

Freedom of Information Policy

Introduction

The Freedom of Information Act 2000 imposes a number of obligations on public authorities, which, for these purposes includes Graveney School, and provides the public with wide rights of access to the school's records. In essence, members of the public have a statutory right:

- a. From 29 February 2004, to obtain all the information covered by the School's Publication Scheme.
- b. From 1 January 2005 to request (with some minor limitations) any information held by the school, regardless of when it was created, by whom, or the form in which it is now recorded.

This policy, and its associated Codes of Practice, sets out how Graveney School will meet its obligations under the Act.

Policy Statement

In accordance with the provisions of the Act we are committed to being open and honest in the conduct of our operations and to complying fully with the Freedom of Information Act. To this end the school:

- Agrees to place in public domain as much information as is practical and, subject to the exemptions permitted by the Act, to make all other information available on request.
- Will establish records management systems and procedures which meet the requirements of the Lord Chancellor's Code of Practice on the Management of Records
- Will deal with all requests for information in accordance with the Lord Chancellor's Code of Practice on the Discharge of Public Authorities' Functions
- There will be occasions when we cannot supply all the information requested. Information will only be withheld in accordance with the exemptions laid down in the Act E.g. confidential information about individual members of staff and students/pupils.
- On such occasions the school will always state the reasons why the information has been withheld.

Relationship with existing policies

This Policy has been formulated within the context of the following documents:

The School's Data protection Policy (attached as Annex 1)

The School's Information Systems Security Policy (attached as Annex 2)

Publication Scheme

Our Publication Scheme conforms to a model approved by the Office of the Information Commissioner and is available on the School's Internet website at www.graveney.org/publicationscheme or in printed form by application to the School Bursar (attached as Annex 3)

Implementation of the Policy

The procedures for implementation of this Policy are contained in two School Codes of Practice:

Management of records

The Lord Chancellor's Code of Practice on the Management of Records makes it clear that public bodies should adopt co-ordinated records management structures, procedures and systems that cover the Freedom of Information, Data protection and Records Management.

The School has followed this guidance in the development of its Code of practice for the Management of Records. (refer to Annex 4 for the school's Record Management Policy and Retention Schedule).

Requests for Information

The Lord Chancellor's Code of Practice on the Discharge of Public Authorities' Functions requires institutions to have in place a system for management requests for information.

The School has followed this guidance in the development of its Code of Practice on Requests for Information. (refer to Annex 5 for the School's Code of Practice on Handling Requests for Information].

Review

The operation of the Policy and its associated Codes of Practice will be reviewed every three years by the Governing Body.

Last reviewed: 30th November 2016.

Next review date: Autumn Term 2019.

Annex 1

Data Protection Policy/Information Security Management Policy

All staff of Graveney School recognise the importance of following the principles of the Data Protection Act 1998 and of making sure that information is securely and appropriately managed.

The Eight Data Protection Principles

The principles state that data must be:-

- Obtained and processed fairly and lawfully
- Processed for limited purposes
- Adequate, relevant and not excessive
- Accurate
- Not kept longer than necessary
- Processed in accordance with the Data Subject's rights
- Secure
- Not transferred to countries which do not have similar protective legislation

The Data Controller

The key person at Graveney School is the Data Controller. That person is currently Cynthia Rickman (03.03.05). The Data Controller is required to undergo training as necessary, to make sure that the procedures in this policy are followed, and to provide detailed guidance where required.

The Data we hold

We are registered with the Data Protection Commissioner. Our registration covers us to hold a wide range of data connected to our business, which is the provision of education and training.

The data is used by authorised members of school staff to support the legitimate interests of the school. Relevant parts of the data may be disclosed legitimately to authorised personnel within the school, to Wandsworth LEA, to Health advisers, Social workers and other relevant agencies, to prospective employers and to the data subjects themselves.

Data processing is done internally by authorised school staff and externally by LEA officers.

Data collection

We follow the principles of the Data Protection Act in collecting only relevant and necessary information. Applicants to the school (staff and pupils) are made aware that information that they supply will be treated in the strictest confidence and will be subject to the conditions of the Data Protection Act.

We are aware of individuals' rights to see what data we hold whether manually or on computer, with the following exceptions:

- material whose disclosure would be likely to cause serious harm to the physical or mental health or emotional condition of the pupil or someone else
- material concerning actual or suspected child abuse
- references supplied to potential employers of the pupil, any national body concerned with student admissions, another school, an institution of further or higher education, or any other place of education and training
- reports by a school to a juvenile court.

We send home a copy of the basic data held in Phoenix (name, address, contact details, emergency contacts etc) each year to ensure accuracy.

Under the Data Protection Act 1998 all pupils are entitled to have their educational records disclosed to them, free of charge, within 15 school days of making a written request. Where a young pupil seeks access to his or her records we will try to establish whether the pupil understands the nature of the request. If we form the view that the pupil does not understand owing to youth or immaturity then the request need not be complied with. A record is kept of all requests and decisions.

Under the Education (Pupil Information) (England) Regulations 2000 parents are entitled to have their child's educational records disclosed to them, free of charge, within 15 school days of making a written request. A parent will be supplied with a copy of their child's educational record at no greater cost than that of supplying it.

Data storage

Electronic data is stored on the school network. This is password protected and access rights are restricted to authorised personnel. The data is 'backed up' every night onto tape and these tapes are kept in a secure safe in the office. Computer screens are sited so that they are not easily seen by visitors to the office, and passworded screen savers are used to increase security.

Anti-virus software is installed on the network and is updated regularly. Data held on paper is stored in the school offices in locked filing cabinets.

Disposal of data

Records are destroyed when no longer relevant, paper formats by shredding, with the following constraints:

- Records that are part of the financial records are kept for seven years;
- Other records (e.g. attendance registers) are kept for five years;
- When pupils change school the academic records are sent to the new school within 15 days of the pupil being taken off our school roll. If it is not known which school the child transfers to records will be sent within 15 days of a request from a new school. Failing that the record will be kept for 5 years. An entry is made in the school admission register showing where records have been sent.

A record is kept by the Data Controller of other data that has been destroyed.

Electronic transmission of data

Graveney School is moving towards electronic transmission as the main method of data transfer. The PLASC is transmitted electronically, teaching staff are increasingly using electronic means (Phoenix Gold) to record pupil assessments.

E-mail will become an increasingly common method of communication. Staff are urged to delete (unread) e-mails from unknown sources and with irrelevant subject headings in order to minimise the risks of virus transmission. Pupil data is transferred to the LEA, when necessary, by secure file transfer.

Although staff are not restricted to the use of e-mail for school business only, it is expected that

- Private use will not interfere with the performance of their normal duties
- Staff will not include abusive or offensive materials in e-mails.

There is a policy on use of the school network and the internet for both pupils and staff.

Annex 2

IT SECURITY SYSTEMS AND PROCEDURES

These procedures are designed to eliminate, as far as reasonably practicable, the incidence of theft, fraud, destruction; loss or other abuse of school computer resources including school data.

APPROPRIATE USE OF SCHOOL IT SYSTEMS

The school's network is for the use of staff and pupils to support the process of teaching and learning. It is to be used on this context only and unauthorised use will be dealt with through the relevant disciplinary codes.

No computer user may attach a peripheral item of hardware to the school system or install an item of software. Any such item that needs to be set up for a class or other purpose must be requisitioned through the appropriate channels.

Guidance for staff and pupils on appropriate use of the internet (including e.mail) and arrangements for file and program downloads are contained in the Appropriate Use of the Internet Policy. Pupil use of the computer installation is regulated through the Pupil IT contract and the FLC contract.

RISK ASSESSMENT

IT security risks include the following:

- Theft of or damage to computer equipment
- Unauthorised access to school systems and data
- Destruction or corruption of school systems and/or data
- By accident
- Through malicious intervention by staff/pupils
- Through environmental factors including power failure and extreme fluctuations in temperature.
- Through access from external agencies e.g. viruses.

CONTROL MEASURES TO PROTECT AGAINST THEFT OF OR DAMAGE TO COMPUTER EQUIPMENT

All hardware must be security marked immediately it is delivered to the site. Details of all hardware and software must be recorded in the appropriate stock book including serial numbers and must identify who completed the record and when. Stock checks will be undertaken on a periodic basis by the Senior Management Team and the school auditors.

Additional security arrangement may be necessary in some areas and the IT team are responsible for advising staff on these, including purpose built security cabinets and other security devices, as appropriate.

All classrooms and offices containing computer, or audio-visual specialist and/or expensive equipment must be locked when not in use.

Each user of a room containing this kind of equipment is responsible for ensuring that it is locked when they leave.

Managers are responsible for ensuring that all keys are handed in on the last day of a person's employment

Access to the server room is restricted to the IT Technical team and their authorised contractors. Authorised contractors must be supervised whilst working in the server room. Only members of the IT

technician team and the Schoolkeeper will have keys to the server room and these keys must not be given out to other staff or contractors.

The computer installation is secured outside of school hours through the school wide motion detection based alarm system.

CONTROL MEASURES TO PROTECT AGAINST UNAUTHORISED ACCESS TO SCHOOL DATA AND SYSTEMS

Internal

Access to data held on the school network is managed through a Windows 2000 server which offers an extensive range of security features. The IT Development Manager is responsible for setting up access level and for agreeing any changes to these through the IT team structure.

Any computer user attempting to access data for which they are not an authorised user will be dealt with through the appropriate code.

All users have a unique log-on and password, which allows them to access those areas of the network for which they are authorised users. The IT Development Manager is responsible for ensuring that:

- Passwords on servers are encrypted
- Passwords are entered in a non-display field
- Interception or decryption of system or user passwords or unauthorised access to control information is identified quickly and reported to the Senior Management Team.
- Account that gives access to extraordinary system capabilities (e.g. system administrator accounts) are protected with more than one password.

Pupils and staff are to be given guidelines which are regularly reviewed, updated and reissued which include information on:

- Secure passwords
- Changing passwords
- Use of passwords and arrangements for temporary passwords for classes
- Arrangements for dealing with breaches of password confidentiality
- Arrangements for leaving work stations unattended.

External

External security is controlled in the following ways:

- London Grid/Atomwide – our ISP provides a basic firewall as part of the arrangements for providing internet capability. An additional layer of security for pupils using the internet is provided which includes the identification and barring of access to specified types of internet sites.
- Sonic Firewall enables the system administrator to monitor all internet traffic both in and out and to set up controls and triggers that support the monitoring
- ISA Server and Mail Sweeper – provide further and more specific functionality which supports the management of Internet and e.mail features.
- Sophos – automatic updates on a daily basis

In addition to the above, USB ports have been disabled on all school computers and any pupil or member of staff needing to access work from any external device must have the device scanned by the IT team and the item of work moved from the device their N drive by the IT team.

No USB ports are to be opened up without written permission from the Bursar.

Any user who finds a possible security lapse or suspects that a virus may have been introduced is obliged to report this to the IT Systems Development Manager immediately.

CONTROL MEASURES TO PROTECT AGAINST DESTRUCTION OR CORRUPTION OF SCHOOL SYSTEMS AND/OR DATA

Data may be lost or destroyed as a result of environmental hazards, malicious damage or by accident.

Environmental Hazards

Overheating is a common hazard where a large installation is accommodated in a relatively small room. Arrangements for server room ventilation will be kept under regular (termly) review and the IT Development Manager is responsible for ensuring that temperature and humidity remain at appropriate levels.

Uninterrupted power supplies are provided for all critical installations including the server room and the finance office. Power supplies are to be checked regularly and upgraded/updated as necessary.

Accidental or Malicious damage

All reasonable steps are taken to ensure that pupils do not have unsupervised access to computer equipment (see under security above). Where malicious damage occurs, it is the responsibility of the IT Development Manager to identify the perpetrator using the system software administration tools at his disposal. The IT coordinator is then responsible for interviewing those identified as being responsible and for taking disciplinary action as appropriate.

BACK UP ARRANGEMENTS

Back-up cycle and storage

The IT Development Manager is responsible for ensuring that regular and appropriate back-ups of all school data are taken. The back-up cycle takes place overnight, each night using rotating tapes.

Back-up tapes are stored in two locations to reduce the risk of losing backup capability in the event of serious damage to either one of the main site locations. The storage arrangements are as follows:

Lower school:	MON	Upper school:	TUES
	WED		THURSDAY
	FRI01		FRI02
	FRI03		FRI04

The Friday backups rotate to become monthly backups.

All backup tapes are to be replaced regularly due to tapes ageing and becoming unreliable.

Tapes are stored upright in fireproof datasafes.

Backups may fail if a user has not properly logged out before closing down their computer or leaving the site. The IT Team must provide regular guidance to users to reinforce this requirements. The IT Development Manager is responsible for identifying users failing to log out and for taking appropriate action.

Monitoring back-up systems

The IT Development Manager is responsible for reviewing the backups each morning and for maintaining a log which confirms that each back-up has been successfully completed. Any incidence of a failed back-up is reported immediately to the Bursar and IT coordinator who are responsible for ensuring that resources are provided to restore appropriate back-up capability. As part of this review it will be necessary to undertake test restores of backed up data and applications on a periodic basis. In the case of critical school systems, i.e. accounting data and pupil database, the frequency of test restores will be agreed between the relevant manager (the Deputy Bursar and Bursar respectively) and the results of the tests recorded and reported back.

Annex 3

PUBLICATION SCHEME

This is Graveney School's Publication Scheme on information available under the Freedom of Information Act 2000

The governing body is responsible for maintenance of this scheme.

1. Introduction: what a publication scheme is and why it has been developed

One of the aims of the Freedom of Information Act 2000 (which is referred to as FOIA in the rest of this document) is that public authorities, including all maintained schools, should be clear and proactive about the information they will make public. To do this we must produce a publication scheme, setting out:

- The classes of information which we publish or intend to publish;
- The manner in which the information will be published; and
- Whether the information is available free of charge or on payment.

This scheme covers information already published and information which is to be published in the future. All information in our publication scheme is either available for you on our website to download and print off or available in paper form.

Some information which we hold may not be made public, for example personal information.

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

2. Who we are

Graveney is a co-educational foundation school offering a wide range of courses and a continuous education for children aged 11 – 19.

Aims and Objectives

The school aims to:

- develop the talents and confidence of all its pupils to the full
- to equip them with knowledge, skills and understanding
- and to help them towards maturity.

and this publication scheme is a means of showing how we are pursuing these aims.

3. Categories 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'. These are contained in section 6 of this scheme.

The classes of information that we undertake to make available are organised into four broad topic areas:

- School Prospectus** – information published in the school prospectus.
- Governors' Documents** – information published in the Governors Annual Report and in other governing body documents.
- Pupils & Curriculum** – information about policies that relate to pupils and the school curriculum.
- School Policies and other information related to the school** - information about policies that relate to the school in general.

4. How to request information

If you require a paper version of any of the documents within the scheme, please contact the school by telephone, email, fax or letter. Contact details are set out below:

Website: www.graveney.org
Email: info@graveney.wandsworth.sch.uk
Tel: 020 8682 7000
Fax: 020 8682 7075

To help us process your request quickly, please mark any correspondence clearly with the following

“PUBLICATION SCHEME 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 school to ask if we have it.

5. Paying for information

Information published on our website is free, although you may incur costs from your Internet service provider. If you don't have Internet access, you can access our website using a local library or an Internet café.

Single copies of information covered by this publication are provided free unless stated otherwise in section 6. If your request means that we have to do a lot of photocopying or printing, or pay a large postage charge, or is for a priced item such as some printed publications or videos we will let you know the cost before fulfilling your request. Where there is a charge this will be indicated by a £ sign in the description box.

6. Classes of Information Currently Published

i. **School Prospectus** – this section sets out information published in the school prospectus.

Class Description – *School Prospectus*

The statutory contents of the school prospectus are as follows

- the name, address and telephone number of the school, and the type of school
- the names of the head teacher and chair of governors
- information on the school policy on admissions
- a statement of the school's ethos and values
- details of any affiliations with a particular religion or religious denomination, the religious education provided, parents' right to withdraw their child from religious education and collective worship and the alternative provision for those pupils
- information about the school's policy on providing for pupils with special educational needs
- number of pupils on roll and rates of pupils' authorised and unauthorised absences
- National Curriculum assessment results for appropriate Key Stages, with national summary figures
- GCSE/GNVQ results in the school, locally and nationally
- a summary of GCE A/AS level results in the school and nationally
- the number of pupils studying for and percentage achieving other vocational qualifications
- the destinations of school leavers¹
- the arrangements for visits to the school by prospective parents
- the number of places for pupils of normal age of entry in the preceding school year and the number of written applications / preferences expressed for those places.

¹ Some information might be confidential or otherwise exempt from the publication by law – we cannot therefore publish this.

ii. INFORMATION RELATING TO THE GOVERNING BODY

This section sets out information published in the School Profile and in other governing body documents.

School Profile – the school profile must be published by the Governing Body once each year using a format prescribed by the DCSF.

Instrument of Government

- The name of the school
- The category of the school
- The name of the governing body
- The manner in which the governing body is constituted
- The term of office of each category of governor if less than 4 years
- The name of any body entitled to appoint any category of governor
- Details of any trust
- If the school has a religious character, a description of the ethos
- The date the instrument takes effect

Minutes of meetings of the governing body and its committees

Agreed minutes of meetings of the governing body and its committees for the current and last full academic school years

iii. Pupils & Curriculum Policies

This section gives access to information about policies that relate to pupils and the school curriculum.

Class Description - *Home – school agreement*

- Statement of the school's aims and values, the school's responsibilities, the parental responsibilities and the school's expectations of its pupils for example homework arrangements
- Curriculum - Policy Statement on following the policy for the secular curriculum subjects and religious education and schemes of work and syllabuses currently used by the school
- Sex Education Policy - Statement of policy with regard to sex and relationship education
- *Special Education Needs– Policy Information about the school's policy on providing for pupils with special educational needs*
- Accessibility Plans - Plan for increasing participation of disabled pupils in the school's curriculum, improving the accessibility of the physical environment and improving delivery of information to disabled pupils.
- Race Equality – Policy Statement of policy for promoting race equality
- Collective Worship - Statement of arrangements for the required daily act of collective worship
- Careers Education– Policy Statement of the programmes of careers education provided for Key 4.
- Child Protection Policy- Statement of policy for safeguarding and promoting welfare of pupils at the school.
- Pupil Discipline Statement of general principles on behaviour and discipline and of measures taken by the head teacher to prevent bullying.

iv. School Policies and other information related to the school

This section gives access to information about policies that relate to the school in general.

Class Description - *Published reports of Ofsted referring expressly to the school*

- Published report of the last inspection of the school and the summary of the report and where appropriate inspection reports of religious education in those schools designated as having a religious character.

- *Post-Ofsted inspection action plan* - A plan setting out the actions required following the last Ofsted inspection and where appropriate an action plan following inspection of religious education where the school is designated as having a religious character.
- *Charging and Remissions Policies* - A statement of the school's policy with respect to charges and remissions for any optional extra or board and lodging for which charges are permitted, for example school publications, music tuition, trips.
- *School session times and term dates* - Details of school session and dates of school terms and holidays.
- *Health and Safety Policy and risk assessment* - Statement of general policy with respect to health and safety at work of employees (and others) and the organisation and arrangements for carrying out the policy.
- *Complaints procedure* - Statement of procedures for dealing with complaints.
- *Performance Management of Staff* - Statement of procedures adopted by the governing body relating to the performance management of staff and the annual report of the head teacher on the effectiveness of appraisal procedures.
- *Staff Conduct, Discipline and Grievance* Statement of procedure for regulating conduct and discipline of school staff and procedures by which staff may seek redress for grievance.
- *Curriculum circulars and statutory instruments* - Any statutory instruments, departmental circulars and administrative memoranda sent by the Department of Education and Skills to the head teacher or governing body relating to the curriculum.

7. 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 the Headteacher. A complaint relating to this scheme will be dealt with under the existing complaints procedure and should only be referred outside the school once all the stages in that procedure have been exhausted.

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:

Information Commissioner, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF
Or Enquiry/Information Line: 01625 545 700, E Mail: publications@ic-foi.demon.co.uk.
Website : www.informationcommissioner.gov.uk

Graveney School
Freedom of Information Publication Scheme
Annex A – Further documents held by the school

Name of Document Description