



**Campion School**

# **Freedom of Information Policy and Procedure**

Dated: June 2023

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# Campion School

## Freedom of Information Policy and Procedure

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Review to be lead by: Steve Bolsover (Deputy Headteacher)

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Date: June 2023

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## 1. Introduction

Campion School is committed to the Freedom of Information Act 2000 and to the principles of accountability and the general right of access to information, subject to legal exemptions. This policy outlines our response to the Act and a framework for managing requests.

## 2. Background

The Freedom of Information Act 2000 (Fol) came fully into force on January 1 2005. 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.

The information which the school routinely makes available to the public is included in the FOI Publication Scheme. Requests for other information should be dealt with in accordance with the statutory guidance. While the Act assumes openness, it recognises that certain information is sensitive. There are exemptions to protect this information.

The Act is fully retrospective so that any past records which the school holds are covered by the Act. The DfE has issued a Retention Schedule produced by the Records Management Society of Great Britain, to guide Academies on how long they should keep records. It is an offence to wilfully conceal damage or destroy information in order to avoid responding to an enquiry, so it is important that no records that are the subject of an enquiry are amended or destroyed.

Requests under Fol can be addressed to anyone in the school; all staff need to be aware of the process for dealing with requests. All requests need to be forwarded to [head@campion.warwickshire.sch.uk](mailto:head@campion.warwickshire.sch.uk) or to FOI, c/o Headteacher, Campion School, Sydenham Drive, Leamington Spa. CV31 1QH. Requests must be made in writing, (including email), and should include the enquirer's name and correspondence address and state what information they require. They do 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 no need to collect data in specific response to a Fol enquiry. There is a time limit of twenty school (20) days, excluding school holidays, for responding to the request.

## 3. Scope

The Fol Act joins the General Data Protection Regulation (GDPR) 2018 and the Environmental Information Regulations as legislation under which anyone is entitled to request information from the school.

Requests for personal data are still covered by the GDPR. Individuals can request to see what information the school holds about them. This is different to a Fol request and is known as a Subject Access Request (SAR). The procedure for a SAR is outlined in the Data Protection Policy.

Requests for information about anything relating to the environment – such as air, water, land, the natural world or the built environment and any factor or measure affecting these – are covered by the Environmental Information Regulations (EIR).

They also cover issues relating to Health and Safety. For example, queries about chemicals used in the school, on its land, car parks etc. would all be covered by the EIR. Requests under EIR are dealt with in the same way as those under FoIA, but unlike FoIA requests, they do not need to be written and can be verbal. All requests should be directed through the Headteacher on [head@campion.warwickshire.sch.uk](mailto:head@campion.warwickshire.sch.uk) or 01926 743200.

If any element of a request to the school includes personal or environmental information, these elements must be dealt with under GDPR or EIR. Any other information is a request under Fol and must be dealt with accordingly.

#### **4. Obligations and Duties**

The school recognises its duty to:

- provide advice and assistance to anyone requesting information. *The school will respond to straightforward verbal requests for information and will help enquirers to put more complex verbal requests into writing so that they can be handled under the Act.*
- tell enquirers whether, or not, the school hold the information they are requesting (the duty to confirm or deny) and provide access to the information the school holds in accordance with the procedures laid down in Appendix 1.

#### **5. Publication Scheme**

Campion School has adopted the Model Publication Scheme for Schools approved by the Information Commissioner.

The Publication Scheme and the materials it covers are readily available on our website at [www.campion.warwickshire.sch.uk](http://www.campion.warwickshire.sch.uk) or by request through the headteacher [head@campion.warwickshire.sch.uk](mailto:head@campion.warwickshire.sch.uk)

#### **6. Dealing with Requests**

Campion School will respond to all requests in accordance with the procedures laid down in Appendix 1.

The school will ensure that all staff are aware of the procedures.

#### **7. Exemptions**

Certain information is subject to either absolute or qualified exemptions. The exemptions are listed in Appendix 2.

When the school wish to apply a qualified exemption to a request, the school will invoke the public interest test procedures to determine if public interest in applying the exemption outweighs the public interest in disclosing the information.

The school will maintain a register of requests where the school have refused to supply information, and the reasons for the refusal. The register will be retained for five (5) years.

#### **8. Public Interest Test**

Unless it is in the public interest to withhold information, it has to be released. The school will apply the Public Interest Test before any qualified exemptions are applied.

For information on applying the Public Interest Test see Appendix 3.

#### **9. Charging**

The school reserve the right to refuse to supply information where the cost of doing so exceeds the statutory maximum, currently £450.

## **10. Responsibilities**

The headteacher, along with the Governing Body of the school, are responsible for ensuring compliance with the FOI.

The day to day responsibility for compliance with the FOI has been delegated to the school Data Champions as set out in the Data Protection Policy.

## **11. Complaints**

Any comments or complaints will be dealt with through the school's normal Complaints Procedure which is published on its the website ([www.campion.warwickshire.sch.uk](http://www.campion.warwickshire.sch.uk)). This sets out the complaints procedure to be followed and the timelines for dealing with and replying to complaints.

The school will maintain records of all complaints and their outcome.

If, on investigation, the school's original decision is upheld, then the school has a duty to inform the complainant of their right to appeal to the Information Commissioner's office.

Appeals should be made in writing to the Information Commissioner's office. They can be contacted using <http://ico.org.uk/complaints> or through their helpline: 0303 123 1113

## Appendix 1: Procedure for Dealing with Requests

1. To handle a request for information the school will ask themselves a series of questions. These are set out below and shown on pages 12 - 13 as Process maps.

### Is it a FOI request for information?

2. A request for information may be covered by one, or all, of three information rights:
  - Data Protection enquiries (or subject access requests) are ones 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 will apply the Data Protection Policy.
  - Environmental Information Regulations enquiries are ones which relate to air, water, land, natural sites, built environment, flora and fauna, and health, and any decisions and activities affecting any of these. These could therefore include enquiries about recycling, school playing fields, car parking etc. If the enquiry is about environmental information the school will follow the guidance on the ICO website [here](#) or the DEFRA website [here](#).
  - FOI enquiries are concerned with all other information and the reasoning behind decisions and policies. The request does not have to mention the FOI Act. All requests for information that are not data protection or environmental information requests are covered by the FOI Act.

### Is this a valid FOI request for information?

3. An FOI request should:
  - be **in writing**, including email or FAX;
  - **state the enquirer's name and correspondence address** (email addresses are allowed);
  - **describe the information requested** - there must be enough information to be able to identify and locate the information<sup>1</sup>; and
  - not be covered by one of the other pieces of legislation.
4. Verbal enquiries are not covered by the FOI Act. Such enquiries can be dealt with satisfactorily. However, for more complex enquiries, and to avoid disputes over what was asked for, the school will ask the enquirer to put the request in writing or email, when the request will become subject to FOI.

<sup>1</sup> In cases where the enquiry is ambiguous the school will assist the enquirer to describe more clearly the information requested. Where possible, the school will establish direct contact. The aim is to clarify the nature of the information requested and not to determine the aims or motivation of the enquirer. If the school notify the enquirer that the school need further information to enable us to answer, the school do not have to deal with the request until the further information is received. The response time limit starts from the date this is received.

### Does the School hold the information?

5. 'Holding' information means information relating to the business of the school:
  - the school has **created**, or
  - the school has **received from another** body or person, or
  - **held by another** body **on the school's behalf**.
6. Information means both hard copy and digital information, including email.

7. If the school does not hold the information, the school must not create or acquire it just to answer the enquiry, although a reasonable search should be made before denying that the school have got information the school might be expected to hold.

#### **Has the information requested already been made public?**

8. If the information requested is already in the public domain, for instance through the school website, the school will direct the enquirer to the information and explain how to access it.

#### **Is the request vexatious or manifestly unreasonable or repeated?**

9. The Act states that there is no obligation to comply with vexatious requests. This is taken to mean a request 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<sup>2</sup>. This however does not provide an excuse for bad records management.

<sup>2</sup> It is not intended to include otherwise valid requests in which the applicant may make complaints or vent frustrations. 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.

#### **Can the School transfer a request to another body?**

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

#### **Could a third party's interests be affected by disclosure?**

11. 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. The school does not need to consult where the school are not going to disclose the information because the school will be applying an exemption.
12. 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.

#### **Does an exemption apply?**

13. The presumption of the legislation is that the school will disclose information unless the Act provides a specific reason to withhold it. There are more than twenty (20) exemptions. They are set out in Appendix 2 and are mainly intended to protect sensitive or confidential information.
14. Only where the school have real concerns about disclosing the information should the school look to see whether an exemption might apply. Even then, where the potential exemption is a qualified exemption, the school needs to consider the 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. Appendix 3 contains guidance on conducting a public interest test.



### **What if the request is for personal information?**

15. Personal information requested by the subject of that information is exempt under the FOI Act as such information is covered by the GDPR. Individuals must, therefore, continue to make a 'subject access request' under the GDPR if they wish to access such information.

### **What if the details contain personal information?**

16. Personal information requested by third parties is also exempt under the FOI Act where release of that information would breach the GDPR. If a request is made for a document which contains personal information whose release to a third party would breach the GDPR, the document may be issued by blanking out the relevant personal information as set out in the redaction procedure. The procedure for redaction is below<sup>3</sup>.

<sup>3</sup>The procedure for redaction is:

i) mask the passages which are not to be disclosed and photocopy; (ii) annotate in the margin against each blank passage, the exemption and section of the Act under which this passage is exempt; iv) explain in the covering letter that the relevant exemptions are marked in the attachments and in the case of non-absolute exemptions, how the public interest test has been considered.

On no account must the school use the computer to rewrite the document or email and simply delete the exempted passages so that the resulting document appears as though they did not exist. The one circumstance where this would be permissible would be where the only redacted parts are personal information such as people's names and the covering letter explains this.

### **How much can the school charge?**

17. The Act allows the school to charge for providing information.
18. The first step is to determine if the threshold (currently £450) would be exceeded. Staff costs should be calculated at £25 per hour. You can take account of the costs of determining if the information is held, locating and retrieving the information and extracting the information from other documents. You cannot take into account the costs involved in determining whether information is exempt.
19. If a request would cost less than the appropriate limit (currently £450) the school can only charge for the cost of informing the applicant whether the information is held and communicating the information to the applicant (e.g. photocopying, printing and postage costs). 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 it decides to charge a fee and does not have other powers to do so, it can charge on the basis of the costs outlined in Appendix 4.
20. The school will however wish to consider whether calculating the cost of the fee outweighs the cost of providing the information. In summary, the school will respond to straightforward enquiries free of charge and charge where the costs are significant.
21. If the school are going to charge, the school must send the enquirer a fees notice and do not have to comply with the request until the fee has been paid. Appendix 4 gives more information on charging.

## **Is there a time limit for replying to the enquirer?**

22. Compliance with a request must be prompt and certainly within the legally prescribed limit of twenty (20) working days, excluding school holidays.<sup>4</sup> Failure to comply could result in a complaint to the Information Commissioner. The response time starts from the time the request is received. Where the school have asked the enquirer for more information to enable it to answer, the twenty days start time begins when this further information has been received.

<sup>4</sup> An order to this effect is to be made under section 10(4) of the Act and should take effect from 1 January 2005

23. If a qualified exemption applies and the school needs more time to consider the public interest test, it should reply within the twenty 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 – in practice, it is recommended that normally this should be within ten (10) working days.
24. Where the school have notified the enquirer that a charge is to be made the time period stops, until payment is received, and then continues again once payment has been received.

## **What action is required to refuse a request?**

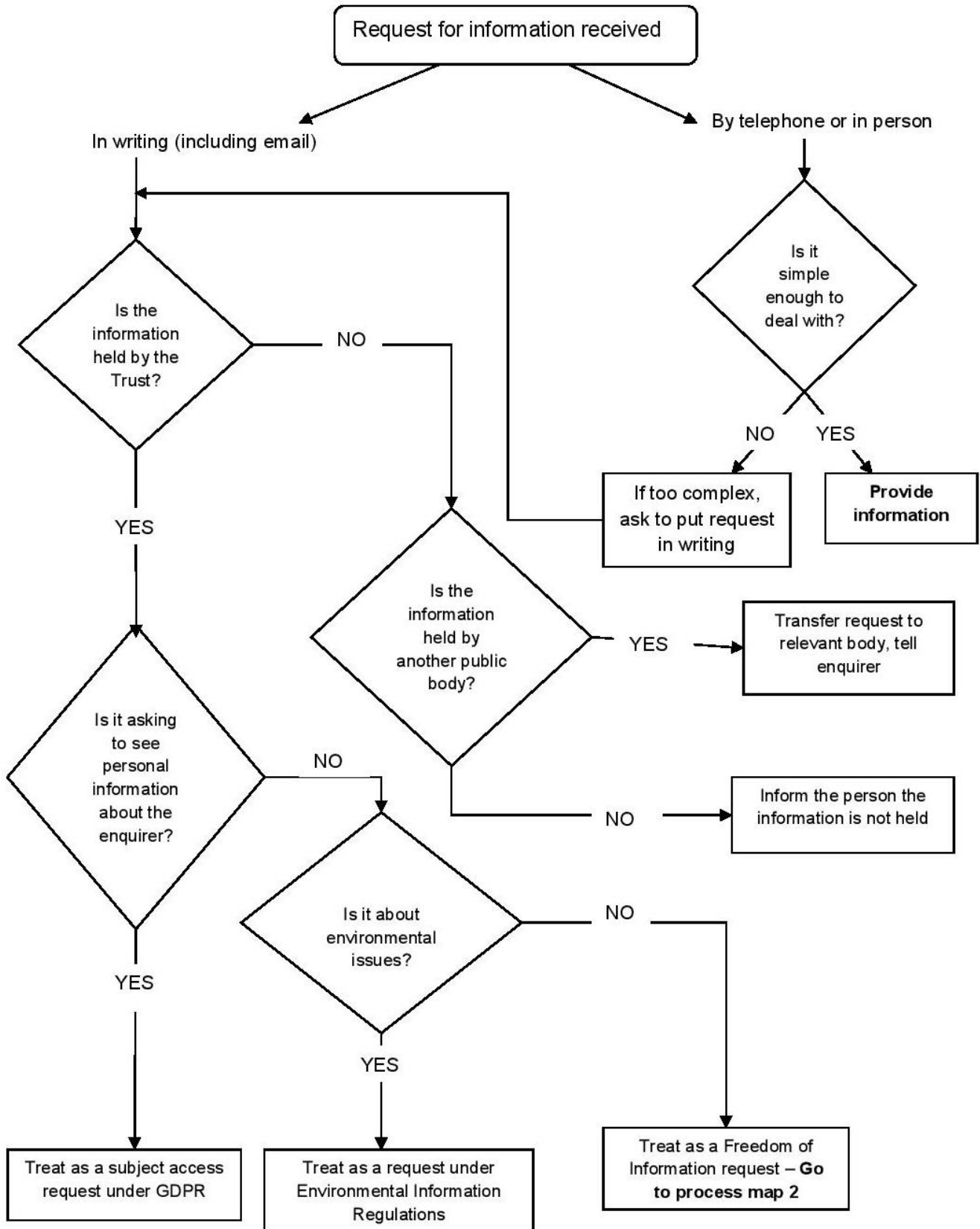
25. If the information is not to be provided, the school must ensure that the case has been properly considered and the reasons for refusal are sound. If it is decided to refuse a request, a refusals notice will be sent, which must contain:
- i) the fact that the responsible person cannot provide the information asked for;
  - ii) which exemption(s) you are claiming apply;
  - iii) why the exemption(s) apply to this enquiry (if it is not self-evident);
  - iv) reasons for refusal if based on cost of compliance (see Appendix 4);
  - v) in the case of non-absolute exemptions, how the public interest test has been applied, specifying the public interest factors taken into account before reaching the decision (see Appendix 3);
  - vi) reasons for refusal on vexatious or repeated grounds; and
  - vii) the internal complaints procedure.
26. 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. Records should be retained for five (5) years.

## **What do I do if someone complains?**

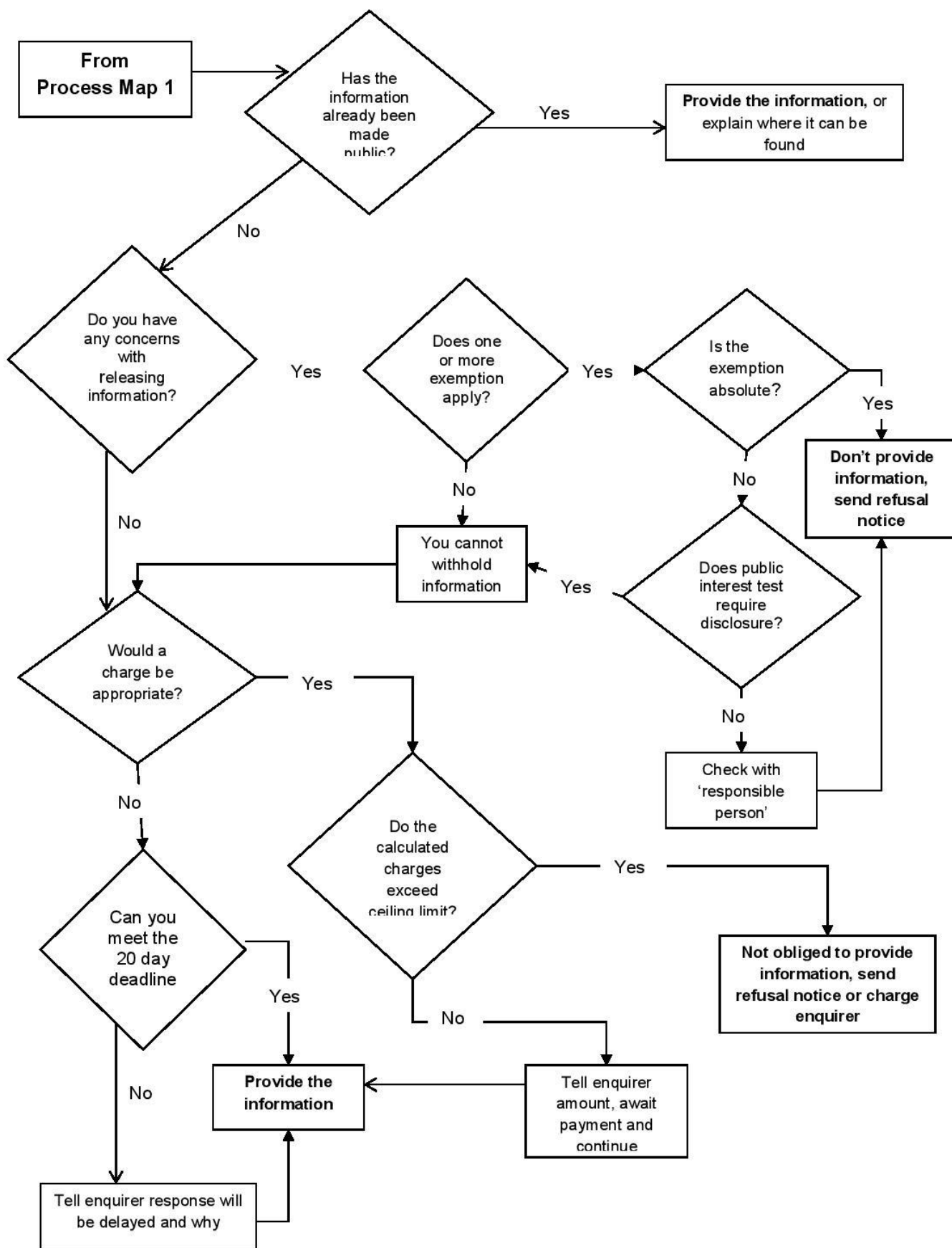
27. Any written expression of dissatisfaction (including email) - even if it does not specifically seek a review – should be handled through the school's existing Complaints Procedure.

When the original request has been reviewed and the outcome is that the information should be disclosed, this should be done as soon as practicable. When the outcome is that procedures within the school have not been properly followed, the school should review procedures to prevent any recurrence. When the outcome upholds the school's original decision or action, the applicant should be informed of their right to appeal to the Information Commissioner. ICO Helpline: **0303 123 111**.

## Process Map 1 for Dealing with Requests



## Process Map 2 for Dealing with Requests



## Appendix 2: Exemptions

1. Although decisions on disclosure should be made on a presumption of openness, the FOI Act recognises the need to preserve confidentiality and protect sensitive material in some circumstances.
2. You cannot withhold information in response to a valid request UNLESS one of the following applies:-
  - an exemption to disclosure, or
  - the information sought is not held, or
  - the request is considered vexatious or repeated or
  - the cost of compliance exceeds the threshold (see Appendix 4)

### **The duty to confirm or deny**

3. A person applying for information has the right to be told if the information requested is held by the school and, if that is the case, to have the information sent (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 (see paragraph 6), or
  - in the case of qualified exemptions (see paragraph 8), confirming or denying would itself disclose exempted information

### **Exemptions**

4. A series of exemptions are set out in the Act which allow the withholding of information in relation to an enquiry. Some are very specialised in their application (such as national security) and would not usually be relevant to schools. There are more than twenty exemptions, but the school is likely to use only a few of them.
5. There are two general categories of exemptions:

**Absolute:** where there is no requirement to confirm or deny that the information is held, disclose the information or consider the public interest; and

**Qualified:** where, even if an exemption applies, there is a duty to consider the public interest in disclosing information.

### **What are the Absolute Exemptions?**

6. There are eight absolute exemptions listed in the Act. Even where an absolute exemption applies:-
  - it does not mean that you can't disclose in all cases; it means that disclosure is not required by the Act. A decision could be taken to ignore the exemption and release the information taking into account all the facts of the case.
  - there is still a legal obligation to provide reasonable advice and assistance to the enquirer.
7. The absolute exemptions in the Act are set out below. **Those which might be relevant to the School/Academies are marked with an \*:**
- 7.1 **Information accessible to the enquirer by other means\*** (Section 21)

If information is reasonably accessible to the applicant by another route other than the Act, it is exempt information. This is the case even if the enquirer would have to pay for the information under that alternative route. This exemption includes cases where you

are required to give information under other legislation, or where the information is available via the Publication Scheme.

7.2 **Information dealing with security matters** (Section 23) (see also qualified exemption under Section 24 on national security)

This applies to information directly or indirectly supplied by, or relating to, bodies dealing with security matters such as GCHQ, MI5, MI6, Special Forces and the National Criminal Intelligence Service.

7.3 **Court records** (Section 32) – (see also the qualified exemption under Section 30 concerning investigations and proceedings conducted by public authorities).

This applies to information related to proceedings in a court or tribunal or served on a public authority for the purposes of proceedings.

7.4 **Parliamentary Privilege** (Section 34)

This exempts information if it is required for the purpose of avoiding an infringement of the Parliamentary privilege. Parliamentary privilege is an immunity whereby MPs cannot be prosecuted for sedition or sued for libel or slander over anything said during proceedings in the House.

7.5 **Prejudice to the effective conduct of public affairs** (Section 36) - see also the qualified exemption part of Section 36

This relates to the maintenance of the collective responsibility of Ministers.

7.6 **Personal information\*** (Section 40) - see also the qualified exemption part of Section 40. Where enquirers ask to see information about themselves, this is exempt under the Act because it is covered by the GDPR. Consult your existing Data Protection Policy.

7.7 **Information provided in confidence\*** (Section 41)

This relates to information obtained from a person if its disclosure would constitute a breach of confidence actionable by that, or another person.

7.8 **Prohibitions on disclosure\*** (Section 44)

Information is exempt where its disclosure is prohibited under any other legislation by order of a court or where it would constitute a contempt of court or where it is incompatible with any EC obligation.

## What are the Qualified Exemptions?

8. With qualified exemptions, even if it is decided that an exemption applies, there is a duty to consider the public interest in confirming or denying that the information exists and in disclosing information. Guidance on carrying out the public interest test is at Annex C. The qualified exemptions in the Act are set out below. **Those which might be relevant to the school are marked with an \*:**

8.1 **Information intended for future publication\*** (Section 22)

If at the time the request was made, information is held with a view to publication, then it is exempt from disclosure if it is reasonable that it should not be disclosed until the intended date of publication. This could apply, for instance, to statistics published at set intervals, for example annually or where information is incomplete and it would be inappropriate to publish prematurely<sup>5</sup>. Remember, you still have a legal duty to provide reasonable advice and assistance.

<sup>5</sup>Note the following:-

- the intended publication does not have to be by the school, it can be by another person or body on behalf of the school
- the date of publication does not have to be known, it could be at some future date (although it is recommended that some idea of a likely date is given)

- the duty to confirm or deny does not apply if to do so would involve the disclosure of any of the relevant information

## 8.2 **National security** (Section 24) (see also absolute exemption 23)

Information is exempt for the purposes of safeguarding national security.

## 8.3 **Defence** (Section 26)

Information is exempt if its disclosure would prejudice the defence of the UK.

## 8.4 **International relations** (Section 27)

Information is exempt if its disclosure would, or would be likely to, prejudice relations between the UK and any other state or international organisation.

## 8.5 **Relations within UK** (Section 28)

Information is exempt if its disclosure would, or would be likely to, prejudice relations between any administrations in the UK, ie the Government, Scottish Administration, Northern Ireland Assembly or the National Assembly of Wales.

## 8.6 **The Economy** (Section 29)

Information is exempt if its disclosure would, or would be likely to, prejudice the economic or financial interests of the UK.

## 8.7 **Investigations and proceedings conducted by public authorities\*** (Section 30)

Information is exempt if it has at any time been held by the school for the purposes of criminal investigations or proceedings, such as determining whether a person should be charged with an offence or whether a charged person is guilty or investigations which may lead to a decision to institute criminal proceedings. The duty to confirm or deny does not apply to such information.

## 8.8 **Law enforcement\*** (Section 31)

Information which is not exempt under Section 30 Investigations and Proceedings, may be exempt under this exemption in the event that disclosure would, or would be likely to, prejudice the following among others:-

- the prevention or detection of crime
- the apprehension or prosecution of offenders
- the administration of justice
- the exercise of functions such as ascertaining if a person has broken the law, is responsible for improper conduct, whether circumstances justify regulatory action, ascertaining a person's fitness or competence in relation to their profession, ascertaining the cause of an accident or protecting or recovering charities or its properties
- any civil proceedings brought by or on behalf of the School which arise out of an investigation carried out for any of the purposes mentioned above.

The duty to confirm or deny does not arise where prejudice would result to any of these matters.

## 8.9 **Audit Functions** (Section 33)

Information is exempt if its disclosure would, or would be likely to, prejudice the exercise of an authority's functions in relation to the audit of the accounts of other public authorities. It does not apply to internal audit reports.

## 8.10 **Formulation of government policy** (Section 35)

Information held is exempt information if it relates to the formulation or development of government policy, ministerial communications, advice by Law Officers (eg the Attorney General) and the operation of any Ministerial private office.

**8.11 Prejudice to the conduct of public affairs** (Section 36) (excluding matters covered by the absolute exemption part of Section 36)

Information likely to prejudice the maintenance of the convention of the collective responsibility of Ministers or likely to inhibit the free and frank provision of advice or exchange of views.

**8.12 Communications with the Queen\*** (Section 37)

Information is exempt if it relates to communications with the Queen, the Royal Family or Royal Household or if it relates to the award of honours. The duty to confirm or deny does not arise where this exemption applies.

**8.13 Health and Safety\*** (Section 38)

Information is exempt if its disclosure would, or would be likely to, endanger the safety or physical or mental health of any individual. The duty to confirm or deny does not arise where prejudice would result.

**8.14 Environmental information\*** (Section 39)

Information is exempt under FOI where it is covered by the Environmental Information Regulations. Environmental information can cover information relating to air, water, land, natural sites, built environment, flora and fauna, and health. It also covers all information relating to decisions or activities affecting any of these.

**8.15 Personal information\*** (Section 40) – see also the absolute exemption part of Section 40

Where an individual seeks information about themselves, GDPR powers apply.

Where the information concerns a third party, it is exempt if its disclosure would contravene the GDPR, or its principles; or if the person to whom the information relates would not have a right of access to it because it falls under one of the exemptions to the GDPR. The duty to confirm or deny does not arise in relation to this information if doing so would be incompatible with any of the above.

**8.16 Legal professional privilege\*** (Section 42)

Legal professional privilege covers any advice given by legal advisers, solicitors and barristers. Generally such information will be privileged. A school wishing to disclose the information will need to seek consent from the provider of the advice. This exemption covers all such information where a claim to legal professional privilege can be maintained in legal proceedings. The duty to confirm or deny does not arise where to do so would involve the disclosure of such information.

**8.17 Commercial interests\*** (Section 43)

Information is exempt if it constitutes a trade secret or would be likely to prejudice the commercial interests of any person or body (including the school). The duty to confirm or deny does not arise where prejudice would result to commercial interests but not where the information constitutes a trade secret.

## **Protective Markings and Applying Exemptions**

9. 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**

10. 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, whilst taking into account any previous exemption applications, each case should be considered separately.

### **Next steps**

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

## Appendix 3: Publication Scheme

### 1. Introduction: what a publication scheme is and why it has been developed

This publication scheme commits the school to make information available to the public as part of its normal business activities. The information covered is included in the classes of information mentioned below, where this information is held by the school.

The scheme commits the school to:

- proactively publish or otherwise make available as a matter of routine, information, including environmental information, which is held by the school and falls within the classifications below.
- specify the information which is held by Champion School and falls within the classifications below.
- proactively publish or otherwise make available as a matter of routine, information in line with the statements contained within this scheme.
- produce and publish the methods by which the specific information is made routinely available so that it can be easily identified and accessed by members of the public.
- review and update on a regular basis the information Champion School makes available under this scheme.
- produce a schedule of any fees charged for access to information which is made proactively available.
- make this publication scheme available to the public through its Freedom of Information Policy.

### 2. Classes of Information

#### 2.1 Who we are and what we do

Organisational information, locations and contacts, constitutional and legal governance.

#### 2.2 What we spend and how we spend it

Financial information relating to projected and actual income and expenditure, tendering, procurement and contracts.

#### 2.3 What our priorities are and how we are doing

Strategy and performance information, plans, assessments, inspections and reviews.

#### 2.4 How we Make Decisions

Policy proposals and decisions. Decision making processes, internal criteria and procedures, consultations.

#### 2.5 Our Policies and Procedures

Current written protocols for delivering our functions and responsibilities.

#### 2.6 Lists and Registers

Information held in registers required by law and other lists and registers relating to the functions of the authority.

## 2.7 The Services we Offer

Advice and guidance, booklets and leaflets, transactions and media releases. A description of the services offered.

The classes of information will not generally include:

- Information, the disclosure of which is prevented by law, or exempt under the Freedom of Information Act, or is otherwise properly considered to be protected from disclosure.
- Information in draft form.
- Information that is no longer readily available as it is contained in files that have been placed in archive storage or is difficult to access for similar reasons.

## 3. **The method by which information published under this scheme will be made available**

Campion School will indicate clearly to the public what information is covered by this scheme and how it can be obtained.

Where it is within the capability of Campion School, information will be provided on our website. Where it is impracticable to make information available on a website or when an individual does not wish to access the information by the website, we will indicate how information can be obtained by other means and provide it by those means.

In 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 an authority is legally required to translate any information, it will do so.

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.

## 4. **Charges which may be made for information published under this scheme**

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

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

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

Charges may be made for actual disbursements incurred such as:

- photocopying

- postage and packaging
- the costs directly incurred as a result of viewing information

Charges may also be made for information provided under this scheme where they are legally authorised, they are in all the circumstances, including the general principles of the right of access to information held by public authorities, justified and are in accordance with a published schedule or schedules of fees which is readily available to the public.

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

## **5. Written Requests**

Information held by a public authority that is not published under this scheme can be requested in writing, when its provision will be considered in accordance with the provisions of the Freedom of Information Act.

## **6. Contact Details**

If you require a paper version of any information, or want to ask whether information is available, please contact Campion School by telephone, email or by letter. All requests should be directed through the headteacher [head@campion.warwickshire.sch.uk](mailto:head@campion.warwickshire.sch.uk) or by telephone 01926 743200.

To help us process your request quickly, please clearly mark any correspondence “**PUBLICATION SCHEME REQUEST**” (in CAPITALS please)

If the information you’re looking for isn’t available via the scheme (**and isn’t on our website**), you can still contact Campion School to ask if we have it.

**Note:** This model publication scheme has been prepared and approved by the Information Commissioner to be adopted without modification by any public authority without further approval and will be valid until further notice.

## Freedom of Information Guide to information available from **Campion School** under the publication scheme

Information to be published	How the information can be obtained	Charge
<p><b>Who we are and what we do (Organisational information, structures, locations and contacts)</b></p> <p>This will be current information only</p>	(hard copy and/ or website)	
Academy Funding Agreement – a link to the document on the Department for Education’s website	By request	Nil
Academy Order (if applicable)	By request	Nil
Academies staff and structure – names of key personnel	On termly newsletter	Nil
Trustees – names and contact details of the Trustees and the basis of their appointment	On the website	Nil
Academies session times, term dates and holidays	On website	Nil
Location and contact information – address, telephone number and website	On website	Nil
Contact details for the headteacher and the Governing Body	On website	Nil
Academy Prospectus	Hard copy by request or digital version on website	Nil
Academy Session times and term dates	On website	Nil
Examination results – a link to the data on the Department for Education’s website	On website	Nil

Information to be published	How the information can be obtained	Charge
<p><b>What we spend and how we spend it</b>            (Financial information relating to projected and actual income and expenditure, procurement, contracts and financial audit)</p> <p>This should be a minimum of current and the previous two years Financial years (accounts that have been filed with the Charity Commission and Companies House).</p>	(hard copy and/ or website)	None
Annual budget plan and financial statements	Financial statements on the website. Other budget plans by request.	None
Capital funding – details of capital funding allocated to the school along with information on related building projects and other capital projects.	By request	According to FOI policy
Additional funding – Income generation schemes and other sources of funding.	By request	According to FOI policy
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.	By request	According to FOI policy
Staffing and grading structure.	By request	According to FOI policy
Pay policy – a statement of the school’s policy on procedures regarding teachers’ pay.	By request	According to FOI policy
Trustees’ allowances – Details of allowances and expenses that can be claimed or incurred.	Campion School website	None

Information to be published	How the information can be obtained	Charge
<p><b>What our priorities are and how we are doing</b> (Strategies and plans, performance indicators, audits, inspections and reviews)</p> <p>Current information should be published.</p>	<p>(hard copy and/ or website)</p> <p>On website and by request</p>	According to FOI policy
<p>Academies profile</p> <ul style="list-style-type: none"> <li>• Government supplied performance data</li> <li>• OFSTED report – summary and full report</li> </ul>	On website	None
Performance management information	By request	According to FOI policy
School' future plans – any major proposals on safeguarding and promoting the welfare of children.	By request	According to FOI policy
Child protection – policies and procedures on safeguarding and promoting the welfare of children.	On website	None

Information to be published	How the information can be obtained	Charge
<p><b>How we make decisions</b> (Decision making processes and records of decisions)</p> <p>Current and previous three years as a minimum</p>	<p>(hard copy and/ or website)</p> <p>By request</p>	According to FOI policy
Admissions policy - arrangements and procedures and right of appeal – include information on application numbers and number of successful applicants by each oversubscription criteria.	On website	None
Governing Body meeting agendas, papers and minutes – information that is properly considered to be private should be excluded.	By request	According to FOI policy

Information to be published	How the information can be obtained	Charge
<p><b>Our Policies and Procedures</b> (Current written protocols, policies and procedures for delivering our services and responsibilities)</p> <p>Current information only</p>	(hard copy and/ or website)	
<p>School's policies including:</p> <ul style="list-style-type: none"> <li>• Charging and remissions policy</li> <li>• Health and Safety and Risk Assessments</li> <li>• Complaints procedure</li> <li>• Staff Conduct policy</li> <li>• Discipline and grievance policies</li> <li>• Pay policy</li> <li>• Safer Recruitment</li> <li>• Information Request Handling policy</li> </ul>	A number of policies are on website, otherwise by request	None
<p>Pupil and curriculum policies, including:</p> <ul style="list-style-type: none"> <li>• Home-school agreement</li> <li>• Curriculum</li> <li>• Sex education</li> <li>• Special Educational Needs</li> <li>• Accessibility</li> <li>• Race equality</li> <li>• Collective Worship</li> <li>• Careers Education</li> <li>• Behaviour Management</li> </ul>	All on each academy's website	None



<p>Records management and personal data policies:</p> <ul style="list-style-type: none"> <li>• Information Security</li> <li>• Records Retention</li> <li>• Data Protection policies</li> </ul>	<p>A number of policies are on school website, otherwise by request</p>	<p>None</p>
<p>Equality and Diversity: (Policies, schemes, statements, procedures and guidelines relating to equal opportunities)</p> <ul style="list-style-type: none"> <li>• Policies and procedures for the recruitment of staff – details of vacancies should be included</li> </ul>	<p>By request</p>	<p>According to FOI policy</p>
<p>Charging Regimes and Policies: This should include details of any statutory charging regimes. Charging policies should include details of charges made for information routinely published. They should clearly state what costs are to be recovered, the basis on which they are made and how they are calculated.</p>	<p>Charging and Remissions Policy on each Academy's website</p>	<p>None</p>

<b>Information to be published</b>	<b>How the information can be obtained</b>	<b>Charge</b>
<b>Lists and Registers</b> Currently maintained lists and registers only	(hard copy and/ or website; some information may only be available for inspection)	
Curriculum circulars and statutory instruments	By request	According to FOI policy
Disclosure logs	By request	According to FOI policy
Asset register	By request	According to FOI policy
Any information the school is currently legally required to hold in publicly available registers	By request	According to FOI policy

Information to be published	How the information can be obtained	Charge
<b>The services we offer</b> (Information about the services we offer, including leaflets, guidance and newsletters produced for the public and businesses)  Current information only	(hard copy and/ or website; some information may only be available for inspection)	
Extra-curricular activities	On website	Nil
Out of school clubs	On website	Nil
Academy publications	On website or occasional hard copy to parents/carers	Nil
Services for which school is entitled to recover a fee, together with those fees	Charging and Remissions Policy on websites	Nil
Leaflets, booklets and newsletters	On website or occasional hard copy to parents.	Nil