



## Freedom of Information and Publication Scheme

<b>Applicable to:</b>	✓	All individual academies within NEAT Academy Trust
	✗	Specified academies only within NEAT Academy Trust
	✓	Central team within NEAT Academy Trust
<b>Approval body:</b>	NEAT Academy Trust Board of Directors, which may be delegated	

### Status:

<b>Statutory policy or document</b>	Yes
<b>Review frequency</b>	As determined by the Board
<b>Approval by</b>	As determined by the Board

### Publication:

<b>Statutory requirement to publish on website</b>	No
<b>If not, agreed to publish on website?</b>	Yes – Trust

### Version Control:

<b>Revision Record of Issued Versions</b>			
<b>Author</b>	<b>Creation Date</b>	<b>Version</b>	<b>Status</b>
Central Support Manager (SH)	29 March 2018	1.0	Agreed by Board of Directors for implementation across the Trust.
<b>Changed by</b>	<b>Revision Date</b>	<b>Version</b>	<b>Status</b>
Director of HR and Governance (SH)	27 April 2019	2.0	Amendments following advice from Data Protection Officer and guidance from Information Commissioner's Office.
Governance Support Adviser (HH)	26 March 2021 To apply from 01.04.21	3.0	Minor amendments including reference to St Hild's. Approved by Executive Team on behalf of NEAT Academy Trust Board.
Head of Governance and Corporate Affairs (SH)	12 April 2021	4.0	Very minor amendment to DPO contact details.

<b>Review Date</b>	
<b>Frequency</b>	<b>Next Review Due</b>
Every three years	March 2022 (or earlier if new guidance or legislation issued and/or business need for earlier review identified)

## 1 Purpose

The purpose of this policy is to set out how we are clear and proactive about information we routinely make public and how we deal with requests for information that is not published under our publication scheme.

## 2 Scope

The policy applies to the trust and all of its academies. This publication scheme sets out:

- the classes of information which we publish or intend to publish;
- the manner in which the information will be published; and
- whether the information is available free of charge or on payment.

## 3 Policy statement

We acknowledge that as a public authority we should be proactive about the information that is available to the public. We commit to:

- proactively publish, or otherwise make available as a matter of routine, information which is held by the trust and falls within the classes of information described below;
- 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 made available under this scheme;
- produce a schedule of any fees charged for access to information which is made proactively available; and
- make this publication scheme available to the public.

## 4 Legal considerations

This policy and publication scheme takes into account the requirements of the Freedom of Information Act 2000 (FOIA) and the Environmental Information Regulations 2004 (EIR). Requests for environmental information will be handled under the EIR; requests for all other information will be handled under the FOIA. It conforms to the model Information Publication Scheme for schools and academies approved by the Information Commissioner.

## 5 Roles and responsibilities

- **NEAT Academy Trust Board of Directors:** The Board will review this policy and monitor its effectiveness. The trust's Audit and Risk Committee has oversight of any risks arising from information governance.
- **Governance Support Adviser:** The Governance Support Adviser is responsible for responding to a request for information not published under this scheme about the trust or its academies.
- **Data Protection Officer:** The Data Protection Officer appointed for the NEAT Group is: Veritau Ltd, Information Governance Team, County Hall, Racecourse Lane, Northallerton DL7 8AL Tel: 01609 554025 E-mail: [schoolsDPO@veritau.co.uk](mailto:schoolsDPO@veritau.co.uk). The DPO is a statutory position and operates in an advisory capacity. Duties include providing advice and guidance in responding to

freedom of information requests.

## 6 Classes of information published and how it is made available

The publication scheme is a guide to information which is currently published (or has recently been published) or which we will publish in the future. This is split into categories of information known as “classes” as set out in Appendix 1.

The classes of information will not generally include:

- information that is prevented by law from being disclosed, or is exempt from disclosure under the Freedom of Information Act, or is otherwise properly considered to be protected from disclosure. This includes personal data protected by the Data Protection Act;
- information in draft form; or
- information that is no longer readily available as it is contained in files that have been placed in archive storage, or it is difficult to access for similar reasons.

Appendix 1 also sets out how the information is published. Where it is within the trust’s capability, the information is available on the trust’s and/or the relevant school’s website which are available at:

- NEAT Academy Trust (NEAT): <http://www.neat.org.uk>
- Benfield School: <http://www.benfield-school.co.uk>
- Central Walker Church of England Primary School: <http://www.centralwalkerce.newcastle.sch.uk>
- St Hilds Church of England School <https://www.sthilds.org.uk>
- Tyneview Primary School: <http://www.tyneview.newcastle.sch.uk>
- Walkergate Community School: <http://www.walkergate.newcastle.sch.uk>
- West Walker Primary School: <http://www.westwalker.newcastle.sch.uk>

Where it is impracticable to make information available on a website or when an individual does not wish to access the information by the relevant website, the published information can be provided in paper form. The contact details to request published information in paper form are:

Governance Support Adviser

NEAT Academy Trust (NEAT)

E-mail: [admin@neat.org.uk](mailto:admin@neat.org.uk)

Telephone: 0191 2284090

Registered Office: Heaton Centre, Trew hitt Road, Newcastle upon Tyne, NE6 5DY.

In exceptional circumstances some information may be available only by viewing in person. Where relevant, you should use the above contact details to contact the trust. An appointment to view the information will be arranged within a reasonable timescale.

Information will be provided in the language in which it is held or in such other language that is legally required. Where an authority is legally required to translate any information, it will do so. Obligations under disability and discrimination legislation and any other legislation to provide information in other forms and formats will be adhered to when providing information in accordance with this scheme.

## 7 Paying for information

Information published on the trust’s and/or the relevant school’s website is free.

Information provided in paper form will be subject to the schedule of charges in

Appendix 2, which will include photocopying costs and any postage and packing costs or costs directly incurred as a result of viewing information.

If a charge is to be made, confirmation of the payment due will be given before the information is provided. Payment may be requested prior to the provision of information.

## **8 Requests for information not published under this scheme**

Information held by the trust that is not published under this scheme can be requested, when its provision will be considered in accordance with the provisions of the Freedom of Information Act 2000 (FOIA) or the Environmental Information Regulations 2004 (EIR).

Requests should be made to:

Governance Support Adviser  
NEAT Academy Trust (NEAT)

E-mail: [admin@neat.org.uk](mailto:admin@neat.org.uk)

Telephone: 0191 2284090

Registered Office: Heaton Centre, Trewhitt Road, Newcastle upon Tyne NE6 5DY

FOIA requests should be made in writing and must provide a valid name and address (requests that require the recipient to click on electronic links will not be considered). EIA requests can be made verbally, however they will be followed up in writing to ensure accuracy.

Each request received will be acknowledged within five working days.

Under the FOIA the trust is usually required to confirm or deny whether it holds the information and if so to provide the information unless there is a good reason not to do so.

The Governance Support Adviser will:

- consider whether the request is for environmental information or not, and deal with it under the appropriate legislation;
- decide whether the requested information is held;
- locate, retrieve or extract the information;
- consider whether any exemption might apply, and the balance of the public interest test;
- prepare the material for disclosure and draft the response;
- seek any necessary approval for the response; and
- send the response to the requester.

The Head of Governance and Corporate Affairs will jointly consider with the Governance Support Adviser all requests where a public interest test is applied or where there is any doubt whether an exemption should be applied. In applying the public interest test they will:

- document clearly the benefits of both disclosing or withholding the requested information;
- where necessary seeking guidance from previous cases in deciding where the balance lies; and
- consult the DPO.

In some cases the trust may withhold information in relation to a FOIA request because

an exemption exists to protect information that should not be disclosed. This includes:

- where disclosing the information would require the trust to breach some other law, such as disclosing personal information in contravention of the Data Protection Act 2018 or the General Data Protection Regulation;
- information within a particular category or class of information e.g. information held for criminal investigations;
- where disclosing the information may cause a specific type of harm e.g. endangering health and safety, prejudicing someone's commercial interests.

Where an exemption is not 'absolute', we will consider whether the public interest in withholding the information is outweighed by the public interest in the disclosure.

The timeframe for responding to requests under FOIA/EIR is 20 school working days or 20 business working days, depending on where the information is held within the trust. The timeframe that applies will be confirmed in the acknowledgement of your request. If the trust claims an extension to consider the public interest test then we will notify you of this in writing within 20 school/business working days. Under EIR, if we consider the request to be particularly voluminous or complex and we wish to apply an additional 20 school/business working days, we will confirm this in writing within the first 20 days.

The trust may refuse a request if:

- it would cost too much or take too much staff time to deal with the request;
- the request is vexatious; or
- the request repeats a previous request from the same person.

When estimating the cost of compliance, the trust will take into account the cost of the following activities:

- determining whether it holds the information;
- finding the requested information, or records containing the information;
- retrieving the information or records; and
- extracting the requested information from records.

Staff time is rated at £25 per person per hour, regardless of who does the work, including external contractors. This means a limit of 18 staff hours as a statutory limit of £450 applies to the trust.

Where the cost to the trust is less than £450, the trust can only charge for the following (and excluding staff time):

- reproducing any document containing the information e.g. printing or photocopying;
- postage and other forms of transmitting the information;
- complying with section 11 of FOIA where the applicant has expressed a preference for the means of communication and where this is reasonably practicable.

These costs are referred to as 'communication costs' or disbursements and are limited to expenses actually incurred.

The trust will take reasonable steps to inform enquirers if any third party might have a copyright or intellectual property interest in information provided in response to their requests. However, it will be the enquirer's responsibility to ensure that any information provided by the trust is not re-used in a way that infringes those interests, whether or not any such warning has been given.

## **9 Complaints**

You can submit a complaint under the trust's Complaints Policy and Procedure if your request is refused or you are dissatisfied with how it has been handled and ask the trust to undertake an internal review. It is recommended by the Information Commissioner that the review is carried out within 20 working days, or 40 working days in exceptional circumstances.

### **General**

This policy is at the discretion of the trust and can be varied at any time. In the event of any conflict with primary legislation or statutory regulations, the legal provisions will have precedence over this procedure in all cases.

## Appendix 1 – Classes of information published and how it is made available

Information to be published	How the information can be obtained	Cost – see Appendix 2
<b>Class 1 - Who we are and what we do</b>		
Organisational information, structures, locations and contacts. This will be current information only.		
Vision and aims of the trust	Trust website	Free unless paper copy requested
Names of academies within the trust	Trust website	Free unless paper copy requested
Key staff in the trust	Trust website	Free unless paper copy requested
Names of the trust's members and directors, the basis of their appointment and their personal and business interests	Trust website	Free unless paper copy requested
Names of the school's local governors, the basis of their appointment and their personal and business interests	Relevant school website	Free unless paper copy requested
Articles of Association	Trust and school websites	Free unless paper copy requested
Contact details for the members, directors and local governors via the trust (named contact)	Trust and school websites	Free unless paper copy requested
Contact details for the headteacher via the school (named contact)	Relevant school website	Free unless paper copy requested
Address of school and contact details including email address	Trust and school websites	Free unless paper copy requested
School prospectus (if any)	Relevant school website	Free unless paper copy requested
Curriculum	Relevant school website	Free unless paper copy requested
Annual Report (part of the Annual Report and Accounts)	Trust and school websites	Free unless paper copy requested
School session times and term dates	Relevant school website	Free unless paper copy requested
<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. Current and previous financial year.		
Statutory financial statements (part of the Annual Report and Accounts)	Trust and school websites	Free unless paper copy requested
Independent auditor's report (part of the Annual Report and Accounts)	Trust and school websites	Free unless paper copy requested
Capital funding (part of the Annual Report and Accounts)	Trust and school websites	Free unless paper copy requested

<b>Information to be published</b>	<b>How the information can be obtained</b>	<b>Cost – see Appendix 2</b>
Reserves and Investment Policy	Trust website	Free unless paper copy requested
Procurement Policy (part of NEAT Financial Handbook)	Trust website	Free unless paper copy requested
List of contracts that have been subject to formal tendering processes – published annually	Trust website	Free unless paper copy requested
Details of expenditure items over £25,000 – published annually	Trust website	Free unless paper copy requested
Pay Policy (including pay and grading structure and salaries for senior staff)	Trust website	Free unless paper copy requested
Travel and Subsistence Policy	Trust website	Free unless paper copy requested
Allowances and expenses that have been paid to individual senior staff members, whose basic actual salary is at least £60,000 per annum, to include travel, subsistence and accommodation	Trust website	Free unless paper copy requested
Directors' and Governors' Allowances Policy	Trust and school websites	Free unless paper copy requested
Total allowances and expenses that have been paid to individual non-executive directors (part of Annual Report and Accounts)	Trust and school websites	Free unless paper copy requested
<b>Class 3 – What our priorities are and how we are doing</b>		
Strategies and plans, performance indicators, audits, inspections and reviews. This will be current information only.		
Trust Strategic Plan	Trust website	Free unless paper copy requested
School performance as supplied to/published by the Department for Education	Relevant school website	Free unless paper copy requested
School inspection report from Ofsted and any post-inspection action plan	Relevant school website	Free unless paper copy requested
Appraisal Policy	Trust website	Free unless paper copy requested
Changes to Provision Policy	Trust website	Free unless paper copy requested
Any proposals that affect the future of the school, such as a change in age range or scope of provision	Relevant school website	Free unless paper copy requested
Safeguarding/Child Protection Policy	Relevant school website	Free unless paper copy requested



Information to be published	How the information can be obtained	Cost – see Appendix 2
<b>Class 4 – How we make decisions</b>		
Decision making processes and records of decisions. This will be current information and previous three years.		
Scheme of Delegation	Trust and school websites	Free unless paper copy requested
Agendas of meetings of the trust board and its committees	Paper copy from trust	Cost - see Appendix 2
Minutes of meetings of the trust board and its committees (excluding information that is classified as confidential and once these are agreed by the relevant body)	Trust website for minutes of trust board and board committees; Paper copy from trust for any ad hoc committee	Free unless paper copy requested
	Relevant school website for minutes of local governing committee meetings	Free unless paper copy requested
		Cost - see Appendix 2
Admissions Policy	Trust and school websites	Free unless paper copy requested
<b>Class 5 – Our policies and procedures</b>		
Current written protocols, policies and procedures for delivering our services and responsibilities. This will be current information only.		
Information governance policies including: <ul style="list-style-type: none"> <li>Data protection (including information sharing policies)</li> <li>Information security</li> <li>Records retention, destruction and archive</li> </ul>	Trust and school websites	Free unless paper copy requested
Charging and Remissions Policy	Trust and school websites	Free unless paper copy requested
Pupil policies including attendance, behaviour, sex education, SEN, accessibility plan, home-school agreement, supporting pupils with medical conditions	Relevant school website	Free unless paper copy requested
Equality information and objectives	Relevant school website	Free unless paper copy requested
Recruitment and Selection Code of Practice	Trust website	Free unless paper copy requested
Vacancies available to external applicants	Trust vacancies – trust website School vacancies – relevant school website	Free unless paper copy requested
Staff disciplinary, allegations of abuse, grievance and capability procedures	Paper copy from trust or relevant school	Cost - see Appendix 2
Health and Safety Policy	Trust and school websites	Free unless paper copy requested
Complaints Policy and Procedure	Trust and school websites	Free unless paper copy requested

<b>Information to be published</b>	<b>How the information can be obtained</b>	<b>Cost – see Appendix 2</b>
<b>Class 6 – Lists and Registers</b>		
Currently maintained lists and registers only (this does not include the attendance register).		
Disclosure logs	Paper copy from trust or relevant school	Cost - see Appendix 2
Asset register	Paper copy from trust or relevant school	Cost - see Appendix 2
Any information the school is currently legally required to hold in publicly available registers	Paper copy from relevant school	Cost - see Appendix 2
<b>Class 7 – The services we offer</b>		
Current information about the services we offer, including leaflets, guidance and newsletters produced for the public and businesses.		
Extra-curricular activities	Relevant school website	Free unless paper copy requested
Out of school clubs	Relevant school website	Free unless paper copy requested
Trust newsletters	Paper copy from trust	Cost - see Appendix 2
Academy publications, leaflets, books and newsletters	Paper copy from relevant school	Cost - see Appendix 2

## Appendix 2 – Schedule of charges

Type of charge	Cost	Basis of charge
Photocopying	1p per A4 sheet black and white	Actual copy charge
	4p per A4 sheet colour	
	5p per A3 sheet black and white	
	10p per A3 sheet colour	
Postage and packing	Royal Mail 2 <sup>nd</sup> class Any specialist packing required due to volume of paper copies	Actual postage charge Actual cost