



# Freedom of Information Policy & Publication Scheme and Procedure

**Approved by:** THE FINANCE AUDIT & RISK COMMITTEE    **Date:** 13<sup>th</sup> May 2024

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## Introduction

Greensand Multi Academy Trust (“the Trust”) is committed to the Freedom of Information Act 2000 (FOIA) and to the principles of accountability and the general rights of access to information, subject to legal exemptions. The FOIA provides that any person has a legal right to ask for information held about them. They are entitled to be told whether Greensand Multi Academy Trust holds the information, and to receive a copy, subject to certain exemptions.

This document outlines our response to the FOIA and the framework and procedure for managing requests.

All information that the Trust routinely makes available to the public is included in the Publication Scheme. Requests for other information should be dealt with in accordance with the statutory guidance. While the FOIA assumes openness, it recognises that certain information is sensitive. There are exemptions to protect this information. The FOIA is fully retrospective; any past records which the Trust holds are included. The Trust adheres to the Retention Schedule set out in the Information Records Management Society Toolkit for Schools, details of which are found in our Data Retention & Destruction Policy. It is an offence to wilfully conceal damage or destroy information in order to avoid responding to an enquiry.

## Greensand Multi Academy Trust Publication Scheme

The Trust’s Publication Scheme contains all information available under the FOIA. We publish information about:

1. Who we are and what we do;
2. What we spend and how we spend it;
3. What our priorities are and how we are doing;
4. How we make decisions;
5. Our policies and procedures;
6. Lists and registers;
7. The services we offer.

The scheme covers information already published and information which is to be published in the future. The Publication Scheme and the materials it covers will be available on the Trust website: [Greensand Multi Academy Trust \(greensandacademytrust.co.uk\)](https://greensandacademytrust.co.uk). Hard copies are available on request.

This publication scheme conforms to the model scheme for Academies approved by the Information Commissioner.

## Who Are We and What Do We Do

Organisational information, structures, locations and contacts.

Information published	Availability
Who's who in the Trust	Trust website: (Executive Leadership Team) <a href="https://greensandacademytrust.co.uk">Our Team (greensandacademytrust.co.uk)</a>
Governance structure & Trust Members and Trustees	Trust website: (members and trustees) <a href="https://greensandacademytrust.co.uk">Greensand Multi-Academy Trust - Governance (greensandacademytrust.co.uk)</a>
Mission & Vision Articles of Association and Master Funding Agreements	Trust website: <a href="https://greensandacademytrust.co.uk">Mission &amp; Vision (greensandacademytrust.co.uk)</a> <a href="https://greensandacademytrust.co.uk">Key Documents &amp; Statutory Information greensandacademytrust.co.uk</a>
Local Stakeholder Governors	Individual School's websites
Senior staff structure	Individual School's websites
Contact details of the Headteacher	Individual School's websites
School Prospectus	Individual School's websites
School session times and term dates	Individual School's websites
Contact details of the Trust & CEO	Trust website: <a href="https://greensandacademytrust.co.uk">Greensand Multi Academy Trust (greensandacademytrust.co.uk)</a>

## What We Spend and How We Spend It

Current and previous year financial information relating to projected and actual income and expenditure, procurement, contracts and financial audit

Information published	Availability
Trust Annual Report within Audited Accounts	Trust website: <a href="https://greensandacademytrust.co.uk">Greensand Multi-Academy Trust - Annual Reports / Accounts (greensandacademytrust.co.uk)</a>
Pay Policy	Trust website: <a href="https://greensandacademytrust.co.uk">Policies and Procedures (greensandacademytrust.co.uk)</a>

## Our Priorities

Strategies and plans, performance indicators, audits, inspections and reviews

Information published	Availability
School Profile Government supplied performance data Latest Ofsted report	Individual school websites
Performance management policy and procedure	Trust Website
Trust's future plans e.g. proposals for any imminent or known consultation on the future of the academy such as a change in status	Trust website
Safeguarding policies and procedures	Individual school websites

## Decision Making

Processes and records for last 3 years

Information published	Availability
Admissions policy and decisions (not individual decisions)	Policy available on Trust website & individual school websites: <a href="https://greensandacademytrust.co.uk">Admission Arrangements (greensandacademytrust.co.uk)</a> Decisions available in hard copy
Minutes of meetings of the Trust (excluding information properly regarded as private to the meetings)	Available by request from Central Team
Local governing body meeting minutes	Available by request from the individual schools.

## Policies and Procedures

Current written protocols, policies and procedures

Information published	Availability
Trust & School Policies	Trust Policies: <a href="https://greensandacademytrust.co.uk">Policies and Procedures (greensandacademytrust.co.uk)</a> , <a href="#">Edupay Document Store</a> School Policies: Individual school policies where applicable.
Charging and Remissions Policy	Individual school's websites
Health and Safety Policy	Individual school's websites
Complaints Procedure	Individual school's websites
Staff Conduct Policy	Trust Website
Disciplinary and Capability Policy	Trust Website
Recruitment and Selection Policy	Trust website
Equal Opportunities Policy	Trust Website
Curriculum Policy	Individual school's websites
Special Educational Needs Policy	Individual school's websites
Pupil Behaviour Policy	Individual school's websites
Data Destruction and Retention Policy	Trust Website

## Lists and Registers

Information published	Availability
Curriculum circulars and statutory instruments	N/A
Disclosure logs	N/A
Asset register	Available on request

## Services

Services we offer including leaflets, guidance and newsletters

Information published	Availability
Extra-curricular activities	Individual school's websites
Out of school clubs	Individual school's websites
School leaflets	Individual school's websites
Newsletters	Individual school's websites

## Requests for Information

Greensand Multi Academy Trust recognises its duty to:

- Provide advice and assistance to anyone requesting information.
- Tell enquirers whether or not we hold the information they are requesting (the duty to confirm or deny) and provide access to the information we hold in accordance with the Greensand Multi Academy Trust Freedom of Information Procedures.

If you require hard copies of any of the documents within the Publication Scheme, please contact the Data Protection Officer at Greensand Multi Academy Trust, c/o Reigate School, Pendleton Road, Reigate, Surrey RH2 7NT or email: [info@greensandacademytrust.co.uk](mailto:info@greensandacademytrust.co.uk)

If the information you are looking for is not available via the publication scheme or on our website, please contact us on the details above to ask if we hold the information. To help us process your request quickly please clearly mark any correspondence '**PUBLICATION SCHEME REQUEST**' (in CAPITALS please).

To assist with dealing with your request promptly, please ensure the following:

- Make your request in writing (including email).
- State your name and correspondence address.
- Describe the information requested so that it is clearly identifiable.
- Verbal requests are not covered under the FOIA.
- Enquiries will be dealt with within 20 working days (or 60 working days if the request is received during the school holidays). If this deadline cannot be met, the Trust will inform the enquirer.

We will deal with your request where it is not be covered by other legislation (e.g. Data Protection or environmental information).

Information will not be disclosed if one or more of the following applies:

- An exemption to disclosure, which may be **absolute** (where there is no obligation to confirm or deny the information is held, disclose the information or consider the public interest test) or **qualified** (where, even if an exemption applies, there is a duty to consider the public interest test);
- The information sought is not held;
- Requests are considered vexatious or repeated;
- An individual may be identified through disclosing information;
- The cost of compliance exceeds the threshold (£450). (Information published on the Trust and schools' websites is free although you may incur costs from an internet service provider. If you do not have access to the internet, you can access our websites using a local library or internet cafe.) Where the cost of postage, printing or photocopying is below £10, we will not make a charge. Where it is over £10, the first £10 will be free of charge; after that, we will charge the full estimated cost of postage and copying. Before we produce the information we will tell you how much it will cost. If you decide not to pay, then we will not release the information. If you decide to refine the request so it reduces the cost of, say, copying we are happy to discuss that with you.

When we wish to apply a qualified exemption to a request we will invoke the public interest test procedures to determine if public interest in applying the exemption outweighs the public interest in disclosing the information. Public interest may not be the same as that which may be of interest to the public.

The Trust will maintain a register of requests where we have refused to supply information and the reasons for the refusal. Information will be retained for 5 years.

Factors taken into account when weighing up public interest include but are not limited to:

For Disclosure	Against Disclosure
Is the disclosure likely to increase access to information held by the school?	Is disclosure likely to distort public reporting or be misleading because it is incomplete?
Is disclosure likely to give the reasons for a decision or allow individuals to understand decisions affecting their lives or assist them in challenging those decisions?	Is premature disclosure likely to prejudice fair scrutiny, or release sensitive issues still on the internal agenda or evolving?
Is disclosure likely to improve the accountability and transparency of the academy in the use of funds and help show that it obtains value for money?	Is disclosure likely to cause unnecessary public alarm or confusion?
Is disclosure likely to contribute to public debate and assist the understanding of existing or proposed policy?	Is disclosure likely to seriously jeopardise the academy's legal or contractual position?
Is disclosure likely to increase public participation in decision making?	Is disclosure likely to infringe other legislation?



Is disclosure likely to increase public participation in political processes in general?	Is disclosure likely to create a controversial precedent on the release of information or impair your ability to obtain information in the future?
Is disclosure likely to bring to light information affecting public safety?	Is disclosure likely to adversely affect the schools proper functioning and discourage openness in expressing opinions?
Is disclosure likely to reduce further enquiries on the topic?	If a large amount of information on the topic has already been made available, would further disclosure shed any more light, or serve any useful purpose?

## Complaints

We take any complaints about our collection and use of personal information very seriously.

If you think that our collection or use of personal information is unfair, misleading or inappropriate, or have any other concern about our data processing, please raise this with us in the first instance.

To make a complaint, you can contact our Data Protection Officer on:

Email: [w.hill@reigate-school.surrey.sch.uk](mailto:w.hill@reigate-school.surrey.sch.uk)

Phone: 01737 948183

Greensand Multi Academy Trust  
 c/o Reigate School  
 Pendleton Road  
 Reigate  
 Surrey  
 RH2 7NT

### For DfE:

Public Communications Unit  
 Department for Education  
 Sanctuary Buildings  
 Great Smith Street  
 London SW1P 3BT

Website: [www.gov.uk/contact-dfe](http://www.gov.uk/contact-dfe)

Telephone: 0370 000 2288

If, however you are dissatisfied with our response to your concerns, you can contact the ICO quoting our ICO registration number and stating that the Data Controller is Greensand Multi Academy Trust.

**Information Commissioners' Office**

Wycliffe House  
Water Lane  
Wilmslow  
Cheshire SK9 5AF

Telephone: 0303 123 1113 (local rate) or 01625 545 745 (national rate)

This Policy will be reviewed every three years unless there are any changes in relevant legislation or guidance in the interim.