



*Saint* **GREGORY'S**  
*Bath*

## **Freedom of Information Policy**

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Title	Freedom of Information Policy	
Prepared By	Karen Tyler, Data Manager	Date: July 2020
Checked By	Karen Howard, Director of Finance and Premises	Date: July 2020
Last Approved By	Governors' Finance and Premises Committee	Date: September 2023
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### **Version History**

Version	Date	Amendments
V01.00	July 2020	Approved by Governors
V01.01	February 2021	Charging information updated
V01.02	September 2023	Reapproved by Governors

*“In Christ we flourish”*

## **Introduction**

As an educational provider, St Gregory's has an obligation to publish a Freedom of Information policy, outlining how we will meet our duties under the Freedom of Information Act 2000 and associated regulations. This policy outlines our procedures for:

- the publication of information;
- providing applicants who have requests for specific information with advice and assistance throughout the duration of their requests.

It also clarifies our position regarding the appropriate limit to the costs incurred by the school in obtaining any requested information.

## **Legal Framework**

This policy has due regard to the following legislation:

- The General Data Protection Regulation
- The Data Protection Act 2018
- The Freedom of Information Act 2000
- The Freedom of Information and Data Protection (Appropriate Limit and Fees) Regulations 2004

It should be read in conjunction with the school's Data Protection Policy.

## **1. Publication of Information**

### **1.1. Publication Scheme**

The school maintains a Publication Scheme, which is a list of the types of information that are made publicly available. Please see Appendix 1 for this scheme. Much of this information is available on our website. Requests for hard copies of information should be submitted to the Data Protection Officer either by email to [dpo@st-gregorys.org.uk](mailto:dpo@st-gregorys.org.uk) or by post to St Gregory's Catholic College, Combe Hay Lane, Odd Down, Bath, BA2 8PA. Please mark all correspondence "**PUBLICATION SCHEME INFORMATION REQUEST**". The information provided will be in the language in which it is held, or another language that is legally required. If, under relevant disability and discrimination regulations, the school is legally obliged to provide the information in other forms and formats, it will do so.

## 1.2. Charges

Information published on our website is free, although you may incur costs from your Internet Service Provider. If you do not have Internet access, you can access our website using a local library or an Internet Café. Where hard copies of information are requested, a small charge may be made to cover disbursements incurred, such as photocopying, printing and postage. Photocopying will be charged at 10p per sheet for black and white and 25p per sheet for colour. Postage will be the actual cost of standard 2nd class mail.

## 2. Requests for Other Specific Information

### 2.1. Rights of Access to Information

Requests for information that is not available through the Publication Scheme should be submitted to the Data Protection Officer either by email to [dpo@st-gregorys.org.uk](mailto:dpo@st-gregorys.org.uk) or by post to St Gregory's Catholic College, Combe Hay Lane, Odd Down, Bath, BA2 8PA. Please mark all correspondence "**FREEDOM OF INFORMATION REQUEST**". The request should state the name of the applicant and include an address for correspondence (which can be an email address). It must adequately describe the information requested. If a request is submitted in a foreign language, the school is not expected to obtain a translation of the request. For the request to be processed, the school will ask the applicant to provide their request in English. Provided that the request meets the requirements set out above, the school will comply with its duty to confirm whether it holds information of the description specified in the request or not within 20 school days, or 60 working days if this is shorter, from receipt of the request. Where a fee is charged, the timeframe within which the school has to respond to the request begins from the day the fee is received. The school will not be able to comply with the above where:

- The school reasonably requires further information to meet a Freedom of Information request and has informed the applicant of this requirement, but is not subsequently supplied with that further information;
- The information 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;
- A request for information is exempt under section 2 of the Freedom of Information Act 2000;
- The cost of providing the information exceeds the statutorily imposed appropriate limit of £450. The cost is estimated at £25 per hour of work, ie the time needed to find, extract and photocopy (if required) the information requested. Therefore there is a maximum of 18 hours work that the school will undertake. If the school feels that any request will take more time than this, it is not required to provide the information. The school will advise the applicant on what could be provided within the 18 hour limit. Where multiple requests are made to the school within 60 consecutive working days of each other, either by a single person or by different persons who appear to be acting in concert, the

estimated cost of complying with any of the requests is to be taken to be the total costs to the school of complying with all of them.

- The request is vexatious;
- The request is a repeated request from the same person made within 60 consecutive working days of the initial one;
- A fee notice was not honoured;
- The requested information is not held by the school for the purposes of the school's business.

Where information is, or is thought to be, exempt the school will, within 20 school days, give notice to the applicant which specifies the reason for the exemption. If information falls within scope of a qualified exemption, and the school needs additional time to consider the public interest test, the school may extend the deadline. In most cases, the extension will exceed no more than a further 20 school days.

Where a public interest test extension is required, the school will write to the applicant to inform them of this, stating which exemption(s) the extension relies on and why and giving a revised deadline for when the applicant will receive their response.

Requests for information that is not recorded by the school (e.g. requests for explanations, clarification of policy and comments on the school's business) will not be considered valid requests. In these cases, the applicant will be provided with an explanation of why their request will not be treated under the Freedom of Information Act 2000 and the school will respond to the applicant through other channels as appropriate.

The information provided to the applicant will be in the format that they have requested, where possible. Otherwise the school will assist the applicant by discussing alternative formats in which it can be provided. The information provided will also be in the language in which it is held, or another language that is legally required. If, under relevant disability and discrimination regulations, the school is legally obliged to provide the information in other forms and formats, it will do so.

In some cases, a request may be dealt with under more than one access regime, e.g. if the request involves both information about the school and personal information, it will be dealt with under the Freedom of Information Act 2000 and the Data Protection Act 2018.

Staff are made aware that it is a criminal offence to alter, deface, block, erase, destroy or conceal any information held by the school with the intention of preventing disclosure following a request.

## **2.2. Charging Fees**

Charges may be made for disbursements such as the following:

- Complying with the applicant's preferences about the format in which they would like to receive the information;
- Printing and photocopying;
- Postage and packaging.

The fees will not exceed the total cost to the school of informing the person making the request whether we hold the information and communicating the information to that person. The school will give the applicant a written notice stating that a fee is to be charged for the school's compliance within 20 days of receiving the request. Where a fee is to be charged, the school will not be able to comply with the request unless the fee is paid within a period of three months, beginning with the day on which the fees notice is given to the applicant. Where a fee is paid by cheque, the school has the right to wait until the cheque is cleared before commencing work. Once a fee is received, the school will inform the applicant of the revised response deadline, i.e. an additional 20 school days (or 60 working days).

## **2.3. Advice and Assistance**

The school will meet its duty to provide advice and assistance, as far as is reasonable, to any person who proposes to make, or has made, requests for information to the school. The school may offer advice and assistance as follows:

- Informing an applicant of their rights under the Freedom of Information Act 2000;
- Assisting an individual in the focus of their request;
- Advising an applicant if information is available elsewhere and how to access this information;
- Keeping an applicant informed on the progress of their request;
- Informing applicants about the types of information the school holds and the format in which it is available, as well as about the fees regulations and charging procedures.

The school will make early contact with an individual and keep them informed of the process of their request. We will accurately record and document all correspondence concerning the clarification and handling of any request.

Where an applicant's request has been refused because the information is accessible by other means, the school will advise the applicant how and where information can be obtained. Where the request has been refused because the information is intended for future publication or research, the school will advise the applicant of when this publication is expected.

Applicants will be given two months to provide any requested clarification. If an applicant decides not to follow the school's advice and assistance and fails to provide clarification, the school is under no obligation to contact the applicant again. If the school is under any doubt that the applicant did not receive the advice and assistance, the school will re-issue it.

#### **2.4. Third Parties**

The school may need to consult third parties about information held in scope of a request to consider whether it would be suitable to disclose the information. Situations where third parties may need to be consulted include the following:

- When requests relate to persons or bodies who are not the applicant and/or the school ;
- When the disclosure of information is likely to affect the interests of persons or bodies who are not the applicant or the school.

The school will consider if a third party needs to be directly consulted about a request, particularly, if there are contractual obligations that require consultation before information is disclosed. Third parties will also be consulted where the school is proposing to disclose information relating to them or information that is likely to affect their business or private interests. Where the school decides to release information following consultation with a third party, the third party will be informed in advance that the information is going to be disclosed.

#### **2.5. Requesting an Internal Review of a Response**

If an applicant is not satisfied with the response to a request for information they can request an internal review. This must be made in writing within 40 school days from the date the school issued an initial response to the request. Upon receipt of an application, the school will acknowledge it and inform the applicant of the intended response date, which will usually be within 20 school days of receipt of the application.

If the internal review is complex, requires consultation with third parties or the relevant information is of high volume, the school may need to extend the usual response timeframe. In these cases, the school will inform the applicant and provide an alternative response date. In most cases, the extension will exceed no more than a further 20 school days; however, the actual length of the extension will be decided on a case-by-case basis.

Wherever possible, the review will be undertaken by a different member of staff than the person who took the original decision. The applicant will be informed of the outcome of the review and a record will be kept of such reviews and the final decision that is made.

If the outcome of the review is to disclose information that was previously withheld, the information will be provided to the applicant at the same time they are informed of the response to the review, where possible. If this is not possible, the applicant will be informed of when the information will be provided. Within the response to a review, the applicant will be informed again of their right to complain to the ICO.

### **3. Feedback**

We welcome any comments or suggestions you may have regarding this policy and any requests you have made. If you want to make any comments or if you require further assistance or wish to make a complaint then please raise your concern with us in the first instance.

If you are not satisfied with the assistance that you get or if we have not been able to resolve your complaint and you feel that a formal complaint needs to be made then this should be addressed to the Information Commissioner's Office. This is the organisation that ensures compliance with the Freedom of Information Act 2000 and that deals with formal complaints. You can contact the Information Commissioner's Office at <https://ico.org.uk/concerns>.

Appendix 1**Publication Scheme for St Gregory's, Bath**

This scheme commits our school to make information available to the public as part of its normal business activities. We will:

- Proactively publish or otherwise make available as a matter of routine, information which is held by the school and falls within the classifications below.
- Specify the information which is held by the 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 the 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.

Where information is held, along with all associated charges, can be found in our 'Guide to Information' in Appendix 2 below.

**Classes of information**

Information that is available under this scheme includes:

- **Who we are and what we do:** Organisational information, locations and contacts, information on constitutional and legal governance;
- **What we spend and how we spend it:** Financial information is available on request;
- **What our priorities are and how we are doing:** Strategy and performance information, plans, assessments, inspections and reviews;
- **How we make decisions:** Policy proposals and decisions, decision-making processes, internal criteria and procedures, consultations;
- **Our policies and procedures:** Current written protocols for delivering our functions and responsibilities;
- **Lists and registers:** Information held in registers required by law and other lists and registers relating to the functions of the school;
- **The services we offer:** Advice and guidance, booklets and leaflets, transactions and media releases. A description of the services offered.

Information which will not be made available under this scheme includes:

- Information the disclosure of which is prevented by law, or exempt under the Freedom of Information Act 2000, or is otherwise properly considered to be protected from disclosure;



- Information in draft form or notes, documents in older versions, emails or other correspondence;
- 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.

**Appendix 2****Guide to Information**

<b>Who we are and what we do</b>		
<b>Information to be published</b>	<b>How the information can be obtained</b>	<b>Cost</b>
The school website	<a href="https://www.st-gregorys.org.uk">https://www.st-gregorys.org.uk</a>	Free
Who's who in the school, the staffing structure and names of key personnel	<a href="https://www.st-gregorys.org.uk/about-us/our-staff/">https://www.st-gregorys.org.uk/about-us/our-staff/</a>	Free
Who's who on the governing board, and the basis of their appointment	<a href="https://www.st-gregorys.org.uk/about-us/our-governors/">https://www.st-gregorys.org.uk/about-us/our-governors/</a>	Free
Contact details for the Headteacher	<a href="https://www.st-gregorys.org.uk/parent-information/statutory-website-information/">https://www.st-gregorys.org.uk/parent-information/statutory-website-information/</a>	Free
St Gregory's Prospectus and the New Sixth Prospectus	<a href="https://www.st-gregorys.org.uk/admissions/">https://www.st-gregorys.org.uk/admissions/</a>	Free
School session times and term dates	<a href="https://www.st-gregorys.org.uk/parent-information/">https://www.st-gregorys.org.uk/parent-information/</a>	Free
The school's address, contact details and email address	<a href="https://www.st-gregorys.org.uk/parent-information/statutory-website-information/">https://www.st-gregorys.org.uk/parent-information/statutory-website-information/</a>	Free

<b>What we spend and how we spend it</b>
Financial Information is available on request

What our priorities are and how we are doing		
Information to be published	How the information can be obtained	Cost
Ethos and values	<a href="https://www.st-gregorys.org.uk/parent-information/statutory-website-information/">https://www.st-gregorys.org.uk/parent-information/statutory-website-information/</a>	Free
The latest Ofsted full report	<a href="https://www.st-gregorys.org.uk/parent-information/statutory-website-information/">https://www.st-gregorys.org.uk/parent-information/statutory-website-information/</a>	Free
The performance management policy and procedures	Available on request	Cost of photocopying, posting and packaging for printed copies
The latest performance data	<a href="https://www.st-gregorys.org.uk/parent-information/statutory-website-information/">https://www.st-gregorys.org.uk/parent-information/statutory-website-information/</a>	Free
The school's future plans (the School Development Plan)	<a href="https://www.st-gregorys.org.uk/parent-information/key-documents/">https://www.st-gregorys.org.uk/parent-information/key-documents/</a>	Free
The safeguarding and child protection policies and procedures	<a href="https://www.st-gregorys.org.uk/parent-information/key-documents/">https://www.st-gregorys.org.uk/parent-information/key-documents/</a>	Free

How we make decisions		
Information to be published	How the information can be obtained	Cost
Admissions policy	<a href="https://www.st-gregorys.org.uk/admissions/">https://www.st-gregorys.org.uk/admissions/</a>	Free
Information pertaining to admissions	<a href="https://www.st-gregorys.org.uk/admissions/">https://www.st-gregorys.org.uk/admissions/</a>	Free
Governing Body and Committee Meeting Minutes	Available on request – Please note that some information might be exempt from publication by law.	Cost of retrieving, photocopying, posting and packaging

Our policies and procedures		
Information to be published	How the information can be obtained	Cost
Admissions arrangements	<a href="https://www.st-gregorys.org.uk/admissions/">https://www.st-gregorys.org.uk/admissions/</a>	Free
Allegations of Abuse Against Staff Policy	Available on request	Cost of photocopying, posting and packaging for printed copies
Appraising Teacher Performance Policy	Available on request	Cost of photocopying, posting and packaging for printed copies
Behaviour policy (Behaviour For Excellence)	<a href="https://www.st-gregorys.org.uk/parent-information/key-documents/">https://www.st-gregorys.org.uk/parent-information/key-documents/</a>	Free
Charging Policy	<a href="https://www.st-gregorys.org.uk/parent-information/key-documents/">https://www.st-gregorys.org.uk/parent-information/key-documents/</a>	Free
Complaints Policy	<a href="https://www.st-gregorys.org.uk/parent-information/key-documents/">https://www.st-gregorys.org.uk/parent-information/key-documents/</a>	Free
Data Protection policy	<a href="https://www.st-gregorys.org.uk/parent-information/key-documents/">https://www.st-gregorys.org.uk/parent-information/key-documents/</a>	Free
Disability Equality Scheme	<a href="https://www.st-gregorys.org.uk/parent-information/key-documents/">https://www.st-gregorys.org.uk/parent-information/key-documents/</a>	Free
Equality Statement	<a href="https://www.st-gregorys.org.uk/parent-information/statutory-website-information/">https://www.st-gregorys.org.uk/parent-information/statutory-website-information/</a>	Free
Freedom of Information Policy	<a href="https://www.st-gregorys.org.uk/parent-information/key-documents/">https://www.st-gregorys.org.uk/parent-information/key-documents/</a>	Free
Health and safety policy	Available on request	Cost of photocopying, posting and packaging for printed copies

Premises Lettings Charges	<a href="https://www.st-gregorys.org.uk/parent-information/key-documents/">https://www.st-gregorys.org.uk/parent-information/key-documents/</a>	Free
Pupil Premium Action Plan	<a href="https://www.st-gregorys.org.uk/parent-information/statutory-website-information/">https://www.st-gregorys.org.uk/parent-information/statutory-website-information/</a>	Free
Records Management Policy	<a href="https://www.st-gregorys.org.uk/parent-information/key-documents/">https://www.st-gregorys.org.uk/parent-information/key-documents/</a>	Free
Register of business interests of the Headteacher and of Governors	Available on request	Cost of photocopying, posting and packaging for printed copies
Relationship and Sex Education Policy	<a href="https://www.st-gregorys.org.uk/parent-information/key-documents/">https://www.st-gregorys.org.uk/parent-information/key-documents/</a>	Free
Safeguarding and Child Protection Policy	<a href="https://www.st-gregorys.org.uk/parent-information/key-documents/">https://www.st-gregorys.org.uk/parent-information/key-documents/</a>	Free
Supporting Students with Medical Conditions Policy	<a href="https://www.st-gregorys.org.uk/parent-information/key-documents/">https://www.st-gregorys.org.uk/parent-information/key-documents/</a>	Free
SEND information report	<a href="https://www.st-gregorys.org.uk/parent-information/statutory-website-information/">https://www.st-gregorys.org.uk/parent-information/statutory-website-information/</a>	Free

Lists and registers		
Information to be published	How the information can be obtained	Cost
Curriculum Information	<a href="https://www.st-gregorys.org.uk/about-us/our-curriculum/">https://www.st-gregorys.org.uk/about-us/our-curriculum/</a>	Free

The services we offer		
Information to be published	How the information can be obtained	Cost
Careers Programme Information	<a href="https://www.st-gregorys.org.uk/academic-life/careers/">https://www.st-gregorys.org.uk/academic-life/careers/</a>	Free
Extra-curricular activities	<a href="https://www.st-gregorys.org.uk/student-life/clubs-activities/">https://www.st-gregorys.org.uk/student-life/clubs-activities/</a>	Free
Out of school clubs	<a href="https://www.st-gregorys.org.uk/student-life/clubs-activities/">https://www.st-gregorys.org.uk/student-life/clubs-activities/</a>	Free
School publications, leaflets, books and newsletters	<a href="https://www.st-gregorys.org.uk/parent-information/">https://www.st-gregorys.org.uk/parent-information/</a>	Free