



Achieving together in faith

**Holy Cross Catholic
Multi-Academy Company
Freedom of Information Policy
2022 - 2024**

Responsible for Policy	Christopher Connoll
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Document Control:

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1.0	Approved	05/09/2019			Approved by The Board of Directors
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2.0	Approved	12/10/2022		MAC Resources Committee	Approved

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1. Introduction

Holy Cross Catholic MAC ICO Registration Number ZA553195

Publication Scheme for information available under the Freedom of Information Act 2000

2. Aims, Objectives and Scope

2.1 Aim

Holy Cross Catholic MAC will promote a culture of openness and accountability through its Publication Scheme.

2.2 Objectives

We acknowledge that under the Freedom of Information Act 2000, any person has a legal right to ask for access to information held by Holy Cross Catholic MAC or its individual academies. We aim to:

- Provide assistance to anyone requesting information
- To make available a significant amount of routinely published information about the Multi Academy Company (hereon in known as the MAC)
- To make available, upon written request, other information not included in this publication scheme, and such requests are dealt with in a timely manner
- Tell enquirers whether we hold the information they are requesting unless exempted from this duty (the duty to confirm or deny)
- To improve public understanding of:
 - How we carry out our duties
 - How we make our decisions
 - How we spend our money

- To recognise the presumption of openness that underlies the Freedom of Information Act. We are committed to maintaining a well – managed records and information system in order to comply efficiently with requests and we will adopt a straight – forward approach to meeting requests for information.

2.3 Scope

This policy covers requests for information under the Freedom of Information Act 2000. The policy does not cover enquiries or subject access requests under the General Data Protection Regulation 2018. The policy outlines our approach to information requests, details of the Publication Scheme (and where it can be found) and how information requests will be handled.

“Information” includes both hard copy and digital information.

3. Roles and Responsibilities

3.1 The Board of Directors – is responsible for overseeing access to information and delegation to the appropriate Headteacher and Local Governing Bodies for the individual academies or the Chief Finance and Operating Officer for the MAC. To oversee and audit the implementation of the Freedom of Information Policy.

3.2 The Chief Finance and Operating Officer – Overseeing the Day to day responsibility for the implementation of the Freedom of Information Policy, the provision of advice, guidance, publicity and interpretation of this policy for the MAC.

3.3 MAC ICT, Communication & Compliance Manager – To oversee Data Protection and Freedom of Information responsibilities with the MAC and ensure compliance with the relevant legislation. To develop good practices that are compliant. To communicate internal policies and procedures and deliver up to date and relevant training. To handle data related queries or complaints, and log and respond to any Subject Access and Freedom of Information requests for both the MAC and the individual schools. To alert the organisation to any risks that may arise and liaise with the Information Commissioners Office (as necessary).

3.4 Headteacher – Day to day responsibility for the implementation of the Freedom of Information Policy, the provision of advice, guidance, publicity and interpretation of this policy for their own individual academy.

3.5 Data Protection Champions (schools) – To oversee Data Protection and Freedom of Information responsibilities within the school and ensure compliance with the relevant legislation. To become the subject matter expert regarding all matters relating to Data Protection and Freedom of Information. To be the point of contact between the school and the MAC Data Protection Officer cascading any training and updates and coordinating any Subject Access or Freedom of Information requests within the school.

4. Policy

4.1 Classes 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”. The classes of information that we undertake to make available are organised into seven broad topic areas:

Who we are and what we do

Organisational information, structures, locations and contacts.

What we spend and how we spend it

Financial information about projected and actual income and expenditure, procurement, contracts and financial audit.

What our priorities are and how we are doing

Strategies and plans, performance and records of decisions.

Our policies and procedures

Current written protocols, policies and procedures for delivering our services and responsibilities.

Lists and Registers

Information held in registers required by law and other lists and registers relating to the MAC.

The services we offer

Information about the services the MAC provides including leaflets, guidance and newsletters.

5. Information

Additional information that is not covered in the scheme can be requested in writing. However, this does not mean that the MAC is obliged to provide the information. In some cases, there will be a good reason why this information should not be made public, some or all of the information requested.

There are 4 reasons for not complying with a valid request for information under the Freedom of Information Act:

- The information is not held
- The cost threshold is reached (£450)
- The request is considered vexatious or repeated
- One or more exemptions apply

Many of the exemptions are intended to protect sensitive or confidential information. However, some exemptions are there simply to avoid the legal position where 2 pieces of law cover the same information requested, or where the information is already available by some other means. In addition, the Freedom of Information Act contains a number of exemptions that allows information to be withheld. In some cases, it will allow the MAC to refuse to confirm or deny whether it holds the information.

Some exemptions relate to a particular type of information, for instance, information relating to Government policy. Other exemptions are based on the harm that would arise or would likely arise from disclosure, e.g. if disclosure would be likely to prejudice a criminal investigation. There is also an exemption for personal data if releasing it would be contrary to the General Data Protection Regulation 2018.

A written refusal notice will be sent to any request that is partially or fully refused.

6. Procedures

6.1 How to request information

If you require a paper version/hard copy of any of the documents within the scheme, please contact the Multi Academy Company by telephone, email or letter.

Requests for information not published under this scheme must be made in writing. Contact details are set out below.

School Data Protection Officer

Warwickshire Legal Services

Warwickshire County Council
Shire Hall
Market Square
Warwick CV34 4RL

Holy Cross Catholic MAC - Data Controller

Mr Chris Connoll

MAC ICT, Communication & Compliance Manager
Holy Cross Catholic MAC,
Heathcote Street,
Radford,
CV6 3BL

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 (and isn't on our website), you can still contact the Multi Academy Company to ask if we have it.

6.2 Charges for information

The scheme has the purpose of making as much information readily available to the public at minimum inconvenience.

In line with the Fees Regulations (SI 2004/3244 Freedom of Information and Data Protection (Appropriate Limit and Fees) Regulations), Holy Cross Catholic MAC does not charge a fee for requests where the prescribed information retrieval costs are estimated to be less than £450. However, a charge may be made for disbursements e.g. postage, printing, computer discs, audio or video tapes, photocopying @ 10p per sheet of A4.

6.3 Further information and complaints

If you require further assistance or wish to make a complaint, then initially this should be addressed to:

Mr Martyn Alcott

Chief Finance and Operating Officer
Holy Cross Catholic MAC,
Heathcote Street,
Radford,
CV6 3BL

martyn.alcott@hcmac.co.uk
02475 816 555

Mr Chris Connoll

MAC ICT, Communication & Compliance Manager
Holy Cross Catholic MAC,
Heathcote Street,
Radford,
CV6 3BL

chris.connoll@hcmac.co.uk
02475 816 555

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. There is also a large amount of information on their website regarding the Freedom of Information Act. They can be contacted at:

Information Commissioner's Office

Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Telephone : 0303 123 1113

Fax : 01625 524510

Website : <https://ico.org.uk/>

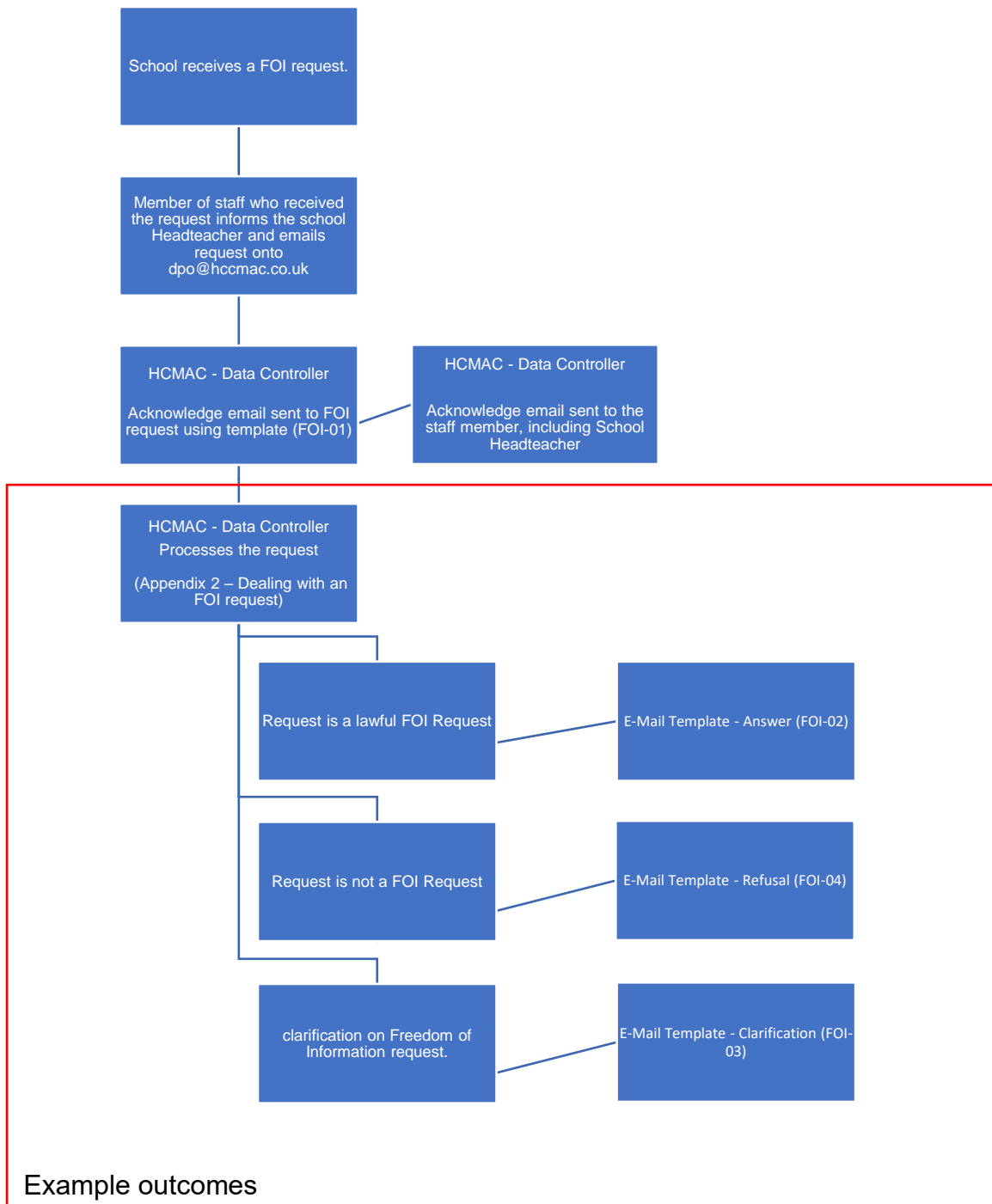
Related Policies

Holy Cross Catholic MAC – **Data Protection Policy**

Holy Cross Catholic MAC – **Whistleblowing Policy**

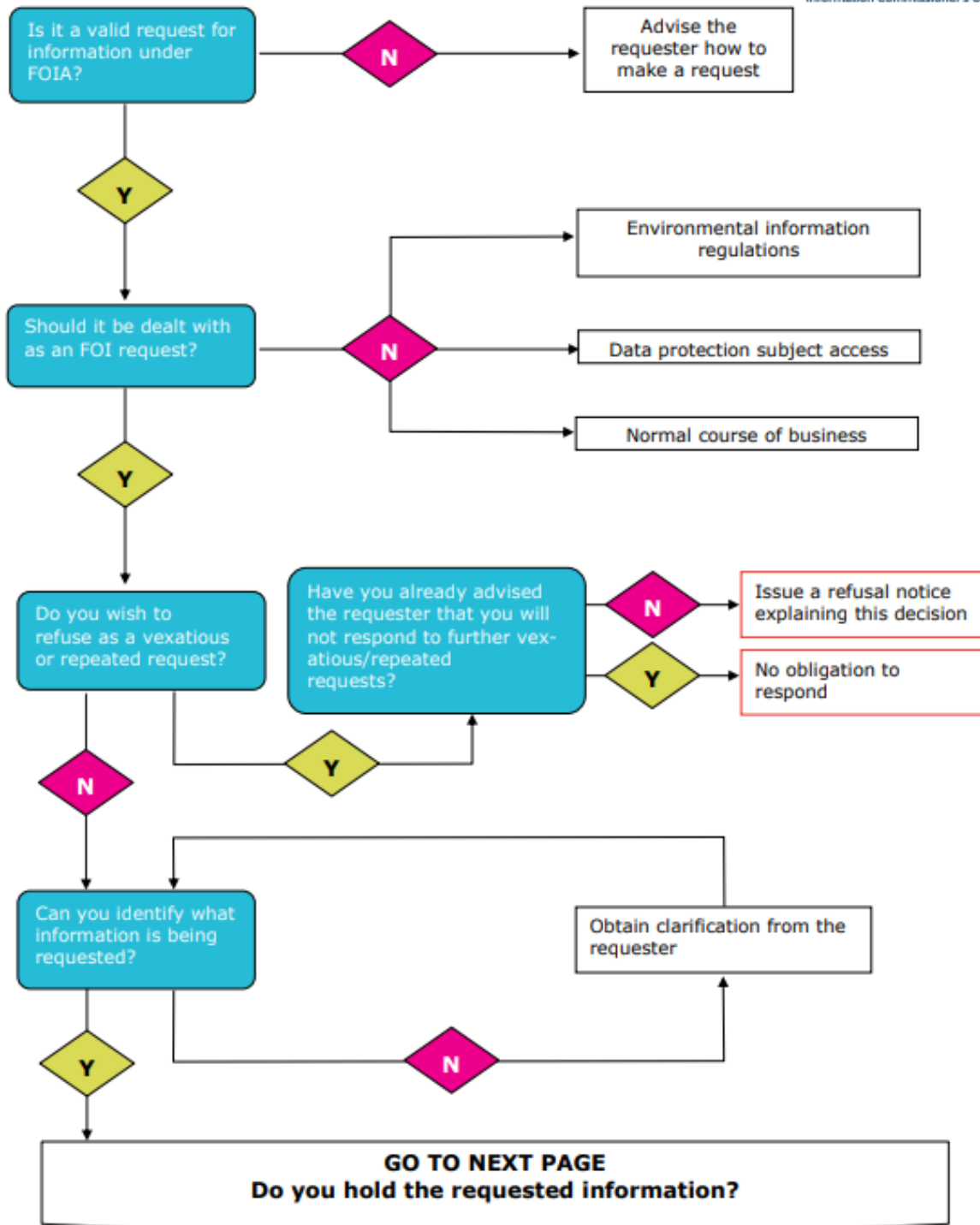
Holy Cross Catholic MAC – **Disciplinary Policy**

Appendix 1 – School processing a FOI request



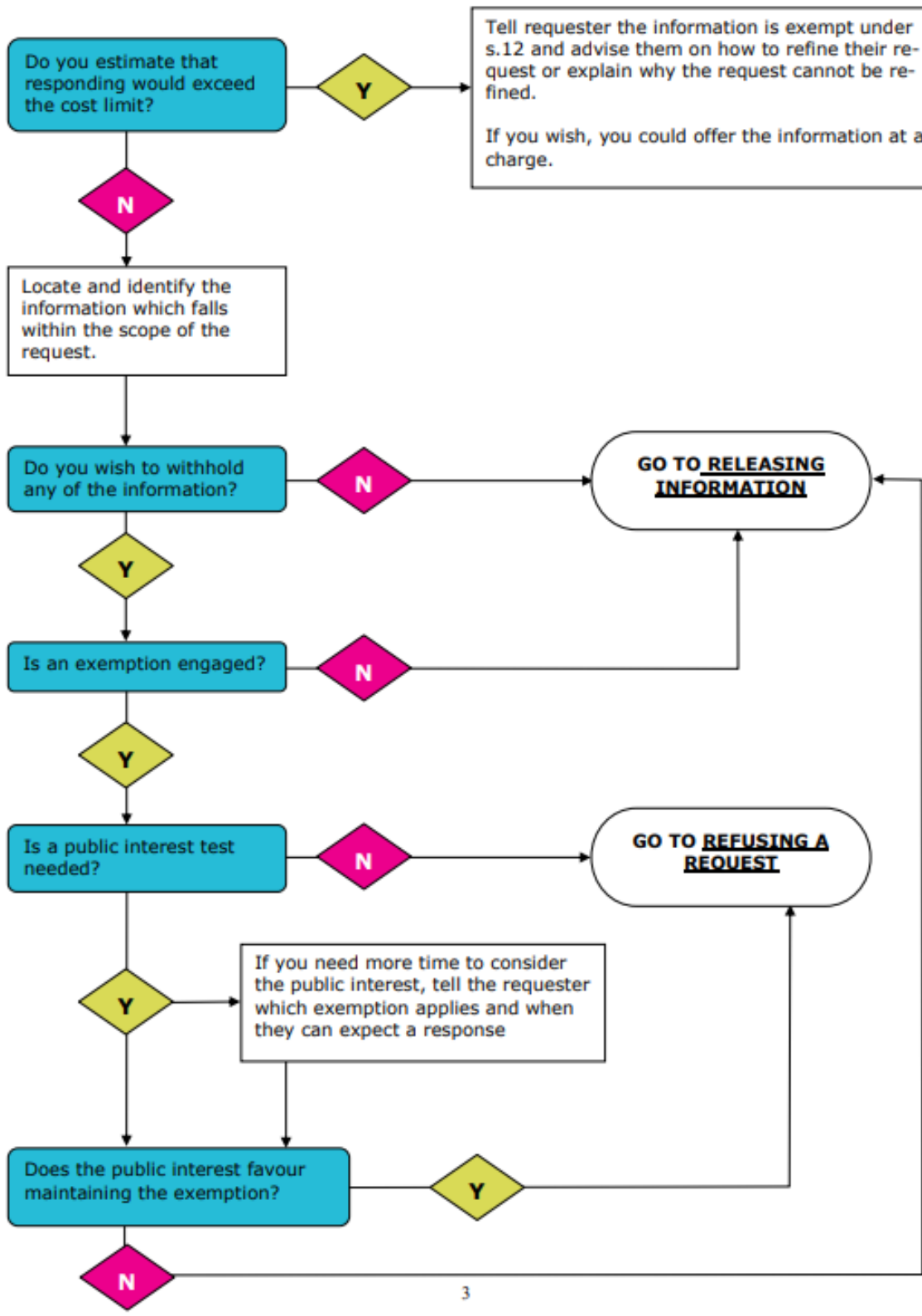
Appendix 2 – Dealing with an FOI request

Start here

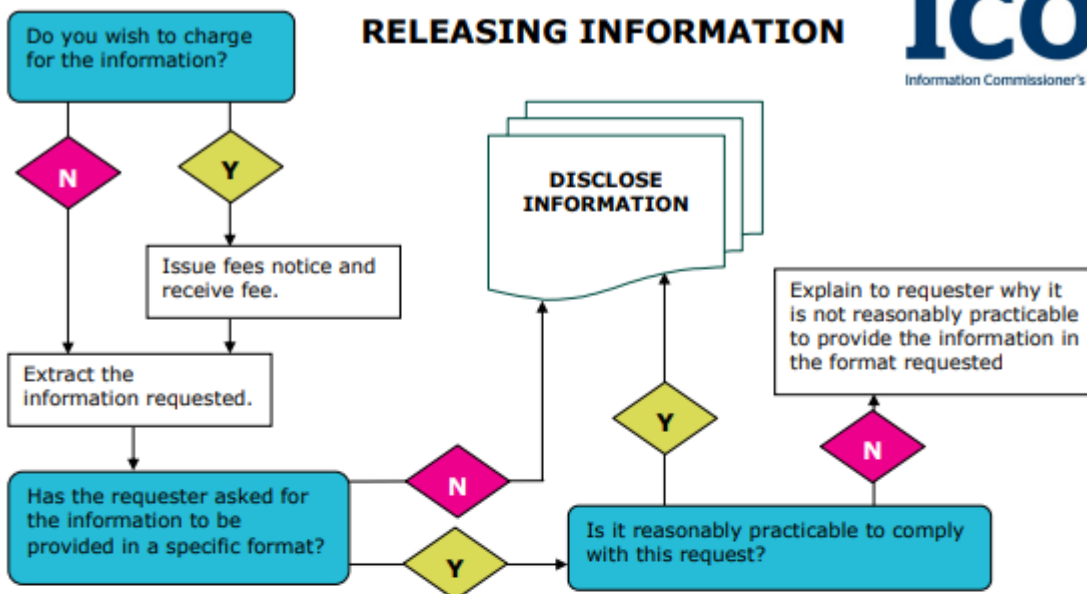


1

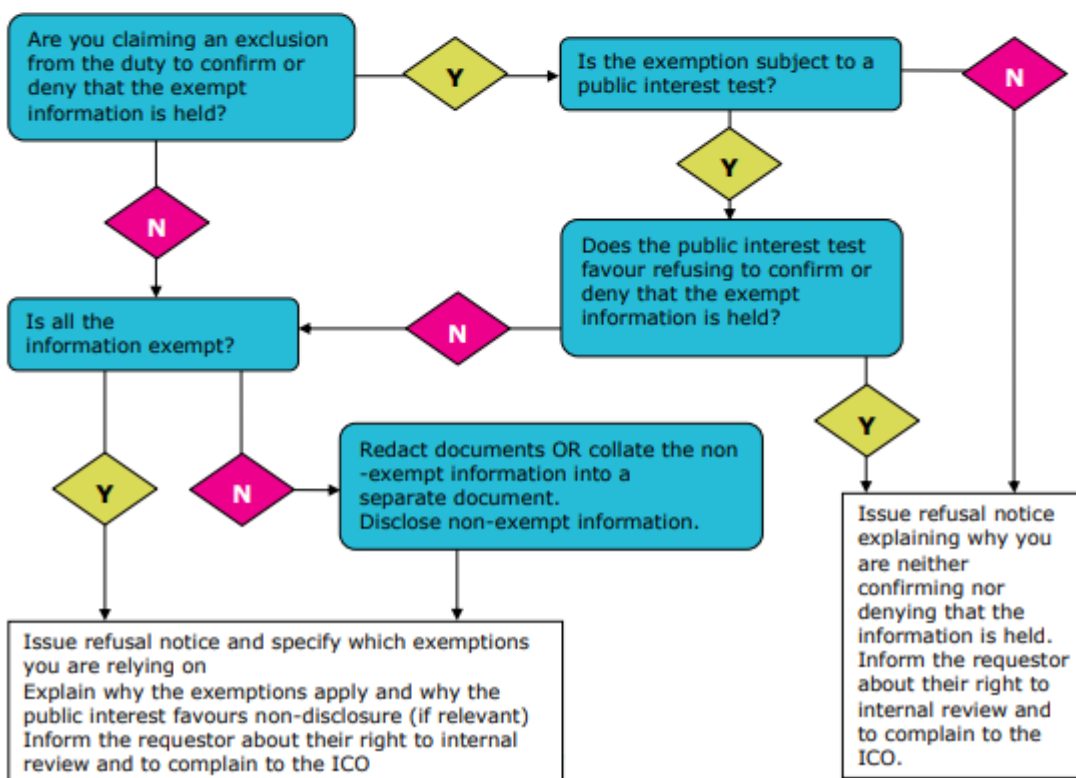
27 November 2012 v1.0



RELEASING INFORMATION



REFUSING A REQUEST



Appendix 3 – E-Mail Template - Acknowledgment (FOI-01)

Template to acknowledge suspected Freedom of Information request.

Subject: FOI Acknowledgment Receipt

Dear <NAME>,

Re: Freedom of Information – Request for Information

Thank you for your letter/email/fax [delete as appropriate] on <DATE LETTER/EMAIL/FAX> requesting the following information:

<REPEAT PRECISELY THOSE PARTS OF THE ORIGINAL REQUEST WHICH DESCRIBED THE INFORMATION REQUESTED BUT OMIT ANY SUPERFLUOUS INFORMATION IN THE REQUEST>

We will now process your request in line with our Freedom of Information Policy, which can be found here [HCCMAC Policies](#). You should expect to receive a further reply within 20 working days from the day when your request was originally received.

If you have any queries about this request do not hesitate to contact me. Please remember to quote the reference number above in any future communications.

Many thanks,

<STANDARD EMAIL SIGNATURE>

Appendix 4 – E-Mail Template - Answer (FOI-02)

Template to answer of Freedom of Information request.

Subject: FOI <REFERENCE FOR REQUEST>

Dear <NAME>,

Re: Freedom of Information – Request for Information

Thank you for your Freedom of Information Request.

Dated: <DATE>

School: <NAME OF SCHOOL(S) OR HCMAC>

Ref: <REFERENCE FOR REQUEST>

Your request has been answered below.

This information is held at school level and therefore the information provided has been collated by the school(s) in question. **<REMOVE IF INFORMATION IS COLLECTED BY MAC CENTRALLY>**

<INSERT ANSWER TO FOI OR SAY IT'S ATTACHED IN DOCUMENT>

We now consider this FOI requested closed, if you do require any additional information, please contact me on the details below.

Many thanks,

<STANDARD EMAIL SIGNATURE>

Appendix 5 – E-Mail Template - Clarification (FOI-03)

Template to ask for more clarification on Freedom of Information request.

Subject: FOI – Clarification on Request for Information

Dear <NAME>,

Re: Freedom of Information – Request for Information

Thank you for your letter/email/fax [delete as appropriate] on <DATE LETTER/EMAIL/FAX>

We have reviewed your Request, however we require further information in order to identify and locate the requested information.

Your request:

<REPEAT PRECISELY THOSE PARTS OF THE ORIGINAL REQUEST WHICH DESCRIBED THE INFORMATION REQUESTED BUT OMIT ANY SUPERFLUOUS INFORMATION IN THE REQUEST>

Please provide clarification on

Until we receive clarification, we will consider this information request to be suspended. The 20 working days to respond will commence when we receive your clarification.

If we do not hear from you within one month of the date of this letter we will assume that you are no longer seeking access to this information and we will take no further action.

Many thanks,

<STANDARD EMAIL SIGNATURE>

Appendix 6 – E-Mail Template - Refusal (FOI-04)

Template to refuse Freedom of Information request.

Subject: FOI – Request for Information

Dear <NAME>,

Re: Freedom of Information – Request for Information

Thank you for your letter/email/fax [delete as appropriate] on <DATE LETTER/EMAIL/FAX>, requesting information about:

<REPEAT PRECISELY THOSE PARTS OF THE ORIGINAL REQUEST WHICH DESCRIBED THE INFORMATION REQUESTED BUT OMIT ANY SUPERFLUOUS INFORMATION IN THE REQUEST>

The Holy Cross Catholic MAC does not hold the information that you have requested and is not aware of any other public authority that could respond to your request. Section 17 of FOIA states that where public authorities receive requests for information that they do not hold, they must issue a notice advising that they do not hold the requested information.

Your right to seek a review

Should you be dissatisfied with the way we have dealt with your request, you have the right to require us to review our actions and decisions. If you wish to request a review, please contact the Chair of the Board of Directors, Board of Directors, Holy Cross Catholic MAC, Heathcote Street, Coventry, CV6 3BL or e-mail: dpo@hccmac.co.uk within 40 working days. Your request must be in a recordable format (letter, email etc). You will receive a full response to your request for review within 20 working days of its receipt.

Your right to appeal the review

If you are dissatisfied with the way in which we have handled your request for review, you may ask the Information Commissioner to review our decision. You must submit your complaint to the Commissioner within 6 months of receiving the response to review letter. The Commissioner’s Office may be contacted as follows:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Telephone: 0303 123 1113

Fax: 01625 524510

We now consider this FOI requested closed, if you do require any additional information, please contact me on the details below.

Many thanks,

<STANDARD EMAIL SIGNATURE>
