

Freedom of Information Policy & Publication Scheme

Introduction

The Freedom of Information Act 2000 (the 'Act') gives individuals the right to access official information from public bodies. Under the Act, any person has a legal right to ask for access to information held by the School. They are entitled to be told whether the School holds the information, and to receive a copy, subject to certain exemptions. While the Act assumes openness, it recognises that certain information is sensitive. There are exemptions to protect this information. Full details on how requests can be made are set out in section 1 of this policy.

Public Authorities should be clear and proactive about the information they will make public. For this reason, a publication scheme is available and can be found at section 2 of this policy.

This policy does not form part of any individual's terms and conditions of employment with the School and is not intended to have contractual effect.

This policy should be used in conjunction with the School's Data Protection Policy.

SECTION 1 – FREEDOM OF INFORMATION REQUESTS

Requests under Freedom of Information should be made to the School Business Manager. However, the request can be addressed to anyone in the School; so, all staff need to be aware of the process for dealing with requests.

Requests for information that are not data protection or environmental information requests will be covered by the Freedom of Information Act: -

Data Protection enquiries (or Subject Access Requests/SARs) are requests where the enquirer asks to see what personal information the school holds about the enquirer. If the enquiry is a Data Protection request, the School's Data Protection Policy should be followed.

Environmental Information Regulations enquiries are those which relate to air, water, land, natural sites, built environment, flora and fauna, health, and any decisions and activities affecting any of these. These could, therefore, include enquiries about recycling, phone masts, school playing fields, car parking etc. If the enquiry is about environmental information, follow the guidance on the Department for Environment, Food and Rural Affairs (DEFRA) website.

Freedom of Information requests *must* be made in writing, (including email), and should include the enquirer's name, correspondence address (email addresses are allowed), and state what information they require. There must be enough information in the request to be able to identify and locate the information. If this information is covered by one of the other pieces of legislation (as referred to above), they will be dealt with under the relevant policy/procedure related to that request.

If the request is ambiguous and/or the School requires further information in order to deal with the request, the School will request this further information directly from the individual making the request. Please note that the School does not have to deal with the request until the further information is received. Therefore, the time limit starts from the date that the School receives all information required in order to deal with the request.

The requester does not have to mention the Act, nor do they have to say why they want the information. There is a duty to respond to all requests, telling the enquirer whether or not the information is held, and supplying any information that is held, except where exemptions apply. There is a time limit of 20 school days (i.e. excluding school holidays) for responding to the request.

Information

Provided all requirements are met for a valid request to be made, the School will provide the information that it holds (unless an exemption applies).

Holding information means information relating to the business of the School:

- That the School has created and is in its possession; or
- That the School has received from another body or person and is in its possession;
or
- Held by another body on the School's behalf.

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

If the information is held by another public authority, such as the Local Authority, first check with them whether they hold it, then transfer the request to them. If this applies, the School will notify the enquirer that they do not hold the information and to whom they have transferred the request. The School will continue to answer any parts of the enquiry in respect of information it does hold.

When the School does not hold the information, it has *no duty to create or acquire it* just to answer the enquiry; although a reasonable search will be made before confirming whether the School has the information requested.

If the information requested is already in the public domain, for instance, through the Publication Scheme or on the School's website, the School will direct the enquirer to the information and explain how to access it.

The requester has the right to be told if the information requested is held by the School (subject to any of the exemptions). This obligation is known as the school's *duty to confirm or deny* that it holds the information. However, the school does not have to confirm or deny if:-

- The exemption is an absolute exemption; or
- In the case of qualified exemptions, confirming or denying would itself disclose exempted information.

Vexatious Requests

There is no obligation on the School to comply with vexatious requests. A vexatious request is one which is designed to cause inconvenience, harassment or expense rather than to obtain information, and would require a substantial diversion of resources or would otherwise undermine the work of the school. However, this does not provide an excuse for bad records management.

In addition, the School do not have to comply with repeated identical or substantially similar requests from the same applicant unless a reasonable interval has elapsed between requests.

Fees

The School may charge the requester a fee for providing the requested information. This will be dependent on whether the staffing costs in complying with the request exceeds the threshold. The threshold is currently £450 with staff costs calculated at a fixed rate of £25 per hour (therefore 18 hours' work is required before the threshold is reached).

If a request would cost less than the threshold, then the school can only charge for the cost of informing the requester whether the information is held, and communicating the information to the requester (e.g. photocopying, printing and postage costs).

When calculating costs/threshold, the School can take account of the staff costs/time in determining whether the information is held by the School, locating and retrieving the information, and extracting the information from other documents. The School will not take account of the costs involved with considering whether information is exempt under the Act.

If a request would cost more than the appropriate limit, (£450) the school can turn the request down, answer and charge a fee or answer and waive the fee.

If the School are going to charge they will send the enquirer a fees notice. The School do not have to comply with the request until the fee has been paid. More details on fees can be found on the ICO website.

If planning to turn down a request for cost reasons, or charge a high fee, the School should contact the enquirer in advance to discuss whether they would prefer the scope of the request to be modified so that, for example, it would cost less than the appropriate limit.

Where two or more requests are made to the School by different people who appear to be acting together or as part of a campaign the estimated cost of complying with any of the requests may be taken to be the estimated total cost of complying with them all.

Time Limits

Compliance with a request must be prompt and within the time limit of 20 school days (this does not include the school holidays or weekends) or 60 working days if this is shorter. Failure to comply could result in a complaint by the requester to the Information Commissioner's Office. The response time starts counting as the first day from the next working day after the request is received (so if a request was received on Monday 6th October the time limit would start from the next working day, the 7th October).

Where the School has asked the enquirer for more information to enable it to answer, the 20 school days start time begins when this further information has been received.

If some information is exempt this will be detailed in the School's response.

If a qualified exemption applies and the School need more time to consider the public interest test, the School will reply in 20 school days stating that an exemption applies but include an estimate of the date by which a decision on the public interest test will be made. This should be within a "reasonable" time.

Where the School has notified the enquirer that a charge is to be made, the time period stops until payment is received.

Third Party Data

Consultation of third parties may be required if their interests could be affected by release of the information requested, and any such consultation may influence the decision.

Consultation will be necessary where:

- Disclosure of information may affect the legal rights of a third party, such as the right to have certain information treated in confidence or rights under Article 8 of the European Convention on Human Rights;
- The views of the third party may assist the School to determine if information is exempt from disclosure; or
- The views of the third party may assist the School to determine the public interest test.

Personal information requested by third parties is also exempt under this policy where release of that information would breach the Data Protection Act. If a request is made for a document (e.g. Governing Body minutes) which contains personal information whose release to a third party would breach the Data Protection Act, the document may be issued by blanking out the relevant personal information as set out in the redaction procedure.

Exemptions

The presumption of the Act is that the School will disclose information unless the Act provides a specific reason to withhold it. The Act recognises the need to preserve confidentiality and protect sensitive material in certain circumstances.

The School may refuse all/part of a request, if one of the following applies: -

- 1) There is an exemption to disclosure within the Act;
- 2) The information sought is not held;
- 3) The request is considered vexatious or repeated; or
- 4) The cost of compliance exceeds the threshold.

A series of exemptions are set out in the Act which allow the withholding of information in relation to an enquiry. Some are specialised in their application (such as national security) and would not usually be relevant to schools.

There are two general categories of exemptions:-

- 1) **Absolute:** where there is no requirement to confirm or deny that the information is held, disclose the information or consider the public interest; and
- 2) **Qualified:** where, even if an exemption applies, there is a duty to consider the public interest in disclosing information.

Absolute Exemptions

There are eight absolute exemptions set out in the Act. However, the following are the only absolute exemptions which will apply to the School: -

- Information accessible to the enquirer by other means (for example by way of the School's Publication Scheme);
- National Security/Court Records;
- Personal information (i.e. information which would be covered by the Data Protection Act);
- Information provided in confidence.

If an absolute exemption exists, it means that disclosure is not required by the Act. However, a decision could be taken to ignore the exemption and release the information considering all the facts of the case if it is felt necessary to do so.

Qualified Exemptions

If one of the below exemptions apply (i.e. a qualified exemption), there is also a duty to consider the public interest in confirming or denying that the information exists and in disclosing information.

The qualified exemptions under the Act which would be applicable to the School are: -

- Information requested is intended for future publication (and it is reasonable in all the circumstances for the requester to wait until such time that the information is actually published);
- Reasons of National Security;
- Government/International Relations;
- Release of the information is likely to prejudice any actual or potential legal action or formal investigation involving the School;
- Law enforcement (i.e. if disclosure would prejudice the prevention or detection of crime, the prosecution of offenders or the administration of justice);
- Release of the information would prejudice the ability of the School to carry out an effective audit of its accounts, resources and functions;
- For Health and Safety purposes;
- Information requested is Environmental information;
- Information requested is subject to Legal professional privilege; and
- For *Commercial Interest* reasons.

Where the potential exemption is a qualified exemption, the School will consider the public interest test to identify if the public interest in applying the exemption outweighs the public interest in disclosing it.

In all cases, before writing to the enquirer, the person given responsibility by the School for dealing with the request will need to ensure that the case has been properly considered and that the reasons for refusal, or public interest test refusal, are sound.

Refusal

If it is decided to refuse a request, the School will send a refusals notice, which must contain:

- The fact that the responsible person cannot provide the information asked for;
- Which exemption(s) apply;
- Why the exemption(s) apply to this enquiry (if it is not self-evident);
- Reasons for refusal; and
- The School's complaints procedure.

For monitoring purposes and in case of an appeal against a decision not to release the information or an investigation by the Information Commissioner, the responsible person must keep a record of all enquiries where all or part of the requested information is withheld and exemptions are claimed. The record must include the reasons for the decision to withhold the information.

SECTION 2 – FREEDOM OF INFORMATION PUBLICATION SCHEME

Introduction

This publication scheme follows a model approved by the Information Commissioners Office.

This scheme is not a list of individual publications but rather a description of the classes of types of information that the School is committed to publishing. This list is not an exhaustive list of all of the types of information that the School publishes. The School will try to proactively publish as much information as it can where the information would have a wider public interest.

This scheme does not include information that the School considers to be sensitive, such as personal information, information prevented from disclosure by law or information about security matters.

Classes of Information

There are seven classes of information that the School holds: -

- Who we are and what we do
- What we spend and how we spend it
- What our priorities are and how we are doing
- How we make decisions
- Our policies and procedures
- Lists and Registers
- The services we offer

Making Information Available

Information will generally be made available on the School website. Where it is not possible to include this information on the School website, or when an individual does not wish to access the information by the website the School will indicate how information can be obtained by other means and provide it by those means. This may be detailed in response to a request or within the scheme itself. This will usually be by way of a paper copy.

In some exceptional circumstances, some information may be available only by viewing in person. Where this manner is specified, contact details will be provided. An appointment to view the information will be arranged within a reasonable timescale.

Information will be provided in the language in which it is held or in such other language that is legally required. Where we are legally required to translate any information, we shall do so.

Charges for Information Published Under this Scheme

The school may charge requesters for information provided under this scheme. The purpose of this scheme is to make the maximum amount of information readily available at the minimum inconvenience and cost to the public. Charges made by the School for routinely published material will be justified and transparent and kept to a minimum.

Material which is published and accessed on the website will be provided free of charge.

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

Charges will be made to cover:

- Photocopying;
- Postage and Packaging; &
- The costs directly incurred as a result of viewing information.

Single copies of information requested which are covered by the publication scheme will be provided free unless otherwise stated within the scheme. If the request involved a large amount of photocopying, printing or postage, then this may be at a cost. If this is the case the School will let the requester know as well as let them know the cost before fulfilling their request.

How to request information

If a requester requires a paper version of any of the documents within the scheme they should contact the School using the contact details below.

Telephone: 01483 542400

Email: info@glebelands.surrey.sch.uk

Address: Glebelands School, Parsonage Road, Cranleigh, Surrey, GU6 7AN

All correspondence should be clearly marked *Publication Scheme Request* in order to help the School process the request quickly. If the information the requester is looking for isn't available via the scheme, the requester can still contact the School to ask whether the school has this information.

The Publication Schedule

Items marked with an * in the schedule are available on the School website.

<p>Class 1 - Who we are and what we do</p>	<p>Description: Organisational information, structures, locations and contacts.</p>
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Pay policy	A copy of the pay policy that the school uses to govern staff pay.
Allowances	Details of allowances and expenses that can be incurred by staff and governors.
Pupil Premium	How the school uses pupil premium funding.* Disadvantaged Learners Strategy and Review 2022-23* Covid 18 Catch-up Premium 2021-22*
Utilities and school running expenditure	Details of the school's overheads and running costs.

Class 3 – What our priorities are and how we are doing	Description: Strategies and plans, performance indicators, audits, inspections and reviews.
Ofsted report	A published report of the outcome of our latest Ofsted inspection.
Performance management Policy	Statement of procedures adopted by the governing body relating to the performance management of staff and the annual report of the Headteacher on the effectiveness of appraisal procedures.
Charging and remissions policies	A statement of the school's policy with respect to charges and remissions for any optional extra or board and lodging for which charges are permitted, for example school publication, music tuition, trips.
Health and Safety Policy and Risk Assessment	Statement of general policy with respect to health and safety at work of employees (and others) and the organisation and arrangements for carrying out the policy.
Staff Conduct, Discipline and Grievance	Statement of procedure for regulating conduct and discipline of school staff and procedures by which staff may seek redress for grievance.
Exam and Assessment Results	National curriculum assessment results for appropriate key stages with national summary figures.
Student numbers and Attendance	Number of pupils on roll and rates of student absence

Class 4 – How we make decisions	Description: Decision-making processes and records of decisions
Admissions Policy/ Decisions (not individual)	This does not include individual decisions. This is a statement of our policy with regards to admissions and how we make decisions regarding admissions.

Class 5 - Our policies and procedures	Description: Current written protocols, policies and procedures for delivering our services and responsibilities
Home-School Agreement*	Written statements of the schools aims and values, the school's responsibilities, the parental responsibilities the school's expectations of its pupils for example homework arrangements.
Complaints Procedure*	Statement of procedures for dealing with complaints
Equality and Diversity Policy	Statement on ensuring that the school follows and promotes

	equality and diversity.
Safeguarding and Child protection Policy*	Statement of policy for safeguarding and promoting welfare of pupils at the school.
Relationships and Sex Education Policy	Statement of policy with regard to sex and relationship education
Absence Management Policy	Statement of policy with regard to how staff absence is managed.
Anti-Bullying Policy*	Statement of general principles on behaviour and discipline and of measures taken by the Headteacher to prevent bullying.
Accessibility Policy*	Statement of policy on accessibility of the school
Appraisal and Capability of Staff Policy*	Statement of policy on general principles on appraisal and capability procedures for staff.
Attendance Policy*	Statement of policy on the school's actions to ensure appropriate student attendance.
Biometrics Policy	Statement of policy on how the school stores and uses biometric data of students.
British Values*	Statement of policy on our British Values within school
Charging and Remissions Policy*	Statement of policy on what the school will and will not charge parents for.
Children with Health Needs who Cannot Attend School	Statement of policy on what will be provided for children with health needs who cannot attend school.
Complaints Procedure	Process to follow to make a formal complaint
Cyber Protection Policy	Statement of policy of how we protect our ICT infrastructure.
Data Protection Policy*	Statement of policy on what data we hold for parents, students, staff and visitors and how we protect that data.
Designated Teacher for Looked After and Previously Looked After Children	Statement of Policy of the role and expectations of the teacher who hold responsibility for LAC and previously LAC.
Educational Visits Policy	Statement of policy on how trips and conducted and what to do in the event of a serious incident during a trip.
Emergency Plan & Facilities	Document outlining processes in the event of a catastrophic incident at school which impacts the day to day running of the school.
Equality information and objectives statement for publication	Statement on how the school ensures equality of access to school.
Exclusion Policy	Statement of policy on the processes for excluding students.
First Aid Policy*	Statement of policy on first aid that will be implemented in school.
Freedom of Information Policy and Publications Scheme*	This Document
Governors Allowances	Statement of policy of what expenses Governors are allowed to claim for in delivering their role as Governor.
Health and Safety	Statement of Policy on how the health and safety of students, staff and visitors of the school will be protected.
Management of Student Behaviour Policy*	Statement of policy on how we manage student behaviour in school, the principles and process implemented.
Medical Conditions Policy	Statement of policy of what provision is available for children with medical needs.
Mental Health Policy*	Statement of policy on how we respond to mental health within school.

Online Safety Policy	
Recruitment and Selection Policy*	Statement of policy on recruitment processed and steps to follow to ensure Safer Recruitment is in place.
Remote Learning Contingency Policy*	Statement of policy on what parents and guardians can expect in the event that the school moves to online learning.
SEND Information Report – A guide for Parents*	Information on how parents and guardians can access SEND provision within school [insert short description]
SEND Strategies*	Statement of strategies in place at school.
Special Education Needs Policy*	Statement of policy on SEND within Glebelands School.
Staff Discipline Policy	Statement of policy on how disciplinary processed will be followed for staff.
Staff Grievance Resolution Policy*	Statement of policy on how grievances can be raised by staff or against staff and how this will be responded to.
Teacher's Pay Policy	Statement of policy on Teachers Pay.
Uniform Expectations*	Statement of expectations with regard to school uniform.
Whistle Blowing Policy	Statement of policy on what actions staff can take when they are concerns about an employee's conduct.

Class 6 – List and Registers	Description
Curriculum circulars and Statutory Instruments	Any statutory instruments, departmental circulars and administrative memoranda sent by the Department of Education to the Headteacher or governing body relating to the curriculum.
CCTV	Details of the locations of any overt CCTV surveillance cameras

Class 7 - The services we offer	Description: Information about the services the school provides including leaflets, guidance and newsletters
Exam Information	<p>External Exams:</p> <ul style="list-style-type: none"> • General Exams Information 2022* • Preparing for exams – A guide for Students* • 2022 Exam and Boost Timetable* • Examinations NEA Rights* • GCSE Examination Timetable 2022* • JCQ NEA Candidate Information* • JCQ Social Media Candidate Information* • JCQ Written Exam Candidate Information* <p>Internal Examinations:</p> <ul style="list-style-type: none"> • Weekly Assembly (For years 7 – 10)* • Revision Grid (For years 7 – 10)* • Test Week Timetable (For years 7 – 10)* • Topic List (For years 7 – 10)* • Year 11 Mock Exam Assembly* • Year 11 Mock Exam Timetable* • Year 11 Revision Grid*
News Letters	Tassomai Online Learning – January 2023* Curriculum Letter – January 2023*

	Newsletter – December 2022* Newsletter – October 2022* Year 11 Information Evening* Year 8&9 Information Evening* Year 7 Information Evening* Return to School September 2022* Newsletter - May 2022* ILS Parent Locker Letter*
Leaflets and Guidance	Students Wellbeing: <ul style="list-style-type: none"> • Source of Advice* • Mental Health Guide for Parents* • Beating Anxiety* • Anxiety Guide for Parents* • Social Media and Teenagers* Uniform Expectations* Attendance* Admissions* Catering* Glebelands Trust* SCOPay*
Facilities Hire	Special Events and Parties* Meetings, Education and Conference Facilities* Sports Facilities* Dance and Drama Facilities*
Extra-curricular Activities and out of school clubs	School Activities* Thrive Brochure Enrichment Clubs*

Internal Review

The requester has the right to ask for an internal review if they are dissatisfied with the handling of a request.

Internal review requests should be made within 40 working days of the initial response. This deadline should be communicated to the requester in that response. We are not obliged to provide a review if it is requested after more than 40 working days.

Requests for internal review must make clear why they are dissatisfied with the original decision, detailing why they feel that the School has not complied with the Act.

Complaints and/or Appeals

Any written (including email) expression of dissatisfaction should be handled through the School's existing complaints procedure. Wherever practicable the review should be handled by someone not involved in the original decision.

The Governing Body should set and publish a target time for determining complaints and information on the success rate in meeting the target. The school should maintain records of all complaints and their outcome.

If the outcome is that the School's original decision or action is upheld, then the applicant can appeal to the Information Commissioner. The appeal can be made via their website or in writing to:

Customer Contact
Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
SK9 5AF