1. Introduction

1.1 This policy sets out the classes of information that the University of Brighton Academies Trust and/ or its academies[1] publish and the terms on which that information may be made available to those who request it. It is based on the generic model publication for academies scheme prepared and approved by the Information Commissioner.

2. Principles

2.1 This publication scheme commits 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.

2.2 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 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 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.

3. Classes of information

3.1 The classes of information that the Trust publishes includes:

- **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.

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[1] For ease of reference the term 'the Trust' is used throughout this document when referring to the University of Brighton Academies Trust and/its academies

- **Lists and Registers**
  Information held in registers required by law and other lists and registers relating to the functions of the Trust.

- **The Services we Offer**
  Advice and guidance, booklets and leaflets, transactions and media releases. A description of the services offered.

3.2 The classes of information the Trust publish 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.

4. Procedures

4.1 The method by which information published under this scheme will be made available

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

4.1.2 Where possible, the Trust will provide information on its website. Where it is impracticable to make information available on a website or when an individual does not wish to access the information by the website, the Trust will indicate how information can be obtained by other means and provide it by those means.

4.1.3 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.

4.1.4 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.

4.1.5 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.

4.2 Charges which may be made for Information published under this scheme

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

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

4.2.3 Charges may be made for information, subject to a charging regime specified by Parliament.

4.2.4 Charges may be made for actual disbursements incurred such as:
- photocopying (10p per A4 sheet)
- postage and packaging (actual cost of 2nd class postage)
- the costs directly incurred as a result of viewing information (£25 per hour of staff time)

4.2.5 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.

4.3   Written Requests

4.3.1   Information held by the Trust that is not published under this scheme can be requested in writing, when its provision will be considered in accordance with the provisions of the Freedom of Information Act.

4.4   Contact details

Trust information
University of Brighton Academies Trust
Multi-Academy Trust Office
University of Brighton
Exion 27
Crowhurst Road
Brighton
BN1 8AF
Phone: 01273 082005
Email: enquiries@brightonacademiestrust.org.uk

Academy information
The contact details of each academy in the Trust are available on the Trust's website
https://www.brightonacademiesTrust.org.uk/academies/our-academies

4.5   The method by which information published under this scheme will be made available

4.5.1   The table in Appendix 1 identifies the information which meets the requirements of the Information Commissioner.

5.   Refusing requests and exemptions to the law

5.1   There will be occasions when a decision is taken to refuse a request for information. Examples of when this could happen are:
- it would cost too much or take too much staff time to deal with the request
- the request is vexatious
- the request repeats a previous request from the same person

5.2   The Freedom of Information Act also contains a number of exemptions that allow the Trust to withhold information from a requester. Examples of this type of exemption are:
- if a disclosure could prejudice a criminal investigation
- if commercial interests could be prejudiced
- if it would be contrary to the General Data Protection Regulation (2018) or Data Protection Act (2018)

5.3   When a decision is taken to apply an exemption, a refusal notice will be issued giving details of the reason for the decision. Details of the Trust internal review process will be provided.

6.   Complaints

6.1   The Trust has an internal review process for dealing with any complaints received in relation to Freedom of Information requests.

6.2   Requests for an internal review should be made in writing to
Head of Governance and Admissions
University of Brighton Academies Trust
Multi-Academy Trust Office
University of Brighton
Exion 27
Crowhurst Road

Brighton
BN1 8AF
Email: governance@brightonacademiestrust.org.uk

6.3   Internal review process

6.3.1   An internal review will be conducted by a staff member who did not deal with the original request. The member of staff conducting the review will usually be a more senior member of staff than the staff member who dealt with the request.

6.3.2   The reviewer will:
- make a fresh decision based on all the available evidence that is relevant to the date of the response, not just a review of the first decision
- ensure that the review takes no longer than 20 working days in most cases or 40 in exceptional circumstances
- consider whether circumstances may have changed which mean that the original concerns about disclosure no longer apply

6.3.3   If a complainant is not satisfied with the outcome of the review then a complaint can be made to the Information Commissioners Office.

6.3.4   The contact details are:
Information Commissioner
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF
Tel: 01625 545700
Web: www.informationcommissioner.gov.uk

7.   Policy status and review

Written by:	Head of Governance and Admissions
Owner:	Executive Director of Strategy
Status:	V1 = Approved V2 = minor amends to contact details only Approved V3 = approved V4 = approved V5 = approved
Summary of changes	V4 = incorporated information available for SCITT/STTP V5 = minor amends to update Trust contact details, policy list, clarity on governance information available
Approval date:	V1 – 1/7/15 V2 29/3/17 V2 = 12 October 2017 V3 = 6 February 2020 V4 = 07 December 2020 V5 = 06 October 2021
Review Date:	Nov 2023

Guide to information available from the University of Brighton Academies Trust under the publication scheme

Information to be published ➢ **Who we are and what we do** (Organisational information, structures, locations and contacts) This will be current information only	How the information can be obtained
Trust information	
Articles of Association	Trust website
Annual report	Trust website
Trust governance structure	Trust website
Board of Trustees – names and contact details of the Trustees and the basis of their appointment	Trust website
Trust senior staff	Trust website
Trust location and contact information – address, telephone number and website	Trust website
Academy information	
Local Board information	Individual academy website
Academy staff	Individual academy website
Academy session times, term dates and holidays	Individual academy website
Academy Prospectus	Individual academy website
School curriculum	Individual academy website
Academy location and contact information – address, telephone number and website	Individual academy website

Sussex Teacher Training Partnership (STTP)	
Programme details	Trust website
Training options	Trust website

Application details	Trust website
Executive Board – Names of members and Terms of reference	Trust website

Information to be published	**How the information can be obtained**
➢ **What we spend and how we spend it** (Financial information relating to actual income and expenditure, procurement, contracts and financial audit) This should be a minimum of current and the previous two years financial years (accounts that have been filed with the Charity Commission and Companies House).	
Annual budget plan and financial statements • Details of the sources of funding and income provided directly by central government together with the annual budget plan and the annual income and expenditure returns • Details of items of expenditure over £5,000, including costs, supplier and transaction information.	Available on request
Capital funding • Information on major plans for capital funding. Details of capital funding allocated to each academy in the trust along with information on related building projects and other capital projects	Available on request
Financial statements and audit reports	Trust website
Procurement and contracts • Details of procedures used for the acquisition of goods and services. • Details of contracts that have gone through a formal tendering process.	• Trust website • Available on request
Pay policy • Teachers' Pay Policy • Support Staff Pay Policy • Senior Staff Pay and Appraisal Policy	Available on request
Staff allowances and expenses • details of the allowances and expenses that can be incurred or claimed • the total of the allowances and expenses paid to individual senior staff members (Executive Team and Principals)	Available on request
Trustees' allowances • Details of allowances and expenses that can be claimed or incurred • A record of total payments made to individual trustees	• Policy published on Trust website • Available on request
Staff pay and grading structure • Names and positions of senior staff (Executive Team members) • Names of academy principals	• Trust website • Individual academy website

Achieving excellence together

• Senior staff salaries (Executive Team and Principals)	• Available on request

Information to be published ➢ **What our priorities are and how we are doing** (Strategies and plans, performance indicators, audits, inspections and reviews) Current information should be published.	**How the information can be obtained**
Trust values, vision and mission	Trust website
STTP aims	Trust website
Academy profile • Government supplied performance data • OFSTED inspection report	Direct link from individual academy website
Performance management information • Professional Review Scheme	Available on request
Academies' future plans	Available on request

Information to be published ➢ **How we make decisions** (Decision making processes and records of decisions) Current and previous three years as a minimum	**How the information can be obtained**
Admissions policy • arrangements and procedures and right of appeal • Information on application numbers and number of successful applicants by each oversubscription criteria.	Trust and/or individual academy website
Agendas, minutes, reports and papers considered at a meeting of the Board of Trustees and its Committees – information that is properly considered to be private will be excluded.	Available on request

Information to be published ➢ **Our policies and procedures (**Current written protocols, policies and procedures for delivering our services and responsibilities) Current information only	**How the information can be obtained** Trust and/or individual academy website
o Safeguarding & pupil policies including: o First Aid and medical policy	Trust and/or individual academy website

- Physical contact guidance - Preventing extremism and Radicalisation - Intimate Care - Exclusions - Special Educational Needs and Disabilities - Academy Safeguarding and Child Protection policy - Pupil and student attendance - Supporting students with medical conditions - Academy on-line safety Policy - ICT Acceptable use - ICT Acceptable use for students/pupils - Children with health needs who cannot attend school - Designated teacher for Looked After Children	
- Staff policies including: - Whistle blowing - Recruitment - Staff Code of Conduct Policy - Staff Remuneration (teachers' pay/Support staff pay) - Professional Review Scheme - Staff Grievance - Staff Disciplinary Policy / Procedures - Staff capability - Expenses policy for Trustees and Local Board members - Adoption - Flexible working - Induction - Leadership pay - Maternity - ECT policy - Paternity - Probation and appointment support - Remote working - Restructure and redundancy - Retirement - Secondment - Shared parental leave - Sickness absence - Staff appraisal	Available on request

o Staff travel and expenses	

• Operational policies including:
  o   Business charge card
  o   Use of Social media
  o   Data Protection
  o   Risk Management
  o   Health and Safety
  o   Minibus
  o   Equality Objectives
  o   Off Site Activities and Educational Visits
  o   Freedom of Information Publication Scheme
  o   Accident and incident reporting
  o   CCTV
  o   Control of asbestos
  o   Control of substances hazardous to health
  o   Fire safety
  o   Gifts and hospitality
  o   Investment
  o   Letting of academy premises
  o   Social media
  o   Document Retention
	Trust website

• Information for parent, carers and visitors including:
  o   Admissions
  o   Charging and Remissions
  o   Complaints
  o   Equality policy
  o   Equality Objectives
  o   Parents/Carers & Visitors code of conduct
  o   Provider Access
	Trust website

• Policies specifically relating to the STTP
  o   Complaints and appeals policy
  o   Data Protection agreement
  o   Disqualification Declaration Form
  o   Equality of opportunity in recruitment policy
  o   Fitness to Train
  o   Online safety
	Available on request

○ Partnership agreement ○ Code of Conduct ○ Harassment and Bullying policy ○ Social Media ○ Trainee absence	

Information to be published ➢ **Lists and Registers** Currently maintained lists and registers only	**How the information can be obtained**
Asset register	Available on request
Any information the Academy is currently legally required to hold in publicly available registers	Available on request

Information to be published ➢ **The services we offer** (Information about the services we offer, including leaflets, guidance and newsletters produced for the public and businesses) Current information only	**How the information can be obtained**
Extra-curricular activities	Available on request
Out of school clubs	Available on request
School publications	Available on request
Services for which the Academy is entitled to recover a fee, together with those fees	Available on request
Leaflets, booklets and newsletters	Available on request