



**Rossmere
Academy**
ENRICHING EDUCATION

Rossmere Primary School

Information Policy

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1. Introduction

This policy will help Rossmere Primary School to comply with the Data Protection Act (DPA 2018), Environmental Regulations 2017 (EIR) and Freedom of Information Act 2000 (FOIA) associated guidance and Codes of Practice issued under the legislation. It addresses dealing with requests for information, records management, security and access to information and use of email and internet. Any user who contravenes this guidance will be dealt with appropriately. This may include disciplinary action and/or informing the Police where appropriate. The Governing Body will be responsible for evaluating and reviewing this policy annually.

2. Policy applies to

The policy applies to any recorded information, which is held by school, or on their behalf, in any form, whether manual or electronic.

3. Data Protection

Personal data will be collected, stored, used and disclosed in accordance with the requirements of the Data Protection principles. Rossmere Primary School has notified its purposes for processing with the Information Commissioner.

4. Making Information Available

Rossmere Primary School will make information available in line with the DPA, EIR and FOI and is committed to the spirit of the legislation to promote openness and accountability.

Requests will be responded to within the prescribed timescales.

Exemptions will only be applied when absolutely necessary. If an exemption applies, individuals will be advised they cannot have the information they have requested and, where appropriate, given the reason why information is being withheld, and/or advised of the complaints procedure and contact details for the Information Commissioner.

The Chair of Governors and the Headteacher will jointly consider all requests where a public interest test is applied, or where there is any doubt on whether or not an exemption should be applied. In applying the public interest test, they will:

- Document clearly the benefits from both disclosing and withholding the requested information; and
- Where necessary seek guidance on case law in deciding where the balance lies.

Reason for disclosing/not disclosing the information will be reported to the next governing body meeting. Rossmere Primary School will offer advice and assistance to individuals to help them access information. For example: if information is not held by the school but may be held by another public body, the school will advise the individual of this and provide contact details of the relevant public body.

Rossmere Primary School has adopted the Information Commissioner's model publication scheme for schools and will publish as much of the information as possible on its website. The publication scheme will be kept up-to-date and will be subject to an annual review by the Governing Body.

5. How Rossmere Primary School manage requests for Information

- The school will provide reasonable advice and assistance to individuals if they need help in putting a request for information together.
- Requests will be acknowledged within one school day.
- If there is any doubt on the scope of information requested clarification will be sought from the applicant.
- Requests will be responded to within the prescribed timelines.
- In some cases, the disclosure of information may affect the rights of a third party. In such circumstances, the school will ensure that disclosure of such information will be in line with FOI, DP and EIR legislation.
- Where the school receives a request to be dealt with under FOIA and some or all of the information is not held by the school and it is believed that another public authority may hold that information, the school will then ask the applicant if they wish to request to be transferred to the other authority once the information held by the school has been disclosed. If the school is unable to facilitate the transfer of the request for information to another authority then, where possible, the applicant will be offered advice to enable him/her to pursue the request.
- Rossmere Primary School will comply with its obligations on requests transferred by another public body in the same manner it would had the request been received directly by the school.

6. Charging for Information

Charging for supplying information will be at the schools' discretion and in line with current regulations. If a charge applies, written notice will be given to the applicant and payment must be received before the requested information is supplied.

- For **FOI AND EIR** requests, the school will use Hartlepool Borough Council Charging Policy. Once the individual has been notified that a fee is payable if this is not received within 3 months of the notification, the request will be deemed to have lapsed.
- For **DPA OR Education (Pupil Information)(England) Regulations 2005** requests, charges will be made in accordance with current legislation.

7. Complaints

Expressions of dissatisfaction will be handled through the school's existing general complaints procedure and on completion of the complaints procedure applicants will be notified of their right to complain to the Information Commissioner.

8. Monitoring and Evaluation

The Headteacher will be responsible for periodically monitoring requests received and action taken to ensure that the school is complying with the information legislation and report annually to the Governing Body.

9. Records management, security and control of information

Rossmere Primary School recognises that the secure and efficient management of its information is necessary to comply with its legal and regulatory obligations and to contribute to the effective overall management of the school.

- Protocols will be in place to ensure the school knows what information is held and by whom.
- The school will maintain/dispose of records in accordance with the Record Management Policy and Record Retention and Disposal Schedule (RRDS).
- The school will ensure that information is held securely with access restricted as appropriate and in line with the guidelines on security and access from Hartlepool Borough Council.
- The school will ensure that use of email and internet is properly controlled in line with the guidance in from Hartlepool Borough Council.
- The school will periodically review and monitor its information management to ensure standards, procedures, guidelines and security measures are in place and being complied with.

10. TRAINING

Rossmere Primary School will ensure that appropriate guidance and training is given to the relevant staff, governors and other authorized school users on access to information regimes, records management, security and access to information using email and the internet.

11. COPYRIGHT

When providing information, the school will ensure that there is no infringement of copyright legislation.

12. RESPONSIBILITY

The day-to-day responsibility for implementation of the Information Policy and the provision of advice, guidance, publicity and interpretation of the policy is delegated to the headteacher. The headteacher is also the Senior Information Risk Owner.

A designated member of staff, Rachael Watson will be a single point of reference and will:

- Oversee all requests.
- Ensure systems are in place to deal with requests.
- Be responsible for maintaining a log of all requests received and for ensuring they are responded to within the prescribed timescales.
- Ensure a record of refusals and reasons for refusals is kept allowing the Governing Body to review the Information Policy on an annual basis.
- Take a view on possibly sensitive areas.
- Coordinate/update the Publication Scheme.
- Consider what training and guidance staff may need.

