



**Alma
Primary**
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Alma Primary Publications Scheme including website regulation and duties under the Freedom of Information Act Policy no. 44

Responsibility: *Marc Shoffren*
GB Body responsible: *FOP Committee*
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Policy Development

Change	Responsible	Date
Amendments to text in order to ensure compliance with responsibilities of academies under FOI act	MJS & MB	May 2014
Updated classes of information; Addition of website relevant privacy info & privacy notices; updated ICO contact details.	MJS	May 2019
Additional clarification re complying, financial limitations and consultation with third parties; addition of social media to website section.	MJS & David Grunwald	Oct 2022

Executive summary

A copy of this executive summary in in the staff handbook – any changes to this policy should be reflected there.

Key points:

The school makes information available to parents via the school website and social media accounts. Some information not available on the school website can be obtained in printed form from the school office on request, and a lists of costs associated with this included in the policy.

Introduction

This is Alma Primary's Publication Scheme on information available under the Freedom of Information Act 2000. This document also incorporates information on the use and regulation of Alma Primary's website. The governing body is responsible for maintenance of this scheme.

1. About our Publication Scheme and Freedom of Information

One of the aims of the Freedom of Information Act 2000 (which is referred to as FOIA in the rest of this document) is that public authorities, including all maintained schools, should be clear and proactive about the information they will make public.

This guidance gives examples of the kinds of information that the Information Commissioner's Office (ICO) would expect schools to provide in order to meet their commitments under the model publication scheme.

To do this our 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.*

The ICO expects schools to make the information in this document available unless:

- *We do not hold the information;*
- *The information is exempt under one of the FOI exemptions or environmental information regulations (EIR) exceptions, or its release is prohibited under another statute;*
- *The information is archived, out of date or otherwise inaccessible; or,*
- *It would be impractical or resource-intensive to prepare the material for routine release.*

The scheme covers information already published and information which is to be published in the future. All information in our publication scheme is either available for you on our website to download and print off or available in paper form. Some information which we hold may not be made public, for example personal information. This publication scheme conforms to the latest model scheme for schools approved by the Information Commissioner.

We endeavour to make relevant information available online. If any of the information is not available online, the scheme will explain how it can be accessed. We will develop this scheme to increase the amount of information that can be accessed through it.

The school does not charge for information which is accessed on our website. However, we may pass on costs for reproducing information or providing it in alternative formats, and we do charge

for some specialist information services. Details of these costs are listed in the Schedule of Charges.

2. How to request information

If you require a paper version of any of the documents within the scheme, please contact the school by telephone, email or letter. Contact details are set out below or you can visit our website at www.almaprimary.org

Email: office@almaprimary.org

Tel: 0208 343 9988

Contact Address: Alma Primary, Friern Barnet Lane, Whetstone, N20 0LP

NB. To help us process your request quickly, please clearly mark any correspondence "PUBLICATION SCHEME REQUEST" (in CAPITALS please)

3. FOI requests

If the information you're looking for isn't available via the scheme and isn't on our website, you can still contact the school to ask if we have it. To do this, please write using the contact details above, addressing your request to the Headteacher, **Mr M Shoffren** directly.

The school will only accept a request for information which meets all of the following criteria:

- It is in writing, this includes requests sent to the school's official social media accounts
- It states the name of the applicant and an address for correspondence
- It adequately describes the information requested

A request will be treated as made in writing if it meets all of the following requirements:

- It is transmitted by electronic means
- It is received in legible form
- It is capable of being used for subsequent reference

Where 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.

Requests which meet the criteria above will be considered in accordance with the provisions of the Freedom of Information Act and will be granted, if the information that you have requested fits the following criteria:

- is appropriate for public dissemination
- in the case of information which is considered sensitive, if it would be in the public interest to release it (if not the school may need or provide an exemption)
- within reasonable parameters (if not the school may suggest ways to narrow down the response)
- will take less than 2 ½ days to compile the information (unfortunately if the school estimates that it will take longer than this to compile, then under the terms of the FOI, the school will be unable to dedicate the time to providing this information).

The school will respond to such requests within 20 school days, or 60 working days if this is shorter, from receipt of the request. Requests received during a school holiday, or over a weekend, will

begin being processed on the first working day following the break or weekend. The school may be unable to process generic requests which do not fulfil the criteria of this publication scheme.

The school will not comply with this duty where:

- The school reasonably requires further information to meet a freedom of information request, has informed the applicant of this requirement, but was 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 appropriate limit.
- 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:

- States that fact.
- Specifies the exemption in question.

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; however, the actual length of the extension will be decided on a case-by-case basis.

Where a public interest test extension is required, the school will write to the applicant to inform them of this, stating the following information:

- Which exemption(s) the extension relies on and why
- A revised deadline for when the applicant will receive their response

Where a deadline has to be further extended, the school will write to the applicant again, stating the information outlined above.

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.

Any a record of any requests made under the Freedom of Information act will be kept in the schools FOI log. For further guidance on making FOI requests, please see http://ico.org.uk/for_the_public/official_information.

4. The appropriate limit

The school will not comply with any freedom of information request that exceeds the statutorily imposed appropriate limit of £450.

When determining whether the cost of complying with a freedom of information request is within the appropriate limit, the school will take account only of the costs we reasonably expect to incur in relation to:

Determining whether it holds the information.

Locating the information, or a document which may contain the information.

Retrieving the information, or a document which may contain the information.

Extracting the information from a document containing it.

Costs related to the time spent by any person undertaking any of the activities outlined in this policy on behalf of the school, are to be estimated at a rate of £25 per person per hour.

The school is not required to search for information in scope of a request until it is within the cost limit. If responding to one part of a request would exceed the cost limit, the school does not have to respond to any other parts of the request.

Where multiple requests for information 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.

5. Paying for information

Information published on our website is free, although you may incur costs from your Internet service provider. If you don't have Internet access, you can access our website using a local library or an Internet café.

Single copies of information covered by this publication are provided free unless stated otherwise in section 4. If your request means that we have to do a lot of photocopying or printing, or pay a large postage charge, or is for a priced item such as some printed publications or videos we will let you know the cost before fulfilling your request. Where there is a charge this will be indicated by a £ sign in the description box.

Where a fee is to be charged, the school will not comply with the General rights of access to information held by the school section of this policy unless the requested 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 charged, the timeframe within which the school has to respond to the request begins from the day the fee is received.

6. Consultation with 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.

The views of third parties will be given appropriate weighting when deciding how to respond to a request. For example, if the third party created or provided the information, they may have a better understanding of its sensitivity.

It is ultimately the school's decision as to whether information in scope of a request will be released following any relevant consultation.

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.

Our website is www.almaprimary.org

7. Classes of Information Currently Published

<u>Information to be published</u>	<u>How to obtain</u>	<u>Cost</u>
Class 1 - Who we are and what we do <i>This will be current information only</i>	Available on website or hard copy on request	Free
Academy Funding Agreement and Articles of Association. These documents will be put on our school website (or links to them on official websites).	Available on website or hard copy on request	Free
SEND information Information and policies about the implementation of the governing body's policy on pupils with special educational needs and disabilities (SEN)D.	Available on website or hard copy on request	Free
Governing Body The names, and contact details of the governors should be available and the basis on which they have been appointed are on our website.	Available on website or hard copy on request	Free
School staff and structure, session times and term dates Details of school session times, contact details for the Headteacher, names of key personnel and dates of school terms and holidays are on our website.	Available on website or hard copy on request	Free
Location and contact information The address, telephone number and website for the school together with the names of key personnel.	Available on website or hard copy on request	Free

Class 2 - What we spend and how we spend it <i>Current and previous two financial years.</i>	Available in hard copy.	£1 per 10 pages
Annual budget plan, financial audit reports and financial statements Details of the school's budget, as well as the annual income and expenditure returns.	Available on website or hard copy on request	£1 per 10 pages
Capital funding Details of the capital funding allocated to the school together with information on related building projects and other capital projects.	Available in hard copy	
Additional Funding Income generation schemes and other sources of funding.	Available in hard copy	
Procurement and contracts Details of procedures used for the acquisition of goods and services. Details of contracts that have gone through a formal tendering process.	Available in hard copy	
Pay policy The statement of the school's policy and procedures regarding teachers' pay.	Available in hard copy	
Governors' allowances Details of allowances and expenses that can be claimed or incurred.	Available in hard copy	
Class 3 - What our priorities are and how we are doing <i>Current information as a minimum</i>	School Development Plan available as hard copy.	£1 per 10 pages
School profile information <ul style="list-style-type: none"> Government-supplied performance data Summary and full version of latest Ofsted report* 	Available on government websites or hard copy	£1 per 10 pages
Performance management information Performance management policy and procedures adopted by the governing body.	Available in hard copy	
Long term plans Any major proposals for the future of the school involving, for example, consultation or a change in school status.	Available on website or hard copy on request	
Child protection	Available on website or hard copy on request	

The policies and procedures that are in place to ensure that functions are exercised with a view to safeguarding and promoting the welfare of children in compliance with any guidance issued by the Secretary of State.		
Class 4 - How we make decisions <i>Current and previous three years as a minimum.</i>	Governing Body minutes available as hard copy.	£1 per 10 pages
Minutes of meetings of the Governing body and its sub-committees Minutes, agendas and papers considered at such meetings should be published as soon as practicable, with the exception of information that is properly considered to be private to the meeting	On the school website and available in hard copy	
Class 5 - Our policies and procedures <i>Current information only.</i>	Hard copy	£1 per 10 pages
School policies This will include school policies and procedures together with other information related to the school such as charging and remissions policy and complaints procedure. It will also include policies and procedures for handling information requests.	On the school website and available in hard copy	£1 per 10 pages
Admissions policy The school's admission arrangements and procedures, together with information about the right of appeal.	On the school website and available in hard copy	
Curriculum information and policies This will include information regarding learning and policies such as our RHSE education, SEND, accessibility, race equality, and behaviour including exclusions.	On the school website and available in hard copy	
Records management and personal data policies This will include information security policies, records retention, destruction and archive policies, and data protection (including data sharing) policies.	On the school website and available in hard copy	
Equality and diversity This will also include policies, schemes, statements, procedures and guidelines relating to equal opportunities.	On the school website and available in hard copy	
Procedures for the recruitment of staff If vacancies are advertised as part of recruitment policies, details of current vacancies will be readily available.	On the school website and available in hard copy	

Charging regimes and policies Details of any statutory charging regimes should be provided. 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.	On the school website and available in hard copy	
Class 6 – Other information <i>Currently maintained list and registers only.</i>	In accordance with Data Protection	
Other Other information, for example: <ul style="list-style-type: none"> • Extra-curricular activities • Out of school clubs • School publications 	On the school website and available in hard copy.	£1 per 10 pages

8. Website and Social media information and privacy

Our school website and social media accounts enable us to:

- Promote the school.
- Provide information to prospective parents, teachers and the wider community.
- Act as a communication channel between teachers, parents, pupils and school management.
- Raise standards in teaching and learning.

The school is required by law to publish certain information, such as the most recent Ofsted report, to comply with The School Information (England) (Amendment) Regulations 2018. This section of our publication scheme outlines the school's terms of use regarding the creation, development and use of the school website.

The school website also includes privacy notices, required under GDPR legislation, for Alma Primary staff as well as for children and their families.

9. Website and Social Media Roles and Responsibilities

All staff, governors and volunteers involved in the development and maintenance of the school website are expected to ensure that content expressed on the school website, and any social media accounts, will not breach copyright, data protection or freedom of information legislation. For the purposes of maintaining and developing the school website the school will establish a 'website team' comprising the Headteacher, a website leader (member of staff) and a website governor.

The school will appoint a member of staff as a website leader, responsible for:

- The overall management of the school website,
- Creating, monitoring and updating the school website content
- Approving any content, in liaison with the headteacher, that other members of staff wish to publish on the school's website.
- Reporting any problems with the school website to the headteacher.
- Meeting regularly with the headteacher to ensure the school website is as effective as possible.
- The school will also appoint a member of staff to undertake similar duties for its social media accounts. This may, or may not, be the same individual as the website leader.

The Governing Body will appoint a website governor who is responsible for:

- Ensuring that all content is up-to-date and relevant, and that statutory requirements contained in DfE guidance or in communication from other Government departments are met.
- Regularly checking the school website and social media accounts to ensure content reflects the schools vision and ethos.

The headteacher is responsible for:

- Supporting the website leader in ensuring that the school's website meets any statutory requirements and that content is appropriate for the site.
- Ensuring that all staff who publish content on the school's website or on social media platforms are aware of the relevant child protection, privacy, data protection, libel, defamation, harassment and copyright laws that may apply.
- Ensuring that all members of staff are aware that they are not permitted to express personal opinions on the website and are aware of the consequences of doing so.

10. Website and Social Media Content

The school website team will ensure that all content on the website and associated accounts is of high quality and error-free. To this end the website leader and headteacher will ensure that

- Before content is published on the school website or on social media platforms it is approved by the headteacher, or website leader.
- Where relevant, amendments will be discussed with the author, and the material will be revised appropriately.
- Approval for participating on behalf of the school, on websites created by third parties, must be obtained from the headteacher.
- Any content deemed to breach the terms of use will be removed from the school website.
- Any content written by children will be reviewed by the Headteacher or website leader prior to publishing to ensure that no personal details are included that could lead to the identification of the pupil. Where appropriate, verbal permission will be obtained from children before their work is uploaded to the website.

Alma Primary will not publish:

- Information which could reveal confidential information about individual members of the school community.
- Information which is exempt under the Freedom of Information Act 2000, or is otherwise properly considered to be protected from disclosure.

11. Website Data protection and Images

In order to comply with relevant legislation, including GDPR, the school website and social media team will ensure that:

- Personal details of children or staff, such as home addresses, telephone numbers and personal email addresses, will not be hosted on the school website.
- Images and videos of children will not be published where parents have withheld permission for this.
- The school website and social posts will not feature any close-up pictures of individual children – only group photographs with two or more children will be published. Any images of children

will not be labelled with their full names and children will only be shown in photos where they are suitably dressed.

- Parents have the right to refuse permission for their child's work and/or image to be published on the school website or on social media platforms. Those wishing to exercise this right should express their wishes in writing to the headteacher, clearly stating whether they object to work, images or both being published.
- The school website will use cookies, also known as internet cookies or web cookies, a type of message that is given to a web browser by a web server. The website provider will ensure users are notified if a cookie is sent to them, which may be stored by their browser on their computer's hard drive. The school may use the information obtained from the cookie in the administration of the school website, to improve the website's usability and for marketing purposes. The school may use the information gathered from the cookie to recognise a user's computer when they visit the school website, and to personalise the school's website for the user.

12. Website disclaimer

The information on the school website is provided free-of-charge, and therefore, the school believes that it would be unreasonable to hold the school liable in respect of the website and the information on the website.

The school ensures that the information on the website is correct and kept up-to-date as much as possible.

To the maximum extent permitted by applicable law, the school excludes all representations, warranties and conditions.

An appropriate disclaimer features on the website, outlining the school's legal position and interests in terms of the use of the website.

The school will not be liable for any direct, indirect or consequential loss or damage arising under this disclaimer or in connection with the school website, whether arising in tort, contract, or otherwise – including, without limitation, any loss of profit, contracts, business, goodwill, data, income, revenue or anticipated savings.

The school will review and revise the disclaimer annually.

13. License to use the website and social media accounts

Parents and the public may view and download school website content for caching purposes only, and print pages from the website, provided that:

- Material is not republished or reproduced from the website (including republication on another website) in any public or private electronic retrieval system.
- Material on the school website is not reproduced, duplicated, copied, sold or otherwise exploited for a commercial purpose, without the school's express written consent. This likewise applies to social media content published by the school.

Resharing of content that the school has published on social media is acceptable if the posts concerned are not shared outside of the original audience or social media platform. For example, if the school publishes a post to a restricted group or a private (invite-only) account, this should not be posted to a wider audience, public or private.

14. Feedback and Complaints

We welcome any comments or suggestions you may have about the scheme. If you want to make any comments about this publication scheme or if you require further assistance or wish to make a complaint then initially this should be addressed to:

office@almaprimary.org

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. They can be contacted at:

Information Commissioner, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF or

Enquiry/Information Line: 0303 123 1113

E Mail: publications@ic-foi.demon.co.uk.

Website: <https://ico.org.uk>

15. Monitoring and review

This policy will be reviewed on an annual basis, or in light of any changes to relevant legislation, by the headteacher.