



**Freedom of Information Act
Publication Scheme
December 2024**

| Owner | Revision no. | Revision Date | Effective From | Distribution | Approved by | Revision Date |
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| GCO | V2.00 | Dec 2024 | 01.12.2024 | Trust wide | Trust Board | 01/12/2025 |

| Version | Date | Summary of Changes |
|---------|------------|--|
| V1.00 | 01/04/2023 | Original scheme |
| V2.00 | 01/12/2024 | No significant changes. Policy reviewed, requires annual review. Documents available under Publication Scheme updated in line with DPO's advice. |

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1 Introduction

The Freedom of Information Act 2000 gives individuals the right to access official information from public bodies. Under the Act, any person has a legal right to ask for access to information held by the school. They are entitled to be told whether the Aspire Schools Trust (the Trust) hold the information, and to receive a copy, subject to certain exemptions. While the Act assumes openness, it recognises that certain information is sensitive. There are exemptions to protect this information. Full details on how requests can be made are set out in section 1 of this policy.

Public Authorities should be clear and proactive about the information they will make public. For this reason, a publication scheme is available and can be found at section 2 of this policy.

This policy does not form part of any individual's terms and conditions of employment with the Trust and is not intended to have contractual effect.

This policy should be used in conjunction with the Trust's Data Protection and Subject Access Request Policy.

2 Responsibilities

The Headteacher in each school within the Aspire Schools Trust is responsible for ensuring Freedom of Information compliance within their setting. Day to day responsibilities for Freedom of Information (including liaising with the Trust appointed Data Protection Officer) may be delegated by the Headteacher to another member of staff within their school.

All members of staff are required to familiarise themselves with the content of this policy and comply with the provisions contained within it. A Freedom of Information request can be addressed to any member of staff and all staff need to be aware of the process for dealing with requests.

3 Making a Freedom of information request

Requests under Freedom of Information (FOI) should be made to the Governance and Compliance Officer, Aspire Schools Trust, Main Road, Welbourn, LN5 0PA or electronically to dpo@aspire-school-trust.org. However, the request can be addressed to anyone in any school across the Trust. All staff need to be aware of the process for dealing with requests. If staff receive a FOI request in their inbox it should be instantly forwarded to the Trust's Governance and Compliance Officer, email dpo@aspire-school-trust.org

Requests for information that are not data protection or environmental information requests will be covered by the Freedom of Information Act:

Data Protection enquiries (or Subject Access Requests/SARs) are requests where the enquirer asks to see what personal information we hold about the enquirer. If the enquiry is a Data Protection request, the Trust's Data Protection Policy should be followed.

Environmental Information Regulations enquiries are those which relate to air, water, land, natural sites, built environment, flora and fauna, health, and any decisions and activities affecting any of these. These could, therefore, include enquiries about recycling, phone masts, school playing fields, car parking etc. If the enquiry is about environmental information, follow the guidance on the Department for Environment, Food and Rural Affairs (DEFRA) website.

Freedom of Information requests **must** be made in writing, (including email), and should include the enquirer's name, correspondence address (email addresses are allowed), and state what information they require. There must be enough information in the request to be able to identify and locate the information. If this information is covered by one of the other pieces of legislation (as referred to above), they will be dealt with under the relevant policy/procedure related to that request.

If the request is ambiguous and/or further information is required in order to deal with the request, we will request this further information directly from the individual making the request. Please note that the Trust does not have to deal with the request until the further information is received. Therefore, the time limit starts from the date that the Trust receives all information required in order to deal with the request.

The requester does not have to mention the Act, nor do they have to say why they want the information. There is a duty to respond to all requests, telling the enquirer whether or not the information is held, and supplying any information that is held, except where exemptions apply. There is a time limit of 20 school days (i.e. excluding school holidays) for responding to the request.

4 Information

Provided all requirements are met for a valid request to be made, we will provide the information that it holds (unless an exemption applies).

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

- That the Trust has created; or
- That the Trust has received from another body or person; or
- Held by another body on the Trust's behalf.

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

If the information is held by another public authority, such as the Local Authority, first check with them they hold it, then transfer the request to them. If this applies, we will notify the enquirer that we do not hold the information and to whom they have transferred the request. We will continue to answer any parts of the enquiry in respect of information it does hold.

When we do not hold the information, we have *no duty to create or acquire it* just to answer the enquiry; although a reasonable search will be made before confirming whether we have the information requested.

If the information requested is already in the public domain, for instance, through the Publication Scheme or on the Trust/School's website, we will direct the enquirer to the information and explain how to access it.

The requester has the right to be told if the information requested is held by the Trust (subject to any of the exemptions). This obligation is known as the Trust's *duty to confirm or deny* that it holds the information. However, the Trust does not have to confirm or deny if:

- The exemption is an absolute exemption; or
- In the case of qualified exemptions, confirming or denying would itself disclose exempted information.

5 Vexatious Requests

There is no obligation on the Trust to comply with vexatious requests. A vexatious request is one 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 Trust. However, this does not provide an excuse for poor records management.

In addition, the Trust does not have to comply with repeated identical or substantially similar requests from the same applicant unless a reasonable interval has elapsed between requests.

6 Fees

The Trust may charge the requester a fee for providing the requested information. This will be dependent on whether the staffing costs deployed in complying with the request exceeds the threshold. The threshold is currently £450 with staff costs calculated at a fixed rate of £25 per hour (therefore 18 hours' work is required before the threshold is reached).

If a request would cost less than the threshold, then the Trust can only charge for the cost of informing the applicant whether the information is held, and communicating the information to the applicant (e.g. photocopying, printing and postage costs).

When calculating costs/threshold, the Trust can take account of the staff costs/time in determining whether the information is held by the Trust, locating and retrieving the information, and extracting the information from other documents. The Trust will not take account of the costs involved with considering whether information is exempt under the Act.

If a request would cost more than the appropriate limit, (£450) the Trust can turn the request down, answer and charge a fee or answer and waive the fee.

If the Trust are going to charge they will send the enquirer a fees notice. The Trust does not have to comply with the request until the fee has been paid. More details on fees can be found on the ICO website.

If planning to turn down a request for cost reasons, or charge a higher fee, the Trust will contact the applicant in advance to discuss whether they would prefer the scope of the request to be modified so that, for example, it would cost less than the appropriate limit.

Where two or more requests are made to the Trust by different people who appear to be acting together or as part of a campaign the estimated cost of complying with any of the requests may be taken to be the estimated total cost of complying with them all.

7 Time Limits

Compliance with a request must be prompt and within the time limit of 20 school days (this does not include the school holidays or weekends) or 60 working days if this is shorter. Failure to comply could result in a complaint by the requester to the Information Commissioner's Office. The response time starts counting as the first day from the next working day after the request is received (so if a request was received on Monday 6th October the time limit would start from the next working day, the 7th October).

Where the Trust has asked the enquirer for more information to enable it to answer, the 20 school days start time begins when this further information has been received.

If some information is exempt this will be detailed in the Trust's response.

If a qualified exemption applies and the Trust needs more time to consider the public interest test, the Trust will reply in 20 school days stating that an exemption applies but include an estimate of the date by which a decision on the public interest test will be made. This should be within a "reasonable" time.

Where the Trust has notified the enquirer that a charge is to be made, the time period stops until payment is received.

8 Third Party Data

Consultation of third parties may be required if their interests could be affected by release of the information requested, and any such consultation may influence the decision.

Consultation will be necessary where:

- Disclosure of information may affect the legal rights of a third party, such as the right to have certain information treated in confidence or rights under Article 8 of the European Convention on Human Rights;
- The views of the third party may assist the Trust to determine if information is exempt from disclosure; or
- The views of the third party may assist the Trust to determine the public interest test.

Personal information requested by third parties is also exempt under this policy, where release of that information would breach the Data Protection Act. If a request is made for a document (e.g. Governing Body minutes) which contains personal information whose release to a third party would breach the Data Protection Act, the document may be issued by blanking out the relevant personal information as set out in the redaction procedure.

9 Exemptions

The presumption of the Freedom of Information Act is that the Trust will disclose information unless the Act provides a specific reason to withhold it. The Act recognises the need to preserve confidentiality and protect sensitive material in certain circumstances.

The Trust may refuse all/part of a request, if one of the following applies: -

- 1) There is an exemption to disclosure within the act;
- 2) The information sought is not held;
- 3) The request is considered vexatious or repeated; or
- 4) The cost of compliance exceeds the threshold.

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

There are two general categories of exemptions:

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

9.1 Absolute Exemptions

There are eight absolute exemptions set out in the Act. However, the following are the only absolute exemptions which will apply to the Trust: -

- Information accessible to the enquirer by other means (for example by way of the Publication Scheme);
- National Security/Court Records;
- Personal information (i.e. information which would be covered by the Data Protection Act);
- Information provided in confidence.

If an absolute exemption exists, it means that disclosure is not required by the Act. However, a decision could be taken to ignore the exemption and release the information, taking into account all the facts of the case if it is felt necessary to do so.

9.2 Qualified Exemptions

If one of the below exemptions apply (i.e. a qualified disclosure), there is also a duty to consider the public interest in confirming or denying that the information exists and in disclosing information.

The qualified exemptions under the Act which would be applicable to the Trust are: -

- Information requested is intended for future publication (and it is reasonable in all the circumstances for the requester to wait until such time that the information is actually published);
- Reasons of National Security;
- Government/International Relations;
- Release of the information is likely to prejudice any actual or potential legal action or formal investigation involving the Trust;
- Law enforcement (i.e. if disclosure would prejudice the prevention or detection of crime, the prosecution of offenders or the administration of justice);
- Release of the information would prejudice the ability of the Trust to carry out an effective audit of its accounts, resources and functions;
- For Health and Safety purposes;
- Information requested is Environmental information;
- Information requested is subject to Legal professional privilege; and
- For *Commercial Interest* reasons.

Where the potential exemption is a qualified exemption, the Trust will consider the public interest test to identify if the public interest in applying the exemption outweighs the public interest in disclosing it.

In all cases, before writing to the enquirer, the person given responsibility by the Trust for dealing with the request will need to ensure that the case has been properly considered, and that the reasons for refusal, or public interest test refusal, are sound.

10 Refusal

If the Trust decides to refuse a request, the Trust will send a refusals notice, which must contain

- The fact that the responsible person cannot provide the information asked for;
- Which exemption(s) apply;
- Why the exemption(s) apply to this enquiry (if it is not self-evident);
- Reasons for refusal; and
- The Trust's complaints procedure.

For monitoring purposes and in the case of an appeal against a decision not to release the information or an investigation by the Information Commissioner, the responsible person must keep a record of all enquiries where all or part of the requested information is withheld and exemptions are claimed. The record must include the reasons for the decision to withhold the information.

The Trust will get advice from their Data Protection Officer prior to withholding data under an exemption or refusing the request in its entirety.

11 Appendix 1 – Freedom of Information Publication Scheme

12 Introduction

This publication scheme follows a model approved by the Information Commissioners Office.

This scheme is not a list of individual publications but rather a description of the classes of types of information that we are committed to publishing. This list is not an exhaustive list of all of the types of information that we publish. We try to proactively publish as much information as we can where the information would have a wider public interest.

This scheme does not include information that we consider to be sensitive, such as personal information, information prevented from disclosure by law or information about security matters.

13 Classes of Information

There are six classes of information that we hold: -

- Who we are and what we do
- What we spend and how we spend it
- What our priorities are and how we are doing
- How we make decisions
- Our policies and procedures
- The services we offer.

14 Making Information Available

Information will generally be made available on our Trust and schools websites. Where it is not possible to include this information on our websites, or when an individual does not wish to access the information by the website the Trust will indicate how information can be obtained by other means and provide it by those means. This may be detailed in response to a request or within the scheme itself. This will usually be by way of a paper copy.

In some exceptional circumstances, some information may be available only by viewing in person. Where this manner is specified, contact details will be provided. An appointment to view the information will be arranged within a reasonable timescale.

Information will be provided in the language in which it is held or in such other language that is legally required. Where we are legally required to translate any information, we shall do so.

15 Charges for Information Published Under this Scheme

The Trust may charge individuals for information published under this scheme. The purpose of this scheme is to make the maximum amount of information readily available at the minimum inconvenience and cost to the public. Charges made by the Trust for routinely published material will be justified and transparent and kept to a minimum.

Material which is published and accessed on the website will be provided free of charge.

Charges may be made for information subject to a charging regime specified by law.

Charges will be made to cover:

- photocopying;
- postage and packaging; and
- the costs directly incurred as a result of viewing information.

Single copies of information requested which are covered by the publication scheme will be provided free unless otherwise stated within the scheme. If the request involved a large amount of photocopying, printing or postage, then this may be at a cost. If this is the case we will let you know as well as let you know the cost before fulfilling your request.

| TYPE OF CHARGE | DESCRIPTION | BASIS OF CHARGE |
|--------------------------|--|--|
| Disbursement cost | Photocopying/printing @ 4p per sheet (black & white) | Actual cost |
| | Photocopying/printing @ 6p per sheet (colour) | Actual cost |
| | Postage | Actual cost of Royal Mail standard 2 nd class |
| Statutory Fee | In accordance with the relevant legislation (quote the actual statute) | |

16 How to request information

If you require a paper version of any of the documents within the scheme please contact us using the contact details below.

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| Aspire Schools Trust | c/o Sir William Robertson Academy Main Road Welbourn LN5 0PA |
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| | Tel: 01400 272422 enquiries@aspire-school-trust.org |
| Sir William Robertson Academy | Main Road Welbourn LN5 0PA Tel: 01400 272422 enquiries@swracademy.org |
| Bassingham Primary School | Lincoln Road Bassingham LN5 9HQ Tel: 01522 788395 enquiries@bassingham-school.org |
| Westgate Academy | Westgate Lincoln LN1 3BQ Tel: 01522 528308 enquiries@westgate.lincs.sch.uk |

Please mark all correspondence *Publication Scheme Request* in order to help us process your request quickly. If the information you are looking for isn't available via the scheme, you can still contact us to ask if we have this information.

17 Internal Review

The requester has the right to ask for an internal review if they are dissatisfied with the handling of a request.

Internal review requests should be made within 40 working days of the initial response. This deadline should be communicated to the requester in that response. We are not obliged to provide a review if it is requested after more than 40 working days.

Requests for internal review must make clear why they are dissatisfied with the original decision, detailing why they feel that the Trust has not complied with Freedom of Information Law.

18 Complaints and/or Appeals

Any written (including email) expression of dissatisfaction should be handled through the existing complaints procedure. Wherever practicable the review should be handled by someone not involved in the original decision.

The Trust Board should set and publish a target time for determining complaints and information on the success rate in meeting the target. We maintain records of all complaints and their outcome.

If the outcome is that the Trust's original decision or action is upheld, then the applicant can appeal to the Information Commissioner. The appeal can be made via their website or in writing to:

Customer Contact
Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
SK9 5AF

19 The Publication Scheme

| Information to be published | Trust/ School | How the information can be obtained: website link or by hard copy | Cost |
|--|------------------|---|---|
| Class 1 – Who we are and what we do | | | |
| Who's Who - including structure | AST | Aspire Schools Trust - Our People | Website: Free Hard Copy: See page 10 for pricing |
| | SWRA | Sir William Robertson Academy - Staff | |
| | BPS | Staff Bassingham Primary School | |
| | WGA | Academy Staff Westgate Academy | |
| Who's who on the governing body / board of governors and the basis of their appointment | AST | Aspire Schools Trust - Governance | |
| | SWRA | Sir William Robertson Academy - Governance | |
| | BPS | Governors Bassingham Primary School | |
| | WGA | Governance Westgate Academy | |
| Instrument of Government / Articles of Association | AST | Corporate Documents – Aspire Schools Trust | |
| | SWRA | Governors – Sir William Robertson Academy (swracademy.org) | |
| | BPS | https://www.bassinghamschool.org/governing-body/ | |
| | WGA | Financial Documents Westgate Academy | |
| Term of office at each category of trustee and governor if it last less than four years | All | Aspire Schools Trust - Governance | |
| The name of anybody entitled to appoint any category of governor or trustee | All | Scheme of Delegation Articles of Association | |
| Category of the school | All | ASPIRE SCHOOLS TRUST - GOV.UK | |
| A statement on progress in implementing the action plan drawn up following an inspection | All | Hard copy: available on request – contact Trust | |
| Minutes from trust board and committee meetings | All | Hard copy: available on request – contact Trust | |
| A financial statement including gifts made to the school and amounts paid to governors and trustees for expenses | All | Hard copy: available on request – contact Trust | |
| Information about the implementation of the trust's policy on special educational needs and any changes to the policy join the last year | All | SEND Policy | |
| A description of arrangements for the admission of pupils with disabilities including details of the steps to prevent disabled students being treated less | SWRA | Sir William Robertson Academy - Key Information & Policies | |

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| favourably than other pupils, details of existing facilities to assist access to the school by pupils with disabilities, the accessibility plan covering future policies for increasing access by those with disabilities to the school | BPS | Policies Bassingham Primary School |
| | WGA | Policies Westgate Academy |
| A statement of policy on whole staff development identifying how teachers professional development impacts on teaching and learning | All | Hard copy: available on request – contact Trust |
| Number of pupils on roll | All | ASPIRE SCHOOLS TRUST - GOV.UK |
| National curriculum assessment results were appropriate key stages with national summary figures | All | ASPIRE SCHOOLS TRUST - Compare school and college performance data in England - GOV.UK |
| Statement on aims and values | SWRA | Sir William Robertson Academy - Vision & Values |
| | BPS | School Values Bassingham Primary School |
| | WGA | Aims of Westgate Westgate Academy |
| Admissions information | SWRA | Sir William Robertson Academy - Student Admissions |
| | BPS | Admissions Bassingham Primary School |
| | WGA | Admissions Process Westgate Academy |
| Uniform | SWRA | Sir William Robertson Academy - Uniform |
| | BPS | Uniform Information Bassingham Primary School |
| | WGA | Uniform Information Westgate Academy |
| Rates of pupils authorised and unauthorised absence | All | ASPIRE SCHOOLS TRUST - Compare school and college performance data in England - GOV.UK |
| Address and contact details for the Headteacher and for the governing body, via the school (named contacts where possible). | AST | Aspire Schools Trust - Contact Us |
| | SWRA | Sir William Robertson Academy - Home Sir William Robertson Academy - Governance |
| | BPS | Contact Details Bassingham Primary School Governors Bassingham Primary School |
| | WGA | Contact Details Westgate Academy Governance Westgate Academy |
| School prospectus | SWRA | Sir William Robertson Academy - Prospectus |
| | BPS | School Tour Bassingham Primary School |
| | WGA | Home Westgate Academy |

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| School session times and term dates | SWRA | Term Dates and School Day – Sir William Robertson Academy (swracademy.org) | |
| | BPS | Term Dates/School Day Bassingham Primary School | |
| | WGA | Term Dates Westgate Academy | |
| Class 2 – What we spend and how we spend it | | | |
| Financial Annual Report and Financial Statements (Final Accounts) | All | Aspire Schools Trust - Annual Report and Accounts | Website: Free |
| Details of expenditure over £5000 including the names supplier and information about the transaction | All | Hard copy: available on request – contact Trust | Hard Copy: See page 10 for pricing |
| Procurement and contracts | All | Hard copy: available on request – contact Trust | |
| Pupil premium | SWRA | Sir William Robertson Academy - Pupil Premium | |
| | BPS | Pupil Premium Bassingham Primary School | |
| | WGA | Pupil Premium Westgate Academy | |
| Utilities and school running expenditure | All | Hard copy: available on request – contact Trust | |
| Pay policy | All | Hard copy: available on request – contact Trust | |
| Staff allowances and expenses that can be incurred or claimed, with totals paid to individual senior staff members | All | Hard copy: available on request – contact Trust | |
| Governors' allowances that can be incurred or claimed, and a record of total payments made to individual governors/trustees | All | Hard copy: available on request – contact Trust | |
| Class 3 – What are our priorities and how are we doing | | | |
| The latest Ofsted report | SWRA | https://reports.ofsted.gov.uk/provider/23/138839 | Website: Free |
| | BPS | https://reports.ofsted.gov.uk/provider/21/145437 | Hard Copy: See page 10 for pricing |
| | WGA | 50174146 (ofsted.gov.uk) | |
| Charging and Remission policy | All | Aspire Schools Trust - Policies | |
| Health and safety policy and risk assessment | All | Hard copy: available on request – contact Trust | |
| Staff conduct, discipline and grievance | All | Hard copy: available on request – contact Trust | |
| Curriculum circulars and statutory instruments | All | Aspire Schools Trust - Legal Documents | |
| | SWRA | Sir William Robertson Academy - Curriculum | |

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| | BPS | Curriculum Bassingham Primary School | |
| | WGA | Curriculum Westgate Academy | |
| Performance management policy and procedures | All | Hard copy: available on request – contact Trust | |
| Class 4 – How we make decisions | | | |
| Admissions policy/decisions (not individual admission decisions) – where applicable | SWRA | Sir William Robertson Academy - Student Admissions https://www.lincolnshire.gov.uk/school-admissions | Website: Free Hard Copy: See page 10 for pricing |
| | BPS | Admissions Bassingham Primary School https://www.lincolnshire.gov.uk/school-admissions | |
| | WGA | Admissions Process Westgate Academy https://www.lincolnshire.gov.uk/school-admissions | |
| Agendas and minutes of meetings of the governing body and its committees. (NB this will exclude information that is properly regarded as private to the meetings) | All | Hard copy: available on request – contact Trust | |
| Class 5 – Our policies and procedures | | | |
| Curriculum policy | SWRA | Sir William Robertson Academy - Curriculum | |
| | BPS | Curriculum Bassingham Primary School | |
| | WGA | Curriculum Westgate Academy | |
| Complaints policy | All | Aspire Schools Trust - Policies | |
| Equality and diversity policy | All | Aspire Schools Trust - Policies | |
| Child protection and safeguarding policy | SWRA | Sir William Robertson Academy - Safeguarding | |
| | BPS | Policies Bassingham Primary School | |
| | WGA | Policies Westgate Academy | |
| Relationships and sex education policy | SWRA | Sir William Robertson Academy - Key Information & Policies | |
| | BPS | Policies Bassingham Primary School | |
| | WGA | Policies Westgate Academy | |

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|--|------|--|---|
| Inclusion policy | SWRA | Sir William Robertson Academy - Key Information & Policies | |
| | BPS | Policies Bassingham Primary School | |
| | WGA | Policies Westgate Academy | |
| Behaviour Policy | SWRA | Sir William Robertson Academy - Key Information & Policies | |
| | BPS | Policies Bassingham Primary School | |
| | WGA | Policies Westgate Academy | |
| Class 6 – The services we offer | | | |
| Extra-curricular activities | SWRA | Sir William Robertson Academy - Extra-Curricular Activities | Website: Free Hard Copy: See page 10 for pricing |
| | BPS | Home Bassingham Primary School | |
| | WGA | Enrichment Activities Westgate Academy | |