



THE PRIORY  
LEARNING TRUST

# Freedom of Information Publication of Scheme Policy

## Policies approved by the Board of Trustees

Signed:

Name: Barry Wratten

Date: 1<sup>st</sup> September 2020

Chair of Board of Trustees

## Authorised for Issue

Signed:

Name: Neville Coles

Date: 1<sup>st</sup> September 2020

Chief Executive Officer

## History of Policy Changes

Version	Author/Owner	Drafted	Origin of Change / Comments	Changed by
1	Martin Kerslake	June 2017	Creation of policy. Based on the Lighthouse model – original source not recorded	Amy Boyle
2	Sarah Gibbon	May 2018	Update to reflect changes in GDPR	Sarah Gibbon
3	Sarah Gibbon	May 2019	Change the PLT to TPLT. Arrangements to contact individual schools. Update website	
4	Sarah Gibbon	May 2020	Annual Review	Sarah Gibbon

This policy applies to The Priory Learning Trust and all its academies

Date policy adopted	September 2020
Review cycle	Annual
Review date	May 2021

## Contents

1. Background
2. Right to Request Information
3. Classes of Information
4. How to Request Information
5. Subject Access Request
6. Record Retention
7. Feedback and Complaints
8. Conclusion

## 1. Background

The Board of Trustees is responsible for maintenance of the scheme.

With effect from 1 January 2005 the Freedom of Information Act (FOIA) 2000 came fully into force. The Priory Learning Trust (TPLT), and schools within TPLT, are committed to openness and are clear and proactive about the information they make public, but also recognises the need to protect sensitive information in certain circumstances. Even where certain exemptions apply, information will still be released if it is in the public interest to do so.

## 2. Right to Request Information

TPLT is duty bound to provide advice and assistance to anyone requesting information.

Requests can be made under either:

- (a) General Data Protection Regulation Enquiry (GDPRE)
- (b) Environmental Information Regulations Enquiry (EIR), or
- (c) Freedom of Information Enquiry (FOI)

The scheme gives clear guidance to ensure that all employees at TPLT are able to comply with requests for information under FOI. To do this we must produce 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 with payment

The scheme covers information already published and information which is to be published in the future. All information in our publication scheme is either available via TPLT or individual schools websites to download and/or print off, or available in paper form. Some information which we hold may not be made public, for example personal information.

The enquirer is entitled to be told whether the information is held (this is known as the duty to confirm or deny) and, if so, to have access to it. Access can include providing extracts of a document or a summary of the information sought, or access to the original document. However, the FOIA recognises the need to preserve confidentiality of sensitive information in some circumstances and sets out a number of exemptions.

There are only four reasons for not complying with a valid request for information under the FOIA:

- The information is not held
- The cost threshold is reached

- The request is considered vexatious or repeated
- One or more of the exemptions apply

### 3. Classes of Information

The publication scheme guides you to 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'.

The classes of information that we undertake to make available are organised into broad topic areas:

- Who we are and what we do: general information about TPLT and its schools e.g. its staff, leadership and governance, information about the curriculum, school term and events.
- What we spend and how we spend it: financial information relating to projected and actual income and expenditure, tendering, procurement and contracts.
- What our priorities are and how we are doing: strategy and performance information e.g. OfSTED reports, SIAMS reports and school outcomes.
- How we make decisions: decisions of the Leadership of TPLT, schools, and Trustees, as well as admission policies.
- Our policies and procedures: current written policies and procedures for delivering our services and responsibilities.
- Lists and registers: Information held in registers required by law and other lists and registers relating to the function of TPLT and its schools.
- Services we offer: e.g. out of schools clubs, extra-curricular activities, newsletters.

TPLT policy documents can be viewed via the following link:

<http://www.priorylearningtrust.org.uk/index.php>

Policies held by schools within the partnership may be viewed via their individual websites.

### 4. How to Request Information

- 4.1. If you require a paper version of any of the documents within the scheme, please contact TPLT by letter or email to our Freedom of Information Officer, Sarah Gibbon at The Priory Learning Trust, Queensway, Worle, Weston-super-Mare, North Somerset, BS22 6BP ([sarah.gibbon@theplt.org.uk](mailto:sarah.gibbon@theplt.org.uk)). Alternatively, if the information relates to an individual school within the Trust, please contact the Freedom of Information Officer at the appropriate school.

To help us process your request quickly, please clearly mark any correspondence 'PUBLICATON SCHEME REQUEST' (in capitals).

Any requests for FOI paperwork will be charged at a cost for reprographics, paper and postage.

4.2. If the information you are looking for is not available via the scheme and is not on our website you can still contact TPLT. Requests should be made in writing addressed to our Freedom of Information Officer, Sarah Gibbon at The Priory Learning Trust, Queensway, Worle, Weston-super-Mare, North Somerset, BS22 6BP ([sarah.gibbon@theplt.org.uk](mailto:sarah.gibbon@theplt.org.uk)). Alternatively, you can contact the Freedom of Information Officer at each individual school. The request should include the enquirers name and correspondence address with a description of the information requested.

4.3. On receipt of a request the designated person will:

- Decide whether the request is a request under GDPR, EIR or FOI
- Decide whether TPLT holds the information and whether the request should be transferred to another body if the information is not held by TPLT
- Provide the information if it has already been made public
- Consider whether a third party's interests might be affected by disclosure and if so consult with them
- Consider whether any exemptions apply and whether they are absolute or qualified
- Carry out a public interest test to decide if applying the qualified exemption outweighs the public interest in disclosing the information
- Consider whether the request is vexatious or repeated

4.4. Requests will be dealt with within twenty working days excluding school holidays. TPLT will inform you when to expect the information if more time is needed.

4.5. The FOIA covers all information held and is retrospective.

4.6. The enquirer is entitled to be told whether TPLT or individual schools hold the information (the duty to confirm or deny) except where certain exemptions apply.

4.7. The enquirer will be informed if the information is not held.

4.8. All information held by TPLT, or individual schools within TPLT, must be recorded legibly.

4.9. TPLT and its schools maintain well managed records and management information to aid the Trust and its schools to meet requests.

4.10. TPLT and its schools will not wilfully conceal, damage or destroy information in order to avoid answering an enquiry.

4.11. Expressions of dissatisfaction will be handled through TPLT's complaint procedure.

- 4.12. TPLT and its schools will maintain records in accordance with TPLT's Information Retention Schedule.
- 4.13. TPLT will charge applicants a fee in accordance with the FOI Fees Regulations and may include disbursements for photocopying, postage and packaging and costs directly incurred as a result of viewing the information. Information published on our website is free, although you may incur costs from your Internet Service Provider. If you do not have internet access, you can access our website using a local library or internet café.
- 4.14. Straightforward enquiries and single copies of information covered by this publication are provided free unless stated otherwise in section 4.13. If your request means that we have to do a lot of photocopying or printing or pay a large postage charge, or is for a priced item such as some printed publications or videos we will let you know the cost before fulfilling your request. Where there may be a charge levied, this will be confirmed in writing prior to the preparation of data for release. Where enquiries require further consideration or a written response, a charge will be made, the school will send the enquirer a fees notice, the school will not comply with the request until the fee has been paid.
- 4.15. TPLT will maintain a record of requests received, responded to and denied. The Board of Trustees will review the register annually.
- 4.16. If the request is made for a document that contains exempt personal information, TPLT will ensure that the personal information is fully redacted.

## **5. Subject Access Request**

Details relating to an information subject access request (SAR) made under General Data Protection Regulations 2018 are available in the Trust's Data Protection Policy.

## **6. Record Retention**

TPLT and its schools have an Information Retention Schedule based on the guidelines issued by the Information and Records Management Society (IRMS).

## **7. Feedback and Complaints**

We welcome any comments or suggestions you may have about the scheme. If you want to make any comments about this publication scheme, or if you require further assistance, or wish to make a complaint, then initially this should be addressed to the

Chief Analytics Officer at The Priory Learning Trust, Queensway, Worle, Weston-super-Mare, North Somerset, BS22 6BP.

If you are not satisfied with the assistance you get, or if we have not been able to resolve your complaint and you feel that a formal complaint needs to be made, then this

should be addressed to the Information Commissioner's Office. This is the organisation that ensures compliance with the Freedom of Information Act 2000 and that deals with formal complaints. They can be contacted at:

Address: Information Commissioner, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF;

Telephone: 01625 545700

Email: [publications@ic-foi.demon.co.uk](mailto:publications@ic-foi.demon.co.uk)

Website: [www.informationcommissioner.gov.uk](http://www.informationcommissioner.gov.uk)

## 8. Conclusion

This policy should be read in conjunction with the Freedom of Information Act 2000. Adherence to these guidelines will ensure that TPLT complies with the Freedom of Information Act 2000.

<https://www.legislation.gov.uk/ukpga/2000/36/contents>

## Guide to information available from The Priory Learning Trust and its schools, under the Freedom of Information publication scheme

Information to be published	How the information can be obtained
<b>Who we are and what we do</b>	
Organisational information, structures, locations and contacts	Hard copy and TPLT website <a href="http://www.priorylearningtrust.org.uk">www.priorylearningtrust.org.uk</a>
Academy Funding Agreement - a link to the document on the Department for Education's website	TPLT website <a href="http://www.priorylearningtrust.org.uk">www.priorylearningtrust.org.uk</a>
Academy Order (if applicable)	TPLT website <a href="http://www.priorylearningtrust.org.uk">www.priorylearningtrust.org.uk</a>
School staff and structure – names of key personnel	Individual schools' websites
Board of Trustees – names of trustees	TPLT website <a href="http://www.priorylearningtrust.org.uk">www.priorylearningtrust.org.uk</a>
Academy Council - names of the Councillors	Individual schools' websites
School session times, term dates and holidays	Individual schools' websites
Location and contact information- address, telephone number and website	Individual schools' websites
Contact details for the Principal and the local Academy Councillors	Individual schools' websites

Information to be published	How the Information can be obtained
<b>What we spend and how we spend it</b>	
Company accounts that have been filed with the Charity Commission and Companies House	The past three years information are published on the TPLT website <a href="http://www.priorylearningtrust.org.uk">www.priorylearningtrust.org.uk</a>
Annual budget plan and financial statements	Available on request
Capital funding – details of capital funding allocated to the school along with information on related building projects and other capital projects	Available on request
Additional funding – Income generation schemes and other sources of funding.	Available on request
Procurement and contracts- details of procedures used for the acquisition of goods and services. Details of contracts that have gone through a formal tendering process.	Available on request
Pay policy – a statement of TPLT’s policy on procedures regarding teachers’ and support staff pay.	Available on request
Trustees/Councillors' allowances - Details of allowances and expenses that can be claimed or incurred.	TPLT website <a href="http://www.priorylearningtrust.org.uk">www.priorylearningtrust.org.uk</a>

Information to be published	How the Information can be obtained
<b>What our priorities are and how we are doing</b>	
<p>Strategies and plans, performance indicators, audits, inspections and reviews.</p> <p>Current information should be published.</p>	<p>TPLT website www.priorylearningtrust.org.uk</p>
<p>School profile</p> <p>Government supplied performance data</p> <p>OFSTED report- summary and full report</p> <p>SIAMS report</p>	<p>DfE website school performance tables (www.compare-school-performance.service.gov.uk)</p> <p>Individual schools' website</p>
<p>Appraisal Policy</p>	<p>Available on request</p>
<p>Trust's future plans</p>	<p>Available on request (access to this information may be restricted if classed as confidential)</p>
<p>Child protection- policies and procedures on safeguarding and promoting the welfare of children.</p>	<p>TPLT website www.priorylearningtrust.org.uk</p>

Information to be published	How the Information can be obtained
<b>How we make decisions</b>	
Decision making processes and records of decisions  Current and previous three years as a minimum	Available on request (access to this information may be restricted if classed as confidential)
Admissions policy – arrangements and procedures and right of appeal – include information on application numbers and number of successful applicants by each oversubscription criteria.	TPLT website <a href="http://www.priorylearningtrust.org.uk">www.priorylearningtrust.org.uk</a>
Board of Trustees meeting agendas, papers and minutes – information that is properly considered private should be excluded.	Available on request
Academy Council meeting agendas, papers and minutes – information that is properly considered to be private should be excluded.	Available on request

Information to be published	How the Information can be obtained
<b>Our Policies and Procedures</b>	
<p>Current written protocols, policies and procedures for delivering our services and responsibilities</p> <p>Current information only</p>	<p>TPLT website <a href="http://www.priorylearningtrust.org.uk">www.priorylearningtrust.org.uk</a></p> <p>Individual schools' websites</p>
<p>Trust Policies:</p> <p>Charging and remissions policy Health and Safety Policy Complaints Policy and Procedure</p>	<p>TPLT website <a href="http://www.priorylearningtrust.org.uk">www.priorylearningtrust.org.uk</a></p>
<p>Trust Policies:</p> <p>Staff conduct policy Staff discipline and grievance policies Pay policy</p>	<p>Available on request</p>
<p>Pupil and curriculum policies, including:</p> <p>Curriculum Sex education Special education needs Accessibility Race Equality Collective worship Behaviour</p>	<p>Individual schools' websites</p>
<p>Records management:</p> <p>Records retention Data Protection Policy</p>	<p>Available on request</p>

Information to be published	How the Information can be obtained
<b>Lists and Registers</b>	
Currently maintained lists and registers only	Currently maintained lists and registers only
Curriculum circulars and statutory instruments	Available on request from the Trust schools
Disclosure Logs	Available on request from the Trust schools
Asset register	Available on request
Any information the school is currently legally required to hold in publicly available registers	Available on request from the Trust schools

Information to be published	How the Information can be obtained
<b>The services we offer</b>	
Information about the services we offer, including leaflets, guidance and newsletters produced for the public and businesses	TPLT website <a href="http://www.priorylearningtrust.org.uk">www.priorylearningtrust.org.uk</a> (some information may only be available for inspection)
Extra-curricular activities	Individual schools' websites
Out of school clubs	Individual schools' websites
School publications	Individual schools' websites
Services for which the school is entitled to recover a fee, together with those fees	Individual schools' websites
Leaflets, booklets and newsletters	Individual schools' websites