



William Henry Smith Foundation

Freedom of Information Policy

Policy Details

Status:	In-house
Frequency of review:	Annual
Lead member of staff:	Sarah Kaler
Responsibility of:	Lisa King
Last reviewed:	Autumn 2024
Next Review Date:	Autumn 2025
Policy Number:	FWS35

1.0 Introduction

- 1.1 The Foundation is committed to the Freedom of Information Act 2000 ('the Act') 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.
- 1.2 The Freedom of Information Act 2000 (FOIA) came fully into force on 1 January 2005. Under the Act, any person has a legal right to ask for access to information held by the Foundation. They are entitled to be told whether the Foundation holds the information, and to receive a copy, subject to certain exemptions.

- 1.3 The Freedom of Information Act is fully retrospective, so that any past records which the Foundation holds are covered by the Act. The Records Management Society of Great Britain provides a guide for Foundations and academies on how long various categories of Foundation records should be kept (www.irms.org.uk). 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.
- 1.4 There is a duty to respond to all requests, informing the enquirer whether or not the information is held, and supplying any information that is held, except where exemptions apply. There is a time limit of 20 working days (ie periods of Foundation closure are excluded from this timetable) for responding to the request.
- 1.5 The Department for Education has a Freedom of Information Guide for Foundations and academies on their website (www.education.gov.uk).

2.0 Purpose and scope

- 2.1 This procedure applies to all Foundation staff.
- 2.2 Requests under Freedom of Information (FOI) legislation can be addressed to anyone employed by the Foundation. Staff need to be aware of the correct process for dealing with requests.
- 2.3 FOI requests must be made in writing (this includes email), and should include the enquirer's name and correspondence address, and state what information they require. It is not necessary to mention the relevant legislation by name, and neither is there any requirement to indicate the reason for requesting the information.
- 2.4 Requests for personal information do not fall within the remit of FOI. Individuals are entitled to request sight of any personal data (this is defined as information from which they could be identified) which is held by the Foundation but this type of request, which is known as a Subject Access Request (SAR), is not covered by FOI legislation.
- 2.5 SARs constitute a separate category of data request (for release of personal data) which must be dealt with in the appropriate manner. Such requests do not relate to FOI but are, instead, covered by (*up to 24 May 2018*) the Data Protection Act (DPA) or (*from 25 May 2018*) the General Data Protection Regulation (GDPR). Further details in relation to SARs are provided in the Data Protection policy.
- 2.6 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 Foundation or on Foundation grounds, or about phone masts or car parks etc would all be covered by EIR. Any requests made under EIR are dealt with in the same way as those under FOI but (unlike FOI) such requests do not need to be in writing and can be submitted verbally.

3.0 Obligations and duties

- 3.1 The Foundation recognises its duty to provide advice and assistance to anyone requesting information. The Foundation 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 relevant legislation.
- 3.2 The Foundation will inform enquirers as to whether or not the information requested is held by the organisation (in accordance with the duty to confirm or deny) and will provide access to the information held by following the procedures specified in Appendix 1.

4.0 Publication Scheme

- 4.1 The Foundation has adopted the Model Publication Scheme for Foundations approved by the Information Commissioner.
- 4.2 The publication scheme and the materials it covers will be readily available from the Foundation's website.

5.0 Dealing with Requests

- 5.1 The Foundation will respond to all FOI requests in accordance with the procedures set out in Appendix 1.
- 5.2 The Foundation will ensure that all staff are aware of the appropriate procedures and will delegate the day-to-day responsibility for FOI policy and the provision of advice, guidance and publicity to the DPO.
- 5.3 DPO will be the single point of reference, will co-ordinate FOI and related policies and procedures and will consider what information and training staff may need.
- 5.4 In many Foundations this role is likely to be undertaken by the Data Protection Officer (DPO).

6.0 Exemptions

- 6.1 Certain information is subject to either absolute or qualified exemptions. The exemptions are listed in Appendix 2.
- 6.2 The Foundation will maintain a register of requests where it has refused to supply information, and the reasons for the refusal. The register will be retained for 5 years.

7.0 Public Interest Tests

7.1 Unless it is in the public interest to withhold disclosure, any information requested which is held by the Foundation has to be released. The Public Interest Test will be applied in relation to any qualified exemptions which may be identified.

7.2 Further information on the application of the Public Interest Test appears in Appendix 3.

8.0 Charging

8.1 The Foundation reserves the right to refuse to supply information where the cost of doing so exceeds the statutory maximum, which is currently £450.

8.2 The governing body reserves the right to charge a fee for complying with requests for information under FOI. Such fees are calculated according to FOI regulations (see Appendix 4).

9.0 Responsibilities

9.1 The governing body has delegated the overall responsibility for compliance with FOI to the Deputy Principal

10.0 Feedback and Complaints

10.1 The Foundation welcomes any comments and suggestions regarding this policy. Any complaints will be dealt with through the Foundation's normal complaints procedure.

10.2 If, following investigation of a complaint, the Foundation's original decision is upheld, then the Foundation has a duty to inform the complainant of their right to appeal to the Information Commissioner's Office.

10.3 Appeals should be made in writing to the Information Commissioner's Office, for whom the contact address is:

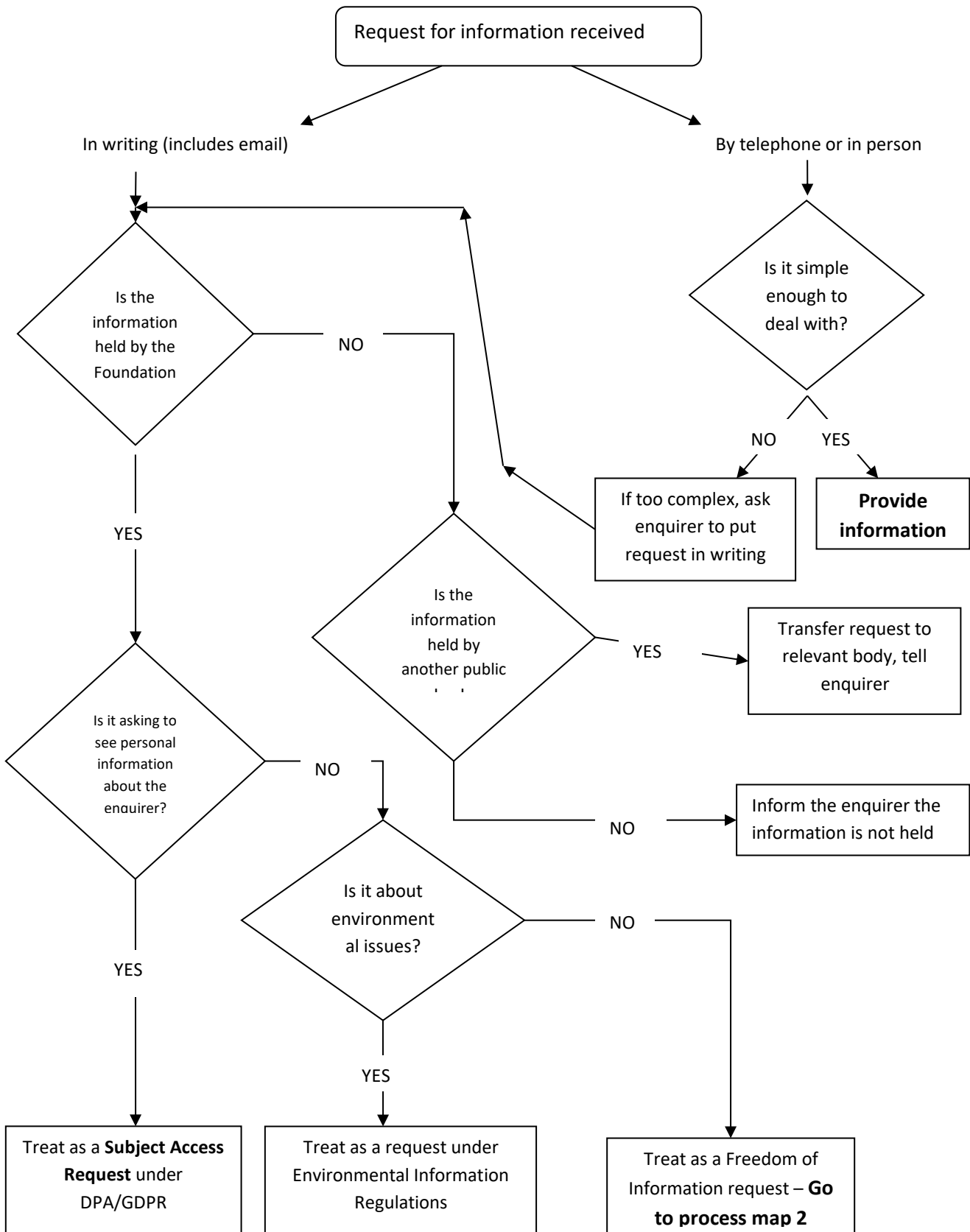
FOIA/EIR Complaints Resolution
Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

11.0 Other policies and procedures

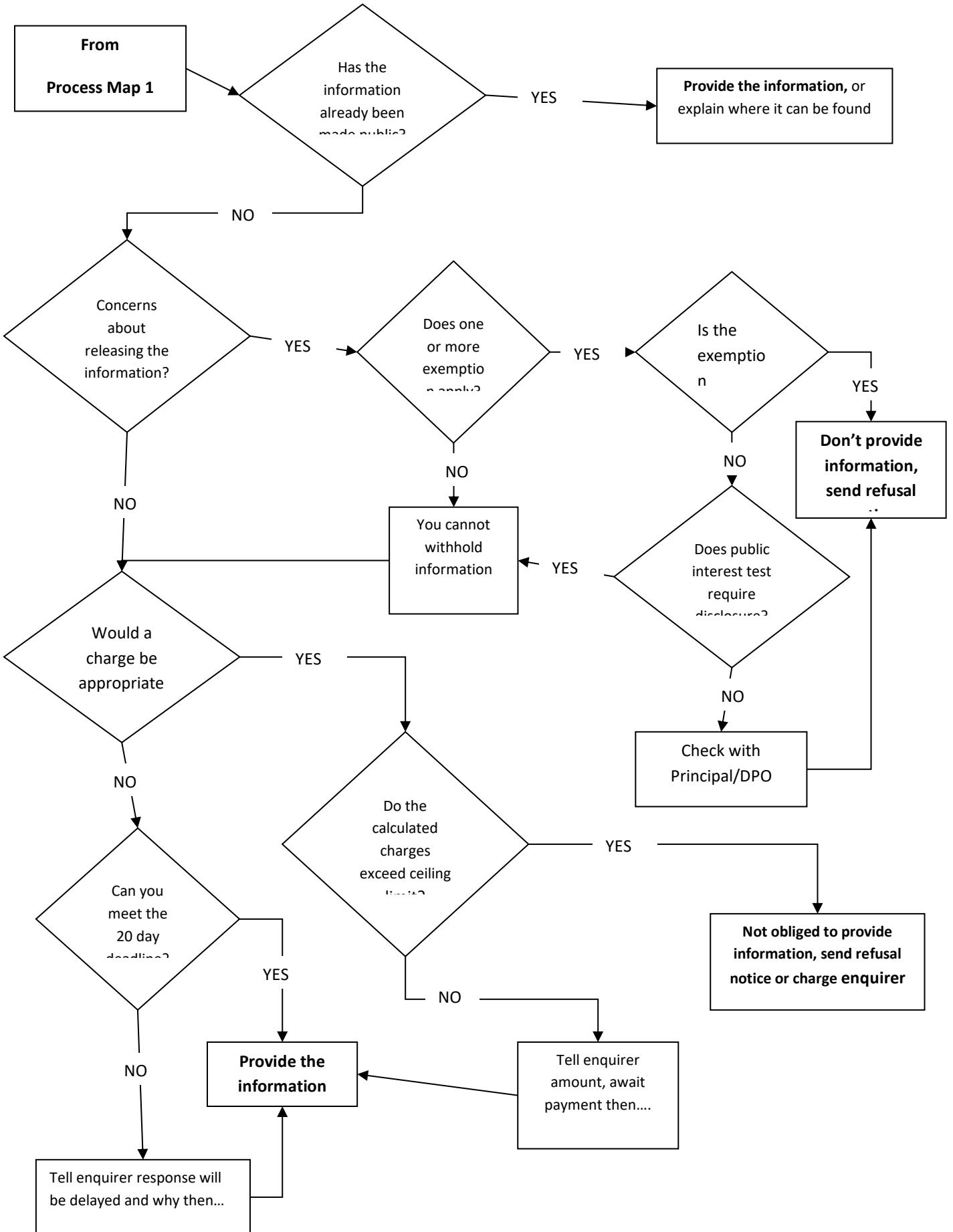
11.1 This policy will be supported by the following policies and procedures:

1. Data Protection Policy

Appendix 1 - Process Map 1 – procedures for dealing with FOI requests



Appendix 1: (continued) Process Map 2 – procedures for dealing with FOI requests



Appendix 2 – Exemptions

Although decisions on disclosure should be made on a presumption of openness, the Freedom of Information Act recognises the need to preserve confidentiality and protect sensitive material in certain (defined) circumstances.

The Foundation will not withhold information in response to a valid request unless one of the following applies:

- 3) an exemption to disclose, or
- 4) the information sought is not held, or
- 5) the request is considered vexatious or repeated, or
- 6) the cost of compliance exceeds the threshold (see Appendix 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 are not normally relevant to Foundations/academies. There are more than twenty types of exemption but Foundations/academies are likely to use only a few of them.

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 test, and
- Qualified – where, even if an exemption applies, there is a duty to consider the public interest in disclosing information.

Absolute exemptions

There are 8 absolute exemptions listed in the Act. Even where an absolute exemption applies it does not mean that the Foundation cannot 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.

The absolute exemptions in the Act are set out below. Those which might be relevant to the Foundation are marked with an asterisk*:

- Information accessible to the enquirer by other means* (section 21) – If information is reasonably accessible to the applicant by another route than the Act, it is exempt information. This is the case even if the enquirer would have to pay for the information under the 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.
- Information dealing with security matters (section 23) – This applies to information directly or indirectly supplied by, or relating to, bodies dealing with security matters such as MI5, MI6, Special Forces, etc.
- Court records (section 32) – This applies to information related to proceedings in a court or tribunal or served on a public authority for the purposes of proceedings.

- Parliamentary Privilege (section 34) – This exempts information if it is required for the purpose of avoiding an infringement of the Parliamentary privilege.
- Prejudice to the effective conduct of public affairs (section 36) – This relates to the maintenance of the collective responsibility of Ministers.
- Personal information* (section 40) – Where the enquirers ask to see information about themselves, this is exempt under the Act because it is covered by the Data Protection Act/General Data Protection Regulation (*respectively before/after 25 May 2018*).
- 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.
- 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.

Qualified exemptions

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 the information. Guidance on carrying out the public interest test is in Appendix 3.

The qualified exemptions in the Act are set out below. Those which might be relevant to the Foundation are marked with an asterisk*:

- 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 publication date. This could apply to statistics published at set intervals, statutory accounts, and similar information.
- National security (section 24) – Information is exempt for the purposes of safeguarding national security.
- Defence (section 26) – Information is exempt if its disclosure would prejudice the defence of the UK.
- International relations (section 27) – Information is exempt if its disclosure would, or would be likely to, prejudice relation between the UK and any other state.
- Relations within the UK (section 28) - Information is exempt if its disclosure would, or would be likely to, prejudice relations between any administration in the UK.
- 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.
- Investigations and proceedings conducted by public authorities* (section 30) – Information is exempt if it has at any time been held by the Foundation 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.

- Law enforcement* (section 31) – Information which is not exempt under Section 30 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 Foundation 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.
- Audit functions (section 33) – Information is exempt if 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.
- j. 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 Attorney General) and the operation of any Ministerial private office.
- k. Prejudice to the conduct of public affairs (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.
- l. 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.
- m. 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.
- n. Environmental information* (section 39) – Information is exempt under FOIA when it is covered by the Environmental Information Regulations.
- o. Personal information* (section 40) – Where the information concerns a third party, it is exempt if its disclosure would contravene the Data Protection Act 1998/General Data Protection Regulation[†], or the data protection principles (common to both DPA and GDPR); 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 Data Protection Act/General Data Protection Regulation. The duty to confirm or deny does not arise in relations to this information if doing so would be incompatible with any of the above.

[†]*respectively before/after 25 May 2018*

- p. Legal professional privilege* (section 42) – Legal professional privilege covers any advice given by legal advisers, solicitors or barristers. If the Foundation wishes to disclose information of this nature, it 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.

- q. 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 Foundations. 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.

Assessing each case on its own merits

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, the Foundation will consider the harm that could result at the time of the request and, whilst taking into account any previous exemption applications, will endeavour to consider each case separately on its own merits.

In all cases, before writing to the enquirer, the person given responsibility for FOI by the governing body 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 - Applying the Public Interest Test

Having established that a qualified exemption definitely applies to a particular case, the Foundation must then carry out a 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. Although precedent and case law will play a part in the decision, individual circumstances will vary and each case will need to be considered on its own merits.

(It is important to note that 'in the public interest' does not necessarily equate to 'that which may be of interest to the public': it may be totally irrelevant that a matter could be the subject of public curiosity.)

In most cases it will be relatively straightforward to decide where the balance of the public interest in disclosure lies. However, there will inevitably be cases where the decision is a difficult one. Factors that might be taken into account when weighing the public interest include:

For Disclosure	Against Disclosure
Is disclosure likely to increase access to information held by the Foundation?	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 Foundation in the use of public funds and help to 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 Foundation's legal or contractual position?
Is disclosure likely to increase public participation in decision making?	Is disclosure likely to infringe upon other legislation such as Data Protection Act/GDPR?
Is disclosure likely to increase public participation in the political processes in general?	Is disclosure likely to create a controversial precedent on the release of information or impair our 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 Foundation's 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?

Note also that:

- a. Potential or actual embarrassment to, or loss of confidence in, the Foundation, its staff or its governors is NOT a valid factor to consider.
- b. The fact that the information is technical, complex to understand and may be misunderstood may not of itself be a reason to withhold information.
- c. The potential harm of releasing information will reduce over time and should be considered at the time the request is made rather than by reference to when the relevant decision was originally taken.
- d. The balance of the public interest in disclosure cannot always be decided on the basis of whether the disclosure of particular information would cause harm, but on certain higher order considerations such as the need to preserve confidentiality of internal discussions.
- e. A decision not to release information may be perverse, i.e. would a decision to withhold information because it is not in the public interest to release it, itself result in harm to public safety, the environment or a third party.

The Foundation will record the answers to these questions and the reasons for these answers.

Deciding on the public interest is not simply a matter of adding up the number of relevant factors on each side. The Foundation will decide how important each factor is in the circumstances before making an overall assessment. This assessment will be reviewed by the CEO.

Decision for disclosure

Where the balance of the public interest lies in disclosure, the enquiry will be dealt with and the information required will be made available.

Decision against disclosure

After carrying out the public interest test if it is decided that the exemption should still apply, the Foundation will reply to the request with the appropriate response under the circumstances.

There will be occasions when it has been decided that a qualified exemption applies but consideration of the public interest test may take longer. In such a case, the Foundation will contact the enquirer within 20 working days stating that a particular exemption applies and including an estimate of the date by which a decision on the public interest test will be made. This will be within a reasonable time, normally no more than 10 working days in addition to the original 20 days.

Appendix 4 - Fee charging

FOI does not require charges to be made but Foundations have discretion to charge applicants a fee in accordance with the Fees Regulations (further detail available on the legislation website):

<http://www.legislation.gov.uk/ukxi/2004/3244/contents/made>

The following costs will be taken into account when calculating the estimated cost of complying with a request for information:

The prescribed costs: these are any costs reasonably incurred by the Foundation in:

- determining whether the Foundation holds information of the description specified in the request
- locating and retrieving the information and in meeting the applicant's preference for communicating the information including the cost of associated staff time.

but it does not include the cost of staff time incurred in determining whether the Foundation is obliged to comply with the request for information

The disbursements: these are any costs directly and reasonably incurred by the Foundation in:

- informing the applicant whether information is held of the description specified in the request
- communicating the information to the applicant

Information on charges

- a. If the information is exempt for the purposes of the FOIA fees will not apply. The Foundation will contact the enquirer to inform them that the information is exempt. There will be no charge.
- b. If it is apparent that the request would cost less than the current limit (£450), the Foundation would not make the calculation.
- c. The Foundation will calculate the appropriate limit. Staff time is costed at £25 an hour. When calculating whether the limit is exceeded, the Foundation will take into account the costs of determining whether the information is held, where it is held, retrieving the information and extracting the information from other documents. The Foundation does not take into account the costs involved with considering whether information is exempt under the Act.
- d. If a request costs less than the limit, the Foundation will only charge for the cost of informing the applicant whether the information is held and communicating the information to the applicant (eg photocopying, printing and postage costs).

Charges are:

1. 5p per A4 sheet for printing or photocopying, black and white;
2. 10p per A3 sheet for printing or photocopying, black and white;
3. 92p per A4 sheet for printing or photocopying, colour;
4. £1.24 per A3 sheet for printing or photocopying, colour;

5. postage costs - documents will be sent by second class mail unless specified otherwise.
- e. If a request exceeds the limit, the Foundation is able to: turn the request down; answer and charge a fee; or answer and waive the fee. If the Foundation chooses to comply with a request where the estimated cost exceeds the threshold it will calculate the appropriate charge (as paragraph 3).
- f. For all requests the Foundation will have regard to the following points:
 - Duty to provide advice and assistance to applicants. If the Foundation plans to turn down a request for cost reasons it will contact the applicant in advance to discuss whether they would prefer the scope of the request to be modified so that it would cost less than the appropriate limit; or
 - If the Foundation plans to suggest charging the applicant a high fee it will contact the applicant in advance to discuss the amount of the charge and enquire whether they would prefer the scope of the request to be modified so that it would cost less than the appropriate limit
 - The Regulations set out the maximum amount that can be charged. They do not set out a minimum charge nor prevent the Foundation from charging no fee. The Foundation may, for straightforward requests, choose to waive a fee.

Limits to fee charges

The fee for complying with a request for information must not be more than the sum of the prescribed costs and the disbursements.

Aggregated costs

Where two or more requests are made to the Foundation by different people who appear to be acting together or as part of a campaign, the estimated costs of complying with any of the requests is to be taken to be the estimated total cost of complying with them all, provided that:

- the two or more requests referred to in that section are for information which is on the same subject matter or is otherwise related;
- the last of the requests is received by the Foundation by the twentieth Foundation day following the date of receipt of the first of the requests, and
- it appears to the Foundation that the requests have been made in an attempt to ensure that the prescribed costs of complying separately with each request would not exceed the appropriate limit.

How will the applicant be informed?

Where the Foundation intends to charge a fee for complying with a request for information, it will give the person requesting the information appropriate notice in writing (the “fees notice”) stating that a fee of the amount specified in the notice is to be charged for complying.

The Foundation requires proof of delivery of a fees notice, either signed for in the post or emailed with a return receipt request. Where a fees notice has been given to the person making the request, the Foundation will not comply with the request unless the fee is paid within 3 months of the notice being received.

Appendix 5 - Guide to information available under the publication scheme

<p style="text-align: center;">Information to be published</p> <p style="text-align: center;">this includes datasets where applicable – please refer to the document</p> <p style="text-align: center;">“How to complete the Guide to Information” available from the ICO</p>	<p style="text-align: center;">How the information can be obtained</p> <p style="text-align: center;">(eg hard copy and/or website)</p> <p style="text-align: center;">NB some information may only</p> <p style="text-align: center;">be available for inspection</p>	<p style="text-align: center;">Charge</p> <p style="text-align: center;">(if applicable)</p>
<p>Class 1 – who we are and what we do</p> <p>(organisational information, structures, locations and contacts) – this will be current information only</p>		
Who’s who in the Foundation	website	
Who’s who on the governing body/board of governors and the basis of their appointment	website	
Instrument of Government/Articles of Association	website	
Contact details for the principal and for the governing body, via the Foundation (named contacts where possible)	website	
Foundation prospectus (if any)	website	
Annual Report (if any)	website	

Staffing structure	website	
Foundation session times and term dates	website	
Address of Foundation and contact details, including email address	website	

<p style="text-align: center;">Information to be published</p> <p style="text-align: center;">(NB some information may only be available for inspection)</p>	<p style="text-align: center;">How the information can be obtained</p> <p style="text-align: center;">(eg hard copy and/or website)</p>	<p style="text-align: center;">Charge</p> <p style="text-align: center;">(if applicable)</p>
<p>Class 2 – what we spend and how we spend it</p> <p>(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	Foundation office/hard copy on request	
Capital funding	Foundation office/hard copy on request	
Financial audit reports	Foundation office/hard copy on request	
Details of expenditure items over £2000 – published at least annually but at a more frequent quarterly or biannual interval where practical	Foundation office/hard copy on request	
Procurement and contracts the Foundation has entered into, or information relating to/a link to information held by an organisation which has done so on its behalf (for example, a local authority or diocese)	Foundation office/hard copy on request	
Pay policy	Foundation office/hard copy on request	

<p>Staff allowances and expenses that can be incurred or claimed, with totals paid to individual senior staff members (senior leadership team or equivalent, whose basic actual salary is at least £60,000 per annum) by reference to categories</p>	<p>Foundation office/hard copy on request</p>	
<p>Staffing, pay and grading structure including, as a minimum, salaries for senior staff (senior leadership team or equivalent as above) in bands of £10,000; and for more junior posts, by salary range.</p>	<p>Foundation office/hard copy on request</p>	
<p>Governors' allowances that can be incurred or claimed, and a record of total payments made to individual governors</p>	<p>Foundation office/hard copy on request</p>	

<p style="text-align: center;">Information to be published (NB some information may only be available for inspection)</p>	<p style="text-align: center;">How the information can be obtained (eg hard copy and/or website)</p>	<p style="text-align: center;">Charge (if applicable)</p>
<p>Class 3 – what our priorities are and how we are doing (strategies and plans, performance indicators, audits, inspections and reviews) – current information should be published</p>		
<p>Foundation profile (if any) and performance data supplied to the government or a direct link to the data Including the latest Ofsted/Education and Training Inspectorate report (summary and full report) and post-inspection action plan</p>	<p>Foundation office/hard copy on request</p>	
<p>Performance management policy and procedures adopted by the governing body</p>	<p>Foundation office/hard copy on request</p>	
<p>The Foundation’s future plans – for example, proposals for and any consultation on the future of the Foundation, such as a change in status</p>	<p>Foundation office/hard copy on request</p>	
<p>Safeguarding and child protection</p>	<p>Foundation office/hard copy on request</p>	
<p>Class 4 – how we make decisions (decision making processes and records of decisions) – current and previous three years as a minimum</p>		
<p>Admissions policy/decisions (not individual admission decisions) – where applicable</p>	<p>Foundation office/hard copy on request</p>	
<p>Governing body meeting agendas, papers and minutes (NB information that is properly considered to be private should be excluded)</p>	<p>Foundation office/hard copy on request</p>	

<p style="text-align: center;">Information to be published (NB some information may only be available for inspection)</p>	<p style="text-align: center;">How the information can be obtained (eg hard copy and/or website)</p>	<p style="text-align: center;">Charge (if applicable)</p>
<p style="text-align: center;">Class 5 – our policies and procedures in relation to pupils (current written protocols, policies and procedures for delivering our services and responsibilities) – current information only.</p> <p style="text-align: center;">As a minimum these must include policies, procedures and documents that the Foundation is required to have by statute or by its funding agreement or equivalent, or by the government – these will include policies and procedures for handling information requests.</p>		
<p>Records management and personal data policies, including:</p> <ol style="list-style-type: none"> 1. information security policies 2. records retention, destruction and archive policies 3. data protection (including information sharing policies) 	<p style="text-align: center;">Foundation office/hard copy on request</p>	
<p>Charging regimes and policies</p> <p>This should include details of any statutory charging regimes.</p> <p>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.</p>	<p style="text-align: center;">Foundation office/hard copy on request</p>	

<p>If the Foundation charges a fee for re-licensing the use of datasets, it should state in its guide how this is calculated (please see “How to complete the Guide to information” available from the ICO).</p>		
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<p>Information to be published (NB some information may only be available for inspection)</p>	<p>How the information can be obtained (eg hard copy and/or website)</p>	<p>Charge (if applicable)</p>
<p>Class 6 – lists and registers (currently maintained lists and registers only – this does not include the attendance register)</p>		
<p>Curriculum circulars and statutory instruments</p>	<p>Foundation office/hard copy on request</p>	
<p>Disclosure logs</p>	<p>Foundation office/hard copy on request</p>	
<p>Asset register</p>	<p>Foundation office/hard copy on request</p>	
<p>Any information the Foundation is currently legally required to hold in publicly available registers</p>	<p>Foundation office/hard copy on request</p>	

<p style="text-align: center;">Information to be published (NB some information may only be available for inspection)</p>	<p style="text-align: center;">How the information can be obtained (eg hard copy and/or website)</p>	<p style="text-align: center;">Charge (if applicable)</p>
<p>Class 7 – the services we offer (information about the services we offer, including leaflets, guidance and newsletters produced for the public and businesses) – current information only</p>		
Extra-curricular activities	Foundation office/hard copy on request	
Out of Foundation clubs	Foundation office/hard copy on request	
Services for which the Foundation is entitled to recover a fee, together with those fees	Foundation office/hard copy on request	
Foundation publications (leaflets, booklets and newsletters)	Foundation office/hard copy on request	
<p>Additional Information (this will provide Foundations with the opportunity to publish information that is not itemised in the lists above)</p>		

SCHEDULE OF CHARGES

This describes how the charges have been arrived at and should be published as part of the guide.

TYPE OF CHARGE	DESCRIPTION	BASIS OF CHARGE
Disbursement cost	photocopying/printing @ XX pence per sheet (black & white)	actual cost
	photocopying/printing @ XX pence per sheet (colour)	actual cost
	postage	actual cost of Royal Mail standard 2 nd class
Statutory Fee		in accordance with the relevant legislation (quote the actual statute)
Other		