



## **Holy Cross Catholic MAC**

### **Freedom of Information Policy 2019/20**

|                                |                                |
|--------------------------------|--------------------------------|
| Responsible for policy         | Martyn Alcott                  |
| Date of policy                 | September 2019                 |
| Date approved by HCC MAC Board | 5 <sup>th</sup> September 2019 |
| Date of policy review          | September 2022                 |

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## 1. Introduction

Holy Cross Catholic MAC Registration Number 12084073  
Publication Scheme for information available under the Freedom of Information Act 2000

## 2. Aims, Objectives and Scope

### a. Aim

Holy Cross Catholic MAC will promote a culture of openness and accountability through its Publication Scheme.

### b. Objectives

We acknowledge that under the Freedom of Information Act 2000, any person has a legal right to ask for access to information held by Holy Cross Catholic MAC or its individual academies. We aim to: -

- Provide assistance to anyone requesting information
- To make available a significant amount of routinely published information about the Multi Academy Company (hereon in known as the MAC)
- To make available, upon written request, other information not included in this publication scheme, and such requests are dealt with in a timely manner
- Tell enquirers whether or not we hold the information they are requesting unless exempted from this duty (the duty to confirm or deny)
- To improve public understanding of:
  - How we carry out our duties
  - How we make our decisions
  - How we spend our money
- To recognise the presumption of openness that underlies the Freedom of Information Act. We are committed to maintaining a well – managed records and information system in order to comply efficiently with requests and we will adopt a straight – forward approach to meeting requests for information.

### c. Scope

This policy covers requests for information under the Freedom of Information Act 2000. The policy does not cover enquiries or subject access requests

under the General Data Protection Regulation 2018. The policy outlines our approach to information requests, details of the Publication Scheme (and where it can be found) and how information requests will be handled. “Information” includes both hard copy and digital information.

### **3. Roles and Responsibilities**

- 3.1 The Board of Directors** – is responsible for overseeing access to information and delegation to the appropriate Headteacher and Local Governing Bodies for the individual academies or the Chief Finance and Operating Officer for the MAC.
- 3.2 The Chief Finance and Operating Officer** – Day to day responsibility for the implementation of the Freedom of Information Policy, the provision of advice, guidance, publicity and interpretation of this policy for the MAC.
- 3.3 Local Governing Body** – To oversee and audit the implementation of the Freedom of Information Policy within their own academy.
- 3.4 Headteacher** – Day to day responsibility for the implementation of the Freedom of Information Policy, the provision of advice, guidance, publicity and interpretation of this policy for their own individual academy.
- 3.5 Data Protection Officer (MAC)** – To oversee Data Protection and Freedom of Information responsibilities with the MAC and ensure compliance with the relevant legislation. To develop good practices that are compliant. To communicate internal policies and procedures and deliver up to date and relevant training. To handle data related queries or complaints, and log and respond to any Subject Access and Freedom of Information requests for both the MAC and the individual schools. To alert the organisation to any risks that may arise and liaise with the Information Commissioners Office (as necessary).
- 3.6 Data Protection Office (schools)** – To oversee Data Protection and Freedom of Information responsibilities within the school and ensure compliance with the relevant legislation. To become the subject matter expert regarding all matters relating to Data Protection and Freedom of Information. To be the point of contact between the school and the MAC Data Protection Officer cascading any training and updates and coordinating any Subject Access or Freedom of Information requests within the school.

## 4 Policy

### 4.1 **Classes 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”. The classes of information that we undertake to make available are organised into seven broad topic areas:

#### **Who we are and what we do**

Organisational information, structures, locations and contacts.

#### **What we spend and how we spend it**

Financial information about projected and actual income and expenditure, procurement, contracts and financial audit.

#### **What our priorities are and how we are doing**

Strategies and plans, performance and records of decisions.

#### **Our policies and procedures**

Current written protocols, policies and procedures for delivering our services and responsibilities.

#### **Lists and Registers**

Information held in registers required by law and other lists and registers relating to the MAC.

#### **The services we offer**

Information about the services the MAC provides including leaflets, guidance and newsletters.

## 5. Information

Additional information that is not covered in the scheme can be requested in writing. However, this does not mean that the MAC is obliged to provide the information. In some cases, there will be a good reason why this information should not be made public, some or all of the information requested.

There are 4 reasons for not complying with a valid request for information under the Freedom of Information Act:

- The information is not held
- The cost threshold is reached (£450)
- The request is considered vexatious or repeated
- One or more exemptions apply

Many of the exemptions are intended to protect sensitive or confidential information. However, some exemptions are there simply to avoid the legal position where 2 pieces of law cover the same information requested, or where the information is already available by some other means. In addition, the Freedom of Information Act contains a number of exemptions that allows information to be withheld. In some cases, it will allow the MAC to refuse to confirm or deny whether it holds the information.

Some exemptions relate to a particular type of information, for instance, information relating to Government policy. Other exemptions are based on the harm that would arise or would likely arise from disclosure, e.g. if disclosure would be likely to prejudice a criminal investigation. There is also an exemption for personal data if releasing it would be contrary to the General Data Protection Regulation 2018.

A written refusal notice will be sent to any request that is partially or fully refused.

## **6. Procedures**

### **6.1 How to request information**

If you require a paper version/hard copy of any of the documents within the scheme, please contact the Multi Academy Company by telephone, email or letter.

Requests for information not published under this scheme must be made in writing. Contact details are set out below.

#### **Data protection Officer - Martyn Alcott**

Email: [martyn.alcott@hcmac.co.uk](mailto:martyn.alcott@hcmac.co.uk)

Telephone: 02475 816512

#### **Contact Address:**

Holy Cross Catholic MAC  
c/o St Augustine Catholic Primary School  
Heathcote Street  
Radford  
Coventry CV6 3BL

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

If the information you’re looking for isn’t available via the scheme (and isn’t on our website), you can still contact the Multi Academy Company to ask if we have it.

## **6.2 Charges for information**

The scheme has the purpose of making as much information readily available to the public at minimum inconvenience.

In line with the Fees Regulations (SI 2004/3244 Freedom of Information and Data Protection (Appropriate Limit and Fees) Regulations), Holy Cross Catholic MAC does not charge a fee for requests where the prescribed information retrieval costs are estimated to be less than £450. However, a charge may be made for disbursements e.g. postage, printing, computer discs, audio or video tapes, photocopying @ 10p per sheet of A4.

## **6.3 Further information and complaints**

If you require further assistance or wish to make a complaint, then initially this should be addressed to:

**Chief Finance and Operating Officer – Martyn Alcott**

Email: [martyn.alcott@hcmac.co.uk](mailto:martyn.alcott@hcmac.co.uk)

Telephone: 02475 816512

### **Contact Address:**

Holy Cross Catholic MAC  
c/o St Augustine Catholic Primary School  
Heathcote Street  
Radford  
Coventry CV6 3BL

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. There is also a large amount of information on their website regarding the Freedom of Information Act. They can be contacted at:

### **Address:**

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow

Cheshire  
SK9 5AF

**Telephone:** 0303 123 1113

**Fax:** 01625 524510

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

### **Related Policies**

Holy Cross Catholic MAC – Data Protection Policy

Holy Cross Catholic MAC – Whistleblowing Policy

Holy Cross Catholic MAC – Disciplinary Policy