

# The SWAN Trust

## Freedom of Information Policy



### Spring Term 2023

Approved by Trustees of The SWAN Trust

Review Date: Spring 2026

The Freedom of Information Act 2002 (FOI) gives the public right of access to information the Trust produces in the course of its work. However, there are exemption to this right; these include data about living, identifiable individuals or personal data, which is covered by the General Data Protection Regulations Act 2018, making this information only available to the person whom the data is about.

In accordance with the FOI, The SWAN Trust has adopted the Information Commissioner's Office's (ICO) publication scheme. This publication scheme commits The SWAN Trust to make information, which covers information already published and information which is to be published in the future, available to the public as a matter of routine. The information covered is included in the classes of information mentioned below, where this information is held by the Trust.

#### **What is a publication scheme and why has it been developed**

The FOI 2000 states that all public authorities, including all maintained schools and academies, are required to adopt a publication scheme that has been approved by the ICO. The publication scheme must be clear regarding the information publicly available.

The publication scheme must specify:

- The classes of information which we publish or intend to publish
- The manner in which the information will be published
- Whether the information is available free of charge or on payment

This publication scheme conforms to the model scheme for schools approved by the ICO.

#### **Categories of information published**

The publication scheme guides you to information which we currently publish (or have recently published) or which we will publish in the future. This is split into categories of information known as 'classes'. There are seven classes;

- 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
- 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 Trust/school
- The service 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 where the disclosure of which is prevented by law, or exempt under the FIO, 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

### **How to request information**

If you require a paper version of any of the documents within the scheme, please contact the Trust by telephone, email or letter. Alternatively, most documents are freely available for you to view, save, or print a copy from our website <https://swantrust.co.uk/>

Contact details are set out below.

Email: [admin@swantrust.co.uk](mailto:admin@swantrust.co.uk)

Tel: 01483 48299

Contact Address: The SWAN Trust, Church Hill, Horsell, Woking, Surrey, GU21 4QQ

To help us process your request quickly, please clearly mark any correspondence "PUBLICATION SCHEME REQUEST". If the information you are looking for is not available via the scheme, you can still contact the Trust or school to ask if we have it. The Trust or school will respond to your request within 20 school days.

## **Paying for information**

The method of calculating charges within this policy is in accordance with the Freedom of Information and Data Protection (appropriate limits and fees) Regulations 2004.

## **Estimating the costs of processing requests; (section 4(3) of the FOI regulations)**

When estimating the cost of complying with a written request for information, The SWAN Trust will take into account the staff time involved in the following activities:

- Determining whether the information is held
- Locating the information or a document that may contain the information
- Retrieving and extracting the information, or a document that may contain the information

The cost of the above activities will be calculated by applying an hourly rate of £25 per person, (section 4(4) of the FOI regulations.)

When calculating the costs to process requests, The SWAN Trust cannot take account of the time taken to consider whether information is exempt under the Act.

## **Where the cost to process a request is below £450**

Where the cost of complying with a written request for information is estimated to be below £450, there will be no charge unless the disbursement costs (printing, copying and postage) exceeds £5. Where disbursement costs exceed £5, the applicant will be issued with a fees notice and must pay the costs within a period of three months before the Trust can comply with the request. Disbursements costs applied by the Trust are shown below.

## **Where the cost to process a request exceeds £450**

In accordance with the Freedom of Information and Data Protection (appropriate Limits and Fees) Regulations 2004, the Trust is not obliged to respond to a written request for information, where it estimates that the cost of complying with the request would be in excess of £450 (which equates to 18 hours of work at £25 per hour).

- Staff costs (£25 per hour) involved in determining whether the Trust holds the information
- Staff costs (£25 per hour) of locating, retrieving and extracting the information
- Disbursement and staff costs (£25 per hour) incurred in informing the applicant that the information is held
- Disbursement and staff costs (£25 per hour) incurred in communicating the information to the applicant
- In all cases the costs must be 'reasonable'

## **Campaign requests**

If the Trust receives two or more related requests within a period of 60 consecutive working days, from a person or different persons who appear to be acting in concert or in pursuance of a campaign, the costs of complying with the individual requests will be aggregated.

## **Disbursements**

### **Photocopies:**

Black & White 50p per sheet (additional cost for producing A3)

Colour 80p per sheet (additional cost for producing A3)

### **Prints from a PC:**

Black & White 50p per page (additional cost for producing A3)

Colour 80p per page (additional cost for producing A3)

### **Postage:**

Actual cost of Royal Mail standard 2nd class

### **The Trust will not charge for:**

Providing information in an alternative format if the Disability Discrimination Act (DDA) covers the person requesting it, unless the original document was a priced publication. In this case, the charge for the alternative format will not exceed the cost of original publication.

### **Notifying charges**

- Where charges apply, the Trust will notify the estimated charge to the applicant before doing any charged work
- Where there is a significant difference between the estimated and the actual charge, the Trust will notify the applicant
- Where charges apply, the Trust will require payment before compiling and supplying information
- If a charge is not paid within the specified time limit of three months, the information will not be supplied

## Freedom of Information

### Guide to information available from The SWAN Trust under the model publication scheme

	How the information can be obtained	Cost
<b>Class 1 - Who we are and what we do</b> (Organisational information, structures, locations and contacts) This will be current information only	(hard copy and/or website)	
Who's in the Trust or school	website	free
Who's on the Trustee Board / Local Governor Committee and the basis of their appointment	website	free
Articles of Association	website	free
Contact details for the CEO, Headteacher, Trustees and the Local Governor Committee, via the Trust/school (named contacts where possible).	website	free
School prospectus	website	free
Annual Report	website	free

Staffing structure	website	free
School session times and term dates	website	free
Address of school and contact details, including email address	website	free
<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 as a minimum	* Information is available by inspection with a prior appointment at the Trust office	
Annual budget plan and financial statements	*	
Capital funding	*	
Financial audit reports	*	
Details of expenditure items over £2000 – published at least annually but at a more frequent quarterly or six-monthly interval where practical.	*	
Procurement and contracts the Trust/school has entered into, or information relating to / a link to information held by an organisation which has done so on its behalf (for example, a local authority or diocese).	*	
Pay policy	*	
Staff allowances and expenses that can be incurred or claimed, with totals paid to individual senior staff members (Senior Leadership Team or equivalent, whose basic actual salary is at least £60,000 per annum) by reference to categories.	*	

Staffing, pay and grading structure. As a minimum the pay information should include salaries for senior staff (Senior Leadership Team or equivalent as above) in bands of £10,000; for more junior posts, by salary range.	*	
Trustees and/or Governors' allowances that can be incurred or claimed, and a record of total payments made to individual Trustees/Governors. (The SWAN Trust states no costs to be incurred or claimed by Trustees/Governors)	*	
<b>Class 3 – What our priorities are and how we are doing</b> (Strategies and plans, performance indicators, audits, inspections and reviews) Current information as a minimum	* Information is available by inspection with a prior appointment at the Trust office	
School profile <ul style="list-style-type: none"> <li>• Performance data supplied to the Government</li> <li>• The latest Ofsted report <ul style="list-style-type: none"> <li>- Summary</li> <li>- Full report</li> </ul> </li> <li>• Post-inspection action plan, if applicable</li> </ul>	*  Website  *	
Performance management policy and procedures adopted by the Local Governing Committee	*	
Performance data	*	
The Trust and/or school's future plans; for example, proposals for and any consultation on the future of the school, such as a change in status	*	

Safeguarding and child protection	*	
<b>Class 4 – How we make decisions</b> (Decision making processes and records of decisions) Current and previous three years as a minimum	* Information is available by inspection with a prior appointment at the Trust office	
Admissions policy/decisions (not individual admission decisions) – where applicable	website	
Agendas and minutes of meetings of the Trust Board. (NB this will exclude information that is properly regarded as private to the meetings).	*	
<b>Class 5 – Our policies and procedures</b> (Current written protocols, policies and procedures for delivering our services and responsibilities) Current information only.		
School policies including; <ul style="list-style-type: none"> <li>• Health and Safety</li> <li>• Complaints procedure *</li> <li>• Staff conduct policy</li> <li>• Discipline and capabilities procedure</li> <li>• Staff grievance policy</li> <li>• Staffing structure implementation plan</li> </ul>	Information is available by inspection with a prior appointment at the Trust office (* if not on the Trust or schools website under key information / policies)	



<ul style="list-style-type: none"> <li>• Freedom of information publication scheme *</li> <li>• Data protection policy (including subject access requests) *</li> <li>• Equality and diversity (including equal opportunities) policies *</li> <li>• Recruitment and selection policy</li> </ul>		
<p>Pupil and curriculum policies including;</p> <ul style="list-style-type: none"> <li>• Curriculum statement (under curriculum)</li> <li>• Relationships and sex education *</li> <li>• Special educational needs *</li> <li>• Accessibility</li> <li>• Race equality</li> <li>• Collective worship</li> <li>• Pupil behaviour *</li> <li>• Home school agreement *</li> </ul>	<p>Information is available by inspection with a prior appoint at the Trust office (* if not on the Trust or Schools website under key information / policies)</p>	
<p>Records management and personal data policies, including:</p> <ul style="list-style-type: none"> <li>• Information security policies</li> <li>• Records retention, destruction and archive policies</li> <li>• Data protection (including information sharing policies)</li> </ul>	<p>Information is available by inspection with a prior appoint at the Trust office</p>	
<p>Charging regimes and policies</p>	<p>Website</p>	
<p><b>Class 6 – Lists and Registers</b></p> <p>Currently maintained lists and registers only (this does not include the attendance register).</p>	<p>* Information is available by inspection with a prior appointment at the Trust office</p>	

Curriculum circulars and statutory instruments	*	
Disclosure logs	*	
Asset register	*	
Any information the Trust/school is currently legally required to hold in publicly available registers – <b>this does not include attendance registers</b>	*	
<p><b>Class 7 – The services we offer</b></p> <p>(Information about the services we offer, including leaflets, guidance and newsletters produced for the public and businesses)</p> <p>Current information only</p>	* Information is available by inspection with a prior appointment at the Trust office	
Extra-curricular activities	Website	free
Out of school clubs	website	free
Services for which the Trust/school is entitled to recover a fee, together with those fees	*	
Leaflets, books and newsletters	Website	free
School publications	*	

## SCHEDULE OF CHARGES

This describes how the charges have been arrived at.

TYPE OF CHARGE	DESCRIPTION	BASIS OF CHARGE
Disbursement cost	Photocopying/printing @ 10p / 20p per sheet (black & white)	Actual cost *
	Postage currently starts at 66p, subject to increase as specified by the Royal Mail	Actual cost of Royal Mail standard 2 <sup>nd</sup> class

\* As a Trust committed to reducing our CO2 emission and our environmental impact, we avoid printing and photocopying wherever possible. Photocopying is available at 10p/20p per sheet in black and white only. All policies can be inspected by prior arrangement. Inspections can be arranged but should be requested in writing, addressed to the CEO of The SWAN Trust, detailing which policies need to be reviewed. An appointment will then be made. Individual requests aim to be answered within 21 working days.