

# Freedom of Information Policy

**Learning together for success and progression**

*Approved by Academy Trust Board: 8<sup>th</sup> December 2025*

# Freedom of Information Policy

Trustee Committee Responsible:	Audit
Nominated Lead Member of Staff:	Principal
Status and Review Cycle:	Three years
Current Review:	November 2025
Next Review Date:	November 2028

## Introduction and Purpose

Godalming College is a Public Authority as defined by the Freedom of Information Act 2000. This policy aims to set out how the College facilitates public access to information and documents held by the College, and to establish clear procedures and expectations around which such information requests can be made.

The College's Publication Scheme, which set out what information is available and how to access it, is contained within this Policy. This includes:

- The classes of information which we publish
- The manner in which the information will be published
- Any charges that may result from the request for information

## Making a Request for Information

Requests for information should be made in writing to and include the name, reply address and the details of the information being requested. The College email address is [college@godalming.ac.uk](mailto:college@godalming.ac.uk).

The College will ensure it responds to all requests within 20 working days. If the College is unable to respond within this timeframe, the College will contact the requestor with an explanation and reason as to why an extension of time is required.

Under the Freedom of Information Act, requests for information not contained within the scheme of publication can also be made. These requests must be also be made in writing, when its provision will be considered in accordance with the provisions of the Freedom of Information Act. The College will also respond within 20 working days to such requests.

## Exemptions

The College will not be required to release information to which an exemption in the Act legitimately applies and will explain why, if this is the case. Requests for Personal Information will be met under the provisions of the Data Protection Act 2018 (UK GDPR) and the Data (Use and Access) Act 2025.

Further information on when a request may be refused can be found on the Information Commissioner's Office website at: <https://ico.org.uk/for-organisations/guide-to-freedom-of-information/refusing-a-request/>

## Charging

Where information is not available on the website or in electronic or paper format that is readily available, a reasonable charge may be made to cover the cost of collating that information. The cost will be calculated on the actual cost to the College for its staff time, and resources needed to satisfy the request. We will follow the Information Commissioner's Office guidelines, and may refuse to provide information where the cost of compliance exceeds the appropriate limit.

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.

For more information see: <https://ico.org.uk/for-organisations/foi/freedom-of-information-and-environmental-information-regulations/section-12-requests-where-the-cost-of-compliance-exceeds-the-appropriate-limit/>

## Monitoring and Evaluation

Godalming College will maintain a register of all requests made for information under the Freedom of Information Act and the action taken on each application. The register will identify whether the same or similar information has previously been requested and provided, or refused, and reasons for the refusal. This will ensure consistency in dealing with similar requests and identify repeated, duplicate or vexatious requests for information. It will also identify recurring requests for the same or similar information not already published and allow the College to consider whether such information should be routinely published on the College's website.

## Feedback

Should anyone be dissatisfied with the way in which the College has dealt with a request, they have the right to require us to review our decision. If they wish to request a review, they must write to The Executive Assistant to the Senior Leadership Team within 40 working days of receipt of the response to their original request. An independent panel, comprised of members of the Board of Trustees, will be convened to consider their request and respond accordingly. They will receive a full response within 20 working days of its receipt.

If they are dissatisfied with the way in which we have handled their request for review, they may ask the Information Commissioner to review our decision. The Commissioner may be contacted as follows:

Information Commissioner

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Further Information – see [www.informationcommissioner.gov.uk](http://www.informationcommissioner.gov.uk)

## APPENDIX: FREEDOM OF INFORMATION MODEL PUBLICATION SCHEME

This model publication scheme has been prepared and approved by the Information Commissioner. It may be adopted without modification by any public authority without further approval and will be valid until further notice. This publication scheme commits an authority 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 authority.

The scheme commits an authority:

- 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 authority 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

### Classes of information

#### **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

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

The authority 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 a public authority, information will be provided on a 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, a public authority 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 an authority 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.

## **PUBLICATION SCHEME PART TWO**

**Accessing information covered by the publication scheme**

The classes of information we publish as Godalming College are described below.

Next to each class we have indicated the manner in which the information described will be available.

## INFORMATION TO BE PUBLISHED

### Class 1: Who we are and what we do

Class	Description	Manner
1.1	Legal framework The Education Reform Act of 1988 The Further and Higher Education Act 1992 Academies Act 2010	HMSO <a href="http://www.legislation.hmso.gov.uk/acts.htm">www.legislation.hmso.gov.uk/acts.htm</a>
1.2	Information on the institutional context	Website
1.3	Structure Annual Report and Financial Statements Senior Leadership Team	Website
1.4	Location Location map	Website
1.5	History Archive photographs and other information	Hard copy

### Class 2: What we spend and how we spend it

This section covers information on Godalming College's strategy and management of financial resources. Information that may damage the institution's commercial interests will be excluded from publication as will personal information relating to members of staff and students.

Class	Description	Manner
2.1	Expenditure Annual Report and Financial Statements	Website
2.2	Planning and use of resources Financial Regulations and Procedures Fraud Response Policy and Response Plan Remuneration of key management personnel as published in Annual Report and Financial Statements	Electronic copy Website Website

### Class 3: What our priorities are and how are we doing

This section provides details on our strategic planning, assessments, inspections and reviews.

Class	Description	Manner
3.1	Corporate plans and self-assessment Annual Report and Financial Statements Publications and Policies Governance Self Assessment Report	Website Electronic Copy Electronic Copy
3.2	External assessment Ofsted reports	Website

#### **Class 4: How we make decisions**

This section provides details on our Board and committee structure and decision making process.

<b>Class</b>		<b>Description</b>	<b>Manner</b>
4.1	Structure	Governance Academy Trust Board Articles of Association Terms of Reference – Academy Trust and Committees Board of Trustee Minutes – current and archive Complaints Procedure	Website  Electronic copy  Website and electronic copy  Website
4.2	Student Voice and Activities	Student Union – activities Trips and visits	Website Electronic copy

#### **Class 5: Our policies and procedures**

This section covers written protocols for delivering our functions and responsibilities. Information relating to individual members of staff and students is restricted in accordance with our Data Protection Policy which embodies the provisions of the EU GDPR Regulations 2018.

<b>Class</b>		<b>Description</b>	<b>Manner</b>
5.1	Employment and employee relations	Student Behaviour and Support Policy Family Friendly Policies Safer Recruitment Policy Health and Safety Policy Staff Disciplinary, Capability and Grievance Policies Whistle-blowing Policy (Public Interest Disclosure Act)	Electronic copy Electronic copy Website Website Electronic copy  Website
5.2	Equality and diversity	Equality, Diversity and Inclusion Policy	Website
5.3	Child Protection	Child Protection & Safeguarding Policy	Website
5.4	Risk management	Risk Management Policy	Electronic copy
5.5	Financial management	See class two above	Website and Electronic copy
5.6	Disaster recovery	Major Incident Recovery Plans	Electronic copy
5.7	Student discipline	IT Acceptable Use Policy Student Behaviour and Support Policy	Electronic copy Electronic copy
5.8	Student liaison	College clubs and societies	Website

## Class 6: Lists and registers

This section covers information we hold relating to administration and progression of our students from admission to course completion, including student support services. It also includes information relating to staff. Information available within this section does not include specific student or staff personal details, by virtue of being personal information.

Class		Description	Manner
6.1	Information on student admission, progression and completion	<ul style="list-style-type: none"> <li>▪ Admissions Policy</li> <li>▪ Data on diversity of the student body</li> <li>▪ Exams Policy</li> <li>▪ Access Arrangements Policy</li> <li>▪ Exam results data</li> <li>▪ Careers Guidance</li> <li>▪ Newsletters</li> </ul>	Website Website  Website Website Website Website Website
6.2	Data Protection	<ul style="list-style-type: none"> <li>▪ Data Protection Policy</li> </ul>	Website
6.3	Staff Information	<ul style="list-style-type: none"> <li>▪ Analysis of Staff               <ul style="list-style-type: none"> <li>○ Gender</li> <li>○ Full time/part time</li> <li>○ Age distribution</li> <li>○ Ethnicity</li> <li>○ Sickness absence</li> </ul> </li> </ul>	Electronic copy

## Class 7: The services we offer

This section covers advice and guidance, information leaflets and media releases.

Class		Description	Manner
7.1	Courses	Course Details Term dates Prospectus (requests can be made via website)	Website Website Website
7.2	Student Learning Support services	Learning and Study Support Bursary Fund	Website Website
7.4	Policies with regard to data and information	Data Protection Policy & Statement Disaster Management Strategy Freedom of Information Policy and Publication Scheme	Website Electronic copy Electronic copy
7.5	Media Releases & Marketing	Publicity information, press releases Newsletters	Electronic copy Website
7.6	Facilities	Facilities for Hire, conditions of hire and charges	Website