

THE SHROPSHIRE GATEWAY EDUCATIONAL TRUST
FREEDOM OF INFORMATION POLICY
(Inc. Publication Scheme)

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1.0 Background

1.1 Freedom of Information

One of the aims of the Freedom of Information Act 2000 (FIOA) is that public authorities, including schools, should be clear and proactive about information that is made public. To do this the Board of Directors will produce and keep up to date a Publication Scheme, which conforms to the Model Publication Scheme approved by the Information Commissioner.

The Publication Scheme will set out:

- The classes of information which it publishes or intends to publish;
- The manner in which the information will be published;
- Whether the information is available free of charge or on payment;
- Procedures for making a request for information, and
- Procedures for making a complaint about the school's compliance with its obligations to provide information

The Data Protection Act requires that the Trust and its schools must keep private and confidential information about students and their families. This remains the case under the Freedom of Information Act and such information will not form part of the Publication Scheme.

The Freedom of Information Act gives a general right of access to all types of recorded information held by the Trust, whether or not included in the publication scheme. It also sets out exemptions from that right and places a number of obligations on the Trust. A person who makes a request to Trust or one of its schools for information will be told whether that information is held and, subject to the exemptions, whether information will be supplied.

Individuals already have the right of access to information about themselves under the Data Protection Act. The Freedom of Information Act extends this right to allow public access to all types of information. The Data Protection Act also requires that the school must keep certain information private and confidential and such information is not the subject of this Publication Scheme.

The Freedom of Information Act and this Publication Scheme do not limit in any way the various other rights that members of the public have to information.

1.2 Publication Scheme

The Trust's Publication Scheme will cover information already published and information to be published in the future. All information in the Publication Scheme will be available in paper form from each of the Trust's schools and, as far as possible, from the School Website

Comments about the Publication Scheme, requests for assistance or complaints should be addressed, in the first instance, to the Trust Business Manager at Lacon Childe School.

The Publication Scheme commits The Shropshire Gateway Educational 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 by the Trust and its Academies. Under this scheme the Trust will:

- 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.
- Specify the information that is held by the Trust and falls within the classifications below.
- Proactively publish, or otherwise make available as a matter of routine, information in line with statements contained within this Scheme.
- Produce and publish methods by which the specific information is made routinely available so that it can be easily identified and accessed by members of the public.
- Review and update, on a regular basis, the information the Shropshire Gateway Educational Trust makes available under this scheme.
- Make this Publication Scheme available to the public

This Publication Scheme is made under the Freedom of Information Act 2000 which places an obligation on the trust to adopt and maintain such a scheme. It is based on the model freedom of information publication scheme for Academy Schools and the Academies and Freedom of Information, Departmental advice for Academies (January 2014.) https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/294920/Academies_and_freedom_of_information_FINAL.pdf

1.2.2 Layout of the Publication Scheme

Each class of information covered by the scheme is identified by a title followed by a definition of the information covered by the class. In some cases particular information is excluded from the class, for example, because it is exempt under the Freedom of Information Act or other legislation. Each entry also contains details of how to obtain the information in that class. It is anticipated that the classes may be widened and/or new classes may be added to the scheme from time to time.

3.0 Freedom of Information Policy

3.1 Responsibility for the Freedom of Information Policy

The individual with overall and day to day responsibility for maintaining this policy on behalf of the Trust Board and the Local Governing Bodies is the Headteacher within each of the Trust's schools. Schools are under a duty to provide advice and assistance to anyone requesting information.

3.2 Procedures for making requests

A request for information relating to a specific school within the Trust should be made in writing or by email and addressed for the attention of that school's Headteacher. Enquirers do not have to say why they want the information and the request does not have to mention the freedom of information act.

A request for information relating to the Shropshire Gateway Educational Trust should be made to the Executive Headteacher.

The school will make reasonable efforts to provide the requested information. This will depend on availability. Paper documents will be provided if requested, although there will be a charge for this.

The school will respond to requests for information promptly and within the legally prescribed limit of 20 working days, excluding non-school days.

Although this procedure describes the Trust's preferred route, it recognises that requests for information can be made through any employees and therefore staff need to be aware of the Freedom of Information Act and how the Trust deals with requests.

3.3 Dealing with a request for information

When receiving a request for information the Headteacher will ask a series of questions:

- Is it a FOI request for information?
- Is it a valid FOI request for information?
- Does the academy or Trust hold the information?

3.4 Is it a FOI request for information?

A request for information may be covered by one, or all, of three information rights:

3.4.1 Data Protection Act

Requests for personal data made under the Data Protection Act (or subject access requests) are ones where the enquirer asks to see what personal information the academy holds about themselves. Both manual and computerised personal information held by academies is subject to the Data Protection Act (DPA). Under the DPA, anyone who submits a written request to see or have copies of personal data held by the academy must have this made available to them within 40 calendar days (subject to relevant ID checks carried out to confirm that the requestor is who they claim they be.) When academies receive requests from pupils for disclosure of educational records under the DPA, they must not disclose any information which may not be disclosed under the DPA.

3.4.2 Environmental Information Regulations

Environmental Information Regulations enquiries are ones which relate to air, water, land, natural sites, built environment, flora and fauna, and health, and any decisions and activities affecting any of these. These could therefore include enquiries about recycling, phone masts, playing fields, car parking etc. If the enquiry is about environmental information, follow the guidance on the ICO's website or the DEFRA website.

3.4.3 Freedom of Information Act

FOI enquiries are concerned with all other information and the reasoning behind decisions and policies. The request does not have to mention the FOIA. All requests for information that are not data protection or environmental information requests are covered by the FOIA.

3.5 Is this a valid FOI request for information?

A Freedom of Information request should:

- be in writing, including email or FAX;
- state the enquirer's name and correspondence address (email addresses are allowed);
- describe the information requested - there must be enough information to be able to identify and locate the information ;
- not be covered by one of the other pieces of legislation.

Verbal enquiries are not covered by the FOIA. Such enquiries can be dealt with where the enquiry is relatively straightforward and can be dealt with satisfactorily. However, for more complex enquiries, and to avoid disputes over what was asked for, you should ask the enquirer to put the request in writing or email, when the request will become subject to FOI.

3.6 Does the academy hold the information?

Holding information means information relating to the business of the academy:

- the academy has created
- the academy has received from another body or person
- held by another body on the academy's behalf.

Information means both hard copy and digital information, including email.

If the academy or Trust does not hold the information, it is not necessary to create or acquire it just to answer the enquiry, although a reasonable search should be made before denying the existence of information that the academy or trust might be expected to hold.

3.7 Dealing with vexatious or manifestly unreasonable or repeated requests

The act states that there is no obligation to comply with vexatious requests. This is taken to mean a request which is designed to cause inconvenience, harassment or expense rather than to obtain information, and would require a substantial diversion of resources or would otherwise undermine the work of the academy or trust.

4.0 Exemptions to Release of Information

The Trust will make decisions regarding disclosure on the principle of openness; however, the act recognises the need to preserve confidentiality and protect sensitive material in some circumstances.

The Trust will not withhold information in response to a valid request unless one of the following applies:

- an exemption to disclosure (see appendix i)
- the information sought is not held
- the request is considered vexatious or repeated
- the cost of compliance exceeds the threshold

Any decisions regarding refusal to release information will be made by the Executive Headteacher who will ensure that the case has been properly considered and that the reasons for refusal, or public interest test refusal, are sound. Unless the case is straightforward it may be necessary for the Executive Headteacher to take appropriate legal advice.

Decisions regarding exemptions on the basis of prejudice to the conduct of public affairs shall be taken by the Chairman of the Board of Directors.

5.0 Complaints

If a school within the Shropshire Gateway Educational Trust does not comply with this policy; for example by not making available documents, or delaying in providing them, a review of the school's actions can be requested by contacting, in the first instance, the School's Local Governing Body.

If a person is dissatisfied with the outcome of the review, the matter can be escalated to the Trust's Board of Directors through the Business Manager at Lacon Childe School.

If a person remains dissatisfied a complaint can be made to the Information Commissioner:

The Information Commissioner
Wycliffe House
Water Lane
Wilmslow
Cheshire SK9 5AF

6.0 Fees

Where a fee is to be charged, it is the responsibility of the person dealing with the request to inform the enquirer that such a fee will be levied. This information should be communicated to the enquirer at the earliest opportunity to ensure that they are aware of the situation.

Where the information being requested is readily available and is to be provided in an electronic format there will generally be no charge. Information available from the websites is free of charge.

For providing information in paper format, the Trust's schools will charge:

- 20p per sheet of photocopy, print out and printed covering letter, regardless of sheet size or colour copy.
- Cost of postage.
- The cost of providing information in a specific format (e.g CD ROM)

For large and more complex requests, in addition to the above, the school will calculate the charges as follows:

- Determine the estimated time required for the Appropriate Limit costs (e.g. determining if the school or trust holds the information, locating, retrieving and extracting this).
- Multiply by £25 (the hourly rate defined within the fees regulations).
- Any other costs relating to supplying the information to the applicant.

These charges will become payable once the data has been collated and will be released upon settlement of the invoice.

Responding to high cost requests (those expected to cost more than £450 based on the above calculation) is discretionary and the Governing Body will refuse such requests.

7.0 Implementation Plan

Is training required to implement this policy?

Yes No

If Yes, how will this be delivered and by whom?

To which groups of staff does this policy need to be issued?

All staff and Trustees

How will the policy be issued and by whom?

*Via email from Head teachers
Via Chair of LGB*

Date adopted by Local Governing Body:

Signed:

Please return signed copy of this page to the Trust Business Manager once policy has been adopted by the Local Governing Body.

Appendix I - Publication Scheme

Information to be published	How the information can be obtained (hard copy and/or website)	Cost
Class 1 - Who we are and what we do. Organisational information, structures, locations and contacts (current information only)		
Who's who in the Academy	Web site	No Charge
Who's who on the: Local Governing Board and the basis of their appointment. Board of Directors and the basis of their appointment.	Web site or via Clerk to Governing Body Web site or via Executive Head PA	No Charge
Terms of Reference of LGB and Board	Clerk to Governing Body	No Charge if Electronic, otherwise Section 6
Articles of Association	From Executive Head PA	No Charge if Electronic, otherwise Section 6
Academy Prospectus	Web site or Hard Copy	No Charge
Academy session times and term dates	Web site	No Charge
Class 2 – What we spend and how we spend it. Financial information relating to projected and actual income and expenditure, procurement, contracts and financial audit		
Annual budget plan Financial statements	Business Manager Web site	No Charge if Electronic, otherwise Section 6

Capitalised funding	Business Manager	
Additional funding	Business Manager	
Pay policy	Clerk to Governing Body	No Charge if Electronic, otherwise Section 6
Class 3 – What our priorities are and how we are doing. Strategies and plans, performance indicators, audits, inspections and reviews		
Government supplied performance data	Web site or via Clerk to Governing Body	No Charge if Electronic, otherwise Section 6
The latest Ofsted report – Summary and Full Report	Web site	No Charge
Performance Management policy and procedures adopted by the Governing Board	Clerk to Governing Body	No Charge if Electronic, otherwise Section 6
Academy Improvement Plan	Via school office	No Charge if Electronic, otherwise Section 6
Safeguarding policies and procedures	Website	No Charge
Class 4 – How we make decisions. Decision making processes and records of decisions		
Admissions Policy/decisions (not individual admission decisions)	Website	No Charge
Agendas of meetings of the Local Governing Board/Boards of Directors and its sub-committees	Web site or via Clerk to Governing Body Web site or via Executive Head PA	No Charge if Electronic, otherwise Section 6
Minutes of meetings (as above) – N.B. This will exclude information that is properly regarded as private to the meetings.	Web site or via Clerk to Governing Body Web site or via Executive Head PA	No Charge if Electronic, otherwise Section 6

Class 5 – Our policies and procedures. Current written protocols, policies and procedures for delivering our services and responsibilities		
Academy policies including: Charging and remissions policy, Health and Safety, Complaints procedure, Staff conduct policy, Discipline and grievance policies, Staff recruitment policies. This list is not intended to be exhaustive.	Via Clerk to Governing Body	No Charge if Electronic, otherwise Section 6
Student and curriculum policies, including: Home-school agreement, Curriculum, Sex education, Special educational needs, Accessibility, Behaviour Policy. This list is not intended to be exhaustive.	Via Clerk to Governing Body	No Charge if Electronic, otherwise Section 6
Records management and personal data policies, including: Information security policies, retention destruction and archive policies, Data protection (including information sharing policies). This list is not intended to be exhaustive.	Via Clerk to Governing Body	No Charge if Electronic, otherwise Section 6
Class 6 – Lists and Registers. Currently maintained lists and registers only		
Disclosure logs	Via Clerk to Governing Body	No Charge if Electronic, otherwise Section 6
Asset register	Via Clerk to Governing Body	No Charge if Electronic, otherwise Section 6
Any information the school is currently legally required to hold in publicly available registers, not	Via Clerk to Governing Body	No Charge if Electronic, otherwise Section 6

including attendance registers.		
Class 7 – The services we offer. Information about the services we offer, including leaflets, guidance and newsletters produced for the public and businesses		
Extra-curricular activities	Web Site	No Charge
Out of academy clubs	Web Site	No Charge
Academy publications	Web Site	No Charge
Leaflets books and newsletters	Web Site	No Charge

Appendix ii - Exemptions

A series of exemptions are set out in the Act which allow the withholding of information in relation to an enquiry. Some are specialised in their application (such as national security) and would not usually be relevant to Academies.

There are more than 20 exemptions but Academies are likely to use only a few of them. There are two general categories of exemptions:

Absolute: where there is no requirement to confirm or deny that the information is held, disclose the information or consider the public interest; and **Qualified:** where, even if an exemption applies, there is a duty to consider the public interest in disclosing information

Absolute Exemptions

There are 8 absolute exemptions listed in the Act. Even where an absolute exemption applies:

- it does not mean that you can't disclose in all cases; it means that disclosure is not required by the Act. A decision could be taken to ignore the exemption and release the information taking into account all the facts of the case;
- there is still a legal obligation to provide reasonable advice and assistance to the enquirer.

The absolute exemptions in the Act that might be relevant to the Trust are set out below. A full list of exemptions can be found at:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/294920/Academies_and_freedom_of_information_FINAL.pdf

Information accessible to the enquirer by other means

If information is reasonably accessible to the applicant by another route than the Act, it is exempt information. This is the case even if the enquirer would have to pay for the information under that alternative route. This exemption includes cases where you are required to give information under other legislation, or where the information is available via the Publication Scheme.

Personal information

Where enquirers ask to see information about them, this is exempt under the Act because it is covered by the Data Protection Act. Consult Chapter 25 – Providing Information, A Guide to the Law for School Governors on the handling of requests for personal information (subject access requests) under the DPA.

Information provided in confidence

This relates to information obtained from a person if its disclosure would constitute a breach of confidence actionable by that, or another, person.

Prohibitions on disclosure

Information is exempt where its disclosure is prohibited under any other legislation by order of a court or where it would constitute a contempt of court or where it is incompatible with any EC obligation. 16

Qualified Exemptions

With qualified exemptions, even if it is decided that an exemption applies, there is a duty to consider the public interest in confirming or denying that the information exists and in disclosing information. Advice on carrying out the public interest test can be found at Appendix ii.

The qualified exemptions in the Act which might be relevant to the Trust are set out below. A full list of exemptions can be found at:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/294920/Academies_and_freedom_of_information_FINAL.pdf

Information intended for future publication

If at the time the request was made, information is held with a view to publication, then it is exempt from disclosure if it is reasonable that it should not be disclosed until the intended date of publication. This could apply for instance to statistics published at set intervals, for example annually or where information is incomplete and it would be inappropriate to publish prematurely.

Investigations and proceedings conducted by public authorities

Information is exempt if it has at any time been held by the trust for the purposes of criminal investigations or proceedings, such as determining whether a person should be charged with an offence or whether a charged person is guilty, or investigations which may lead to a decision to institute criminal proceedings. The duty to confirm or deny does not apply to such information.

Law enforcement

Information which is not exempt under Section 30 Investigations and Proceedings, may be exempt under this exemption in the event that disclosure would, or would be likely to, prejudice the following among others:

- the prevention or detection of crime
- the apprehension or prosecution of offenders

- the administration of justice
- the exercise of functions such as ascertaining if a person has broken the law, is responsible for improper conduct, whether circumstances justify regulatory action, ascertaining a person's fitness or competence in relation to their profession, ascertaining the cause of an accident or protecting or recovering charities or its properties.
- any civil proceedings brought by or on behalf of the Trust which arise out of an investigation carried out for any of the purposes mentioned above.

The duty to confirm or deny does not arise where prejudice would result to any of these matters.

Prejudice to the conduct of public affairs

Information likely to prejudice the maintenance of the convention of the collective responsibility of Ministers or likely to inhibit the free and frank provision of advice or exchange of views

Communications with the Queen

Information is exempt if it relates to communications with the Queen, the Royal Family or Royal Household or if it relates to the award of honours. The duty to confirm or deny does not arise where this exemption applies.

Health and Safety

Information is exempt if its disclosure would or would be likely to endanger the safety or physical or mental health of any individual. The duty to confirm or deny does not arise where prejudice would result.

Environmental information

Information is exempt under FOI where it is covered by the Environmental Information Regulations. Environmental information can cover information relating to: air, water, land, natural sites, built environment, flora and fauna, and health. It also covers all information relating to decisions or activities affecting any of these.

Personal information

Where an individual seeks information about themselves Data Protection Act powers apply. Where the personal information concerns a third party, it is exempt if its disclosure would contravene the Data Protection Act, or the data protection principles; or if the person to whom the information relates would not have a right of access to it because it falls under one of the exemptions to the Data Protection Act. The duty to confirm or deny does not arise in relation to this information if doing so would be incompatible with any of the above.

Legal professional privilege

Legal professional privilege covers any advice given by legal advisers, solicitors and barristers. Generally such information will be privileged. If the Trust wished to disclose the information, consent will be sought from the provider of the advice. This exemption covers all such information where a claim to legal professional privilege can be in legal proceedings.

The duty to confirm or deny does not arise where to do so would involve the disclosure of such information.

Commercial interest

Information is exempt if it constitutes a trade secret or would be likely to prejudice the commercial interests of any person or body (including the Trust). The duty to confirm or deny does not arise where prejudice would result to commercial interests but not where the information constitutes a trade secret.

Appendix iii - Public Interest Test

Having established that a qualified exemption(s) definitely applies to a particular case, you must then carry out a public interest test to identify if the public interest in applying the exemption outweighs the public interest in disclosing it. Therefore, unless it is in the public interest to withhold the information, it has to be released. Although precedent and a developed case law will play a part, individual circumstances will vary and each case will need to be considered on its own merits.

Carrying out the test

It is worth noting that what is in the public interest is not necessarily the same as that which may be of interest to the public. It may be irrelevant that a matter may be the subject of public curiosity. In most cases it will be relatively straightforward to decide where the balance of the public interest in disclosure lies. However, there will inevitably be cases where the decision is a difficult one. Applying such a test depends to a high degree on objective judgement and a basic knowledge of the subject matter and its wider impact on the Academy and possibly wider. Factors that might be taken into account when weighing the public interest include:

For Disclosure	Against Disclosure
Is disclosure likely to increase access to information held by the Trust?	Is disclosure likely to distort public reporting or be misleading because it is incomplete?
Is disclosure likely to give the reasons for a decision or allow individuals to understand decisions affecting their lives or assist them in challenging those decisions?	Is premature disclosure likely to prejudice fair scrutiny, or release sensitive issues still on the internal agenda or evolving?
Is disclosure likely to improve the accountability and transparency of the Trust in the use of public funds and help to show that it obtains value for money?	Is disclosure likely to cause unnecessary public alarm or confusion?
Is disclosure likely to contribute to public debate and assist the understanding of existing or proposed	Is disclosure likely to seriously jeopardise the Trust's legal or contractual position?
Is disclosure likely to increase public participation in decision-making?	Is disclosure likely to infringe other legislation e.g. Data Protection Act?
Is disclosure likely to increase public participation in political processes in general?	Is disclosure likely to create a controversial precedent on the release of information or impair your ability to obtain information in the future?
Is disclosure likely to bring to light information affecting public safety?	Is disclosure likely to adversely affect the Academy's proper functioning and discourage openness in expressing

	opinions?
Is disclosure likely to reduce further enquiries on the topic?	If a large amount of information on the topic has already been made available, would further disclosure shed any more light or serve any useful purpose?

Potential or actual embarrassment to, or loss of confidence in, the Trust, Academy, staff or trustees is NOT a valid factor.

The fact that the information is technical, complex to understand and may be misunderstood may not of itself be a reason to withhold information.

The potential harm of releasing information will reduce over time and should be considered at the time the request is made rather than by reference to when the relevant decision was originally taken.

The balance of the public interest in disclosure cannot always be decided on the basis of whether the disclosure of particular information would cause harm, but on certain higher order considerations such as the need to preserve confidentiality of internal discussions.

A decision not to release information may be perverse i.e. would a decision to withhold information because it is not in the public interest to release it, itself result in harm to public safety, the environment or a third party?

In arriving at a decision, the executive headteacher will record the answers to these questions and the reasons for the answers given.

For Disclosure

Where the balance of the public interest lies in disclosure, the enquiry should be dealt with and the information required should be made available. Where the factors are equally-balanced, the decision should usually favour disclosure.

Against Disclosure

After carrying out the public interest test if it is decided that the exemption should still apply, proceed to reply to the request.

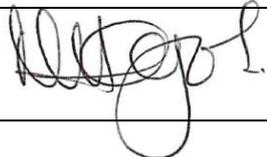
There will be occasions when it has been decided that a qualified exemption applies but consideration of the public interest test may take longer. In such a case, you must contact the enquirer within 20 working days stating that a particular exemption applies, but including an estimate of the date by which a decision on the public interest test will be made. This should be within a “reasonable” time – in practice, it is recommended this decision is made and communicated within the 20 days but where not possible it is suggested that no more than 10 working days beyond the 20 days should be allowed.

7. In the case of Academies, the ‘Qualified Person’ for section 36 - prejudice to effective conduct of public affairs would be the Chair of the Board of Directors of the proprietor of the Academy¹². In most cases, this would be the Chair of the Governing Body.

Equality impact assessment screening form – Appendix iv

Section one: screening for impact				
Name of policy		Freedom of Information (inc. Publication Scheme)		
Project lead completing assessment:		Matt Hayes		
Position:		Business Manager		
1. What is the main purpose of the strategy/project/policy?				
Describes the Trust's commitment and approach to freedom of information, supports the principles and describes the process. Also lists the Trust's Scheme of Publication.				
2. Who will be the main stakeholders/users of the policy? Please consider the impact of the policy on the different groups of stakeholder /users.				
Headteachers, Staff and General Public.				
3. Use the table to show:				
<ul style="list-style-type: none"> ■ Where you think that the policy could have a negative impact on any of the equality strands, that is, it could disadvantage them – if no impact please note the evidence for this. ■ Where you think that the strategy/project/policy could have a positive impact on any of the groups or contribute to promoting equality, equal opportunities or improving relationships within equality characteristics. 				
	Positive impact	Negative impact	No impact	Reason and evidence (provide details of specific groups affected even for no impact)
Age	✓			Provides people with access to a wide range of information held by the Trust. Provides people with access to policies and how decisions are arrived at. This enables transparent governance and could lead to challenge in any areas where equality is perceived to be an issue.

Disability	✓			Provides people with access to a wide range of information held by the Trust. Provides people with access to policies and how decisions are arrived at. This enables transparent governance
Gender	✓			Provides people with access to a wide range of information held by the Trust. Provides people with access to policies and how decisions are arrived at. This enables transparent governance
Gender identity	✓			Provides people with access to a wide range of information held by the Trust. Provides people with access to policies and how decisions are arrived at. This enables transparent governance
Sexual orientation	✓			Provides people with access to a wide range of information held by the Trust. Provides people with access to policies and how decisions are arrived at. This enables transparent governance
Race	✓			Provides people with access to a wide range of information held by the Trust. Provides people with access to policies and how decisions are arrived at. This enables transparent governance
Religion or belief	✓			Provides people with access to a wide range of information held by the Trust. Provides people with access to policies and how decisions are arrived at. This enables transparent governance

4. If you have indicated there is a negative impact on any group, is that impact:		
Legal? (not discriminatory under anti-discriminatory legislation)	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Intended?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Level of impact?	High <input type="checkbox"/>	Low <input type="checkbox"/>
If the negative impact is possibly discriminatory and not intended and/or of high impact you must complete a full equality impact assessment. If not, complete the rest of section one below.		
5. Could you minimise or remove any negative impact that is of low significance? Could you add any additional action to have a positive impact rather than no impact?		
Policy can be available in large print or different language if required; however, it is not considered that this will make any material difference.		
6. If there is no evidence that the strategy, project or policy promotes equality, equal opportunities or improved relations – could it be adapted so that it does? If so, explain how.		
7. Please list the outcome following this equality impact assessment (this could be no changes, some changes, further work needed around particular groups or cease development of the policy).		
Policy can be available in large print or different language if required; however, it is not considered that this will make any material difference.		
Signed: 	Date: 24.04.2016	