



# THAMES LEARNING TRUST

Name of Policy	Freedom of Information
Scope of Policy	This policy relates to all academies across The Thames Learning Trust
Approved by	Chief Executive Officer
Date of Approval	September 2020
Review period	Three Years
Review Date	September 2023

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# THAMES LEARNING TRUST

## **1. INTRODUCTION**

- 1.1 The Thames Learning Trust (“the Trust”) is subject to the Freedom of Information Act 2000 (“FOI”) as a public authority, and as such must comply with any requests for information in accordance with the principles laid out in the FOI.

## **2. WHAT IS A REQUEST UNDER FOI**

- 2.1 Any request for any information from the Trust is technically a request under the FOI, whether or not the individual making the request mentions the FOI. However, the Information Commissioner’s Office (ICO) has stated that routine requests for information (such as a parent requesting a copy of a policy) can be dealt with outside of the provisions of the FOI.
- 2.2 In all non-routine cases, if the request is simple and the information is to be released, then the individual who received the request can release the information, but must ensure that this is done within the timescale set out below. A copy of the request and response should then be sent to the Trust’s Information Team:

Email: [info@thameslearningtrust.co.uk](mailto:info@thameslearningtrust.co.uk)

Or you can send a letter addressed to:

Rosie Bounds

Information Team

Thames Learning Trust,

c/o Reading Girls’ School, Northumberland Avenue, Reading, Berkshire, RG2 7PY

- 2.3 All other requests should be referred in the first instance to the Information Team, using the contact details above, who may allocate another individual to deal with the request. If the request is received elsewhere within the Trust, it must be forwarded promptly to the Information Team, and in any event within 3 working days of receiving the request.
- 2.4 When considering a request under FOI, you must bear in mind that release under FOI is treated as release to the general public, and so once it has been released to an individual, anyone can then access it, and you cannot restrict access when releasing by marking the information “confidential” or “restricted”.

## **3. TIME LIMIT FOR COMPLIANCE**

- 3.1 The Trust must respond as soon as possible, and in any event within 20 working days of the date of receipt of the request. When calculating the 20 working day deadline, a “working day” is a school day (one in which pupils are in attendance), subject to an absolute maximum of 60 normal working days (not school days) to respond.

## **4. PROCEDURE FOR DEALING WITH A REQUEST**

- 4.1 When a request is received that cannot be dealt with by simply providing the information, it should be referred in the first instance to the Information Team, using the contact information under para 2.2 above, who may re-allocate to an individual with responsibility for the type of information requested.

- 4.2 The first stage in responding is to determine whether or not the Trust “holds” the information requested. The Trust will hold the information if it exists in computer or paper format. Some requests will require the Trust to take information from different sources and manipulate it in some way. Where this would take minimal effort, the Trust is considered to “hold” that information, but if the required manipulation would take a significant amount of time, the requestor should be contacted to explain that the information is not held in the manner requested, and offered the opportunity to refine their request. For example, if a request required the Trust to add up totals in a spreadsheet and release the total figures, this would be information “held” by the Trust. If the Trust has to go through a number of spreadsheets and identify individual figures and provide a total, this is likely not to be information “held” by the Trust, depending on the time involved in extracting the information.
- 4.3 The second stage is to decide whether the information can be released, or whether one of the exemptions set out in the FOI applies to the information. Common exemptions that might apply include:
- 4.3.1 Section 40 (1) – the request is for the applicant’s personal data. This must be dealt with under the subject access regime of data protection legislation, detailed in the Trust’s Data Protection Policy, which can be found on the Trust’s website.
- 4.3.2 Section 40 (2) – compliance with the request would involve releasing third party personal data, and this would be in breach of the data protection principles, as set as in the Data Protection Policy;
- 4.3.3 Section 41 – information that has been sent to the Trust (but not the Trust’s own information) which is confidential;
- 4.3.4 Section 21 – information that is already publicly available, even if payment of a fee is required to access that information;
- 4.3.5 Section 22 – information that the Trust intends to publish at a future date;
- 4.3.6 Section 43 – information that would prejudice the commercial interests of the Trust and / or a third party;
- 4.3.7 Section 38 – information that could prejudice the physical health, mental health or safety of an individual (this may apply particularly to safeguarding information);
- 4.3.8 Section 31 – information which may prejudice the effective detection and prevention of crime – such as the location of CCTV cameras;
- 4.3.9 Section 36 – information which, in the opinion of the chair of the Board of Directors of the Trust, would prejudice the effective conduct of the Trust.
- 4.4 The sections mentioned in italics are qualified exemptions. This means that even if the exemption applies to the information, we also have to carry out a public interest weighting exercise, balancing the public interest in the information being released, as against the public interest in withholding the information.

## **5. RESPONDING TO A REQUEST**

- 5.1 When responding to a request where the Trust has withheld some or all of the information, the Trust must write to the requestor to explain why the information has been withheld, quoting the appropriate section number and explaining how the information requested fits within that exemption. If the public interest test has been applied, this also needs to be explained.

5.2 The letter should end by explaining to the requestor how they can complain using the Trust’s Complaints Policy or by contacting the ICO.

**6. CONTACT**

6.1 Any questions about this policy should be directed in the first instance to the Information Team, using the contact details under para 2.2 above

Information to be published	How the information can be obtained	Cost
<p><b>Class 1 - Who we are and what we do</b>            (Organisational information, structures, locations and contacts)</p> <p>This will be current information only</p>		
Who’s who in each school	Website	none
Who’s who on the Board of Trustees and the basis of their appointment	Website	none
Instrument of Government <i>The Instrument of Government is the document which records the name and category of the school and the name and constitution of its governing body.</i>	Website	none
Contact details for the Principal and for the Board of Trustees named contacts where possible with telephone number and email address (if used))	Website	none
School prospectus	Website	none
Staffing structure	Hardcopy	Cost of photocopying
School session times and term dates	Website	None
<p><b>Class 2 – 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>Current and previous financial year as a minimum</p>		
Annual budget plan and financial statements	Hardcopy	Cost of photocopying
Capitalised funding	Hardcopy	Cost of photocopying
Additional funding	Hardcopy	Cost of photocopying
Procurement and projects	Hardcopy	Cost of photocopying
Pay policy	Hardcopy	Cost of photocopying
Staffing and grading structure	Hardcopy	Cost of photocopying
Trustees’ allowances <i>Details of allowances and expenses that can be claimed or incurred</i>	Hardcopy	Cost of photocopying
<p><b>Class 3 – What our priorities are and how we are doing</b>            (Strategies and plans, performance indicators, audits, inspections and reviews)</p> <p>Current information as a minimum</p>		

School profile <ul style="list-style-type: none"> <li>• Government supplied performance data</li> <li>• The latest Ofsted report <ul style="list-style-type: none"> <li>- Summary</li> <li>- Full report</li> </ul> </li> </ul>	Website	none
Performance management policy and procedures adopted by the Board of Trustees	Available on request	none
Schools future plans <i>Any major proposals for the future of the school involving, for example, consultation or a change in school status.</i>	Website	None
Every Child Matters – policies and procedures	Website	none
<b>Class 4 – How we make decisions</b> (Decision making processes and records of decisions)  Current and previous three years as a minimum		
Admissions policy/decisions (not individual admission decisions)	Website	none
Agendas of meetings of the Board of Trustees and (if held) their sub-committees	Available on request	none
Minutes of meetings (as above) – nb this will exclude information that is properly regarded as private to the meetings.	Available on request	none
<b>Class 5 – Our policies and procedures</b> (Current written protocols, policies and procedures for delivering our services and responsibilities)  Current information only		
School policies including: <ul style="list-style-type: none"> <li>• Charging and remissions policy</li> <li>• Health and Safety</li> <li>• Complaints procedure</li> <li>• Staff conduct policy</li> <li>• Discipline and grievance policies</li> <li>• Staffing structure implementation plan</li> <li>• Information request handling policy</li> <li>• Equality and diversity (including equal opportunities) policies</li> <li>• Staff recruitment policies</li> </ul>	Website	None
Pupil and curriculum policies, including: <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> </ul>	Website	None

<ul style="list-style-type: none"> <li>• Careers education</li> <li>• Pupil discipline</li> </ul>		
Records management and personal data policies, including: <ul style="list-style-type: none"> <li>• Information security policies</li> <li>• Records retention destruction and archive policies</li> <li>• Data protection (including information sharing policies)</li> </ul>	Website	None
Charging regimes and policies.  This should include details of any statutory charging regimes. Charging policies should include 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.	Website	None
<b>Class 6 – Lists and Registers</b>		
Currently maintained lists and registers only		
Curriculum circulars and statutory instruments	Hardcopy	Cost of photocopying
Disclosure logs <i>If a school produces a disclosure log indicating the information provided in response to requests, it should be readily available. Disclosure logs are recommended as good practice.</i>	On Inspection at the School	Cost of photocopying
Asset register	Hardcopy	Cost of photocopying
Any information the school is currently legally required to hold in publicly available registers <b>(THIS DOES NOT INCLUDE THE ATTENDANCE REGISTER)</b>	Website	none
<b>Class 7 – 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		
Extra-curricular activities	Website	None
Out of school clubs	Website	None
School publications	Website	None
Services for which the school is entitled to recover a fee, together with those fees	Website	None
Leaflets books and newsletters	Website	None