



Company No: 9111449
Registered Office: St. Mary's Catholic Academy
 St. Walburga's Road, Blackpool FY3 7EQ
Telephone: 01253 396286
Website: www.bebcmat.co.uk
 Registered in England & Wales

**THE BLESSED EDWARD BAMBER CATHOLIC MULTI ACADEMY TRUST
 FREEDOM OF INFORMATION & GENERAL DATA PROTECTION REGULATION POLICIES**

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 academies, 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.*

The 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 the Trust's website, or the websites of the Trust's academies, to download and print off or available in paper form on request. 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. Aims and Objectives

The Trust and its academies aim to:

- enable every child to fulfil their learning potential, with education that meets the needs of each child,
- help every child develop the skills, knowledge and personal qualities needed for life and work,

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:

- Prospectus* Information published in the Academy's prospectus.
- Directors' Documents* Information published in the Business Plan and in other Directors' documents.
- Pupils & Curriculum* Information about policies that relate to pupils and the curriculum.
- Policies and other information related to the Trust/Academy* Information about policies that relate to the Trust/Academy in general.

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4. How to request information

The vast majority of the documentation listed below is available on the Trust or academies' websites. If you require a paper version of any of the documents within the scheme, please contact the school by telephone, email or letter.

Contact details are set out below.

Blessed Edward Bamber Catholic Multi Academy Trust

Email: admin@st-mary.blackpool.sch.uk

Tel: 01253 396286

Contact Address: Executive Director, St. Mary's Catholic Academy, St. Walburga's Rd, Blackpool FY3 7EQ

Christ the King Catholic Academy

Email: admin@ctkacademy.co.uk

Tel: 01253 395985

Contact Address: Headteacher, Christ the King Catholic Academy, Rodwell Walk, Blackpool FY3 7NJ

St. Cuthbert's Catholic Academy

Email: admin@st-cuthbert.blackpool.sch.uk

Tel: 01253 403232

Contact Address: Headteacher, Lightwood Avenue, Blackpool FY4 2A

St. Mary's Catholic Academy

Email: admin@st-mary.blackpool.sch.uk

Tel: 01253 396286

Contact Address: Headteacher, St. Mary's Catholic Academy, St. Walburga's Rd, Blackpool FY3 7EQ

To help us process your request quickly, please clearly mark any correspondence "**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 any of our websites 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.

Please note any information available on the Trust's or academies' websites that are requested in hard copy will be charged for.

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6. Classes of Information Currently Published

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

Class	Description
Prospectus	<p>The contents of the prospectus are determined at the Academy's discretion but may include the following:</p> <ul style="list-style-type: none"> • the name, address and telephone number of the school, and the type of school • the names of the head teacher and chair of the board • information on the Admissions Policy • a statement of the Academy'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 leavers • 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

Information relating to the Directors and the Trust's Business

Class	Description
Articles of Association	<ul style="list-style-type: none"> • The objects of the Trust • Matters relating to members, directors and clerk to the board • Arrangements and procedures for general meetings and meetings of the directors • Matters relating to accounts, annual report and annual returns
Minutes of meeting of the Board and its committees	Agreed minutes of meetings of the Trust Board and its committees
Directors	<p>Information about and the names of directors is available here: http://www.bebcmat.co.uk/bebcmat/index.php/board-of-directors</p> <p>The Trust has also published a statement on the claiming of allowances by its Directors</p>
Business Plan	The Trust's Business Plan contains its key objectives and information relating to its functioning.

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Pupils & Curriculum Policies

This section gives access to information about policies that relate to pupils and the curriculum. This information plus other information required by the latest Schools' Regulation Information.

Class	Description
Accessibility Plans	Plan for increasing participation of disabled pupils in the academy's curriculum, improving the accessibility of the physical environment and improving delivery of information to disabled pupils.
Collective Worship	Statement of arrangements for the required daily act of collective worship
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
Educational Visits Policy	
Equality Policy	Statement of policy for promoting equality and agreed objectives from each academy
Home – Academy agreement	Statement of aims and values, the academy's responsibilities, the parental responsibilities and the academy's expectations of its pupils for example homework arrangements
Premises Management Policy	Statement of procedures relating to how we ensure our sites are safe, welcoming and meet statutory requirements
Pupil Discipline	Statement of general principles on behaviour and discipline and of measures taken by the head teacher to prevent bullying.
Safeguarding Policy	Statement of policy for safeguarding and promoting welfare of pupils at the academy.
Sex Education & Relationships Policy	Statement of policy with regard to sex and relationship education
Special Education Needs Policy	Information about the academy's policy on providing for pupils with special educational needs
Supporting Children with Medical Needs	Information about how we support children with medical needs

Policies and other information related to the Academy

This section gives access to information about policies that relate to the Trust and academies in general. Trust wide policies may be accessed at <http://www.bebcmat.co.uk/bebcmat/index.php/trust-policies>

Class	Description
Charging and Remissions Policies	Statement of the Trust's policy with respect to charges and remissions for any optional extra or board and lodging for which charges are permitted, for example publications, music tuition, trips
Complaints procedure	Statement of procedures for dealing with complaints
Critical Incident Policy	Statement of procedures for dealing with a critical incident.
Dealing with Allegations of Abuse against Staff and Safer Recruitment	Statement of procedures of how the Trust will respond to an allegation of abuse against one of its members of staff and arrangements for the safe recruiting of employees and volunteers.
Financial Regulations	A copy of the Trust's Financial Regulations which also apply to all its academies.
Flexible Working Policy	Statement of entitlement to and procedures for applying for flexible working arrangements for those staff employed by the Trust.

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LGPS Policy	The Trust's statement on its determinations relating to discretionary elements of the Local Government Pension Scheme
Management of Staffing Establishment	Statement of procedures to be enacted in the situation that one or more redundancies are required within the Trust.
Pay Policy (Teachers)	The Trust's policy on pay of staff employed as teachers.
Staff Personal & Special Leave Policy	The Trust's statement on personal and special leave allowances including types of leave permitted, time allowances and procedures for applying.
Staff Appraisal, Capability, Discipline, Grievance & Sickness Absence	Statement of procedure for regulating conduct and discipline of school staff, procedures for managing staff sickness absence and procedures by which staff may seek redress for grievance
Whistleblowing Policy	Procedures for whistleblowing and how concerns will be addressed by the Trust.
Published reports of Ofsted and Section 48 (Diocesan)	Published report of the last inspection of the Academy and the summary of the report and Section 48 inspection reports
Session times and term dates	Details of session and dates of 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

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 of the relevant academy.

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

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General Data Protection Regulation

1. Aims & Objectives

The aim of this policy is to provide a model set of guidelines to enable staff, parents and pupils to understand:

- The law regarding personal data
- How personal data should be processed, stored, archived and deleted/destroyed
- How staff, parents and pupils can access personal data

The objective of the policy is to ensure that the school acts within the requirements of the General Data Protection Regulation (GDPR) when retaining and storing personal data, and when making it available to individuals, and that the process of responding to enquiries for other information is also legal under the Freedom of Information Act 2000 (in force from 1st January 2005).

2. General Data Protection Regulation – the law

- Under the GDPR, the Trust is a Data Controller and determines the purposes and means of processing personal data. The GDPR applies to “personal data” meaning any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier.
- The general data protection regulation principles set out the main responsibilities for organisations; that personal data shall be:
 - Processed lawfully, fairly and in a transparent manner in relation to individuals;
 - Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;
 - Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
 - Accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
 - Kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals; and
 - Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.
- GDPR provides the following rights for individuals:
 - The right to be informed
 - The right of access
 - The right of rectification
 - The right to erasure
 - The right to restrict processing
 - The right to data portability
 - The right to object
 - Rights in relating to automated decision making and profiling
- Access to their own personal information is a statutory right for pupils (if they are of an age to understand the information they request) and parents (as defined in the Education Act 1996) may also request access to their child’s personal data.
- Staff have a right of access to personal data on themselves.
- Anyone has the right to question and correct inaccurate information, but this must be matters of fact, not opinions.
- The named person with overall responsibility for personal data within each academy is the Head Teacher and for the Blessed Edward Bamber Catholic Multi Academy Trust the Executive Director.

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3. Processing, storing, archiving and deleting personal data: Guidance

- Pupil and parent personal data is processed under the lawful basis of Public Task that is, in the exercise of official authority to enable the effective running of the academies.
- Employee personal data and in particular payroll information is processed under the lawful basis of Legal Obligation that is, to comply with a common law or statutory obligation, for example to comply with HMRC rules.
- Biometric data means personal information about an individual's physical or behavioural characteristics that can be used to identify that person; this can include their fingerprints, facial shape, retina and iris patterns, and hand measurements. At St Mary's we use fingerprint measurements in an automated biometric recognition system for payment of school meals for pupils and staff. The personal information will be processed under the lawful basis of Consent. We will only process biometric data for pupils under the age of 18 with parental consent.
- Personal data and school records about pupils are confidential to the child. The information can be shared appropriately within the professional working of the academy to enable the academy to make the best educational provision for the child. The law permits such information to be shared with other educational establishments when pupils change schools.
- Records for a child should be kept until the child reaches 25 years of age and examination records the same.
- Data on staff is sensitive information and confidential to the individual, and is shared, where appropriate, at the discretion of the Head Teacher and with the knowledge, and if possible the agreement of the staff member concerned.
- Employment records form part of a staff member's permanent record and will be retained for 6 years after the termination of employment and then securely disposed of.
- Interview records, CV's and application forms for unsuccessful applicants are kept for 6 months.
- All formal complaints made to the Head Teacher or the Trust will be kept for at least seven years in confidential files, with any documents on the outcome of such complaints. Individuals concerned in such complaints may have access to such files subject to data protection and to legal professional privilege in the event of a court case.

4. Accessing personal data: Guidance

- A child can request access to his/her own data. The request is not charged and does not have to be in writing. The staff will judge whether the request is in the child's best interests, and that the child will understand the information provided. They may also wish to consider whether the request has been made under coercion.
- A parent can request access to or a copy of their child's school records and other information held about their child. The request must be made in writing. There is no charge for such requests on behalf of the child, but there may be a charge for photocopying records – this is detailed in guidance available from the Information Commissioner. Staff should check, if a request for information is made by a parent, that no other legal obstruction (for example, a court order limiting an individual's exercise of parental responsibility) is in force.
- Parents should note that all rights under the GDPR to do with information about their child rest with the child as soon as they are old enough to understand these rights. This will vary from one child to another, but, as a broad guide, it is reckoned that most children will have a sufficient understanding by the age of 12. Parents are encouraged to discuss and explain any request for information with their child if they are aged 12 or over.
- Separately from the GDPR, The Education (Pupil Information)(England) Regulations 2005 provide a pupil's parent (regardless of the age of the pupil) with the right to view, or to have a copy of, their child's educational record at the academy. Parents who wish to exercise this right must apply to the academy in writing.
- For educational records (unlike other personal data; see below) access must be provided within 15 academy working days (defined as days the academy is open for pupils), and if copies are requested, these must be supplied within 15 academy working days of payment.
- The law requires that all requests for personal information are dealt with within one month of receipt except requests for educational records (see above). All requests will be acknowledged in writing on receipt, and

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access to records will be arranged as soon as possible. If awaiting third party consents, the academy will arrange access to those documents already available, and notify the individual that other documents may be made available later.

- In all cases, should third party information (information about another individual) be included in the information the staff will try to obtain permission to show this information to the applicant, with the exception of information provided by another member of staff (or local authority staff) which is exempt from a requirement for third party consents. If third party permission is not obtained the person with overall responsibility should consider whether the information can still be released.
- Personal data should always be of direct relevance to the person requesting the information. A document discussing more general concerns may not be defined as personal data.
- From 1st January 2005, when the Freedom of Information Act came into force, a request for personal information can include unstructured as well as structured records – for example, letters, emails etc. not kept within an individual's personal files, or filed by their name, but still directly relevant to them. If these would form part of a wider record it is advisable to file these within structured records as a matter of course and to avoid excessive administrative work. These can be requested if sufficient information is provided to identify them.
- Anyone who requests to see their personal data has the right to question the accuracy of matters of fact within the data, and to ask to have inaccurate information deleted or changed. They may also question opinions, and their comments will be recorded, but opinions do not need to be deleted or changed as a part of this process.
- The academy will document all requests for personal information with details of who dealt with the request, what information was provided and when, and any outcomes (letter requesting changes etc.) This will enable staff to deal with a complaint if one is made in relation to the request.

5. Fair processing of personal data: data which may be shared

Schools, local education authorities and the Department for Education (DfE) all hold information on pupils in order to run the education system, and in doing so have to follow the GDPR. This means, among other things that the data held about pupils must only be used for specific purposes allowed by law. The Trust has Privacy Notice which explains how personal data is used and with whom it will be shared. This Notice is available on the Trust website and at the end of this document.

The **Local Authority** uses information about pupils to carry out specific functions for which it is responsible, such as the assessment of any special educational needs the pupil may have. It also uses the information to derive statistics to inform decisions on (for example) the funding of schools, and to assess the performance of schools and set targets for them. The statistics are used in such a way that individual pupils cannot be identified from them.

Pupils, as data subjects, have certain rights under the Data Protection Act, including a general right of access to personal data held on them, with parents exercising this right on their behalf if they are too young to do so themselves. If you or your child wishes to access their personal data, or you wish to do so on their behalf, then please contact the relevant academy in writing.

6. Bibliography

General Data Protection Regulation: All personal data which is held must be processed and retained in accordance with the six principles with the rights of the individual. Personal data must not be kept longer than is necessary (this may be affected by the requirements of other Acts in relation to financial data or personal data disclosed to Government departments). Retention of personal data must take account of the Act, and personal data must be disposed of as confidential waste. Covers both personal data relating to employees and to members of the public.

Accessing Pupils' Information: General information note from the Information Commissioner on access to education records. Includes timescale (15 days) and photocopy costs.

Publication of exam results by schools: General information note from the Information Commissioner on publication of examination results.

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Disclosure & Barring Service

<https://www.gov.uk/disclosure-barring-service-check/overview>

Education Act 1996: Section 509 covers retention of home to school transport appeal papers. (By LA)

Education (Pupil Information) (England) Regulations 2005: Retention of Pupil records

Guidance to LAS: Requirements with respect to “fair processing” under the data protection act and the passing of information to connexions. 2005 DfES: Guidance Note

Health and Safety at Work Act 1974 & Health and Safety at Work Act 1972: Retention requirements for a range of health and safety documentation including accident books, H&S manuals etc.

Information Commissioner’s Code of Practice Guidelines (ICC of P Guidelines): available on the internet www.ico.gov.uk Guidance on retention of interview and employment records

School Standards and Framework Act 1998: Retention of school admission and exclusion appeal papers and other pupil records.

Information and Records Management Society – Schools records management toolkit

<http://www.irms.org.uk/resources/information-guides/199-rm-toolkit-for-school>

A downloadable schedule for all records management in schools

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Privacy Notice – How we use pupil information

Categories of information

The categories of pupil information that we collect, hold and share include:

- Personal information (such as name, unique pupil number and address)
- Characteristics (such as ethnicity, language, nationality, country of birth and free school meal eligibility)
- Attendance information (such as sessions attended, number of absences and absence reasons)
- Assessment information (such as test, mock and exam results)
- Relevant medical information
- Special educational needs information
- Exclusions/behavioural information
- Post-16 learning information
- Video information captured by CCTV for security purposes
- Biometric information – fingerprint measurements for the purposes of cashless catering

Why we collect and use this information

We use the pupil data to:

- Support pupil learning
- Monitor and report on pupil progress
- Provide appropriate pastoral care
- Assess the quality of our services
- Comply with the law regarding data sharing

The lawful basis on which we use this information

We collect and use some pupil information under the lawful basis of Public Task as it is necessary in the exercise of official authority to enable the effective running of the academies and to comply with the Education Act 1996 as part of our census returns to the Department for Education. Please see the following link for more information on how the Department for Education processes this information <https://www.gov.uk/guidance/data-protection-how-we-collect-and-share-research-data>

We collect and use biometric information in the form of fingerprint measurements under the lawful basis of Consent.

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Privacy Notice – How we use school workforce information

Categories of information

The categories of school workforce information that we collect, process, hold and share include:

- Personal information (such as name, employee or teacher number, national insurance number)
- Special categories of data including characteristics information such as gender, age, ethnic group
- Contract information (such as start dates, hours worked, post, roles and salary information)
- Work absence information (such as number of absences and reasons)
- Qualifications (and, where relevant, subjects taught)
- Relevant medical and emergency contact information
- Payroll information
- Video information captured by CCTV for security purposes
- Biometric information – fingerprint measurements for the purposes of cashless catering

Why we collect and use this information

We use school workforce data to:

- Enable the development of a comprehensive picture of the workforce and how it is deployed
- Inform the development of recruitment and retention policies
- Enable individuals to be paid

The lawful basis on which we use this information

We process this information the lawful basis of Legal Obligation as it is necessary for us to comply with the law in relation to HMRC rules and regulations.

We collect and use biometric information in the form of fingerprint measurements under the lawful basis of Consent.

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