



# THE BENTLEY WOOD TRUST

## FREEDOM OF INFORMATION PUBLICATION SCHEME

**GB Committee Responsible:****Board of Directors****Reviewed by:**

Marion Tam &amp; Paola Boyadjian

**Review Date:**

June 2022

**Ratified by Local GB:**

BWHS 05.07.2022

AYL 07.07.2022

**Ratified by the Board:**

18.07.2022

**Next Review Date:**

June 2024

## **Introduction: what a publication scheme is and why it has been developed**

One of the aims of the Freedom of Information Act 2000 is that public authorities, including all schools, should be clear and proactive about the information they will make public. To do this we must produce a publication scheme.

This Publication Scheme commits The Bentley Wood 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 school.

The scheme commits The Bentley Wood Trust:

- To proactively publish or otherwise make available as a matter of routine, information, including environmental information, which is held by the authority and falls within the classifications below.
- To specify the information which is held by the authority 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 within 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 Bentley Wood 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 publication scheme available to the public.
- Publish any dataset held by the school that has been requested, and any updated versions it holds, unless the school is satisfied that it is not appropriate to do so; to publish the dataset, where reasonably practicable, in an electronic form that is capable of re-use; and, if any information in the dataset is a relevant copyright work and the school is the only owner, to make the information available for re-use under the terms of the Re-use of Public Sector Information Regulations 2015, if they apply, and otherwise under the terms section 19 of the Freedom of Information Act 2000. The terms 'dataset' and 'relevant copyright work' are defined in sections 11(5) and 19(8) of the Freedom of Information Act 2000 respectively.

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

### **1. Classes of Information**

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 7 of this scheme.

- **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.

- **Our 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 authority.
- **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.

## **2. The methods by which information published under the scheme will be made available**

The school will indicate clearly to the public what information is covered by this Scheme and how it can be obtained.

Where it is within the capability of The Bentley Wood Trust, information will be provided on our school websites. Where it is impracticable to make information available on the website or when an individual does not wish to access the information from the website, the Trust will indicate how information can be obtained by other means and provide it by those means.

In exceptional circumstances some information may be available only by viewing in person. Where this manner is specified, contact details will be provided. An appointment to view the information will be arranged within a reasonable timescale.

Information will be provided in the language in which it is held or in such other language that is legally required. Where the Trust is legally required to translate any information it will do so.

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.

## **3. Written Requests**

The Bentley Wood Trust is comprised of two schools: Aylward Primary School & Bentley Wood High School. If you require a paper version of any of the documents within the scheme, please complete the "Freedom of Information - Request Form" (Appendix 1) and return it to the appropriate School Office. Alternatively, you can contact us by telephone, email or letter. Contact details are set out as follows:

Email: [office@aylward.harrow.sch.uk](mailto:office@aylward.harrow.sch.uk) or [schooloffice@bentleywood.harrow.sch.uk](mailto:schooloffice@bentleywood.harrow.sch.uk)

Tel: Aylward Primary School: 020 8958 9202 or  
Bentley Wood High School: 020 8954 3623

Contact Address: Aylward Primary School, Pangbourne Drive, Stanmore, Middlesex, HA7 4RE  
Bentley Wood High School, Bridges Road, Stanmore, Middlesex, HA7 3NA

To help us process your request quickly, please clearly mark any correspondence **“FREEDOM OF INFORMATION REQUEST”** (in CAPITALS please)

If the information you're looking for isn't available via the scheme you can still contact the school to ask if we have it.

#### **4. Charges which may be made for information published under this scheme**

The school may charge individuals for information published under this scheme. The purpose of this scheme is to make the maximum amount of information readily available at the minimum inconvenience and cost to the public. Charges made by the school for routinely published material will be justified and transparent and kept to a minimum.

Material which is published and accessed on the website will be provided free of charge.

Charges may be made for information subject to a charging regime specified by law.

Charges will be made to cover:

- Photocopying;
- Postage and Packaging; &
- The costs directly incurred as a result of viewing information.

Single copies of information requested which are covered by the publication scheme will be provided free unless otherwise stated within the scheme. If the request involved a large amount of photocopying, printing or postage, then this may be at a cost. If this is the case we will let you know as well as let you know the cost before fulfilling your request.

If you require a paper version of any of the documents within the scheme, please contact the school using the contact details below.

Email: [office@aylward.harrow.sch.uk](mailto:office@aylward.harrow.sch.uk) or [schooloffice@bentleywood.harrow.sch.uk](mailto:schooloffice@bentleywood.harrow.sch.uk)

Tel: Aylward Primary School: 020 8958 9202 or  
Bentley Wood High School: 020 8954 3623

Contact Address: Aylward Primary School, Pangbourne Drive, Stanmore, Middlesex, HA7 4RE  
Bentley Wood High School, Bridges Road, Stanmore, Middlesex, HA7 3NA

Please mark all correspondence *Publication Scheme Request* in order to help us process your request quickly. If the information you are looking for isn't available via the scheme, you can still contact the school to ask if we have this information.

#### **5. Fees**

The School may charge the requester a fee for providing the requested information. This will be dependent on whether the staffing costs in complying with the request exceeds the threshold. The threshold is currently £450 with staff costs calculated at a fixed rate of £25 per hour (therefore 18 hours' work is required before the threshold is reached).

If a request would cost less than the threshold, then the school can only charge for the cost of informing the applicant whether the information is held, and communicating the information to the applicant (e.g. photocopying, printing and postage costs).

When calculating costs/threshold, the School can take account of the staff costs/time in determining whether the information is held by the School, locating and retrieving the information, and extracting the information from other documents. The School will not take account of the costs involved with considering whether information is exempt under the Act.

If a request would cost more than the appropriate limit, (£450) the school can turn the request down, answer and charge a fee or answer and waive the fee.

If the School are going to charge they will send the enquirer a fees notice. The School do not have to comply with the request until the fee has been paid. More details on fees can be found on the ICO website.

If planning to turn down a request for cost reasons, or charge a high fee, you should contact the applicant in advance to discuss whether they would prefer the scope of the request to be modified so that, for example, it would cost less than the appropriate limit.

Where two or more requests are made to the School by different people who appear to be acting together or as part of a campaign the estimated cost of complying with any of the requests may be taken to be the estimated total cost of complying with them all.

## **6. Time Limits**

Compliance with a request must be prompt and within the time limit of 20 school days (this does not include the school holidays or weekends) or 60 working days if this is shorter. Failure to comply could result in a complaint by the requester to the Information Commissioner's Office. The response time starts counting as the first day from the next working day after the request is received (so if a request was received on Monday 6<sup>th</sup> October the time limit would start from the next working day, the 7<sup>th</sup> October).

Where the School has asked the enquirer for more information to enable it to answer, the 20 school days start time begins when this further information has been received.

If some information is exempt this will be detailed in the School's response.

If a qualified exemption applies and the School need more time to consider the public interest test, the School will reply in 20 school days stating that an exemption applies but include an estimate of the date by which a decision on the public interest test will be made. This should be within a "reasonable" time.

Where the School has notified the enquirer that a charge is to be made, the time period stops until payment is received.

## **7. Third Party Data**

Consultation of third parties may be required if their interests could be affected by release of the information requested, and any such consultation may influence the decision.

Consultation will be necessary where:

- Disclosure of information may affect the legal rights of a third party, such as the right to have certain information treated in confidence or rights under Article 8 of the European Convention on Human Rights;
- The views of the third party may assist the School to determine if information is exempt from disclosure; or
- The views of the third party may assist the School to determine the public interest test.

Personal information requested by third parties is also exempt under this policy where release of that information would breach the Data Protection Act. If a request is made for a document (e.g. Governing Body minutes) which contains personal information whose release to a third party would breach the Data Protection Act, the document may be issued by blanking out the relevant personal information as set out in the redaction procedure.

## **8. Exemptions**

The presumption of the Freedom of Information Act is that the School will disclose information unless the Act provides a specific reason to withhold it. The Act recognises the need to preserve confidentiality and protect sensitive material in certain circumstances.

The School may refuse all/part of a request, if one of the following applies: -

- 1) There is an exemption to disclosure within the act;
- 2) The information sought is not held;
- 3) The request is considered vexatious or repeated; or
- 4) The cost of compliance exceeds the threshold.

A series of exemptions are set out in the Act which allow the withholding of information in relation to an enquiry. Some are specialised in their application (such as national security) and would not usually be relevant to schools.

There are two general categories of exemptions:-

- 1) **Absolute:** where there is no requirement to confirm or deny that the information is held, disclose the information or consider the public interest; and
- 2) **Qualified:** where, even if an exemption applies, there is a duty to consider the public interest in disclosing information.

## **9. Absolute Exemptions**

There are eight absolute exemptions set out in the Act. However, the following are the only absolute exemptions which will apply to the School: -

- Information accessible to the enquirer by other means (for example by way of the School's Publication Scheme);
- National Security/Court Records;
- Personal information (i.e. information which would be covered by the Data Protection Act);
- Information provided in confidence.

If an absolute exemption exists, it means that disclosure is not required by the Act. However, a decision could be taken to ignore the exemption and release the information taking into account all the facts of the case if it is felt necessary to do so.

## **10. Qualified Exemptions**

If one of the below exemptions apply (i.e. a qualified disclosure), there is also a duty to consider the public interest in confirming or denying that the information exists and in disclosing information.

The qualified exemptions under the Act which would be applicable to the School are: -

- Information requested is intended for future publication (and it is reasonable in all the circumstances for the requester to wait until such time that the information is actually published);

- Reasons of National Security;
- Government/International Relations;
- Release of the information is likely to prejudice any actual or potential legal action or formal investigation involving the School;
- Law enforcement (i.e. if disclosure would prejudice the prevention or detection of crime, the prosecution of offenders or the administration of justice);
- Release of the information would prejudice the ability of the School to carry out an effective audit of its accounts, resources and functions;
- For Health and Safety purposes;
- Information requested is Environmental information;
- Information requested is subject to Legal professional privilege; and
- For *Commercial Interest* reasons.

Where the potential exemption is a qualified exemption, the School will consider the public interest test to identify if the public interest in applying the exemption outweighs the public interest in disclosing it. In all cases, before writing to the enquirer, the person given responsibility by the School for dealing with the request will need to ensure that the case has been properly considered, and that the reasons for refusal, or public interest test refusal, are sound.

## **11. Refusal**

If it is decided to refuse a request, the School will send a refusals notice, which must contain:

- The fact that the responsible person cannot provide the information asked for;
- Which exemption(s) apply;
- Why the exemption(s) apply to this enquiry (if it is not self-evident);
- Reasons for refusal; and
- The School's complaints procedure.

For monitoring purposes and in case of an appeal against a decision not to release the information or an investigation by the Information Commissioner, the responsible person must keep a record of all enquiries where all or part of the requested information is withheld and exemptions are claimed. The record must include the reasons for the decision to withhold the information.

## **12 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 Ms J Howkins, Headteacher, Bentley Wood High School.

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 an independent regulatory body that ensures compliance with the Freedom of Information Act 2000 and deals with formal complaints. They can be contacted at:

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

**Enquiry/Information Line: 0303 123 1113**

**Website: [www.informationcommissioner.gov.uk](http://www.informationcommissioner.gov.uk)**

## **13 Monitoring, Evaluation and Review**

The Governing Body will review this policy at least every two years and assess its implementation and effectiveness. The policy will be promoted and implemented throughout the Trust.



## 14 Information to be published

Information to be published.	How the information can be obtained (hard copy and/or website)	Cost
<b>Class 1 - Who we are and what we do</b> <b>Organisational information, structures, locations and contacts</b> This will be current information only		
Who's who in the school	Via School Office	No Charge
Who's who on the governing body / board of governors and the basis of their appointment	Via Clerk to Governing Body	No Charge
Instrument of Government / Articles of Association	Via Clerk to Governing Body	Schedule of Charges
Contact details for the Head teacher and for the governing body, via the school (named contacts where possible).	Via Clerk to Governing Body	No Charge
School prospectus	Website	No Charge
Annual Report (if any)	Website	No Charge
Staffing structure	Hard Copy	Schedule of Charges
School session times and term dates	Website	No Charge
Address of school and contact details, including email address.	Website	No Charge

Information to be published.	How the information can be obtained (hard copy and/or website)	Cost
<b>Class 2 – What we spend and how we spend it</b> <b>Financial information relating to projected and actual income and expenditure, procurement, contracts and financial audit</b> Current and previous financial year as a minimum		
Annual budget plan and financial statements	Hard Copy	Schedule of Charges
Financial statements	Website	No Charge
Capitalised funding	Hard Copy	Schedule of Charges
Additional Funding	Hard Copy	Schedule of Charges
Procurement and projects	Hard Copy	Schedule of Charges
Pay policy	Hard Copy	Schedule of Charges
Staffing and grading structure.	Hard Copy	Schedule of Charges
Governors' allowances	Hard Copy	Schedule of Charges

Information to be published.	How the information can be obtained (hard copy and/or website)	Cost
<b>Class 3 – What our priorities are and how we are doing</b> <b>Strategies and plans, performance indicators, audits, inspections and reviews</b> Current information as a minimum		
School profile <ul style="list-style-type: none"> <li>• Government supplied performance data</li> <li>• The latest Ofsted Report – Summary &amp; Full Report</li> <li>• Post-inspection action plan</li> </ul>	Hard Copy Website Hard Copy	Schedule of Charges No Charge Schedule of Charges
Performance management policy and procedures adopted by the governing body.	Hard Copy	Schedule of Charges
School Improvement Plan	Hard Copy	Schedule of Charges
Safeguarding policies and procedures	Website	No Charge
<b>Class 4 – How we make decisions</b> <b>Decision making processes and records of decisions</b> Current and previous three years as a minimum		
Admissions policy/decisions (not individual admission decisions) – where applicable	Website	No Charge
Agendas of meetings of the governing body and (if held) its sub-committees.	Hard Copy	Schedule of Charges
Minutes of meetings (as above) (NB this will exclude information that is properly regarded as private to the meetings).	Hard Copy	Schedule of Charges

Information to be published.	How the information can be obtained (hard copy and/or website)	Cost
<b>Class 5 – Our policies and procedures</b> <b>Current written protocols, policies and procedures for delivering our services and responsibilities</b> Current information only.		
School Policies including: <ul style="list-style-type: none"> <li>• Charging and remissions policy</li> <li>• Health &amp; Safety</li> <li>• Complaints procedure</li> <li>• Staff Conduct policy</li> <li>• Discipline and grievance policies</li> <li>• Staffing structure implementation plan</li> <li>• Information request handling plan</li> <li>• Equality and diversity (including equal opportunities) policies</li> </ul>	Website Via E-mail Hard Copy	No Charge No Charge Schedule of Charges
Student and curriculum policies including: <ul style="list-style-type: none"> <li>• Home/School Agreement</li> <li>• Curriculum</li> <li>• Sex Education</li> <li>• Special Education Needs</li> <li>• Accessibility</li> <li>• Race Equality</li> <li>• Collective Worship</li> <li>• Behaviour Policy</li> </ul>	Website Via E-mail Hard Copy	No Charge No Charge Schedule of Charges
Records management and personal data policies, including: <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>	Via e-mail Hard Copy	No Charge Schedule of Charges

Information to be published.	How the information can be obtained (hard copy and/or website)	Cost
Charging regimes and policies.  This should include details of any statutory charging regimes. Charging policies should include charges made for information routinely published. They should clearly state what costs are to be recovered, the basis on which they are made and how they are calculated.	Website	No Charge
<b>Class 6 – Lists and Registers</b> <b>Currently maintained lists and registers only</b>		
Curriculum circulars and statutory instruments	Hard Copy	Schedule of Charges
Disclosure logs	Hard Copy	Schedule of Charges
Asset register	Hard Copy	Schedule of Charges
Any information the school is currently legally required to hold in publicly available registers  <b>THIS DOES NOT INCLUDE THE ATTENDANCE REGISTER</b>	Hard Copy	Schedule of Charges
<b>Class 7 – The services we offer</b> <b>Information about the services we offer, including leaflets, guidance and newsletters produced for the public and businesses)</b> Current information only		
Extra-curricular activities	Website	No Charge
Out of school clubs	Website	No Charge
School publications	Website	No Charge

Information to be published.	How the information can be obtained (hard copy and/or website)	Cost
Services for which the school is entitled to recover a fee, together with those fees	Website	No Charge
Leaflets, books and newsletters	Website	No Charge
<b>Additional Information</b> This will provide schools with the opportunity to publish information that is not itemised in the lists above		

## SCHEDULE OF CHARGES

This describes how the charges have been arrived at and should be published as part of the guide.

Type of Charge	Description	Basis of Charge
<b>Disbursement cost</b>	Photocopying/printing @ 10p per sheet (black & white)	Actual cost *
	Photocopying/printing @ 30p per sheet (colour)	Actual cost
	Postage	Actual cost of Royal Mail standard 2 <sup>nd</sup> class
<b>Statutory Fee</b>		In accordance with the relevant legislation (quote the actual statute)



## Appendix 1 Freedom of information Request Form



This form can be completed sent by email or alternatively it can be printed and sent to the address at the bottom of this form. You do not have to use this form to make your request but it will help us deal with your request as promptly as possible if you do. If you prefer, you can make your request in writing e.g. letter, email, fax or other form which we can use for reference.

Applicant name:

Address:

Email address:

Fax number:

*(at least one of the above (address, email or fax) must be provided for contact purposes)*

Phone number (optional)

Date:

Description of the information you seek:

Any other details that may help us to identify and locate the information:

Any special requirements:

Send this form by post or email to the appropriate school:

**Address**

Aylward Primary School  
Pangbourne Drive  
Stanmore  
Middlesex  
HA7 4RE

Bentley Wood High School  
Bridges Road  
Stanmore  
Middlesex  
HA7 3NA

**Email**

[office@aylward.harrow.sch.uk](mailto:office@aylward.harrow.sch.uk).

[schooloffice@bentleywood.harrow.sch.uk](mailto:schooloffice@bentleywood.harrow.sch.uk)