

With Appended Information Policy

The governing body is responsible for maintenance of this scheme.

Introduction

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. To do this we must produce a publication scheme, setting 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.

Levens CE School's publication scheme conforms to the model scheme for schools approved by the Information Commissioner. The scheme covers information already published and information which is to be published in the future. All information in our publication scheme is available on our website.

Some information which we hold may not be made public, for example personal information.

Aims and Objectives

The school aims to:

- Enable every child to fulfil their learning potential, with education that meets the needs of each child;
- Help every child develop the skills, knowledge and personal qualities needed for life and work;
- Enable children to Enjoy, Enthuse and Excel in all aspects of their learning;
- This publication scheme is a means of showing how we are pursuing these aims.

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'. These are contained in section 6 of this scheme.

The classes of information that we undertake to make available are organised into four broad topic areas:

- **School Profile and other information relating to the governing body** – information published in the School Profile and in other governing body documents;
- **Pupils & Curriculum** – information about policies that relate to pupils and the school curriculum;
- **School Policies and other information related to the school** - information about policies that relate to the school in general.

How to request information

If you require a paper version of any of the documents within the scheme, please contact the school via the process outlined in the attached Information Policy – 'Access to Information'.

Paying for information

Information published on our website is free, although you may incur costs from your Internet service provider..

Single copies of information covered by this publication are provided free.

Classes of Information Currently Published

These tables set out the information published in the various document classes. Information is constantly updated and new policies and procedures are adopted. Information is published on the school website:

<http://www.levens.cumbria.sch.uk/wp/information/school-policies>

School Specific and other information relating to the governing body

School Class	Description
School Information	The contents of the School Profile are as follows: <ul style="list-style-type: none">• Performance data• Ofsted reports
Instrument of Government	<ul style="list-style-type: none">• The name of the school• The category of the school• The name of the governing body• The manner in which the governing body is constituted• The term of office of each category of governor if less than 4 years• The name of any body entitled to appoint any category of governor• Details of any trust• If the school has a religious character, a description of the ethos• The date the instrument takes effect
Minutes ¹ of meeting of the governing body and its committees	Agreed minutes of meetings of the governing body and its committees for the current and last full academic school year. Non-confidential minutes available on request to the school.

Pupils & Curriculum Policies

Class	Description
Curriculum Policy	Statement on following the policy for the secular curriculum subjects and religious education and schemes of work and syllabuses currently used by the school
SCARF (Relationships and Sex Education and Health Education Policy)	Statement of policy with regard to sex and relationship and health education
Special Education Needs Policy	Information about the school's policy on providing for pupils with special educational needs

¹ Some information might be confidential or otherwise exempt from the publication by law – we cannot therefore publish this

Accessibility Statement and Plan	Plan for increasing participation of disabled pupils in the school's curriculum, improving the accessibility of the physical environment and improving delivery of information to all pupils and families.
Equality Scheme and Statement	Statement of scheme for promoting equality
Whole School Behaviour Policy	Statement of policy, compliant with Section 89 of the Education and Inspections Act 2006.
Collective Worship	Statement of arrangements for the required daily act of collective worship
Whistleblowing Procedure	Statement of the statutory processes for whistleblowing
Child Protection Policy	Statement of policy for safeguarding and promoting welfare of pupils at the school
Online Safety Policy and Procedures	Statement of general principles to optimise online safety

School Policies

Class	Description
Published reports of Ofsted referring expressly to the school	Published report of the last inspection of the school and the summary of the report and the inspection reports of religious education
Ofsted inspection Self-Evaluation form	A statement of the governing body's evaluation of the school's performance
Statutory Information	<ul style="list-style-type: none"> • Expenditure details and impact of COVID-19 grant • Sports Funding – expenditure, impact and strategy • Pupil Premium – expenditure, impact and strategy • Statutory pupil testing outcomes • SEND and disability information • Statement of behaviour principles • School financial information • Governor details and register of interests
Charging and Remissions Policies	A statement of the school's policy with respect to charges and remissions for any optional extra or board and lodging for which charges are permitted, for example school publications, music tuition, trips
School session times and term dates	Details of school session and dates of school terms and holidays
Data Protection Policy	Statement of procedures following statutory guidelines
Complaints procedure	Statement of procedures for dealing with complaints
Appraisal of Staff	Statement of procedures adopted by the governing body relating to staff appraisal
Staff Conduct, Discipline and Grievance	Statement of procedure for regulating conduct and discipline of school staff and procedures by which staff may seek redress for grievance

Pay Policy	Statement of the school's policy regarding teachers' pay including procedures for determining teachers' grievances in relation to their pay
Curriculum circulars and statutory instruments	Any statutory instruments, departmental circulars and administrative memoranda sent by the Department of Education and Skills to the head teacher or governing body relating to the curriculum
Admissions Policy	Statement of the school's policy on admissions

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 The School Business Manager.

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 following the guidance contained in the following Information Policy under 'Complaints'.

Introduction

This policy is to ensure that Levens CE School complies with the requirements of the General Data Protection Regulation, Environmental Information Regulations 2004 (EIR) and Freedom of Information Act 2000 (FOIA), associated guidance and Codes of Practice issued under the legislation.

Scope

The Information Policy applies to information in all forms including, but not limited to:

- Hard copy or documents printed or written on paper;
- Information or data stored electronically, including scanned images;
- Communications sent by post/courier or using electronic means such as email, fax or electronic file transfer;
- Information or data stored on or transferred to removable media such as tape, CD, DVD, USB storage device or memory card;
- Information stored on portable computing devices including mobile phones, tablets, cameras and laptops;
- Speech, voice recordings and verbal communications, including voicemail;
- Published web content, for example intranet and internet;
- Photographs and other digital images.

This policy is the School's main information governance policy and addresses:

- Data Protection (including rights and complaints)
- Freedom of Information
- Information Asset Management

Information security, acceptable use of systems, records management and security incident reporting are addressed in separate policies.

Data Protection

Personal data will be processed in accordance with the requirements of GDPR and in compliance with the data protection principles specified in the legislation.

The school has notified the Information Commissioner's Office that it is a Data Controller and has appointed a Data Protection Officer (DPO). Details of the DPO can be found here:

Schools Data Protection Officer
Veritau
West Offices
Station Rise
York
North Yorkshire
YO1 6GA
schoolsDPO@veritau.co.uk // 01904 554025

The DPO is a statutory position and will operate in an advisory capacity. Duties will include:

- Acting as the point of contact for the Information Commissioner's Office (ICO) and data subjects;
- Facilitating a periodic review of the corporate information asset register and information governance policies;

- Assisting with the reporting and investigation of information security breaches
- Providing advice on all aspects of data protection as required, including information requests, information sharing and Data Protection Impact Assessments; and
- Reporting to governors on the above matters

Information Asset Register

The DPO will advise the school in developing and maintaining an Information Asset Register (IAR). The register will include the following information for each asset:

- An individual information asset identification number;
- The owner of that asset;
- Description and purpose of the asset;
- Whether there is a privacy notice published for that asset;
- Format and location of the asset;
- Which officers (job titles/teams) have routine access to the information;
- Whether there are any data sharing agreements relating to the information and the name of that agreement,
- Conditions of data processing;
- Details of any third parties contracted to process the information;
- Retention period for the asset

The IAR will be reviewed annually and the Head Teacher will inform the DPO of any significant changes to their information assets as soon as possible.

Information Asset Owners

An Information Asset Owner (IAO) is the individual responsible for an information asset, understands the value of that information and the potential risks associated with it. The school will ensure that IAO's are appointed based on sufficient seniority and level of responsibility.

IAO's are responsible for the security and maintenance of their information assets. This includes ensuring that other members of staff are using the information safely and responsibly. The role also includes determining the retention period for the asset, and when destroyed, ensuring this is done so securely.

Training

The school will ensure that appropriate guidance and training is given to the relevant staff, governors and other authorised school users on access to information procedures, records management and data breach procedures. Individuals will also be made aware and given training in relation to information security including using email and the internet.

The DPO will provide the School with adequate training resources and guidance materials. The DPO will be consulted, and will offer an adequacy opinion, if the School opts to use a third party training provider.

The School will maintain a 'training schedule' which will record when employees have completed an information governance training module and when a refresher is due to be completed.

The school will ensure that any third party contractors have adequately trained their staff in information governance by carrying out the appropriate due diligence.

Privacy notices

Levens CE School will provide a privacy notice to data subjects each time it obtains personal information from or about that data subject. Our main privacy notices are displayed on the school's website in an easily accessible area. This notice will also be provided in a hard copy to pupils and parents at the start of their time at the School within their information pack.

A privacy notice for employees will be provided at commencement of their employment with the school. Specific privacy notices will be issued where the data subject requires more information about specific processing (e.g. school trips, projects).

Privacy notices will be cleared by the DPO prior to being published or issued. A record of privacy notices shall be kept on the school's Information Asset Register.

Information sharing

In order to efficiently fulfil our duty of education provision it is sometimes necessary for the school to share information with third parties. Routine and regular information sharing arrangements will be documented in our main privacy notices (as above). Any adhoc sharing of information will be done in compliance with our legislative requirements.

Data Protection Impact Assessments (DPIAs)

The school will conduct a data protection impact assessment for all new projects involving high risk data processing as defined by GDPR. This assessment will consider the privacy risks and implications of new projects as well as providing solutions to the identified risks. The DPO will be consulted at the start of a project and will advise whether a DPIA is required. If it is agreed that a DPIA will be necessary, then the DPO will assist with the completion of the assessment, providing relevant advice.

Retention periods

Retention periods will be determined by any legal requirement, best practice or national guidance, and lastly the organisational necessity to retain the information. In addition IAOs will take into account the Limitation Act 1980, which provides timescales within which action may be taken for breaches of the law, when determining retention periods.

The School has opted to adopt the retention schedule suggested by the Information and Records Management Society (IRMS).

Destruction of records

Retention periods for records are recorded in the school's IAR. When a record reaches the end of its retention period the IAO will arrange for the records, both electronic and paper to be destroyed securely. Provisions to destroy paper information securely include cross cutting shredders and confidential waste bins.

Advice in regards to the secure destruction of electronic media will be sought from relevant IT support.

A record will be retained of all files destroyed including, where relevant:

- File reference number,
- Description of file,

- Date of disposal,
- Method of disposal,
- Officer who destroyed record

Third party Data Processors

All third party contractors who process data on behalf of the school must be able to provide assurances that they have adequate data protection controls in place to ensure that the data they process is afforded the appropriate safeguards. Where personal data is being processed, there will be a written contract in place with the necessary data protection clauses contained.

Relevant senior leadership may insist that any data processing by a third party ceases immediately if it believes that that third party has not got adequate data protection safeguards in place. If any data processing is going to take place outside of the EEA then the Data Protection Officer must be consulted prior to any contracts being agreed.

Access to information

Requests for information under the Freedom of Information Act 2000 and Environmental Information Regulations 2004

Requests under this legislation should be made to the School Business Manager, Levens CE School, Church Road, Levens, Kendal LA8 8PU

The School Business Manager in liaison with the Headteacher is responsible for:

- Deciding whether the requested information is held;
- Locating, retrieving or extracting the information;
- Considering whether any exemption might apply, and the balance of the public interest test;
- Preparing the material for disclosure and drafting the response;
- Seeking any necessary approval for the response; and
- Sending the response to the requester

FOIA requests should be made in writing. Please note that we will only consider requests which provide a valid name and address and we will not consider requests which ask us to click on electronic links. EIR requests can be made verbally, however we will endeavour to follow this up in writing with the requestor to ensure accuracy.

Each request received will be acknowledged within 5 school days. The Chair of Governors and Head Teacher will jointly consider all requests where a public interest test is applied or where there is any doubt on whether an exemption should be applied. In applying the public interest test they will:

- Document clearly the benefits of both disclosing or withholding the requested information; and
- Where necessary seek guidance from previous case law in deciding where the balance lies
- Consult the DPO

Reasons for disclosing or not disclosing will be reported to the next governing body meeting.

We have adopted the Information Commissioner's model publication scheme for schools and will publish as much information as possible on our website in the interests of transparency and accountability.

We will charge for supplying information at our discretion, in line with current regulations. If a charge applies, written notice will be given to the applicant and payment must be received before the information is supplied. Levens CE School will follow the Local Authority's charging regime for FOI/EIR.

We will adhere to the required FOI/EIR timescales, and requests will be answered within **20 school days**.

Requests for information under the GDPR- Subject Access Requests

Requests under this legislation should be made to the School Business Manager, Levens CE School, Church Road, Levens, Kendal LA8 8PU

Any member of staff/governor may receive a request for an individual's personal information. Whilst GDPR does not require such requests to be made in writing, applicants are encouraged where possible to do so; applicants who require assistance should seek help from the school. Requests will be logged with the School Business Manager and acknowledged within 5 days.

We must be satisfied as to your identity and may have to ask for additional information such as:

- Valid Photo ID (driver's licence, passport etc);
- Proof of Address (Utility bill, council tax letter etc);
- further information for the school to be satisfied of the applicant's identity;

Only once the school is satisfied of the requestor's identity and has sufficient information on which to respond to the request will it be considered valid. We will then respond to your request within the statutory timescale of One Calendar Month.

The school can apply a discretionary extension of up a further Two Calendar Months to comply with the request if the requested information would take a considerable amount of time to collate, redact, and prepare for disclosure due to either the complexity or voluminous nature of the records. If we wish to apply an extension we will firstly seek guidance from our DPO, then inform the applicant of the extension within the first calendar month of receiving the request. This extension period will be kept to a minimum and will not be used as a way of managing workloads. In very limited cases we may also refuse a request outright as 'manifestly unreasonable' if we would have to spend an unjustified amount of time and resources to comply.

Should we think any exemptions are necessary to apply we will seek guidance from our DPO to discuss their application.

Requests received from parents asking for information held within the pupil's Education Record will be dealt with under the Education (Pupil Information) (England) Regulations 2005. Any charges which arise from this request will be applied at our discretion.

Data Subject rights

As well as a right of access to information, data subjects have a series of other rights prescribed by the GDPR including:

- Right to rectification
- Right to erasure
- Right to restrict processing
- Rights in relation automated decision making and profiling

All requests exercising these rights must be in writing and forwarded to the Headteacher who will acknowledge the request and respond within One Calendar Month. Advice regarding such requests will be sought from our DPO.

A record of decisions made in respect of the request will be retained, recording details of the request, whether any information has been changed, and the reasoning for the decision made.

Complaints

Complaints in relation to FOI/EIR and Subject Access will be handled through our existing procedures. Any individual who wishes to make a complaint about the way we have handled their personal data should contact the DPO on the address provided.

Copyright

Levens CE School will take reasonable steps to inform enquirers if any third party might have a copyright or intellectual property interest in information provided in response to their requests. However it will be the enquirer's responsibility to ensure that any information provided by the school is not re-used in a way which infringes those interests, whether or not any such warning has been given.

General

The Board of Governors of Levens CE School will be responsible for evaluating and reviewing this policy.

**Signed: S Bishop
(Chair)**

Date: 7th December 2023

Review Date: autumn term 2026