

Academies Trust

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Freedom of Information and Environmental Information Policy (including our Publication Scheme)

Approved by the Trust Board on 3 October 2024

Applicable from 4 October 2024

This document will be reviewed annually, or more frequently when significant changes are made to the law.

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Freedom of Information and Environmental Information Policy (including our publication scheme)

1. Purpose

- 1.1. The Co-op Academies Trust (including all of its academies) [the Trust] is committed to transparency in our dealings with the public and fully embraces the aims of the Freedom of Information Act 2000, the Environmental Information Regulations 2004, and the access provisions of the Data Protection Act 2018 (DPA). We will make every effort to meet our obligations under the respective legislation and will regularly review procedures to ensure that we are doing so.
- 1.2. The underlying principle of this policy is that the public has a right to access recorded information held by the Trust, and that the Trust should seek to promote an open regime regarding access to information, subject to the exemptions contained within the relevant legislation.
- 1.3. Guidance to staff on how to manage requests for information can be found in the Data Protection and Information Governance Handbook.
- 1.4. This policy should be read alongside the Trust's Data Protection Policy.

2. Introduction

- 2.1. The Freedom of Information Act 2000 (FOIA) applies to all public authorities (which includes academy trusts) and came fully into force on 1st January 2005. It provides the public with a statutory right of access to recorded information held by authorities, subject to certain exemptions, within twenty working days.
- 2.2. The FOIA is fully retrospective and applies to all information that falls within the scope of the FOIA, not just information created from 1st January 2005.
- 2.3. The FOIA does not operate in isolation. The Environmental Information Regulations 2004 (EIR) support individuals seeking information about the environmental performance of public authorities. Requests for Environmental Information, for example, information about land development, pollution levels, energy production, and waste management will be dealt with under the Environmental Information Regulations 2004, all other requests will be dealt with under the Freedom of Information Act 2000
- 2.4. One of the aims of the Freedom of Information Act 2000 (FOIA) is that public authorities, including academy trusts, should be clear and proactive about the information they will make public. 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 on payment.

- 2.5. The scheme (Section 4, below) covers information already published and information which is to be published in the future.
- 2.6. Some information which we hold may not be made public, for example, because it contains personal information.
- 2.7. This publication scheme conforms to the model scheme for schools approved by the Information Commissioner.

3. Our Values

- 3.1. The Trust is committed to the co-operative values and principles. The Trust expects all of its academies and those working centrally to have these at the core of their work. Our values are:
 - Self-help
 - Self-responsibility
 - Democracy
 - Equality
 - Equity
 - Solidarity
- 3.2. The Trust and its academies also work to the co-operative ethical values of:
 - Openness
 - Honesty
 - Social responsibility
 - Caring for others
- 3.3. In addition to our obligations under the FOIA and EIR, we seek to be as transparent as possible with our community and stakeholders. This annex outlines how we will respond to requests.

4. Publication Scheme

This 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 3 broad topic areas:

- Website – each academy has their own website, and we also have our Trust website
- Governance Documents
- Policies and other information related to our Trust and its academies

4.1. Classes of Information Currently Published

The information required to be published online can be found here: [What academies, free schools and colleges must or should publish online - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/consultations/what-academies-free-schools-and-colleges-must-or-should-publish-online) .

Governance Documents:

This section sets out information published in our governance documents:

- The name of our Trust and its academies
- The category of each academy
- Our governance structure
- The term of office of our trustees and community council members
- Those responsible for appointing our trustees and community council members
- Details of delegated authority and decision making
- Written rules about how the company (the Trust) is run.
- The date any instrument takes effect

Minutes of governance meetings:

Agreed governance minutes can be obtained upon request.

Policies and Information:

This section sets out details of policies and information that can be found on our websites:

- Anti Fraud and Corruption Framework
- Anti Slavery and Human Trafficking
- Behaviour
- Charges and Remissions Policy
- Complaints Policy
- Early Career Teacher (ECT) Induction Policy
- Educational Visits Policy
- Equality Diversity & Inclusion Policy
- Health and Safety Policy
- Reserves Policy
- Risk Management Policy
- Suspension and Permanent Exclusion Policy
- Treasury and Investment Management Policy
- Whistleblowing Policy
- Data Protection Policy
- CCTV Policy
- Privacy Notices
- Child Protection and Safeguarding Policy
- Our Vision and Values
- 16-19 Bursary Policy & Procedures
- Attendance Policy

- Lettings Policy
- SEN and Disability Policy
- SEN Local Offer Information

Other information related to our Trust and its academies:

- Our vision and values
- Our strategic plan
- Published Ofsted reports
- Academy session times and term dates
- Details of academy events and Inset days throughout the academic year

5. How to request information

- 5.1. Where information is not published on one of our websites, you may make a request by contacting the Trust or the relevant academy by email or letter.
- 5.2. To help us process your request quickly, it would be helpful if you could clearly mark any correspondence 'FREEDOM OF INFORMATION REQUEST' or 'ENVIRONMENTAL INFORMATION REQUEST'.
- 5.3. We will, no later than 20 school days from receipt of the request:
 - Confirm or deny whether we hold information of the description specified in the request
 - Provide the documentation, if we hold the requested information.
- 5.4. Except where:
 - we reasonably require further information to meet a request, have informed the requestor of this requirement, but have not been supplied with that further information;
 - the information is no longer readily available as it is contained in files that have been placed in archive storage or is difficult to access for similar reasons;
 - a request for information is exempt under section 2 of the Freedom of Information Act 2000;
 - the cost of providing the information exceeds the appropriate limit (in relation to Freedom of Information requests);
 - the request is vexatious;
 - the request is a repeated request from the same person made within 60 consecutive working days of the initial one; or
 - a fee notice was not honoured.
- 5.5. Where information is, or is thought to be, exempt, we will, within 20 school days, give notice to the requestor which:
 - States the fact, and
 - Specifies the exemption in question.

6. Format

- 6.1. The information provided will be in the format requested, where possible. Where it is not possible to provide the information in the requested format, we will assist the requestor by discussing alternative formats in which it can be provided.
- 6.2. The information provided will also be in the language in which it is held, or another language that is legally required. Translations and alternative formats required under relevant disability and discrimination regulations will be provided where necessary.

7. The appropriate limit

- 7.1. We will not comply with any freedom of information request that exceeds the statutorily imposed appropriate limit of £450.
- 7.2. In determining whether the cost of complying with a freedom of information request is within the appropriate limit, we will take account only of the costs we reasonably expect to incur in relation to:
 - Determining whether we hold the information.
 - Locating the information, or a document which may contain the information.
 - Retrieving the information, or a document which may contain the information.
 - Extracting the information from a document containing it.
 - Costs related to the time are to be estimated at a rate of £25 per person per hour.
- 7.3. Where multiple requests for information are made to the school within 60 consecutive working days of each other, either by a single person or by different persons who appear to be acting in concert, the estimated cost of complying with any of the requests is to be taken to be the total costs to us of complying with all of them.

8. Advice and Assistance

- 8.1. We have a duty to provide advice and assistance and will do so in the following circumstances:
 - If an individual requests to know what types of information we hold and the format in which it is available, as well as information on the fees regulations and charging procedures.
 - If a request has been made, but we are unable to regard it as a valid request due to insufficient information, leading to an inability to identify and locate the information.
 - If a request has been refused, e.g. due to an excessive cost, and it is necessary for us to assist the individual who has submitted the request.

- 8.2. We will provide assistance for each individual on a case-by-case basis; examples of how we will provide assistance include the following:
- Informing a requestor of their rights under the Freedom of Information Act 2000 or Environmental Information Regulations 2004.
 - Assisting an individual in the focus of their request, e.g. by advising of the types of information available within the requested category
 - Advising a requestor if information is available elsewhere and how to access this information
 - Keeping a requestor informed on the progress of their request
- 8.3. This list is not exhaustive, and we may decide to take additional assistance measures that are appropriate to the case.
- 8.4. In order to provide assistance as outlined above, we will engage in the following good practice procedures:
- Make early contact and keep the requestor informed of the process of their request.
 - Accurately record and document all correspondence concerning the clarification and handling of any request.
 - Give consideration to the most appropriate means of contacting the requestor, taking into account their individual circumstances.
 - Remain prepared to assist a requestor who has had their request denied due to an exemption.
- 8.5. We will give particular consideration to what level of assistance is required for a requestor who has difficulty submitting a written request.
- 8.6. In circumstances where a requestor has difficulty submitting a written request, we will:
- Make a note of the application over the telephone and then send the note to the requestor to confirm and return – the statutory time limit for a reply would begin here.
 - Direct the individual to a different agency that may be able to assist with framing their request.
- 8.7. This list is not exhaustive and we may decide to take additional assistance measures that are appropriate to the case.
- 8.8. Where a requestor's request has been refused either because the information is accessible by other means, or the information is intended for future publication or research, we, as a matter of good practice, will provide advice and assistance.
- 8.9. We will advise the requestor how and where information can be obtained, if it is accessible by other means.
- 8.10. Where there is an intention to publish the information in the future, we will advise the requestor of when this publication is expected.

- 8.11. If the request is not clear, we will ask for more detail from the requestor in order to identify and locate the relevant information, before providing further advice and assistance.
- 8.12. If we are able to clearly identify the elements of a request, we will respond following usual procedures and will provide advice and assistance for the remainder of the request. If any additional clarification is needed for the remainder of a request, we will ensure there is no delay in asking for further information.
- 8.13. If a requestor decides not to follow our advice and assistance and fails to provide clarification, we are under no obligation to contact the requestor again.
- 8.14. If we are in any doubt that the requestor did not receive the advice and assistance, we will re-issue it.
- 8.15. We are not required to provide assistance where a requestor's request is vexatious or repeated, as defined under section 14 of the Freedom of Information Act 2000 or manifestly unreasonable under regulation 12(4)(b) of the Environmental Information Regulations 2004.
- 8.16. We are also not required to provide information where the cost of complying with a request exceeds the limit outlined in the Freedom of Information Act 2000. In such cases, we will consider whether any information can be provided free of charge if the requestor refuses to pay the fee.
- 8.17. A record will be kept on the Trust's chosen data protection platform, GDPRiS, of all the advice and assistance provided.

9. Paying for information

- 9.1. Information published on our website is free, although you may incur costs from your Internet service provider. If you don't have Internet access, you can access our website using a local library or an Internet café.
- 9.2. Single copies of information covered by this publication are provided free unless stated otherwise in section 6. If however your request means that we have to do a lot of photocopying or printing, the following charges may apply:
 - 5p per single side of A4,
 - 10p per single side of A3,
 - plus any postal charge at the current rate applied by Royal Mail.
- 9.3. For a priced item such as some printed publications or videos we will let you know the cost before fulfilling your request. Where there is a charge this will be indicated on application on an individual basis.

10. Feedback and Complaints

If you want to make any comments about this publication scheme or if you require further assistance or wish to make a complaint please contact the Data Protection Officer:

Head of Data Protection
(incorporating the role of Data Protection Officer)
Email: data@coopacademies.co.uk
Phone: 07815 654419

If however you are dissatisfied with our response to your concerns you can of course contact the ICO (details below) quoting our ICO registration number: ZA201403.

Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF
Tel: 0303 123 1113 (local rate) or 01625 545 745 if you prefer to use a national rate number
Website: <https://ico.org.uk/concerns/>