



Brampton Abbotts CE Primary School



Bridstow CE Primary School



Oak Meadow Federation

FREEDOM OF INFORMATION POLICY

Chapters 2 & 3

DATA MANAGEMENT POLICY SUITE

This policy will be reviewed and updated by the governing body at least annually.
All references to 'the school' imply both Brampton Abbotts and Bridstow Primary Schools.

Date signed off by full governing body: 17th October 2023

Signed Daniel Brearey, Head teacher

Handwritten signature of Daniel Brearey in black ink.

Paul Mason, Chair of governors

Handwritten signature of Paul Mason in black ink.

Date next review due: October 2024

Introduction

Our vision is rooted in Psalm 1:3: 'You are like a tree, planted by streams of water that never run dry. Your fruit ripens in its time; your leaves never fade or curl. In all you do, you prosper'. To this end, and in order to create a positive learning environment, this policy suite sets out the school's approach to ensuring that all data are handled respectfully and sensitively, so that pupils, staff and volunteers flourish.

This suite of policies aims:

- to ensure that all staff and volunteers understand their responsibilities in relation to data protection;
- to ensure the school has appropriate training, documents, procedures and IT systems in place to support safe management of data;
- to safeguard both children and adults by ensuring that their data are managed responsibly;
- to safeguard the school against hacking, cyber-attack or accidental destruction of data management systems;
- to ensure that, where appropriate, data are shared in a safe, open and fair manner.

This policy suite contains the following chapters.

[Chapter 1](#): Data management principles and approach

[Chapter 2](#): **Freedom of Information: responding to requests for information**

[Chapter 3](#): **Freedom of Information: scheme of publication**

Complaints and whistleblowing

Complaints should follow the procedures as set out in the Complaints Policy on our website. Staff also have a responsibility to raise any concerns following the school's whistleblowing policy. Complaints relating to information handling may be referred to the ICO (the statutory regulator).

Compliance

This policy suite complies with the UK General Data Protection Regulation (the retained EU law version of the General Data Protection Regulation (EU) 2016/679) ("GDPR"), the Data Protection Act 2018 ("the DPA") and other related legislation which protects Personal Information. It also meets DfE requirements for identifying which documents will be published on the website, and Freedom of Information Act requirements.

The school takes compliance with this policy suite very seriously. Failure to comply puts data subjects whose personal information is being processed at risk and carries the risk of significant civil and criminal sanctions for the individual and the school and may in some circumstances amount to a criminal offence by the individual.

Any failure to comply with this policy may lead to disciplinary action under the school's procedures and this action may result in dismissal for gross misconduct. If a non-employee breaches this policy, they may have their contract terminated with immediate effect.

Anyone with questions or concerns about this policy should contact the school's Data Protection Officer, HY Education, by email at DPO@wearehy.com, by telephone on 0161 543 8884 or in writing at HY Education, 3 Reed House, Hunters Lane, Rochdale OL16 1YL.

This suite of policies applies to all staff, volunteers and contractors who have any access to school data. For brevity, the policy refers to 'staff' but includes all groups listed here.

CHAPTER 2: FREEDOM OF INFORMATION: RESPONDING TO REQUESTS FOR INFORMATION

2.1 Information covered by the Freedom of Information Act

The Freedom of Information Act requires public authorities (including schools) proactively to publish certain information and provide a publication scheme. It also gives the public a right of access (subject to some exemptions) to copies of recorded information held by the school or held on its behalf by another person or organisation. It covers all recorded information both written and digital, including emails (and drafts of emails), notes, recordings of 'phone conversations (or Zoom/Teams calls), letters sent and received, online messages and social media. For documents that have been created electronically, it also covers information (known as meta data) that can be recovered from the document's properties (e.g. who created the document and when).

2.2 Responding to requests under the Freedom of Information Act

A full procedure for responding to Freedom of Information requests can be obtained from the school office. In summary, the school aims to respond to all requests for information within 20 school days (excluding school holidays) or 60 working days if this is shorter, even if it is to say that you do not have the information. All requests must be in writing (including email) and must have an address for a response to be sent to. However, they do not need to mention the Freedom of Information Act.

No new information has to be created in order to respond to a request. However, unless it is covered by a specific exemption (see 2.3 below), any information requested that already exists must be released.

If information will take more than 18 hours to collate, you can refuse the request or request payment (see below).

2.3 Refusing requests under the Freedom of Information Act

Under limited circumstances, we may [refuse a request](#) for information if:

- the request is vexatious;
- the request is a repeat request from the same person;
- it would cost more than £450 to comply (this includes staff time, which must be costed at £25 an hour or 18 hours, regardless of the pay of the member of staff who would undertake the work);
- the information requested is covered by an exemption, e.g. because of commercial or personal sensitivity or an ongoing criminal investigation, balanced against the public interest.

CHAPTER 3: FREEDOM OF INFORMATION: SCHEME OF PUBLICATION

3.1 Proactively publishing information

In addition to responding to requests for information, the school proactively publishes information, using the [template provided by the Information Commissioner's Office](#).

3.2 Charging for information

All of the information in our Publication Scheme is available free of charge from our website. If you need a printed copy, there is no charge for a single copy. However, multiple copies will be charged at the current rate for photocopying. There will also be a charge for any information that we would normally sell, e.g. videos. A full schedule of charges can be obtained from the school office.