to the public. This “publication scheme” follows a template approved by the Information Commissioner.

The classes of information we hold are:

- Class 1 – who we are and what we do
- Class 2 – What we spend and how we spend it
- Class 3 – What our priorities are and how we are doing
- Class 4 – How we make decisions
- Class 5 – Our policies and procedures
- Class 6 – Lists and registers



This information will not generally include:

- Information, which we are prevented by law to disclose.
- Information in draft form.
- Information which is no longer readily available as it is contained within files that have been placed in archive or are difficult to access for similar reasons.

Information is available via our website unless it is impracticable to do so or where an individual does not wish to access the internet. In these circumstances we will indicate how this can be obtained. 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. Information will be provided in the language in which it is held or in such other language that is legally required.

Charges will be made for information published under this scheme. Our intention is to make information covered within this Publication Scheme as readily available as possible at a minimum cost. Charges made by the Trust for routinely published material will be justified and transparent and kept to a minimum. Publications via our website are free of charge; charges may be made to cover the cost of supplying information in hard copy form to cover the cost of photocopying and postage.

If a charge is to be made, confirmation of payment due will be given before the information is provided. Any payment may be requested prior to providing information.

Information outside that included in the Publication Scheme can be requested in writing.

## 14. The Publication Scheme

<b>CLASS 1 - Who we are and what we do; i.e. organisational information, staffing structures, locations and contacts. This is current information only.</b>		
<b>Information Published</b>	<b>How to obtain a copy</b>	<b>Cost</b>
Who's who in school	Website	Free
Who's who on the governing body and the basis of their appointment	Website	Free
Instrument of Government	Website	Free
Contact details for Headteachers and names of Governing Body	Website	Free
School prospectus	Website	Free
School session times and term dates	Website	Free
<b>CLASS 2 – What we spend and how we spent it. For example, financial information relating to projected and actual income and expenditure, procurement, contacts and financial audit. Current and previous financial year as a minimum.</b>		
<b>Information Published</b>	<b>How to obtain a copy</b>	<b>Cost</b>
Annual budget plan and financial statements	Website	Free
Capital Funding	Hard Copy	£
Additional Funding	Hard Copy	£
Pay Policy	Website	Free
<b>CLASS 3 – What our priorities are and how we are doing. For example, strategies and plans, performance indicators, audits, inspections and reviews. Current information as a minimum.</b>		



Information Published	How to obtain a copy	Cost
Academy profile: Government supplied performance data Latest Ofsted Report Summary and full report	Website	Free
Professional Development Policy and procedures adopted by the Governing Body.	Website	Free
<b>CLASS 4 – How we make decisions. For example, decision making processes and records of decisions. Current and previous three years as a maximum.</b>		
Information Published	How to obtain a copy	Cost
Admissions Policy	Website	Free
<b>CLASS 5 – Our policies and procedures. For example, current written protocols, policies and procedures for delivering our services and responsibilities. Current information only. The following is an example of the policies that may be available via the Trust/Academy website(s) at the time a request is made.</b>		
Information Published	How to obtain a copy	Cost
<b><i>Pupil &amp; Curriculum Policies include:</i></b>		
Accessibility & Inclusion Policy	Website	Free
Admissions Policy	Website	Free
Anti-Bullying Policy	Website	Free
Attendance Policy	Website	Free
Behaviour Policy	Website	Free
<b><i>School Policies include:</i></b>		
Charging & Remissions Policy	Website	Free
Communications Protocol	Website	Free
Emergency Care in School Policy	Website	Free
Equality & Diversity Policy	Website	Free
Off-Site Direction & Alternative Provision Policy	Website	Free
<b>CLASS 6 – Lists and registers. For example, currently maintained lists and registers only.</b>		
Information Published	How to obtain a copy	Cost
Asset register/inventory	Hard Copy	£
<b>CLASS 7 – The services we offer. For example, information about the services we offer, including leaflets, guidance, newsletter produced. Current information only.</b>		
Information Published	How to obtain a copy	Cost
Newsletters	Website	Free
Extra-curricular activities	Website	Free

**Schedule of Charges**

Type of Charge	Description	Basis of Charge
Disbursement cost	Photocopying/printing @ £X per sheet (black & white)	Actual cost @ £ per sheet (black and white)
Photocopying/printing @ £ per sheet (colour)		Actual cost @ £ per sheet (colour)



Postage		Actual cost of Royal Mail standard 2 <sup>nd</sup> class (actual cost incurred by school)
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## 15. Environmental Information Regulations (EIRs)

Is the request FOIA or Environmental Information?

“Environmental information” can be summarised as

- (a) The state of the elements of the environment, such as air and atmosphere, water, soil, land, landscape and natural sites and the interaction between these elements.
- (b) Factors such as substances, energy, noise, radiation or waste affecting or likely to affect the elements of the environment.
- (c) Measures such as policies, legislation, plans, programmes, environmental agreements, and activities affecting or likely to affect or protect the elements of the environment.
- (d) Reports on the implementation of environmental legislation.
- (e) Cost-benefit and other economic analyses and assumptions used within the framework of environmental measures and activities.
- (f) The state of human health and safety, including the contamination of the food chain, conditions of human life, cultural sites and built structures in as much as they are or may be affected by the state.

The procedure for issuing information under the FOIA should be followed whilst relating to Environmental Information requests. However, under the EIRs there is no “cost limit” for dealing with requests, but requests that cost a disproportionate amount will be refused on the basis that they are manifestly unreasonable, subject to a public interest test.

### EIR exceptions subject to the public interest test

We will not fulfil a request made under EIRs if:

- the request does not hold that information when an applicant’s request is received;
- it is manifestly unreasonable;
- it is formulated in too general a manner (provided assistance has been given to the applicant with a view to re-framing the request);
- it relates to unfinished documents or incomplete data;
- it would involve disclosure of internal communications;

and if disclosure would adversely affect:

- international relations, defence, national security or public safety;
- the course of justice, fair trial, conduct of a criminal or disciplinary inquiry;
- intellectual property rights;
- confidentiality of public authority proceedings when covered by law;
- confidentiality of commercial or industrial information, when protected by law to cover legitimate economic interest;
- interests of the person who provided the information; or
- protection of the environment.