

## **Freedom of Information Act 2000 (FOIA)**

### **Decision notice**

**Date:** 15 July 2021

**Public Authority:** The Governing Body of Townley Grammar School

**Address:** Townley Road  
Bexleyheath  
Kent  
DA6 7AB

#### **Decision (including any steps ordered)**

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1. The complainant has submitted 78 requests for information to Townley Grammar School ('the School'). The School is relying on section 12(1) of the FOIA to refuse to comply with the requests as it considers the cost of doing so would exceed the appropriate limit.
2. The Commissioner's decision is as follows:
  - Under section 12(4) of the FOIA the School is entitled to aggregate the cost of complying with the requests and to rely on section 12(1) of the FOIA to refuse to comply with them.
  - The School offered the complainant appropriate advice and assistance as to how the requests might be refined and, as such, there was no breach of section 16(1) of the FOIA in the School's handling of the requests.
3. The Commissioner does not require the School to take any remedial steps.

## Request and response

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4. On 25 June 2020 the complainant submitted 78 requests for information to the School. Given their combined length they are reproduced in the appendix to this notice. The Commissioner has redacted third party personal data from the requests.
5. The School responded on 11 August 2020. It advised that it would rely on section 12(1) of the FOIA to refuse to comply with the requests as framed, as to do so would exceed the appropriate cost limit. The School advised how the complainant might refine their requests.
6. The complainant requested an internal review on 3 September 2020. They asked the School to respond to request 1 and then work through the requests, responding to them until the appropriate limit of £450 had been reached. The complainant also stated:

“Please provide full and frank answers to all of the following and provide any documents audio, video files separately as part of your response.

**In addition, please provide all other recorded information that you may hold which the requester may not be aware of, which includes; information held on computers, in emails and in printed or handwritten documents as well as images, video and audio recordings. [Complainant’s emphasis.]”**

7. In the Commissioner’s view this is a clarification, or widening, of the complainant’s requests of 25 June 2020.
8. The School provided an internal review on 29 January 2021. It confirmed that it was relying on section 12(1) of the FOIA to refuse to comply with the requests.

## Scope of the case

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9. The complainant contacted the Commissioner on 22 October 2020 to complain about the way their requests for information had been handled.
10. The Commissioner’s investigation has focussed on the School’s reliance on section 12(1) to refuse to comply with the complainant’s requests. She has also considered the School’s duty to offer the complainant advice and assistance, under section 16(1) of the FOIA.

## Reasons for decision

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### **Section 12 – cost exceeds appropriate limit**

11. Under section 1(1) of the FOIA anyone who requests information from a public authority is entitled under subsection (a) to be told if the authority holds the information and, under subsection (b) to have the information communicated to him or her if it is held and is not exempt information.
12. Section 12(1) of the FOIA says that a public authority is not obliged to comply with section 1(1) if the authority estimates that the cost of doing so would exceed the appropriate limit.
13. The estimate must be reasonable in the circumstances of the case. The appropriate limit is currently £600 for central government departments and £450 for all other public authorities. Public authorities can make a notional charge of a maximum of £25 per hour to undertake work to comply with a request; 18 hours work in accordance with the appropriate limit of £450 set out above, which is the limit applicable to the School. If an authority estimates that complying with a request may cost more than the cost limit, it can consider the time taken to:
  - determine whether it holds the information
  - locate the information, or a document which may contain the information
  - retrieve the information, or a document which may contain the information, and
  - extract the information from a document containing it.
14. When a public authority is estimating whether the appropriate limit is likely to be exceeded, it can include the costs of complying with two or more requests if the conditions laid out in regulation 5 of the Freedom of Information and Data Protection (Appropriate Limit and Fees) Regulations 2004 (“the Fees Regulations”) can be satisfied.
15. The effect of the provisions under section 12(4) of the FOIA and regulation 5(2) of the Fees Regulations mean that a public authority may aggregate the cost of complying with two or more requests if the following three criteria are met:
  - the requests are made by one person, or by different persons who appear to the public authority to be acting in concert or in pursuance of a campaign
  - two or more requests relate, to any extent, to the same or similar information; and

- the requests were received by the public authority within any period of 60 consecutive working days.
16. The complainant advised the School that it could comply with request 1 and then work through the requests until the £450 cost limit had been met. The Freedom of Information Code of Practice<sup>1</sup> advises at paragraph 6.6 that public authorities do not have to search for information in scope of a request until the cost limit is reached, even if the applicant requests that they do so.
  17. The First-tier Tribunal (Information Rights) decision in EA/2007/0124 also confirmed that there is no requirement under section 12 of FOIA that a public authority should work up to the appropriate limit.
  18. However, where a public authority claims that section 12 of the FOIA is engaged it should, where reasonable, provide advice and assistance to help the applicant refine the request so that it can be dealt with under the appropriate limit, in line with section 16(1) of the FOIA.
  19. In its submission to the Commissioner, the School has provided her with an estimate of the time it would take to comply with each of the requests. These estimates run from one hour (11 requests), one to two hours (two requests), two hours (25 requests), two to four hours (17 requests), four hours (two requests), four to six hours (six requests) and six hours (two requests).
  20. The School's breakdown indicates that it considers that requests 6 to 10 are not valid requests as there is no "game", that the information requested in request 2 is published on its website and so would take '0' hours to comply with, and that it would take '0' hours to comply with request 1. The Commissioner also notes that the School's breakdown comprises 76 requests and that the complainant submitted 78 requests. However, that discrepancy does not have a bearing on this occasion.
  21. In its submission, the School goes on to say that, looking at the number of hours it would take altogether if this was multiplied by the £25 hourly staff rate, it is clear this would far exceed the £450 cost limit.

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[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/744071/CoP\\_FOI\\_Code\\_of\\_Practice\\_-\\_Minor\\_Amendments\\_20180926\\_.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/744071/CoP_FOI_Code_of_Practice_-_Minor_Amendments_20180926_.pdf)

*The Commissioner's conclusion*

22. Multiple requests within a single item of correspondence are separate requests for the purpose of section 12 and, as discussed above, public authorities can aggregate two or more separate requests. Having reviewed them, the Commissioner is satisfied that the complainant has submitted 78 separate requests rather than one multi-part request, albeit some of the requests have multiple parts.
23. With regard to the criteria at paragraph 15, the Commissioner is satisfied, first, that there is an overarching theme to the complainant's many requests in that they all request information broadly relating to the same matter, namely the running of the School in question. Since all the requests were also submitted by the same person on the same day, the Commissioner considers the School is in fact entitled to rely on section 12(4) of the FOIA to aggregate the requests.
24. Reviewing the School's estimates, the time it would take to comply with the requests has been estimated as a minimum of 141 hours and a maximum of 189 hours, approximately. It would cost between £3,525 and £4,725 to comply with the requests.
25. The Commissioner has reviewed the estimates against each of the requests. As one example, the School has estimated that it would take six hours to comply with requests 75 and 76. These are multi-part requests for information about complaints that the School and the Odyssey Trust may have received. The Commissioner considers that the School's estimates are credible. As another example, the School has estimated that it would take four to six hours to comply with requests 47 and 48. These are requests for information about assemblies and its website and diversity matters. If held, the Commissioner considers that this is not information that the School is likely to routinely collate and so it would take time to gather that information. As such, she again considers that the School's estimate is reasonable. Even at the lower estimate, the cost/time limit has therefore been exceeded complying with just four of the complainant's 78 requests.
26. The Commissioner considers that the School's time estimates are credible. Given the volume of requests the complainant has submitted, and the complexity of many of them, the Commissioner is satisfied that the School can aggregate the requests and, under section 12(1) of the FOIA, refuse to comply with them.

## **Section 16 – advice and assistance**

27. Section 16(1) of the FOIA places a duty on a public authority to provide advice and assistance, so far as it would be reasonable to expect the authority to do so, to persons who propose to make, or have made, requests for information to it.
28. In its initial response to the request, the School advised the complainant how they might refine their requests to bring complying with them within the cost limit. It suggested they could be more specific about the information they were seeking, including any dates or time period relevant to information they had requested.
29. Given the number of requests the complainant submitted and their wide-ranging nature, in the Commissioner's view it would be difficult to narrow them down in any meaningful way and the complainant still be provided with the breadth of information about the School that they are seeking. As such, the Commissioner is satisfied that the School offered the complainant adequate advice and assistance and that there was no breach of section 16(1) of the FOIA.

## Right of appeal

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30. Either party has the right to appeal against this decision notice to the First-tier Tribunal (Information Rights). Information about the appeals process may be obtained from:

First-tier Tribunal (Information Rights)  
GRC & GRP Tribunals  
PO Box 9300  
LEICESTER  
LE1 8DJ

Tel: 0203 936 8963

Fax: 0870 739 5836

Email: [grc@justice.gov.uk](mailto:grc@justice.gov.uk)

Website: [www.justice.gov.uk/tribunals/general-regulatory-chamber](http://www.justice.gov.uk/tribunals/general-regulatory-chamber)

31. If you wish to appeal against a decision notice, you can obtain information on how to appeal along with the relevant forms from the Information Tribunal website.
32. Any Notice of Appeal should be served on the Tribunal within 28 (calendar) days of the date on which this decision notice is sent.

## Signed

**Cressida Woodall**  
**Senior Case Officer**  
**Information Commissioner's Office**  
**Wycliffe House**  
**Water Lane**  
**Wilmslow**  
**Cheshire**  
**SK9 5AF**



## APPENDIX

1. Please include *all* meta-data information, found in the properties of *all* information and documents provided under this request (such as emails, notes, policies, minutes, photographs, video and audio recordings).
2. The Townley Grammar School website does not contain a copy of the School's Publication Scheme. Please provide information (details) of the public authority's (Townley Grammar School) Publication Scheme.
3. The Townley Grammar School website does not contain a copy of the "Trust pay policy" detailed in the Odyssey Trust Annual Report & Financial Statements 2019. Please provide a copy of the "Trust pay policy".
4. The Townley Grammar School website does not contain a Diversity Policy. Please provide information (details) of the Diversity Policy in place between 1 September 2019 - 24 June 2020 and all other current policies (not published) which demonstrate Townley Grammar School's compliance with its Public Sector Equality Duty (PSED) in respect of Equality, Diversity, Inclusion and Human Rights; and statutory responsibility to comply with the Equality Act 2010 and the Human Rights Act 1998.
5. Please provide information (details) of PSED monitoring compliance and effectiveness systems and strategies in place at Townley Grammar School and the Odyssey Trust. Please provide copies of annual Diversity and Inclusion reports, based on performance against equality objectives and actions published in any diversity and inclusion workplan and related PSED objectives.
6. Please provide information (details) of "the game" that male students and those from a minority heritage are required to play for A Level Art, Townley Grammar School?
7. Please provide information (details and copy) of the rules for "the game" that male students and those from a minority heritage are required to play for A Level Art?
8. Please provide information (details) of the consultation and subsequent policy adopted by the Governors for the "game" and minutes of the meeting where the Governors ratified the policy relating to "the game" that male students and those from a minority heritage are required to play for A Level Art?
9. Please provide information (details) of all students required to "play the game" for A Level Art. Please provide breakdown by gender and heritage.
10. Please provide information (details) of all students, who decided not to continue with A Level Art after being told that they must "play the game" or they will fail? Please provide a breakdown by gender and heritage ("race":18 "ethnic groups" recommended for use by government).
11. Please provide information (details) of total number of Sixth Form Applicants, in 2018 and 2019.
12. Please provide information (details) of total number of Sixth Form Applicants, by gender and heritage, in 2018 and 2019.
13. Please provide information (details) of total number of male, female and non-binary Sixth Form students (Year 12) in 2018 - 2020 studying:
  - a) Art
  - b) Classical Civilisations
  - c) English
  - d) History



14. Please provide details of information (details) of how: "The entire curriculum has been decolonised, with sweeping changes made to English literature, history and the sciences".
15. Please provide all information to support how each of the subjects have been granted *independence* and policy or decision matrix used to define a *colonised* "curriculum" and achievement of a "decolonised curriculum". Please include copies of certificates of *decolonisation* granted from awarding bodies:
  - a) Ofsted;
  - b) Ofqual;
  - c) Equality and Human Rights Commission;
  - d) Other awarding body.
16. Please provide information (details) of measured "decolonised" objectives, actions, and workplan (including assessment tools used) of how the following A Level subjects have been "decolonised":
  - a) Art
  - b) Classical Civilisations
  - c) English
  - d) History
17. Please provide information (details) of how many current or former male students have been blocked by the CEO between May - June 2020 on his @CEOOdyssey Twitter account; and subsequently unblocked.
18. Please provide information (details) of how many current or former female students have been blocked by the CEO between May - June 2020 on his @CEOOdyssey Twitter account; and then unblocked.
19. Please provide information (details) of the social exclusion policy and decision matrix used by the CEO to block and unblock student voices on his @CEOOdyssey Twitter account.
20. Please provide information (details) of how many students posting messages on Twitter or writing to Townley Grammar School about bias and discrimination, lack of parity and failure by school to "decolonise the curriculum" have been issued with letters by the Head, Nevita Pandya with a copy of "Complaints Policy & Procedure 2020" and told to make a complaint.
21. Please provide information (details) of how many students posting messages on Twitter or writing to Townley Grammar School about bias and discrimination, lack of parity and failure by school to "decolonise the curriculum" have instead been invited via Twitter by the Head Nevita Pandya to "contact" or "email" her. Please provide a breakdown by gender and heritage (race: "18 ethnic groups" recommended for use by government when asking individuals questions relating to "ethnicity").
22. Please provide information (details) of how many individuals have met with the CEO, Head, SLT and Trust following messages posted on Twitter between May 2020 and June 2020 speaking out about bias and discrimination by Townley Grammar School. Please provide a breakdown by gender heritage (race: "18 ethnic groups" recommended for use by government when asking individuals questions relating to "ethnicity") and whether they are current or former students.

23. Please provide information (details) of how Townley Grammar School "recognises the value of cultural and religious differences" in accordance with its published "EQUAL OPPORTUNITIES POLICY 29 June 2015"; including the "18 ethnic groups" recommended for use by government when asking individuals questions relating to "ethnicity" and for religious groups and philosophical beliefs including but not limited to:
- a) Christianity (Protestants, Methodists or Jehovah's Witnesses);
  - b) Judaism (Orthodox, Hasidic or Reform);
  - c) Islam (Sunnis, Shi'as, Sufism etc);
  - d) Sikhism;
  - e) Buddhism (Mahayana, Theravada, Vajrayana and Zen);
  - f) Hinduism (Vaishnavism, Shaivism, Shaktism and Smartism);
  - g) Zoroastrianism;
  - h) Bahá'ism;
  - i) Rastafarianism;
  - j) Yazidism;
  - k) Yarsanism;
  - l) Alevism;
  - m) Haitian Vodou;
  - n) Scientology;
  - o) Mysticism;
  - p) Paganism;
  - q) Humanism;
  - r) Secularism;
  - s) Atheism;
  - t) Pantheism
  - u) Environmentalism
  - v) Satanism
24. Please provide information (details) of how: "Resources" are "carefully monitored so that they reflect and represent the full range of cultures within society" as detailed in Townley Grammar School "EQUAL OPPORTUNITIES POLICY 29 June 2015" and promote the PSED (Equality Act 2010) duty not to unlawfully discriminate based on protected characteristics of:
- i. Age
  - ii. Disability
  - iii. Gender reassignment
  - iv. Pregnancy and maternity
  - v. Marriage and civil partnership
  - vi. Race (including colour, nationality, and ethnic or national origin)
  - vii. Religion and belief
  - viii. Sex
  - ix. Sexual orientation
25. Please provide information (details) of 'any incident which appears to the individual concerned to contain an element of racial motivation' reported to Townley Grammar School since February 2020 by male pupils from a minority heritage which have resulted in "Immediate action" by Townley Grammar School in accordance with the Townley Grammar School "EQUAL OPPORTUNITIES POLICY 29 June 2015" and provide details of the:
- a) The incident and the action taken and recorded;
  - b) Support provided for the victims and counselling for the offenders;
  - c) Of how and when parents of those involved were informed of the incident and the action taken;
  - d) Details of any year or whole school assembly held to address the issue.



26. Please provide information (details) of how diversity, heteronormativity and heterosexism are addressed by Townley Grammar School in accordance with the Townley Grammar School "EQUAL OPPORTUNITIES POLICY 29 June 2015"; and in particular through the Townley Grammar School:
- a) Website
  - b) Prospectuses
  - c) Social media accounts
  - d) Assemblies
  - e) Guest speakers
  - f) Use of non-gender specific language (in reports, letters and correspondence, website, social media and when addressing parents).
27. Please provide information (details) of how threats and verbal abuse by teachers that a male student "will fail" to gain a qualification; if he does not "play the game"; forcing a student to produce extra work; teacher destroying a student's work and discarding it in a dustbin; belittling, humiliating, mocking and laughing at a student in front of peers, trivialising and dismissing sexual harassment and hazing of males; have been recorded or reported by Townley Grammar School. Please provide details of the steps taken "to reassure the child that what he says will be taken very seriously and everything possible done to help" in accordance with its Draft Child Protection and Safeguarding Policy (created on 15 June 2020 at 15:10 hours); and DfE's statutory guidance; Keeping Children Safe in Education (KCSIE) 2019. For allegations concerning all teachers including but not limited to Art teachers, Headteacher, Deputy Headteacher, Head of Sixth Form, Deputy Head of Sixth Form and CEO please provide details of any investigations, findings and referrals made to the Local Authority Designated Officer (LADO) between 1 September 2019 - June 2020.
28. Please provide information (details) of how Townley Grammar School have responded to "peer on peer abuse" and to sexual harassment of male students by female students through acts such as: catcalling, screaming and shouting at male students during "Children In Need" assemblies, in corridors, lascivious ogling at team building / sporting events and offensive personal remarks such as "nice bum" "all men are trash"; "you're like . . .". Please provide details of all such incidents reported or known to Townley Grammar School between 1 September 2019 to June 2020. Please provide details of any "Immediate action" by Townley Grammar School in accordance with its duty under the Equality Act 2010 and the DfE's statutory guidance; Keeping Children Safe in Education (KCSIE) 2019; and its Draft Child Protection and Safeguarding Policy (created on 15 June 2020 at 15:10 hours). Please provide details of the:
- a) The incident and the action taken and recorded;
  - b) Support provided for the victims and counselling for the offenders;
  - c) Of how and when parents of those involved were informed of the incident and the action taken;
  - d) Details of any year or whole school assembly held to address the issue.
29. Please provide information (details) of the student and parent, Governor, Trustee consultation conducted by Townley Grammar School before the "Townley Sixth Form ANNUAL LEG WAXING" of "BOYS" event was first held.
30. Please provide information (details) of when the decision matrix, (decision notes or minutes of any meeting) where the Trust (Trustees And Governors) approved the implementation of the "Townley Sixth Form ANNUAL LEG WAXING" of "BOYS" event.
31. Please provide information (details) of date on which the "Townley Sixth Form ANNUAL LEG WAXING" of "BOYS" event was first held and money raised by sponsorship.



- Please include information on how the money raised was spent; and those involved in the decision making process of how the money was spent.
32. Please provide information (details) for each year where the "Townley Sixth Form ANNUAL LEG WAXING" of "BOYS" event has been held; money raised by sponsorship and information on how the money raised was spent; and those involved in the decision making process of how the money was spent.
  33. Please provide information (details) of how the "Townley Sixth Form ANNUAL LEG WAXING" of "BOYS" accords with the Townley Grammar School "EQUAL OPPORTUNITIES POLICY 29 June 2015".
  34. Please provide details information (details) of how the "Townley Sixth Form ANNUAL LEG WAXING" of "BOYS" accords with Townley Grammar School's duty under the Equality Act 2010.
  35. Please provide information (details) of how the "Townley Sixth Form ANNUAL LEG WAXING" of "BOYS" accords with the DfE's statutory guidance; Keeping Children Safe in Education (KCSIE) 2019 and Townley Grammar School Draft Child Protection and Safeguarding Policy (15 June 2020: awaiting ratification) for safeguarding from hazing.
  36. Please provide information (details) of how the "Townley Sixth Form ANNUAL LEG WAXING" of "BOYS" complies with a "non-conformist hair policy" which Townley Grammar School promotes in relation to positive, free hair choices for female students.
  37. Please provide information (details) of how the "Townley Sixth Form ANNUAL LEG WAXING" of "BOYS" empowers students and accords with the: "**Townley Grammar aims** to cultivate resilience, courage and compassion; to enhance communication skills; to embrace creativity, and to promote a progressive and outward-looking mentality so that our students are well prepared to make a real difference in their community," as detailed on the Townley Grammar School website launched on 27 February 2020
  38. Please provide information (details) of the equality impact assessment for the "Townley Sixth Form ANNUAL LEG WAXING" of "BOYS" event.
  39. Please provide a copy of the risk assessment (for blood borne infections, injuries etc) for the "Townley Sixth Form ANNUAL LEG WAXING" of "BOYS" event. Please include details of any training and PPE provided to those conducting "WAXING" of "BOYS".
  40. Please provide information (details) of the medical and consent forms used for "BOYS" who are subjected to "WAXING" in the "Townley Sixth Form ANNUAL LEG WAXING" of "BOYS".
  41. Please provide information (details) of how the aim "to raise the awareness of the wide range of opportunities that are available to women" is implemented by Townley Grammar School in accordance with its "EQUAL OPPORTUNITIES POLICY 29 June 2015."
  42. Please provide information (details) of how Townley Grammar School complies with its duty under the Equality Act 2010 to equally raise awareness of "the wide range of opportunities that are available" to:
    - a) Men;
    - b) Non-binary individuals;
    - c) Those with other protected characteristics.

43. Please provide information (details) of how "issues concerning women in society, such as stereotyping, self image and self esteem, employment and choices regarding sexual behaviour and orientation" are implemented by Townley Grammar School in accordance with its "EQUAL OPPORTUNITIES POLICY 29 June 2015".
44. Please provide information (details) of how Townley Grammar School complies with its duty under the Equality Act 2010 to equally raise "issues" concerning men and non binary individuals "in society, such as stereotyping, self image and self esteem, employment and choices regarding sexual behaviour and orientation".
45. Please provide information (details) of how Townley Grammar School complies with its duty under the Equality Act 2010 to equally promote the positive role of men through:
  - a) "literature in the library and,
  - b) in English lessons",
  - c) through "display boards
  - d) including information on past and present pupils and their achievements".
46. Please provide information (details) of all Headteacher's assemblies promoting:
  - a) traditional male occupations to female students held between 1 September 2019 and March 2020;
  - b) traditional female occupations to male students held between 1 September 2019 and March 2020;
  - c) traditional non-binary occupations to non-binary students held between 1 September 2019 and March 2020.
47. Please provide information (details) of all Headteacher's assemblies promoting:
  - a) positive female role models for female students held between 1 September 2019 and March 2020;
  - b) positive male role models for male students held between 1 September 2019 and March 2020;
  - c) positive role models for non-binary students.
48. Please provide information (details) of how many male and female students are represented on the Townley Grammar School website Home page "in picture- in picture video"; and please supply a copy of the policy or other criteria used to select students featured on the Home page "in picture- in picture video". Please provide details of diversity assessment or decision matrix used to select students.
49. Please provide information (details) of how many male or non-binary students are featured in the 21c@Townley Grammar Twitter account and supply a copy of the policy / decision matrix or other criteria used to select students selected to be featured on the 21c@Townley Grammar Twitter account between 1 September 2019 and June 2020.
50. Please provide information (details) of how many male or non-binary students / artists are featured in the @TownleyArt Twitter account. Please supply a copy of the policy / decision matrix or other criteria used to select students featured on the @TownleyArt Twitter account; between 1 September 2019 and June 2020.
51. Please provide information (details) of number of #WOMENSART tags posted by @TownleyArt Twitter account between 1 September 2019 and June 2020.



52. Please provide information (details) of number of #MENSART tags posted by @TownleyArt Twitter account between 1 September 2019 and June 2020.
53. Please provide information (details) of number of #NONBINARYART tags posted by @TownleyArt Twitter account between 1 September 2019 and June 2020.
54. Please provide information (details) of number of #BAMEART tags posted by @TownleyArt Twitter account between 1 September 2019 and June 2020.
55. Please provide information (details) of number of #tags for each of the "18 ethnic groups" (recommended for use by government when asking individuals questions relating to "ethnicity") posted by @TownleyArt Twitter account between 1 September 2019 and June 2020.
56. Please provide information (details) of number of #MothersDay tagged messages posted or retweeted by @TownleyArt Twitter account between 1 September 2019 and June 2020.
57. Please provide information (details) of number of #FathersDay tagged messages posted or retweeted by @TownleyArt Twitter account between 1 September 2019 and June 2020.
58. Please provide information (details) of postcards sent to students after 11 May 2020 by the Acting Headteacher Nevita Pandya following her appointment to the permanent Headteacher role at Townley Grammar School. Please provide full details of:
  - a) The design and printing cost for postcards;
  - b) If each pupil at Townley Grammar School was issued with a postcard and how many postcards in total were sent;
  - c) Details of postage costs for sending postcards.
59. Please provide full information (details) relating to design, launch and hosting cost of the Townley Grammar School website launched on 27 February 2020.
60. Please provide information (details) of any expenses or remuneration paid to Governors or benefits received between 1 January 2019 and June 2020.
61. Please provide information (details) of any expenses, remuneration or salary paid or benefits received by the Clerk to Governors between 1 January 2019 and June 2020.
62. Please provide information (details) of any expenses or remuneration paid to Trustees or benefits received by Trustees between 1 January 2019 and June 2020.
63. Please provide information (details) of services provided by JUDICIUM CONSULTING LIMITED (Company number 03926056) to Townley Grammar School including a breakdown of public funds paid to JUDICIUM CONSULTING LIMITED for each service; between 1 January 2019 and June 2020.
64. Please provide details of election or appointment of Clerk to Governors in 2019 and 2020. Please include all information on the process including job specification / description, application, interview / assessment and date of appointment.
65. Please provide information (details) of election or appointment of Clerk to Trustees in 2019 and 2020. Please include all information on the process including job specification / description, application, interview / assessment and date of appointment.



66. Please provide information (details) of the date and time of resignation of \_\_\_\_\_ of JUDICIUM CONSULTING LIMITED; as Clerk to Governors for Townley Grammar School in 2020.
67. Please provide information (details) of the date and time of appointment of \_\_\_\_\_ of JUDICIUM CONSULTING LIMITED; as Clerk to Governors for Townley Grammar School in 2020.
68. Please provide information (details) of how the personal data of parents and students is protected from unauthorised dissemination by the use of email accounts and servers hosted by JUDICIUM CONSULTING LIMITED for complaints to be forwarded to Governors. Please provide details how this practice accords with the requirements of the General Data Protection Regulation (GDPR), Data Protection Act 2018 (DPA 2018). Please provide a copy of all current data sharing agreements with JUDICIUM CONSULTING LIMITED, or other suppliers or contractors.
69. Please provide information (details) of the public consultation for the "Complaints Policy & Procedure" suddenly "created on 15 June 2020 at 17:00 hours".
70. Please provide information (details) of discussion, emails, telephone calls, letters or meetings between \_\_\_\_\_ of JUDICIUM CONSULTING LIMITED (as Clerk to Governors for Townley Grammar School) and Trust board members, delegated subcommittee members or CEO, Head or other individual who agreed and approved the "Complaints Policy & Procedure" on 15 June 2020; between 12:30 hours to 17:00 hours which led to a new 8 page "Complaints Policy & Procedure" being "created on 15 June 2020 at 17:00 hours".
71. Please information (details) of copies of any legal advice provided by JUDICIUM CONSULTING LIMITED (a company "founded by a team of barristers") to Townley Grammar School between 1 May 2020 - June 2020 in relation to messages posted on Twitter, by current and former pupils and in relation to complaints between February 2020 to June 2020 of bias, discrimination and unequal treatment by current or former students.
72. Please provide information (details) of the Trust board meeting or delegated to subcommittee or individual who agreed and approved the 8 page "Complaints Policy & Procedure" suddenly "created on 15 June 2020 at 17:00 hours". Please provide any minutes, decision matrix or notes or other relevant information.
73. Please provide information (details) of the timetable for ratification of the Townley Grammar School Draft Child Protection and Safeguarding Policy created on 15 June 2020 at 15:10 hours.
74. Please provide information (details) of how the Complaints Policy & Procedure" suddenly "created on 15 June 2020 at 17:00 hours" was ratified and the Draft Child Protection and Safeguarding Policy (created on the same day) 15 June 2020 at 15:10 hours was not.
75. Please provide information (details) of complaints received between **1 January 2019 – 15 June 2020** under the "**Townley Grammar School Complaints Procedure for Parents Policy March 2015** (Review Date March 2020) Created: 25/02/2015 15:52: Last Modified By \_\_\_\_\_ ; 25/02/2020 11:38":
  - i. **Informal:** "discussions with the class teacher, a Learning Manager, Curriculum Leader, a senior member of staff or the Headteacher".

- ii. **Formal Stage 1:** details of matters put in writing to the head teacher by parents and students (not personal data) outlining their concern **about:**
  - the day-to-day running of the school
  - the interpretation of school policies
  - the actions or inactions of staff at the school
- iii. Please provide details of "response from the Headteacher within 15 working days"
- iv. **Formal Stage 2:** details of matters investigated by the Chairman of Governors or a governor nominated by the Chairman about:
  - school policies as determined by the governing body
  - the actions or inactions of the governing body
  - the actions or inactions of the head teacher
- v. Please provide details of all responses from Governors "within 15 working days of receiving the complaint".

76. Please provide information (details) of complaints received between **1 January 2019 – 19 June 2020** under the "**Complaints Policy & Procedure Odyssey Trust for Education March 2019**" "Approved" by "Trustees: March 2019" Created: 18/03/2019 14:12 Author: "":

#### **Stage 1: informal**

- i. Please provide details of numbers of complaints raised with members of staff or the headteacher, either in person or by letter, telephone or email.
- ii. Details of number complainants unclear who to contact, contacting the school office.
- iii. Details of numbers of acknowledgements of informal complaints by The Trust within 7 days, investigations and responses within 14 days

#### **Stage 2: formal**

- iv. Please provide details of numbers of complaints put to the headteacher:
  - In a letter or email
  - Over the phone
  - In person
  - Through a third party acting on behalf of parents or pupils
- v. Details of numbers of, investigations and responses provided within 14 days by the headteacher;
- vi. Details of numbers of, investigations and responses provided after 14 days by the headteacher;
- i. Details of numbers of complaints where the headteacher, has failed to provide any response conduct any investigation, or take any action whatsoever;

#### **Stage 3: review panel**

- ii. Please provide information (details) of numbers of complaints escalated to the panel hearing stage where the complainant was not satisfied with the response to the complaint at the second, formal, stage;
- iii. Please provide information (details) of numbers of complaints made against the headteacher forwarded to the Chair of Governors by the Clerk to the Governors.



- iv. Please provide information (details) of numbers of complaints made against the headteacher
- In a letter or email
  - Over the phone
  - In person
  - Through a third party acting on behalf of parents or pupils

not forwarded to the Chair of Governors by the Clerk to the Governors.

77. Please provide information (details) of all website updates and changes including website cache data for the Townley Grammar School website: <https://www.townleygrammar.org.uk/> for the period:

- i. 1 January 2019 – 1 September 2019
- ii. 2 September 2019 – 27 February 2020
- iii. 28 February 2020- 24 June 2020

78. Please provide information on why the £2.5 million "Total cash and cash equivalents" (£2,565,062) as detailed in the Odyssey Trust Annual Report & Financial Statements 2019 cannot be used for the Yr13 Leaver's Ball in place of the Townley Sixth Form ANNUAL LEG WAXING" of "BOYS" event.