



Wilson's School

- 1. Freedom of Information Policy**
- 2. Publication Scheme (ICO Model)**
- 3. Guide to Information Available**

Date approved by Trust Board: Spring 2024

Date of next review: Spring 2026

FREEDOM OF INFORMATION POLICY

1 INTRODUCTION

- 1.1 The School 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 Act.
- 1.2 The School has adopted the Information Commissioner's Office (ICO's) Model Publication Scheme (see Appendix 1) and has produced a Guide to Information routinely available from the School (see Appendix 2).

2 WHAT IS A REQUEST UNDER FOI

- 2.1 Any request for any information from the School is technically a request under the FOI, whether or not the individual making the request mentions the FOI. However, the 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 Act.
- 2.2 All FOI requests should be referred promptly to the Data Protection Officer, who will make arrangements for the request to be dealt with.
- 2.3 When considering a request under FOI, consideration must be given to the fact 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 the School cannot restrict access when releasing by marking the information "confidential" or "restricted".

3 TIME LIMIT FOR COMPLIANCE

- 3.1 The School must respond as soon as possible, and in any event, within 20 working days of the date of receipt of the request. For a School, a "working day" is one in which pupils are in attendance, subject to an absolute maximum of 60 calendar days to respond.

4 PROCEDURE FOR DEALING WITH A REQUEST

- 4.1 When a request is received by the Data Protection Officer, consideration will be given to re-allocation 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 School "holds" the information requested. The School will hold the information if it exists in computer or paper format. Some requests will require the School to take information from different sources and manipulate it in some way. Where this would take minimal effort, the School 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 School to add up totals in a spread sheet and release the total figures, this would be information "held" by the School. If the School would have to go through a number of spread sheets and identify individual figures and provide a total, this is likely not to be

information “held” by the School, 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 Act 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 request regime detailed in the Data Protection Policy above and relevant legislation;
- 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, data protection legislation and the Data Protection Policy above;
- 4.3.3 Section 41 – information that has been sent to the School (but not the School’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 School intends to publish at a future date;*
- 4.3.6 *Section 43 – information that would prejudice the commercial interests of the School 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 or site security 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 trustees of the School, would prejudice the effective conduct of the School.*

4.4 The sections mentioned in italics are qualified exemptions. This means that even if the exemption applies to the information, it is necessary 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 School has withheld some or all of the information, the School will 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 will also be explained.

5.2 The response should end by explaining to the requestor how they can complain if they are not satisfied with the response.

6 CONTACT

5.3 Any questions about this policy should be directed in the first instance to Data Protection Officer, Wilson's School, Mollison Drive, Wallington, Surrey, SM6 9JW. Email: dpo@wilsonsschool.sutton.sch.uk

Appendix 1



Wilson's School

Freedom of Information Act Publication Scheme

This model publication scheme has been prepared and approved by the Information Commissioner. It has been adopted without modification by Wilson's School. In this publication scheme references to the "authority" are references to Wilson's School.

This publication scheme commits an authority to make information available to the public as part of its normal business activities. The information covered is included in the classes of information mentioned below, where this information is held by the authority. Additional assistance is provided to the definition of these classes in sector specific guidance manuals issued by the Information Commissioner.

The scheme commits an authority:

- To proactively publish or otherwise make available as a matter of routine, information, including environmental information, which is held by the authority and falls within the classifications below.
- To specify the information which is held by the authority and falls within the classifications below.
- To proactively publish or otherwise make available as a matter of routine, information in line with the statements contained within this scheme.
- To 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.
- To review and update on a regular basis the information the authority makes available under this scheme.
- To produce a schedule of any fees charged for access to information which is made proactively available.
- To make this publication scheme available to the public.

Classes of information

Who we are and what we do

Organisational information, locations and contacts, constitutional and legal governance.

What we spend and how we spend it

Financial information relating to projected and actual income and expenditure, tendering, procurement and contracts.

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 authority.

The Services we offer

Advice and guidance, booklets and leaflets, transactions and media releases. A description of the services offered.

The classes of information will not generally include:

- Information the disclosure of which is prevented by law, or exempt under the Freedom of Information Act, or is otherwise properly considered to be protected from disclosure.
- Information in draft form.
- 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.

The method by which information published under this scheme will be made available

The authority will indicate clearly to the public what information is covered by this scheme and how it can be obtained. Where it is within the capability of a public authority, information will be provided on a website. Where it is impracticable to make information available on a website or when an individual does not wish to access the information by the website, a public authority will indicate how information can be obtained by other means and provide it by those means.

In exceptional circumstances some information may be available only by viewing in person. Where this manner is specified, contact details will be provided. 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.

Charges which may be made for Information published under this scheme

The purpose of this scheme is to make the maximum amount of information readily available at minimum inconvenience and cost to the public. Charges made by the authority for routinely published material will be justified and transparent and kept to a minimum.

Material which is published and accessed on a website will be provided free of charge.

Charges may be made for information subject to a charging regime specified by Parliament.

Charges may be made for actual disbursements incurred such as:

- photocopying

- postage and packaging
- the costs directly incurred as a result of viewing information

Charges may also be made for information provided under this scheme where they are legally authorised, they are in all the circumstances, including the general principles of the right of access to information held by public authorities, justified and are in accordance with a published schedule or schedules of fees which is readily available to the public.

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 provision of the information.

SCHEDULE OF CHARGES		
TYPE OF CHARGE	DESCRIPTION	BASIS OF CHARGE
Disbursement cost	Photocopying/printing @ 15p per sheet (black & white)	Actual cost incurred by school
	Photocopying/printing @ 20p per sheet (colour)	Actual cost incurred by school
	Packaging – envelopes etc	Actual cost incurred by the school
	Postage	Actual cost of Royal Mail standard 2 nd class postage
Statutory Fee	As applicable	In accordance with the relevant legislation

Written requests

Information held by a public authority that is not published under this scheme can be requested in writing, when its provision will be considered in accordance with the provisions of the Freedom of Information Act.

Contact Details:

The website for the School is www.wilsons.school
 Email: dpo@wilsonsschool.sutton.sch.uk
 Tel: 020 8773 2931
 Address: Data Protection Officer
 Wilson's School
 Mollison Drive

Wallington
Surrey
SM6 9JW

Appendix 2

Guide to the Information Available from Wilson's School

The school's website is <https://www.wilsons.school/>

WHO WE ARE AND WHAT WE DO

(Organisational information, structures, locations and contacts) Current information

Information to be published	How the information can be obtained
Funding Agreement (including any Variations thereto)	Website
Memorandum and Articles of Association	Website
Memorandum of Understanding with Southwark Diocesan Board of Education	Website and / or hard copy
Who's who in the School	Website
Who's who on the Trust Board	Website
School prospectus	Website
School session times, term dates and holidays	Website
Location and contact information – address, telephone number, email address and website	Website
Public examination results (and link to the data on the Department for Education's website)	Website

WHAT WE SPEND AND HOW WE SPEND IT

(Financial information relating to projected and actual income and expenditure, procurement, contracts and financial audit) Current and the previous financial year minimum

Information to be published	How the information can be obtained
Directors' Report and Financial Statements for the last financial year	Website
Annual budget plan and financial statements	Hard copy

Capital funding – details of capital funding allocated to the school along with information on related building projects and other capital projects	Hard copy
Additional funding	Hard copy
Pupil Premium Strategy	Website
16-19 Bursary	Website
Procurement and contracts – details of procedures used for the acquisition of goods and services.	Hard copy
Pay policy - procedures regarding teachers' pay.	Hard copy
Trustees' allowances – Details of allowances and expenses that have been claimed or incurred.	Hard copy

WHAT OUR PRIORITIES ARE AND HOW WE ARE DOING

(Strategies and plans, performance indicators, audits, inspections and reviews)

Current information should be published

Information to be published	How the information can be obtained
Government supplied performance data	Website
Ofsted Report (summary and full report)	Website
Section 48 SIAS Report	Website
Aims of the School	Website
Directors' Report and Financial Statements for the period ended 31 August last	Website
Safeguarding and Child Protection Policies and Procedures	Website
Performance management procedures	Hard copy
School's future plans	Hard copy

HOW WE MAKE DECISIONS

(Decision making processes and records of decisions) Current and previous three years as a minimum

Information to be published	How the information can be obtained
Admissions Criteria – arrangements and procedures and right of appeal	Website
Trust Board (and it's sub committees) meeting agendas, papers and minutes – information that is properly considered to be private will be excluded.	Hard copy

OUR POLICIES AND PROCEDURES

(Current written protocols, policies and procedures for delivering our services and responsibilities) Current information only

Information to be published	How the information can be obtained
Charging and Remissions Policy	Website
Health and Safety policy and risk assessments	Website and / or hard copy
Complaints Procedure	Website
Employment Policies – discipline and grievance policy, capability procedures, redundancy procedures, staff sickness absence policy.	Hard copy
Staff Conduct Policy	Hard copy
Acceptable Use Policy	Website
Relationships and Sex Education Policy	Website
Curriculum information	Website
Special Educational Needs and Disabilities Policy	Website
Accessibility Plan	Website
Code of Conduct Anti-Bullying Policy Drugs Policy	Website
Equality Duty Plan and Equality Objectives	Website

School Uniform Policy	Website
Religious Education and Collective Worship and Policy	Website
Work Related Learning and Careers Education advice and information	Website
Staff Vacancies	Website
Anti Fraud, Bribery and Corruption Policy	Hard copy
Whistleblowing Statement	Hard copy
Data Protection Policy & Freedom of Information Policy and Publication Scheme Privacy Notices	Website Website and/or hard copy
Records Management Procedures	Hard copy
Assessment Policy	Website
Attendance Policy	Website
Policy on the Use of Force to Control or Restrain Pupils	Website
Reserves Policy	Hard copy
School Visits Policy and Procedures	Hard copy
Major Incident Policy and Procedures	Hard copy
Parental Agreement for School to Administer Medicine	Website and / or hard copy
Policy for Pupils with Medical Needs	Website
Privacy Notices	Website
Safeguarding and Child Protection Policy and Procedures	Website
Sixth Form Agreement	Website
Lettings Policy and Procedures	Hard copy
IT Security Policy	Website and / or hard copy
Flexible Working Policy	Hard copy

LISTS AND REGISTERS

Currently maintained lists and registers only (and some information may only be available for inspection). This does not include personnel or student registers or the attendance register.

Information to be published	How the information can be obtained
Freedom of Information Disclosure log	Hard copy
Asset Register (excluding information properly regarded as protected from disclosure)	Hard copy
Register of Trustees' Business and Pecuniary Interests	Website
Any information the School is currently legally required to hold in publicly available registers	Hard copy

THE SERVICES WE OFFER

(Information about the services we offer, including leaflets, guidance and newsletters produced for the public and businesses) Current information only

Information to be published	How the information can be obtained
Sixth Form Brochure	Website and / or Hard copy
Prospectus for Year 7 entry	Website
Key Stage 4 Options Booklet	Website and / or Hard copy
Details of Co-curricular Activities	Website and / or hard copy
School publications e.g. Omnibus, The Wilsonian, The Intrigue	Website and / or Hard copy
Leaflets, booklets and newsletters	Website and / or hard copy