

Freedom of Information Request

F.25.26.05: Questions Relating to Live Consultation

Date: 13.02.2026

Where possible, the Trust has provided high-level information about processes and policies. Where disclosure would reveal personal data or prejudice the effective conduct of public affairs during a live consultation, exemptions have been applied in accordance with the FOIA.

Question	Response
<p>Whether senior leadership roles are included in the restructuring process</p>	<p>We hold information relevant to your request:</p> <ul style="list-style-type: none"> ● Information relating to the consideration of alternative staffing models, including draft options, scenario planning and internal discussions, forms part of the Trust's deliberative processes. Disclosure during an ongoing consultation would be likely to inhibit the free and frank provision of advice, the exchange of views for the purposes of deliberation, and would otherwise prejudice the effective conduct of public affairs. This information is therefore exempt under section 36(2)(b)(i), 36(2)(b)(ii) and 36(2)(c) of the FOIA (see below for more information). ● In addition, information that would identify individual staff or specific posts considered during internal consultation is exempt under section 40(2), as it constitutes personal data. Disclosure of this information would breach the first principle of data protection law- that personal data is processed lawfully, fairly and in a transparent manner (Article 5(1)(a) UK GDPR). There is no strong legitimate interest that would override the prejudice that disclosure would cause to the rights and freedoms of the individuals concerned. ● The Trust can confirm that a range of structural and financial considerations are being reviewed. The consultation process is designed to ensure that all relevant factors are considered before final decisions are made.
<p>How the Trust has assured itself that senior leadership costs are proportionate and represent value for money</p>	<p>We hold information relevant to your request:</p> <ul style="list-style-type: none"> ● Leadership structures and associated costs are reviewed through established governance processes, including the Scheme of Delegation, which is publicly available at: https://www.initiolearning.org/about-initio/governance
<p>What measurable impact senior leadership has had on student outcomes and the quality of education at QE</p>	<p>We hold information relevant to your request:</p> <ul style="list-style-type: none"> ● Student outcomes and the quality of education at QE are monitored through established processes, including analysis of published performance data and external evaluations. ● Measurable outcomes for QE can be found in the Department for Education's published performance tables and in Ofsted inspection reports, which provide independent assessments of educational quality. ● Queen Elizabeth's School - School Performance & Exam Results ● Attendance at QE has improved by over 3% since 02 March 2025.
<p>whether senior leadership have managed funds effectively and made good hiring choices (e.g. QE has</p>	<p>We hold information relevant to your request:</p> <ul style="list-style-type: none"> ● Decisions relating to recruitment, appointment of senior leaders, and financial oversight are made in accordance with the Scheme of Delegation. This document sets out the processes

<p>had a number of heads and acting heads over the last few years - how were decisions made and who is accountable for those choices?)</p>	<p>for decision-making and the governance structures that determine accountability and is publicly available at: https://www.initiolearning.org/about-initio/governance</p> <ul style="list-style-type: none"> Information relating to the performance of identifiable individuals, specific hiring decisions, or internal deliberations is exempt under section 40(2) of the FOIA as it constitutes personal data. Disclosure of this information would breach the first principle of data protection law- that personal data is processed lawfully, fairly and in a transparent manner (Article 5(1)(a) UK GDPR). There is no strong legitimate interest that would override the prejudice that disclosure would cause to the rights and freedoms of the individuals concerned.
<p>What alternatives to frontline staff cuts were considered</p>	<p>We hold information relevant to your request:</p> <ul style="list-style-type: none"> Information relating to the consideration of alternative staffing models, including draft options, scenario planning and internal discussions, forms part of the Trust's deliberative processes. Disclosure during an ongoing consultation would be likely to inhibit the free and frank provision of advice, the exchange of views for the purposes of deliberation, and would otherwise prejudice the effective conduct of public affairs. This information is therefore exempt under section 36(2)(b)(i), 36(2)(b)(ii) and 36(2)(c) of the FOIA. In addition, information that would identify individual staff or specific posts considered during internal consultation is exempt under section 40(2), as it constitutes personal data. Disclosure of this information would breach the first principle of data protection law- that personal data is processed lawfully, fairly and in a transparent manner (Article 5(1)(a) UK GDPR). There is no strong legitimate interest that would override the prejudice that disclosure would cause to the rights and freedoms of the individuals concerned. The Trust can confirm that a range of structural and financial considerations are being reviewed. The consultation process is designed to ensure that all relevant factors are considered before final decisions are made.
<p>Why these alternatives were not pursued</p>	<p>We hold information relevant to your request:</p> <ul style="list-style-type: none"> As explained in the previous response, information relating to the evaluation of alternative options forms part of the Trust's internal deliberative processes and is exempt under section 36(2)(b)(i), 36(2)(b)(ii) and 36(2)(c) of the FOIA.
<p>How educational provision at QE will be protected during restructuring</p>	<p>We hold information relevant to your request:</p> <ul style="list-style-type: none"> Educational provision at QE is protected through the Scheme of Delegation, which establishes that the CEO is accountable for ensuring an effective strategy for building educational and leadership capacity "ahead of need," which is a key process for ensuring continuity. The scheme is publicly available at https://www.initiolearning.org/about-initio/governance
<p>How A-level choice and curriculum breadth will be maintained</p>	<p>We hold information relevant to your request:</p> <ul style="list-style-type: none"> A-level choice and curriculum breadth are protected through established curriculum planning processes and statutory requirements for post-16 provision set out in the national 16-19 Study Programme guidance, which ensures that a broad and balanced curriculum is maintained and that student choice

	<p>remains central to programme design. Oversight of curriculum breadth is provided by the Trust Board and senior education leaders as part of routine quality assurance.</p>
<p>How vulnerable subjects will be safeguarded</p>	<p>We hold information relevant to your request:</p> <ul style="list-style-type: none"> ● Draft subject viability assessments and internal deliberations form part of the Trust's deliberative processes. Disclosure during an ongoing consultation would be likely to inhibit the free and frank provision of advice, the exchange of views for the purposes of deliberation, and would otherwise prejudice the effective conduct of public affairs. This information is therefore exempt under section 36(2)(b)(i), 36(2)(b)(ii) and 36(2)(c) of the FOIA. ● All subjects, including those with smaller cohorts or specialist staffing requirements, are overseen through established curriculum planning processes and quality assurance frameworks.
<p>What reassurance is being provided directly to students concerned about staffing and subject continuity</p>	<p>We hold information relevant to your request:</p> <ul style="list-style-type: none"> ● Students are supported through established communication and pastoral processes. Reassurance about staffing and subject continuity is provided through routine channels such as tutor time, pastoral teams, and senior staff briefings, ensuring that students receive clear and age-appropriate information. These arrangements operate alongside student wellbeing practices and procedures, which ensure continuity of education and support for all learners during periods of organisational change. ● Examples of school practice and procedures for supporting students are publicly available at: https://www.queenelizabeths.com/page/?title=Student+Wellbeing&pid=30
<p>What assessment the Trust has made of current staff morale and staff absence levels at QE</p>	<p>We hold information relevant to your request:</p> <ul style="list-style-type: none"> ● Staff wellbeing and attendance are monitored through established HR processes and line-management structures, in line with the Trust's HR policies and procedures, and statutory duties as an employer. Support for staff is provided through routine pastoral and management channels. ● The recorded information relevant to this is contained within the Trust's HR policies relating to staff wellbeing, stress management and absence, including (but not limited to) the Promoting Positive Mental Health Policy and Stress Management Policies. ● These policies are publicly available at: https://www.initiolearning.org/about-initio/policies-and-documents
<p>How the Trust will mitigate increased stress and potential rises in staff absence during the restructuring process</p>	<p>This is not something for which the Trust holds recorded information, and responding would require the creation of new commentary, which falls outside the scope of the Act.</p> <p>However, we can state that staff are supported through line-management structures, occupational health referrals, wellbeing resources and HR policies and processes. Colleagues also have access to a dedicated employee assistance programme.</p>

<p>What concrete measures will be put in place to support staff wellbeing, maintain attendance, and prevent further instability for students</p>	<p>This is not something for which the Trust holds recorded information, and responding would require the creation of new commentary, which falls outside the scope of the Act.</p> <p>However, as above, we can state that staff support is provided through established HR and pastoral processes, and that continuity of education is maintained through the Trust's curriculum, safeguarding and quality assurance frameworks.</p>
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Public Interest Test (for section 36 exemptions)

The Qualified Person for the Trust has given their reasonable opinion that the exemptions under section 36(2)(b) and 36(2)(c) are engaged.

Because Section 36 is a qualified exemption, we have also carried out a public interest test. We recognise the strong public interest in transparency, particularly where staffing, curriculum planning and the use of public funds are involved. However, at this stage, we consider that the public interest in allowing the consultation to run properly and ensuring that decision-makers can deliberate freely outweighs the public interest in disclosure. In particular, disclosure may:

- disrupt the consultation by placing incomplete or evolving information into the public domain.
- discourage staff and stakeholders from contributing openly, knowing that discussions may be disclosed before proposals are finalised.
- create confusion or unnecessary concern while options are still being considered.
- limit the space needed for leaders and advisers to explore, test and refine proposals before decisions are made.