Imperial Avenue Infant School

THE FREEDOM OF INFORMATION POLICY

www.dpoforschools.co.uk

1. Purpose and Scope

The Freedom of Information Act 2000 (FOIA) requires all public authorities, including schools, to maintain a publication scheme. This scheme sets out the types of information we routinely make available to the public.

Simultaneously, Imperial Avenue Infant School is committed to protecting personal data in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. This policy governs how we balance our duty to provide open access to information with our legal duty to protect the privacy of students, staff, and other individuals.

2. Commitment to Data Protection (GDPR Compliance)

In managing FOI requests and publishing information, the school adheres to the following GDPR principles:

Data Minimization: We will not publish or disclose personal data unless there is a lawful basis to do so. We will redact (black out) personal data from documents unless its disclosure is required by law or satisfies a public interest test that outweighs the privacy rights of the data subject.

Transparency and Lawful Basis: When responding to requests that involve personal data, we will assess whether disclosure is lawful under Article 6 of the UK GDPR. We will generally rely on the "legal obligation" basis for complying with FOI requests, but this does not override the protection of personal data.

Data Subject Rights: Our procedures ensure that FOI responses do not violate the rights of data subjects (e.g., the right to be informed, the right to object).

Security: Any information provided in response to requests will be transmitted securely.

3. The Publication Scheme

This scheme commits [Category] to:

Proactively publish information held by the school within the seven classes defined below, provided it does not constitute personal data or confidential information.

Review and update this information regularly to ensure accuracy.

Publish information in a digital format capable of re-use where applicable.

The 7 Classes of Information:

- Who we are and what we do
- What we spend and how we spend it
- What our priorities are and how we are doing
- How we make decisions
- Our policies and procedures
- Lists and registers
- The services we offer

4. Exclusions and Redactions (The "Privacy Filter")

The classes of information listed above will not include:

Personal Data: Any information that identifies an individual (e.g., names of students or staff, contact details, medical records, performance data) will be redacted unless disclosure is required by law.

Exempt Information: Information prevented from disclosure by law, information exempt under the FOIA (e.g., commercial interests, legal professional privilege), or information otherwise considered protected.

Draft Documents: Information not yet finalized.

Archive Material: Information that is difficult to access or no longer relevant.

If an FOI request covers information containing personal data, the school will perform a "Data Privacy Impact Assessment" (in effect) for the request: we will consider if the release of that data would violate the data protection principles. If it would, the data will be redacted.

5. Accessing Information

Information is available via our website. If you wish to request information not published in this scheme, you may submit a request in writing.

Accessibility: We will adhere to our obligations under the Equality Act 2010 to provide information in alternative formats for those with disabilities.

Language: Information will be provided in the language it is held.

6. Charging and Fees

We aim to provide information at the minimum cost.

Website Content: Routinely published material on our website is free of charge.

Administrative Costs: We may charge for photocopying, postage, or packaging in line with statutory guidelines.

Notification: If a charge applies, we will provide a "Fees Notice" stating the amount due. We will not process the request until payment is received.

7. Complaints and Data Protection Concerns

If you are unhappy with the way an FOI request has been handled or believe your personal data has been handled incorrectly:

FOI Appeals: You may request an internal review by contacting [Insert Contact Name/Role].

Data Protection Concerns: If you believe we have breached data protection law in the course of an FOI request, you have the right to lodge a complaint with the Information Commissioner's Office (ICO).