



Data Protection Policy
and
Freedom of Information Publication
Scheme

May 2021

1. INTRODUCTION TO DATA PROTECTION POLICY

The Mill Academy collects and uses relevant personal data regarding staff, students, parents and carers, and other individuals who come into contact with the Academy and its schools. This information is gathered in order to enable it to provide education and its other associated functions, including complying with its statutory obligations. We shall take all reasonable steps hold and process this data only in accordance with this policy.

2. DEFINITIONS

“Processing” means anything done to personal data such as collecting, recording, organising, structuring, holding/storing, adapting, altering, retrieving, using, disseminating/disclosing, erasing, destroying or otherwise using data. Processing can be automated or manual.

“Students” may include current, past or prospective students.

“Data subject” means the identified or identifiable individual who is the subject of personal data or the person to whom the information is being held and relates to.

“Personal data or personal information” means any data or information which relates to a living individual who can be identified. This may include the individual’s – name (including initials), identification number, location data, and online identifiers such as usernames. It may also include factors specific to the individual’s physical, physiological, genetic, mental, economic, cultural or social identify. Addresses and telephone numbers are particularly vulnerable to abuse, but so can names and photographs be, if published in the press, Internet or media.

“Special categories or personal data” means data which is more sensitive and so needs more protection, including information about racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetics, biometrics (such as fingerprints), physical or mental health, sexual orientation.

“Parent” has the meaning given in the Education Act 1996, and includes any person having parental responsibility or care of a child.

“Data Controller” means the person or organisation that determines the purpose and the means of processing of personal data.

“Data Processor” means a person or other body, other than an employee of the data controller, who processes personal data on behalf of the data controller.

“Personal Data Breach” means a breach of security leading to accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to personal data.

3. PRINCIPLES, AIMS AND OBJECTIVES

This policy is intended to ensure that all personal data/information collected about staff, pupils, parents and carers, Trustees, Local Committee Volunteers, visitors and

other individuals is collected, stored and used/processed in accordance with the General Data Protection Regulations (GDPR) and the Data Protection Act 2018 (DPA 2018).

The Policy applies to any personal information or data regardless of the way that it is held, i.e. in paper files or held electronically.

4. LEGISLATION AND GUIDANCE

This Policy meets the requirements of the DPA 2018. It is based on guidance published by the Information Commissioner's Office (ICO) on the GDPR and the ICO's Code of Practice for subject access requests.

It meets the requirements of the Protection of Freedoms Act 2012 when referring to our use of Biometric data. It also reflects the ICO's code of practice for the use of surveillance cameras and personal information. In addition, this Policy complies with our funding agreement and Articles of Association.

5. THE DATA CONTROLLER

The Mill Academy processes personal data relating to parents and carers, students, staff, Trustees, Local Committee Volunteers, visitors and others and is therefore a data controller. The Mill Academy is registered as a data controller with the ICO and will renew the registration annually or as otherwise legally required.

6. THE DATA PROTECTION OFFICER

The Data Protection Officer (DPO) is the first point of contact for individuals whose data the Mill Academy, or one of its schools' processes and for the ICO. The Mill Academy's DPO is Ms N Stretton and is contactable at info@themillacademy.co.uk or 01993 848150.

7. DATA PROTECTION PRINCIPLES

The GDPR is based on data protection principles that the Academy and its schools must comply with. The principles say that personal data must be:

1. Processed fairly and lawfully and in a transparent manner
2. Collected for specified, explicit and legitimate purposes
3. Adequate, relevant and limited to what is necessary to fulfil the purpose for which it is processed
4. Accurate kept up to date
5. Not kept longer than necessary for the purposes for which it is collected
6. Processed in accordance with the data subject's rights
7. Processed in a way that ensures it is appropriately secure

This Policy sets out how the Mill Academy aims to comply with these principles.

8. COLLECTING PERSONAL DATA

8.1 Lawfulness, fairness and transparency

We will only process personal data where we have one of 6 “lawful bases” (legal reasons) to do so under data protection law.

- The data needs to be processed so that the school can fulfil a contract with the individual, or the individual has asked the school to take specific steps before entering into a contract;
- The data needs to be processed so that the school can comply with a legal obligation;
- The data needs to be processed to ensure the vital interests of the individual, e.g. to protect someone’s life;
- The data needs to be processed for the legitimate interests of the school or a third party (provided the individual’s rights and freedoms are not overridden);
- The individual (or their parent/carer where appropriate in the case of a student under 13) has freely given clear consent.

For special categories of personal data, we will also meet one of the special category conditions for processing which are set out in the GDPR and DPA 2018.

If we offer online services to students, such as classroom apps, and we intend to rely on consent as a basis for processing, we will get parental consent where the student is under 13 (except for online counselling and preventative services).

Whenever we first collect personal data directly from individuals, we will provide them with the relevant information required by data protection law.

8.2 Limitation, minimisation and accuracy

We will only collect personal data for specified, explicit and legitimate reasons. We will explain these reasons to the individuals when we first collect their data.

If we want to use personal data for reasons other than those given when we first obtained it, we will inform the individuals concerned before we do so, and seek consent where necessary.

Staff must only process personal data where it is necessary in order to do their jobs. When staff no longer need the personal data they hold, they must ensure it is deleted or anonymised. This will be done in accordance with the Academy’s records management policy.

9. SHARING PERSONAL DATA

We will not normally share personal data with anyone else, but may do so where:

- There is an issue with a pupil or parent/carer that puts the safety of our staff at risk;
- We need to liaise with other agencies – we will seek consent as necessary before doing this;
- Our suppliers or contractors need data to enable us to provide services to our staff and students – for example IT companies. When doing this, we will:
 - Only appoint suppliers or contractors which can provide sufficient guarantees that they will comply with data protection law;

- Establish data sharing agreements with the supplier or contractor, either in the contract or as a standalone agreement, to ensure the fair and lawful processing of any personal data we share
- Only share data that the supplier or contractor needs to carry out their service, and information necessary to keep them safe while working with us.

We will also share personal data with law enforcement and government bodies where we are legally required to do so, including for:

- The prevention and detection of crime and/or fraud
- The apprehension or prosecution of offenders
- The assessment or collection of tax owed to HMRC
- In connection with legal proceedings
- Where the disclosure is required to satisfy our safeguarding obligations
- Research and statistical purposes, as long as personal data is sufficiently anonymised or consent has been provided.

We may also share personal data with emergency services and local authorities to help them respond to an emergency situation that affects any of our students or staff.

Where we transfer personal data to a country or territory outside the EU, we will do so in accordance with data protection law.

10. SUBJECT ACCESS REQUESTS AND OTHER RIGHTS OF INDIVIDUALS

10.1 Subject access requests

Individuals have a right to make a 'subject access request' to gain access to personal information that the school holds about them. This includes:

- Confirmation that their personal data is being processed
- Access to a copy of the data
- The purposes of the data processing
- The categories of personal data concerned
- Who the data has been, or will be, shared with
- How long the data will be stored for, or if this isn't possible, the criteria used to determine this period
- The source of the data, if not the individual
- Whether any automated decision-making is being applied to their data, and what the significance and consequences of this might be for the individual

Subject access requests must be submitted in writing, either by letter or email to the DPO (see section 6). They should include:

- Name of individual
- Correspondence address
- Contact number and email address
- Details of the information requested

If staff receive a subject access request they must immediately forward it to the DPO.

10.2 Children and subject access requests

Personal data about a child belongs to that child, and not the child's parents or carers. For a parent or carer to make a subject access request with respect to their child, the child must either be unable to understand their rights and the implications of a subject access request, or have given their consent.

Children below the age of 13 are generally not regarded to be mature enough to understand their rights and the implications of a subject access request. Therefore, most subject access requests from parents or carers of students at our primary schools may be granted without the express permission of the pupil. This is not a rule and a student's ability to understand their rights will always be judged on a case-by-case basis.

Children aged 13 and above are generally regarded to be mature enough to understand their rights and the implications of a subject access request. Therefore, most subject access requests from parents or carers of students at our secondary school may not be granted without the express permission of the student. This is not a rule and a pupil's ability to understand their rights will always be judged on a case-by-case basis.

10.3 Responding to subject access requests

When responding to requests, we:

- May ask the individual to provide 2 forms of identification
- May contact the individual via phone to confirm the request was made
- Will respond without delay and within 1 month of receipt of the request
- Will provide the information free of charge
- May tell the individual we will comply within 3 months of receipt of the request, where a request is complex or numerous. We will inform the individual of this within 1 month, and explain why the extension is necessary

We will not disclose information if it:

- Might cause serious harm to the physical or mental health of the pupil or another individual
- Would reveal that the child is at risk of abuse, where the disclosure of that information would not be in the child's best interests
- Is contained in adoption or parental order records
- Is given to a court in proceedings concerning the child

If the request is unfounded or excessive, we may refuse to act on it, or charge a reasonable fee which takes into account administrative costs. A request will be deemed to be unfounded or excessive if it is repetitive, or asks for further copies of the same information.

When we refuse a request, we will tell the individual why, and tell them they have the right to complain to the ICO.

10.4 Other data protection rights of the individual

In addition to the right to make a subject access request (see above), and to receive information when we are collecting their data about how we use and process it (see section 8), individuals also have the right to:

- Withdraw their consent to processing at any time
- Ask us to rectify, erase or restrict processing of their personal data, or object to the processing of it (in certain circumstances)
- Prevent use of their personal data for direct marketing
- Challenge processing which has been justified on the basis of public interest
- Request a copy of agreements under which their personal data is transferred outside of the European Economic Area
- Object to decisions based solely on automated decision making or profiling (decisions taken with no human involvement that might negatively affect them)
- Prevent processing that is likely to cause damage or distress
- Be notified of a data breach in certain circumstances
- Make a complaint to the ICO
- Ask for their personal data to be transferred to a third party in a structured, commonly used and machine-readable format (in certain circumstances)

Individuals should submit any request to exercise these rights to the DPO. If staff receive such a request, they must immediately forward it to the DPO.

11. PARENTAL REQUESTS TO SEE THE EDUCATIONAL RECORD

In Academies, there is no automatic parental right of access to their child's educational record. Our schools may consider such requests where the request is made for genuine reasons and is not excessive and in the case of secondary students, the student confirms their consent. There may be a charge for the provision of such information. Any such requests should be agreed with the DPO whose decision on provision or not of such information will be final.

12. BIOMETRIC RECOGNITION SYSTEMS

Where we use students' biometric data as part of an automated biometric recognition system (for example, pupils use finger prints to receive school dinners instead of paying with cash), we will comply with the requirements of the Protection of Freedoms Act 2012.

Parents/carers will be notified before any biometric recognition system is put in place or before their child first takes part in it. The school will get written consent from at least one parent or carer before we take any biometric data from their child and first process it.

Parents/carers and students have the right to choose not to use the school's biometric system(s). We will provide alternative means of accessing the relevant services for those pupils. For example, students can be given a PIN number.

Parents/carers and students can object to participation in the school's biometric recognition system(s), or withdraw consent, at any time, and we will make sure that any relevant data already captured is deleted.

As required by law, if a pupil refuses to participate in, or continue to participate in, the processing of their biometric data, we will not process that data irrespective of any consent given by the pupil's parent(s)/carer(s).

Where staff members or other adults use the school's biometric system(s), we will also obtain their consent before they first take part in it, and provide alternative means of accessing the relevant service if they object. Staff and other adults can also withdraw consent at any time, and the school will delete any relevant data already captured.

13. CCTV

We use CCTV in various locations around the school site to ensure it remains safe. We will adhere to the ICO's code of practice for the use of CCTV.

We do not need to ask individuals' permission to use CCTV, but we make it clear where individuals are being recorded. Security cameras are clearly visible and accompanied by prominent signs explaining that CCTV is in use.

Any enquiries about the CCTV system should be directed to Headteacher of the relevant school.

14. PHOTOGRAPHS AND VIDEOS

As part of our school activities, we may take photographs and record images of individuals within our school.

We will obtain written consent from parents/carers, or students aged 13 and over, for photographs and videos to be taken of students for communication, marketing and promotional materials.

Where we need parental consent, we will clearly explain how the photograph and/or video will be used to both the parent/carer and pupil. Where we don't need parental consent, we will clearly explain to the student how the photograph and/or video will be used.

Uses may include:

- Within school on notice boards and in school magazines, brochures, newsletters, etc.
- Outside of school by external agencies such as the school photographer, newspapers, campaigns
- Online on our school website or social media pages

Consent can be refused or withdrawn at any time. If consent is withdrawn, we will delete the photograph or video and not distribute it further. When using photographs and videos in this way we will not accompany them with any other personal information about the child, to ensure they cannot be identified.

15. DATA PROTECTION BY DESIGN AND DEFAULT

We will put measures in place to show that we have integrated data protection into all of our data processing activities, including:

- Appointing a suitably qualified DPO, and ensuring they have the necessary resources to fulfil their duties and maintain their expert knowledge
- Only processing personal data that is necessary for each specific purpose of processing, and always in line with the data protection principles set out in relevant data protection law (see section 7)
- Completing privacy/data impact assessments where the school's processing of personal data presents a high risk to rights and freedoms of individuals, and when introducing new technologies (the DPO will advise on this process)
- Integrating data protection into internal documents including this policy, any related policies and privacy notices
- Regularly training members of staff on data protection law, this policy, any related policies and any other data protection matters; we will also keep a record of attendance
- Regularly conducting reviews and audits to test our privacy measures and make sure we are compliant
- Maintaining records of our processing activities, including:
 - For the benefit of data subjects, making available the name and contact details of our school and DPO and all information we are required to share about how we use and process their personal data (via our privacy notices)
 - For all personal data that we hold, maintaining an internal record of the type of data, data subject, how and why we are using the data, any third-party recipients, how and why we are storing the data, retention periods and how we are keeping the data secure

16. DATA SECURITY AND STORAGE OF RECORDS

We will protect personal data and keep it safe from unauthorised or unlawful access, alteration, processing or disclosure, and against accidental or unlawful loss, destruction or damage. In particular:

- Paper-based records and portable electronic devices, such as laptops and hard drives that contain personal data are kept under lock and key when not in use
- Papers containing confidential personal data must not be left on office and classroom desks, on staffroom tables, pinned to notice/display boards, or left anywhere else where there is general access
- Where hard copy personal information needs to be taken off site, staff must sign it in and out from the school office
- Passwords that are at least 8 characters long containing letters and numbers are used to access school computers, laptops and other electronic devices. Staff and pupils are reminded to change their passwords at regular intervals
- Encryption software is used to protect all portable devices and removable media, such as laptops and USB devices
- Staff, pupils, Trustees or Local Committee Volunteers who store personal information on their personal devices are expected to follow the same security procedures as for school-owned equipment (see our code of conduct and acceptable use agreement)

- Where we need to share personal data with a third party, we carry out due diligence and take reasonable steps to ensure it is stored securely and adequately protected (see section 9)

17. DISPOSAL OF RECORDS

Personal data that is no longer needed will be disposed of securely. Personal data that has become inaccurate or out of date will also be disposed of securely, where we cannot or do not need to rectify or update it. For example, we will shred or incinerate paper-based records, and overwrite or delete electronic files. We may also use a third party to safely dispose of records on the school's behalf. If we do so, we will require the third party to provide sufficient guarantees that it complies with data protection law.

18. PERSONAL DATA BREACHES

Schools will make all reasonable endeavours to ensure that there are no personal data breaches.

When appropriate, we will report the data breach to the ICO within 72 hours. Such breaches in a school context may include, but are not limited to:

- A non-anonymised dataset being published on the school website such as exam results of pupils
- Safeguarding information being made available to an unauthorised person
- The theft of a school laptop containing non-encrypted personal data about pupils

19. THE FREEDOM OF INFORMATION PUBLICATION SCHEME

The Mill Academy is committed to the Freedom of Information Act 2000 and to the principles of accountability and the general right of access to information, subject to legal exemptions.

The Freedom of Information Act 2000 (FOI) came fully into force on 1st January 2005. Under the Act, any person has a legal right of access to information produced in the course of the Trust and/or its schools' work. They are entitled to be told whether the Trust or its schools hold information and to receive a copy. There are exceptions to this right to information; in particular data about living, identifiable people (personal data) continues to be covered by the General Data Protection Regulations (GDPR) and is not generally publicly available except to the "subject" of the data – that is, the person whom the data is about.

The Trustees are responsible for ensuring that the Trust and/or its Schools comply with FOI.

The Trust and its schools will be clear and proactive about the information they will make public, each school will set out its own Publication Scheme and the Trust's own Publication Scheme is shown in Appendix 1.

Each Publication Scheme will show the following

- The classes of information which we publish or intend to publish;
- The manner in which the information published will be made available; and
- Whether the information is available free of charge or the charges applicable for providing it.

Information held by the Trust and its Schools which is not published under the Publication Scheme can be requested in writing, when its provision will be considered in accordance with the provisions of the FOI Act.

20. POLICY REVIEW PROCEDURE

The Trust will review this policy in a 3-year cycle and assess its implementation and effectiveness. A log of requests for information under this policy will be required to be kept by each School and any logged requests will be notified to and reviewed by the Trust's DPO and reported regularly to the Trustees.

21. ROLES AND RESPONSIBILITIES

This policy applies to all staff employed by the MILL Academy and/or its schools, and to any external organisations or individuals working on our behalf. Staff who do not comply with this policy may face disciplinary action.

- The Trustees have overall responsibility for ensuring that the Academy and its schools comply with all relevant data protection obligations.
- The DPO is responsible for overseeing the implementation of this policy, monitoring compliance with data protection law, and developing related policies and guidelines where applicable.
- The DPO will provide an annual report of their activities directly to the Trust Board, and advise and make recommendations to the Trust on school data protection issues.
- Headteachers act as the representative of the MILL Academy (the data controller) on a day-to-day basis.
- The Business Manager in each school is responsible for maintaining the log of data requests under the DPA.
- The Headteachers for reporting the log when requested to the DPO.
- All staff are responsible on a day-to-day basis for:
 - Collecting, storing and processing any data in relation to this policy;
 - Informing the school of any changes to their own personal data such as change of address;
 - Contacting the DPO in the following circumstances:
 - With questions about the operation of the policy, data protection law, retaining or keeping personal data secure;
 - If they have concerns this policy is not being followed by anyone;
 - If they are unsure they have a legal basis to use personal data in a particular way;
 - If they need to rely on or capture consent, draft privacy notices, deal with data protection rights invoked by an individual, or transfer data outside of the EU;
 - If there has been a data breach;

- Whenever they engage in a new activity that may affect privacy rights of individuals;
 - If they need help with any contracts or sharing personal data with third parties.
- The Headteachers and LGBs for compiling their Publication Scheme and putting in place a system for logging and managing information requests made either under their Publication Scheme or under the provisions of the Freedom of Information Act.

Author: Nichola Stretton – Chief Finance Officer

Date Revised: May 2021

Next Review Date: May 2024 or as required by statutory changes if relevant before the review date

APPENDIX 1

THE MILL ACADEMY - FREEDOM OF INFORMATION ACT PUBLICATION SCHEME

1. Introduction

- 1.1 This Publication Scheme ("Scheme") is based on the model prepared and approved by the Information Commissioner.
- 1.2 This Scheme commits the MILL Academy (the Trust) to make information available to the public as part of its normal business activities. The information covered is included in the classes of information mentioned below, where this information is held by the Trust. Additional information on these classes of information can be obtained from the guidance issued by the Information Commissioner (contact details in section 5.2).
- 1.3 The Scheme commits the Trust:
- To proactively publish or otherwise make available as a matter of routine, information, including environmental information which is held by the Trust and falls within the classifications below.
 - To specify the information, which is held by the Trust and falls within the classifications below.
 - To proactively publish or otherwise make available as a matter of routine, information in line with the statements contained in this Scheme.
 - To produce and publish the methods by which the specific information is made routinely available so that it can be easily identified and accessed by members of the public.
 - To review and update on a regular basis the information the Trust makes available under this Scheme.
 - To produce a schedule of any fees charged for access to information which is made proactively available.
 - To make this Scheme available to the public.

2. Classes of Information

- a. Who are we and what do we do
- Organisational Information, locations and contacts, constitutional and legal governance.

- b. What we spend and how we spend it
 - Financial information relating to projected and actual income and expenditure, tendering, procurement and contracts.
- c. What our priorities are and how we are doing
 - Strategy and performance information, plans, assessments, inspections and reviews.
- d. How we make decisions
 - Policy proposals and decisions. Decision making processes, internal criteria and procedures.
- e. Our policies and procedures
 - Current written protocols for delivering our functions and responsibilities.
- f. Lists and registers
 - Information held in registers required by law and other lists and registers relating to the functions of the Trust.
- g. The Services 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 the disclosure of which is prevented by law, or exempt under the Freedom of Information Act, 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.

If the information you're looking for isn't available via the Scheme and isn't on our website, you can still contact the Trust to ask if we have it. Contact details are in section 3 below. The provision of any additional information will be considered in accordance with the provisions of the Freedom of Information Act.

3. The method by which information published under this Scheme will be made available

- 3.1 The Trust will indicate clearly to the public what information is covered by the Scheme and how it can be obtained.
- 3.2 In most cases, the main method of providing public information by the Trust will be by publishing it on its website.
- 3.3 Where it is impractical to make certain information available on the website or when an individual does not wish to access the information by the website or

does not have access to a computer, the Trust will provide paper copies or provide a facility for the individual to view the website and download and/or print information from it that they require.

- 3.4 The contact details are shown below, if you require a paper version of any of the documents within the Scheme or to arrange access to documents within the Scheme. Access in person will be arranged within a suitable timescale agreed with you.

Email: info@millacademy.co.uk
Telephone: 01993 848150
Address: The Mill Academy
Church Green
Witney
Oxfordshire
OX28 4AX

To help the Trust process your request quickly, please clearly mark any email or written correspondence "PUBLICATION SCHEME REQUEST" (in CAPITALS please).

- 3.5 Information will be provided in the language in which it is held. If the Trust is legally required to translate information, it will do so.
- 3.6 Obligations under disability and discrimination legislation and any other legislation to provide information in other forms and formats will be adhered to when providing information in accordance with this Scheme.

4. Charges which may be made for information published under this Scheme

- 4.1 The purpose of the Scheme is to make the maximum amount of information readily available at minimum convenience and cost to the public. Charges made by the Trust for routinely published material will be justified, transparent and kept to a minimum.
- 4.2 Material which is published and accessed via the website will be provided free of charge.
- 4.3 Charges may be made for actual expenditure incurred on items such as:
- Photocopying costs
 - Postage and packaging
 - Any cost incurred in arranging a viewing in person of information
- 4.4 If a charge is to be made, confirmation of the payment due will be given before the information is provided. Payment may be requested prior to provision of the information.

5. Feedback and Complaints

- 5.1 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 Clerk to the Trustees using the contact details shown in Section 3.4 above.
- 5.2 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:

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

Telephone: 01625 545 700

Email: publications@ic-foi.demon.co.uk.

Website: www.informationcommissioner.gov.uk

**GUIDE TO INFORMATION AVAILABLE FROM THE MILL ACADEMY UNDER THE
FREEDOM OF INFORMATION PUBLICATION SCHEME**

INFORMATION TO BE PUBLISHED	HOW THE INFORMATION CAN BE OBTAINED	COST
CLASS 1: WHO WE ARE AND WHAT WE DO		
Who's who in the Trust	Website	Free
Members and Trustees, basis of their appointment, method of contact	Website	Free
Articles of Association	Website	Free
Funding Agreements	Website	Free
Contact Details for key staff in the Trust, including Chief Executive, Chief Finance Officer, Clerk to the Trustees and Company Secretary	Website	Free
Annual Report (as part of Financial Statements)	Website	Free
Register of Interests of Trustees	Website	Free
CLASS 2: WHAT WE SPEND AND HOW WE SPEND IT		
Audited Financial Statements	Website	Free
Annual Revenue Budget Plans	Hard Copy	Photocopying and postal charges (please request a quote)
Annual Capital Plans and Funding	Hard Copy	Photocopying and postal charges (please request a quote)
Details of expenditure items over £5000	Hard Copy	Photocopying and postal charges (please request a quote)
Contracts Register	Hard Copy	Photocopying and postal charges (please request a quote)
Pay policy	Website	Free
Staffing structure	Hard Copy	Photocopying and postal charges (please request a quote)
Trustees' allowances policy, and a record of total payments made to individual Trustees	Website	Free

INFORMATION TO BE PUBLISHED	HOW THE INFORMATION CAN BE OBTAINED	COST
CLASS 3: WHAT OUR PRIORITIES ARE AND HOW WE ARE DOING		
Performance Management Policy	Website	Free
Business Plan	Website	Free
School Improvement Plan	Website	Free
Data Dashboard	Hard Copy	Photocopying and postal charges (please request a quote)
Safeguarding and child protection Policies	Website	Free
CLASS 4: HOW WE MAKE DECISIONS		
Schemes of Delegation, Trust Committees and School Local Committees	Website	Free
Agendas and minutes of meetings (except for confidential agenda items)	Website	Free
CLASS 5: OUR POLICIES AND DECISIONS		
Risk Management Policy	Website	Free
Data Protection Policy	Website	Free
Equality and Diversity Policy	Website	Free
Whistleblowing Policy	Website	Free
HR Policies	By contacting the HR Team	Free
Health, Safety and Wellbeing Policy	Website	Free
CLASS 6: LIST AND REGISTERS		
Lists and Registers are kept in the individual schools and not with the Trust itself. Please refer to the Publications Policy for the relevant schools.		
CLASS 7: THE SERVICES WE OFFER		
Business Plans, Improvement Plans, School Self Assessments	Website	Free
Trust leaflets and publicity materials	Hard Copy	Photocopying and postal charges (please request a quote)