Olive Academies Independent School
OA-North View
Provision of Information Policy

Document control table	
Title	Provision of Information Policy
Date updated and approved	September 2026
Approved by	OA Trustees
Date of next review	July 2027
Updates/revisions included:	Complete rewrite with Independent School Standards (ISS) Part 6 compliance framework for specialist SEMH provisions.
This policy applies to Olive Academies Independent School OA-North View and should be implemented consistently throughout the school. Proposed amendments should be referred to the Head of School/Executive Headteacher and OAISB for consideration.	

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1. Purpose and scope

As an independent special school specialising in Social, Emotional, and Mental Health (SEMH) needs, OA-North View is governed by the Education (Independent School Standards) Regulations 2014.
Unlike state-funded academies, independent schools are legally exempt from the Freedom of Information Act 2000 (FOIA). However, Olive Academies Trust operates with a core commitment to transparency, collaboration with families, and statutory compliance.
This policy details how OA-North View proactively publishes, provides, and manages access to school information under Part 6 (Provision of Information) and Part 7 (Handling of Complaints) of the Independent School Standards (ISS), while strictly upholding the Data Protection Act 2018 and UK GDPR.

2. Legal Framework

This policy is constructed in accordance with the following statutory legislation and guidance:

- The Education (Independent School Standards) Regulations 2014 (specifically Part 6 and Part 7)
- The UK General Data Protection Regulation (UK GDPR)
- The Data Protection Act 2018
- The Education (Pupil Information) (England) Regulations 2005

3. Links to other policies

This policy will be viewed in conjunction with the following trust policies:

- Data Protection and Subject Access Request (SAR) Policy
- Safeguarding and Child Protection Policy
- Admissions and SEND Policy
- Behaviour Management and Exclusions Policy
- Complaints Policy (ISS Part 7 Compliant)

4. Mandatory Information Made Routinely Available

Under Part 6 of the Independent School Standards, OA-North View ensures that the following information is published directly on the school website or is provided directly to parents/carers of pupils and prospective pupils upon request:

- School Contact and Governance Details
- The school's address, telephone number, and the name of the Head of School.
- The address and registered office of the proprietor (Olive Academies Trust) and the contact details of the Chair of Trustees.
- Education, SEND, and Curriculum Policies
- The school's statement of educational particulars, including the curriculum policy.
- Written documentation of the provision for pupils with Special Educational Needs and Disabilities (SEND) and those holding Education, Health and Care Plans (EHCPs).

- The English as an Additional Language (EAL) policy (where applicable).
- Pupil Welfare and Safety Policies
- The Safeguarding and Child Protection Policy (must be published on the website).
- The Behaviour Management and Exclusions Policy (including anti-bullying strategies).
- The Health and Safety Policy and First Aid Policy.
- Performance and Compliance Reports
- Details of the school's academic performance during the preceding school year.
- The most recent inspection report from Ofsted.
- The number of formal complaints registered under the school's complaints procedure during the preceding school year.

5. Information Provided Directly to Local Authorities

Because OA-North View is a specialist SEMH environment catering to pupils placed via local authorities, the school directly provides:

- An annual account of income and expenditure relating to the placement of pupils to the commissioning local authorities.
- Regular progress reports, EHCP annual review data, and attendance records as specified in service level agreements.

6. Personal Data and Subject Access Requests (SARs)

Requests by individuals (such as parents, carers, or pupils) to see the personal data the school holds about them are governed entirely by the UK GDPR and Data Protection Act 2018, not by freedom of information parameters.

- Handling Requests: All parental or pupil requests for educational records or personal data must be directed immediately to the Data Protection Officer (DPO) at info@oliveacademies.org.uk.
- Timeline: The school will respond to valid SARs within one calendar month (30 days) as prescribed by UK GDPR. This may be extended by up to two additional months for highly complex or historical files typical of SEMH placements.
- Fees: No fee will be charged for processing standard information requests regarding a pupil's educational file.
- Redactions & Safeguarding: Information may be withheld or redacted if its disclosure would expose a third party's personal data, or if disclosure would cause significant harm to the physical or mental health of the pupil or another individual (in accordance with Data Protection exemptions for safeguarding).

7. Managing Complex, Repetitive, or Escalated Communications

In a specialist SEMH setting, families and carers often navigate complex, high-stress, or crisis milestones regarding their children's placements, safeguarding, or EHCP provisions.

- Empathetic Engagement: The school will never dismiss complex or emotionally charged inquiries from parents as "vexatious" under public authority criteria. Every effort will be made by the Head of School to provide clarity, host meetings, and support information transparency.
- Unreasonable or Manifestly Unfounded Requests**:** If an information request from an external party or a repetitive seeker is manifestly unfounded, structurally excessive, or places an unmanageable administrative burden on the school, the Director of Resources and the DPO will

review the request. The school reserves the right to charge a reasonable administrative fee or refuse requests that disrupt the safe operational running of the provision.

8. Complaints Framework

If a parent, carer, or prospective parent believes that OA-North View has failed to provide information required under Part 6 of the Independent School Standards, or is dissatisfied with how an information request was handled:

1. The matter must be escalated through the school's **Complaints Policy**.
2. The complaint will follow the mandatory 3-stage independent school process: **Informal Resolution, Formal Written Complaint, and a Panel Hearing** (featuring at least one panel member who is entirely independent of the management and running of the school).
3. *Note:* Because OA-North View is an independent school, the Information Commissioner's Office (ICO) does not adjudicate matters of school operational disclosure outside of standard UK GDPR/Data Protection breaches.

9. Records Management and Retention

The school maintains an internal administrative log of formal data and information access requests. This log, along with the original written requests and responses, is kept securely on the Trust Portal for a minimum of **five years** before secure disposal, overseen by the DPO.

10. Template Register for School Information & SAR Requests

Request Details & Status					**Exclusion / Redaction Details (If Applicable)**		
Date Rec'd	**Requester Type** *(Parent / LA / Public)*	**Information Requested**	**Target Due Date** *(30 Days for SAR)*	**Status of Request** *(Completed / Rejected)*	**Date Completed or Refused**	**Reason for Refusal/Redaction** *(e.g., Safeguarding Exemption)*	**Linked Complaint Reference No.** *(If escalated to ISS Part 7)*

11. Distribution

Electronic copies of this policy are published openly on the OA-North View school website. Physical or digital copies will be provided directly to parents, carers, prospective families, and commissioning Local Authorities immediately upon request.

12. Monitoring and Review Process

This Provision of Information Policy will be reviewed every two years, or sooner if there are significant changes to independent school legislation or data protection guidance. The review will be conducted by the Trust's Head of Governance in consultation with the Data Protection Officer. Final approval of any amendments will be made by the Trust Board to ensure continued compliance with the Education (Independent School Standards) Regulations 2014 and alignment with the Trust's values and operational practices.

13. Template register for Freedom of Information Requests

Request Details & Core Tracking					**Outcome & Compliance Details**		
Date Rec'd	**Requester Type** *(Parent / Carer / LA / Public)*	**Summary of Information Requested**	**Internal ID No.**	**Target Due Date** *(30 Calendar Days for SAR)*	**Status of Request** *(Fulfilled / Redacted / Refused)*	**Date Completed or Finalised**	**Reason for Redaction or Refusal** *(e.g., Safeguarding Exemption / Third-Party Data Protection)*