



Bishop Chadwick

Catholic Education Trust

Bishop Chadwick Catholic Education Trust

**Freedom of Information Act Policy &
Publication Scheme**

March 2024

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1. Introduction

The Freedom of Information Act 2000 grants members of the public the right to access information possessed by public bodies, including multi-academy trusts. This publication scheme pledges that the Bishop Chadwick Catholic Education Trust (BCCET) will disclose information to the public as part of its standard operational procedures. The information encompassed falls under the categories detailed below. Further details about the definition of these categories can be found in the [sector-specific guidance](#) provided by the Information Commissioner.

Under this scheme BCCET is committed to:

- Actively disclose or routinely make accessible information, including environmental information, in possession of the Trust that fits within the categories listed below.
- Identify the information in the Trust's possession that corresponds to the categories outlined below.
- Actively disclose or routinely provide information in accordance with the statements outlined in this scheme.
- Develop and make public the procedures through which specific information is regularly made available, ensuring it can be easily located and accessed by the public.
- Regularly reassess and refresh the information that the Trust disseminates under this scheme.
- Create a list detailing any fees associated with accessing information that is provided.
- Make this publication scheme available to the public.
- Disclose any dataset requested from BCCET, along with any updated versions it possesses, unless BCCET determines disclosure to be inappropriate; to release the dataset, where feasibly possible, in an electronic format conducive to re-use; and, if the dataset includes any copyrighted material for which the public authority holds exclusive rights, to make such information available for re-use in accordance with the Re-use of Public Sector Information Regulations 2015, where applicable, or otherwise under the stipulations of section 19 of the Freedom of Information Act. The term 'dataset' is clarified in section 11(5) of the Freedom of Information Act, and 'relevant copyright work' is explained in section 19(8) of the same Act.

2. Document Purpose

The purpose of the policy is to ensure:

- The Trust adheres to its obligations under the FOI Act and manages requests accordingly.
- The Trust has implemented a system to ensure the proactive disclosure of information it holds.

- Staff within the Trust are trained to identify and properly address a valid information request.
- Individuals are aware that they can submit a request and know the appropriate contact for doing so.

3. Freedom of Information (FOI) requests

Any inquiry for recorded data from BCCET or any of our individual Academies is regarded as a request under the FOI Act, regardless of whether the FOI Act is explicitly mentioned by the person making the inquiry.

All requests under the FOI should initially be directed to the Trust's Head of Service via email, who might assign the request to another person for handling. This action should be taken swiftly, ideally within 2 working days of the request's receipt.

Upon notification, the Head of Service, along with the Trust's Data Protection Officer, will guide the Academy or member of the Central Team, on the process for gathering the requested information and/or formulating a response to the requester.

When evaluating a request under the FOI, it's crucial to understand that disclosing information under the FOI is considered as making it available to the wider public. Thus, once information is disclosed to one person, it becomes accessible to all. Therefore, BCCET must carefully assess the implications of granting access to confidential information held by BCCET Academies.

4. Time limit for compliance

BCCET is required to reply to all FOI requests promptly, ensuring a response is provided within 20 working days from the receipt date of the request. In this context, a "working day" refers to a school day (a day when pupils are present). If the response period extends over a school holiday, the deadline for the FOI response may be extended to 60 days, based on normal working days rather than school days.

5. Procedure for dealing with a FOI request

Upon receipt of any request, it should initially be directed to the Trust Head of Service. This individual may then delegate the request to someone responsible for the specific type of information sought or provide guidance on the necessary response and timelines, including the applicability of any fees.

The initial step in responding to a request is to ascertain whether BCCET and/or the specific academy possesses the requested information. BCCET Academies are considered to possess information if it is available in electronic form and may also possess it in paper

form. Certain requests might necessitate BCCET to compile data from various sources or to process the data in some manner. Nevertheless, The Trust or its academies are not required to generate new information in response to an FOI request, as the FOI Act pertains only to information already in possession. If consolidating or processing the information would require minimal effort, BCCET or the academy is deemed to possess that information. However, if significant time is needed for such manipulation, the requester should be informed that the information is not available in the requested form and be given the chance to amend their request. For instance, if fulfilling a request involves summing totals in a spreadsheet for disclosure, such information is considered possessed by BCCET Academies. Conversely, if addressing the request necessitates combing through numerous spreadsheets to identify and sum individual figures, this may not be regarded as information possessed by the academy, depending on the effort required to extract the needed data.

The classes of information that are available include:

[Who we are and what we do](#)

Information on the organisation, its locations and contact details, along with its constitutional and legal governance framework.

[What we spend and how we spend it](#)

Financial data pertaining to forecasted and actual revenues and expenses, bidding processes, purchasing, and agreements.

[What our priorities are and how we are doing](#)

Information on strategy and performance, including strategic plans, evaluations, inspections, and assessments.

[How we make decisions](#)

Policy proposals and decisions. Decision making processes, internal criteria and procedures, consultations.

[Our policies and procedures](#)

Existing documented protocols for executing our duties and responsibilities.

[Lists and registers](#)

Data maintained in legally mandated registers and other records and lists pertinent to the operations of the multi academy trust.

[The services we offer](#)

Guidance and advice, brochures and pamphlets, transactions, and press releases. An overview of the services provided.

The classes of information will not generally include:

- Information whose release is prohibited by law, exempted by the Freedom of Information Act, or is justifiably regarded as confidential and protected from being disclosed.
- Draft versions of documents.
- Information that is not easily accessible because it has been archived or for reasons that make retrieval challenging.

This policy and publication scheme adheres to the template scheme for Academies sanctioned by the Information Commissioner.

The next step involves determining if the requested information can be disclosed or if it falls under any of the exemptions outlined in the Act. Some frequently applicable exemptions include:

Section 40 (1) – the request forms part of the applicant’s personal data. This must be dealt with under the subject access regime in the GDPR, detailed in [Article 15](#).

Section 40 (2) – compliance with the request would involve releasing third party personal data, and this would be in breach of the GDPR principles as set out in paragraph 4 of [Article 15](#).

Section 41 – information that has been sent to the Trust (but not the Academy’s own information) which is confidential;

Section 21 – information that is already publicly available, even if payment of a fee is required in order to access that information;

Section 22 – information that the Trust intends to publish at a future date;

Section 43 – information that would prejudice the commercial interests of the Academy and/or a third party;

Section 38 – information that could prejudice the physical health, mental health or safety of an individual (this may apply particularly to safeguarding information);

Section 31 – information which may prejudice the effective detection and prevention of crime – such as the location of CCTV cameras;

Section 36 – information which, in the opinion of the Data Protection Officer, would prejudice the effective conduct of Trust.

Section 12 - The cost, including time (calculated at £25 per hour), taken to respond to a request must not exceed £450. If costs exceed £450, we can charge the requester, should they wish to continue with their request (hours taken x cost per hour = amount to charge). Consideration must always be given to asking the requester to refine their request so that we can comply.

The exemptions highlighted in italics are considered qualified exemptions. This implies that, even when an exemption is applicable to the requested information, a public interest test must be conducted. This involves weighing the benefits to the public of disclosing the information against the benefits to the public of keeping the information confidential.

Such evaluations must always be performed in collaboration with the CEO, Head of Service, Data Protection Officer, and Communications and Marketing Manager. Depending on the specifics of the request, other officers from BCCET may also need to be involved.

6. Responding to a FOI request

In instances where BCCET decides to withhold some or all of the requested information, it is obligatory for BCCET to clarify the reasons for not disclosing the information. This explanation should include the citation of the specific section of the law under which the exemption falls and detail how the requested information meets the criteria for that exemption. Should a public interest test have been conducted, its application must also be articulated.

The response should conclude by guiding the requester on how to lodge a complaint, either through an internal review conducted by BCCET or by submitting a complaint to the Information Commissioner's Office (ICO), including the contact details of the ICO.

However, it should be noted that the requester cannot approach the ICO for a review without first undergoing an internal review by BCCET.

7. Making a FOI request

Requests for information should be referred to the Head of Service, who will coordinate the response depending on the nature of the request.

Email

foi@bccet.org.uk

Postal address

Head of Service
Bishop Chadwick Catholic Education Trust
Evolve Business Centre
Cygnet Way
Houghton le Spring
DH4 5QY

8. Publication Scheme

CLASS 1 – WHO WE ARE AND WHAT WE DO Organisational information, structures, locations and contacts This will be current information only		
Information for Publication	Format for publication (email / hard copy and/or website)	Cost
Central Office Contact details	https://bccet.org.uk/contact-us/	No charge
Academy contact details	Academy websites	No charge
Articles of Association	https://bccet.org.uk/key-documents/	No charge
BCCET Staffing Structure	https://bccet.org.uk/trust-structure/	No charge
Board of Directors business and pecuniary interests	https://bccet.org.uk/key-documents/	No charge
Board of Directors attendance at meetings	Email / Hard copy	Schedule of charges
Biographies of BCCET Directors	https://bccet.org.uk/our-directors/	No charge
BCCET Governance Structure	https://bccet.org.uk/governance/	No charge
BCCET Scheme of Delegation	https://bccet.org.uk/key-documents/	No charge
A list of BCCET Academies	https://bccet.org.uk/our-schools/	No charge
Academy Local Governing Body (LGB) members names, business interests & attendance at meetings	https://bccet.org.uk/governance/	No charge
BCCET Academies Key Personnel	See each Academy's individual website https://bccet.org.uk/our-schools/	No charge
BCCET Academies term dates and holidays	See each Academy's individual website https://bccet.org.uk/our-schools/	No charge
BCCET Academies Prospectuses	See each Academy's individual website https://bccet.org.uk/our-schools/	No charge

CLASS 2 – 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 previous 2 financial years**

Information for Publication	Format for publication (email / hard copy and/or website)	Cost
Statutory accounts	https://bccet.org.uk/key-documents/	No charge
Master Funding Agreements	https://bccet.org.uk/key-documents/	No charge
Supplemental Funding Agreements	Email / Hard copy	Schedule of charges
Procurements and contracts	Email / Hard copy	Schedule of charges
Pay Policy	Email / Hard copy	Schedule of charges
Purchasing and Tendering Policy	Email / Hard copy	Schedule of charges
Staff pay and grading structures	Email / Hard copy	Schedule of charges
Staff allowances and expenses	Email / Hard copy	Schedule of charges
Governors allowances	Email / Hard copy	Schedule of charges
Financial statements	https://bccet.org.uk/key-documents/	No charge
Pupil premium funding	Websites of academies that receive pupil premium funding	No charge
Year 7 literacy and numeracy catch-up premium	Websites of academies that receive this funding	No charge
PE and sport	Websites of academies that receive this funding	No charge
TU facility time reporting	https://bccet.org.uk/key-documents/	No charge

CLASS 3 – WHAT OUR PRIORITIES ARE AND HOW WE ARE DOING
Strategies and plans, performance indicators, audits, inspections and reviews
 Current information

Information for Publication	Format for publication (email / hard copy and/or website)	Cost
BCCET Academy Ofsted Reports	Ofsted website: https://www.gov.uk/government/organisations/ofsted And each academy website	No charge
Strategic priorities	https://bccet.org.uk/our-vision-and-values/	No charge
Values and ethos	https://bccet.org.uk/our-vision-and-values/	No charge
Directors' report	https://bccet.org.uk/key-documents/	No charge
Performance Tables and exam results	http://www.education.gov.uk/schools/performance/ Academy websites	No charge
School profile	Academy websites	No charge
Safeguarding and Child Protection policies	Academy websites	No charge
Special educational needs (SEN) information report	Academy websites	No charge
Equality information and objectives statement	Academy websites	No charge
Performance management policy	Hard copy / email	Schedule of charges
Gender pay gap report	https://bccet.org.uk/key-documents/	No charge

CLASS 4 – HOW WE MAKE DECISIONS
Decision making processes and records of decisions

Current and previous 3 years as a minimum

Information for Publication	Format for publication (email / hard copy and/or website)	Cost
BCCET Academies Admissions Arrangements	Academy websites	No charge
Agendas and minutes of meetings of the governing body and its committees. (NB this will exclude information that is properly regarded as private to the meetings).	Email / Hard copy	Schedule of charges
Scheme of Delegation	https://bccet.org.uk/key-documents/	No charge

CLASS 5 – OUR POLICIES AND PROCEDURES

Current written protocols, policies and procedures for delivery our services and responsibilities

Current information only

Information for Publication	Format for publication (email / hard copy and/or website)	Cost
Accessibility plan	Academy websites	No charge
Charging And Remissions Policy	https://bccet.org.uk/key-documents/	No charge
Medical Needs Policy	Email / Hard copy (held at academy level)	Schedule of charges
Data Protection Policies	https://bccet.org.uk/key-documents/	Schedule of charges
First aid in schools policy	Academy websites	No charge
Health and safety Policies	https://bccet.org.uk/key-documents/	Schedule of charges
HR policies	Email / Hard copy	Schedule of charges
Low Level Concerns Policy	Email / Hard copy (held at academy level)	Schedule of charges
Safeguarding Policy	Academy websites	No charge
Sex and relationships education	Email / Hard copy (held at academy level)	Schedule of charges

Complaints Policy	https://bccet.org.uk/key-documents/	No charge
Behaviour Policy and anti bullying strategy	Academy websites	No charge
Freedom of Information policy and procedure	https://bccet.org.uk/key-documents/	No charge
Records management policy and record retention schedule	Email / Hard copy	No charge
Subject Access request policy and procedure for handling disclosures safely	https://bccet.org.uk/key-documents/	Schedule of charges
Privacy notice for pupils and parents	https://bccet.org.uk/key-documents/	No charge
Careers programme information	Academy websites (secondary only)	No charge

CLASS 6 – LISTS AND REGISTERS

Currently maintained lists and registers only

Information for Publication	Format for publication (email / hard copy and/or website)	Cost
Asset register	Email / Hard copy	No charge
CCTV	All academies premises – see academies websites for post codes	

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

Information for Publication	Format for publication (email / hard copy and/or website)	Cost
What we offer	Academy websites	No charge
News and Newsletters	BCCET and Individual Academy websites	No charge

9. Schedule of Charges

The aim of this scheme is to ensure the widest possible dissemination of information with the least inconvenience and cost to the public. Fees levied by BCCET for materials published on a regular basis will be reasonable, clear, and kept to the lowest possible level.

Content that is published and available on a website will be offered at no cost, as will information that can be sent via email. However, fees may apply for information that falls under a charging scheme established by Parliament.

Fees may be applied to cover actual expenses incurred, such as:

- Postage and packaging
- Photocopying
- The direct expenses associated with accessing information.

Fees for information supplied under this scheme may be applied when legally permitted, justified by all relevant factors, including the fundamental principles of public access to information held by public authorities, and aligned with a publicly accessible and published fee schedule.

Should a fee be applicable, notification of the required payment will be provided before the release of the information. Payment may be required before the information is supplied.

Type of Charge	Description	Basis of Charge
Disbursement cost	Photocopying/printing @ 1p per A4 sheet (black & white)	Actual Cost £0.0014□
Disbursement cost	Photocopying/printing @ 1p per A4 sheet (colour)	Actual Cost £0.0095
Disbursement cost	Postage	Actual cost of Royal Mail standard 2nd class
Statutory Fee		In accordance with the relevant legislation

10. Comments and Complaints

Feedback and suggestions regarding this publication scheme are appreciated. If you have any comments, please feel free to email our Data Protection Office at **bccet_dpo@data2action.co.uk** or write to Sarah Burns, Data2Action Ltd, 2 Orchard Court, North Shields, NE29 9LR

Should you be dissatisfied with the support provided, or if your grievance remains unresolved and you believe that lodging a formal complaint with the ICO is necessary, then your complaint should be directed to:

Postal Address Information Commissioners Office, Wycliffe House, Water Lane,
Wilmslow, Cheshire, SK9 5A

Telephone 0303 123 1113

Website www.ico.org.uk