



Freedom of Information Act Policy

Policy Group	E	Data, IT, GDPR & Security
Title	E3	Freedom of Information Act
Trust sub-committee		Resources
Last reviewed		November 2024
Next scheduled review		November 2025
Co-ordinated by		AET COO, Phil O'Neill



1 This is the Ambition Education Trust Publication Scheme on information available under the Freedom of Information Act 2000. Reference to the term school in this publication relates to each of the individual schools within the Ambition Education Trust.

2 **Aims**

- 2.1 Ambition Education Trust (The Trust) is committed to the Freedom of Information Act 2000 (FOIA), which came into effect on 1 January 2005 and which includes Academies by the Academies Act 2010, with effect from 1 January 2011. The Trust is committed to the principles of accountability and the general right of access to information, subject to legal exemptions. This policy outlines our framework for managing requests.
- 2.2 Under the FOIA 2000, any person has a legal right to ask for access to information held by the school. They are entitled to be told whether the school holds the information, and to receive a copy, subject to certain exemptions.
- 2.3 The information which the school routinely makes available to the public is included in the Publication Scheme. Requests for other information are dealt with in accordance with statutory guidance. Whilst the Act assumes openness, it recognises that certain information is sensitive. There are exemptions to protect this information.
- 2.4 The Publication Scheme will set out:
- 2.4.1 the classes of information which we publish or intend to publish;
 - 2.4.2 the manner in which the information will be published; and
 - 2.4.3 whether the information is available free of charge or on payment.
- 2.5 Information will be made available, unless:
- 2.5.1 we do not hold the information;
 - 2.5.2 the information is exempt under one of the FOI exemptions or Environmental Information Regulations (EIRs) exceptions, or its release is prohibited under another statute;
 - 2.5.3 the information is archived, out of date or otherwise inaccessible; or,
 - 2.5.4 it would be impractical or resource-intensive to prepare the material for routine release.
- 2.6 The Scheme covers information already published and information which is to be published in the future. All information in the Publication Scheme is either available on the school website to download and print off or available in paper form. The Publication Scheme is derived from the model Publication Scheme for schools approved by the Information Commissioner.
- 2.7 The Trust endeavours to make as much information as possible available online. If any of the information is not available online, the scheme will explain how it can be accessed. The school continues to develop this scheme to increase the amount of information that can be accessed through it.
- 2.8 Requests for information about anything relating to the environment – such as air, water, land, the natural world, or the built environment and any other factor or measure affecting these – are covered by the Environmental Information Regulations. Requests under EIR are dealt with in the same way as those under FOIA, but they do not need to

be written and can be verbal.

- 2.9 The Trust does not charge for information which is accessed from the respective schools websites. However, it may pass on costs for reproducing information or providing it in alternative formats. Information for some specialist information services is chargeable. Details of these costs are listed in the **Schedule of Charges**. Please also refer to **Appendix B**.

3 Procedure

- 3.1 If you require a paper version of any of the documents within the scheme, please contact the Trust by telephone, email or letter. Contact details are set out below or you can visit our website at:

Ambition Education Trust

www.ambitioneducationtrust.org

Email: info@ambitioneducationtrust.org

Tel: 01727 759240

Contact Address: Ambition Education Trust, The Ridgeway, St Albans, Herts AL4 9NX

Beech Hyde Primary School

www.beechhyde.herts.sch.uk

Email: admin@beechyhyde.aetrust.uk

Tel: 01582 832661

Contact Address: Beech Hyde Primary School, Nurseries Road, Wheathampstead, St Albans, Hertfordshire, AL4 8TP

Garden Fields JMI School

www.gardenfields.herts.sch.uk

Email: admin@wheatfieldsinfants.aetrust.uk

Tel: 01727 890440

Contact Address: Garden Fields JMI School, Townsend Drive, St Albans, Hertfordshire, AL3 5RL.

Ridgeway Academy

www.ridgeway.herts.sch.uk

Email: admin@ridgeway.aetrust.uk

Tel: 01707 351350

Contact Address: Ridgeway Academy, Hens Lane, Welwyn Garden City, AL7 2AF

Sandringham School

www.sandringham.herts.sch.uk

Email: admin@sandringham.aetrust.uk

Tel: 01727 799560

Contact Address: Sandringham School, The Ridgeway, St Albans, Herts. AL4 9NX

Skyswood Primary and Nursery School

www.skyswood.herts.sch.uk

Email: admin@skyswood.aetrust.uk

Tel: 01727 854164

Contact Address: Skyswood Primary and Nursery School, Chandlers Road, St Albans,

Hertfordshire, AL4 9RS.

The Adeyfield Academy

www.adeyfieldschool.org

Email: admin@adeyfield.aetrust.uk

Tel: 01442 406020

Contact Address: The Adeyfield Academy, Longlands, Hemel Hempstead, Hertfordshire, HP2 4DE

St Albans Girls School

www.stags.herts.sch.uk

Email: admin@stags.aetrust.uk

Tel: 01727 853134

Contact Address: St Albans Girls School, Sandridgebury Lane, St Albans, Hertfordshire, AL3 6DB

Verulam School

www.verulamschool.co.uk

Email: admin@verulam.aetrust.uk

Tel: 01727 766100

Contact Address: Verulam School, Brampton Road, St Albans, Hertfordshire AL1 4PR

Wheatfields Infants' and Nursery School

www.wheatfieldsinfants.herts.sch.uk

Email: admin@wheatfieldsinfants.aetrust.uk

Tel: 01727 859978

Contact Address: Wheatfields Infants' and Nursery School, Downes Road, St Albans, Hertfordshire, AL4 9NT.

Wheatfields Junior School

www.wheatfieldsjm.herts.sch.uk

Email: admin@wheatfieldsjm.aetrust.uk

Tel: 01727 757444

Contact Address: Wheatfields Junior School, Downes Road, St Albans, Hertfordshire, AL4 9NT.

- 3.2 To help us process your request quickly, please clearly mark any correspondence "PUBLICATION SCHEME REQUEST"
- 3.3 If the information you're looking for isn't available via the scheme, and isn't on the Trust or individual schools' websites, you can still contact the Trust/schools to ask if they have it.
- 3.4 Any request for any information from the Trust is technically a request under the FOI, whether or not the individual making the request mentions the FOI. However, the Information Commissioner's Office has stated that routine requests for information (such as a parent requesting a copy of a policy) can be dealt with outside of the provisions of the Act.
- 3.5 In all non-routine cases, if the request is simple and the information is to be released, then the individual who received the request can release the information, but must ensure that

this is done within the timescale set out below. A copy of the request and response should then be sent to the Trust Chief Operating Officer.

- 3.6 All other requests should be referred in the first instance to the Trust Chief Operating Officer, who may allocate another individual to deal with the request. This must be done promptly, and in any event within 3 working days of receiving the request.
- 3.7 When considering a request under FOI, you must bear in mind that release under FOI is treated as release to the general public, and so once it has been released to an individual, anyone can then access it, and you cannot restrict access when releasing by marking the information “confidential” or “restricted”. In certain circumstances restricted disclosures can be made.
- 3.8 For an FOI request to be valid under the Act it must be in writing, include the requestor’s real name and address for correspondence, and must make a genuine attempt to describe the information requested
- 3.9 The Trust will follow the ICO guidance ([HERE](#)) in determining as to whether information is held by the Trust.
- 3.10 The second stage is to decide whether the information can be released, or whether one of the exemptions set out in the Act applies to the information.
- 3.11 Common exemptions that might apply include:
 - 3.11.1 Section 40 (1) – the request is for the applicant’s personal data. This must be dealt with under the subject access regime in the DPA, detailed in paragraph 9 of the DPA policy above;
 - 3.11.2 Section 40 (2) – compliance with the request would involve releasing third party personal data, and this would be in breach of the DPA principles as set out in the DPA policy above;
 - 3.11.3 Section 41 – confidential information that has been sent to the Trust (but not the Trust’s own information) and complying with the request would constitute a breach of confidence that could be upheld in legal proceedings;
 - 3.11.4 Section 21 – information that is already publicly available, even if payment of a fee is required to access that information and it is not reasonable to disclose the information before then;
 - 3.11.5 Section 22 – information that the Trust intends to publish at a future date;
 - 3.11.6 Section 43 – information that would prejudice the commercial interests of the Trust and / or a third party;
 - 3.11.7 Section 38 – information that would endanger the physical health, mental health or safety of any individual;
 - 3.11.8 Section 31 – information which may prejudice the effective detection and prevention of crime – such as the location of CCTV cameras;
 - 3.11.9 Section 36 – information which, in the opinion of the Board of Directors of the Trust, would prejudice the effective conduct of the Trust. There is a special form for this on the ICO’s website to assist with the obtaining of the chair’s opinion. The sections mentioned in italics are qualified exemptions. This means that even if the exemption applies to the information, the Trust also has to carry out a public interest weighting exercise, balancing the public interest in the information being released, as against the public interest in withholding the information.

4 Exemptions

- 4.1 Certain information is subject to either absolute or qualified exemptions. The exemptions are listed in Appendix A.
- 4.2 When the Trust/schools wish to apply a qualified exemption to a request, it will invoke the public interest test procedures to determine if public interest in applying the exemption outweighs the public interest in disclosing the information.
- 4.3 The school will maintain a register of requests where we have refused to supply information, and the reasons for the refusal. The register will be retained for 5 years from the date of request.

5 Public Interests Test

Unless it is in the public interest to withhold information, it has to be released. The schools will apply the Public Interest Test before any qualified exemptions are applied. For information on applying the Public Interest Test see Appendix A.

6 Charges

Information published on our website is free, although you may incur costs from your Internet Service Provider. If you don't have internet access, you can access our website using a local library or an internet café. Single copies of information covered by this publication are provided free unless stated otherwise. If your request means that we have to do a lot of photocopying or printing, or pay a large postage charge, or is for a priced item such as some printed publications or videos we will let you know the cost before fulfilling your request. Where there is a charge this will be indicated by a £ sign in the description box. The Trust/schools reserve the right to refuse to supply information where the cost of doing so exceeds the statutory maximum, currently £450.

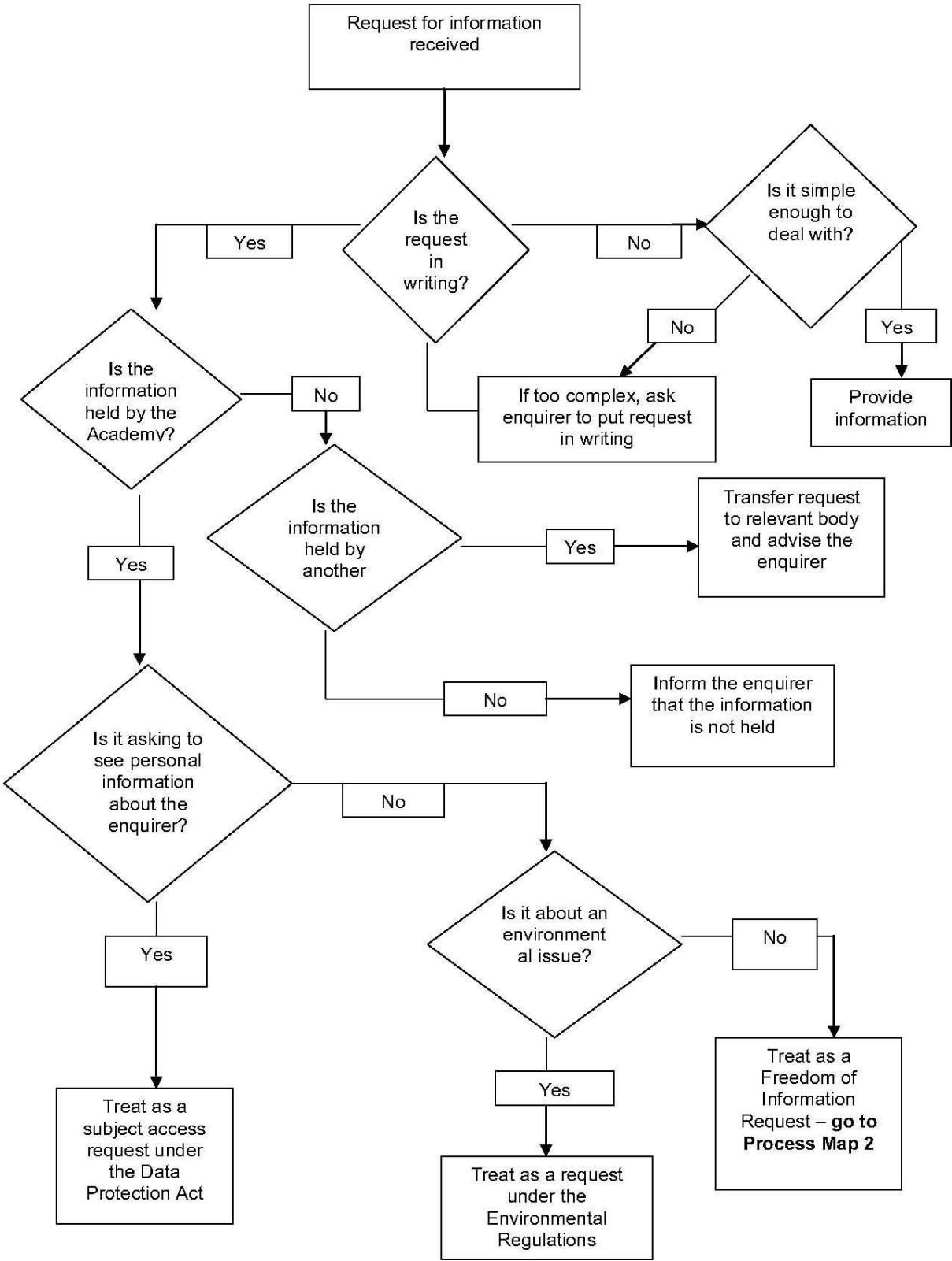
7 Responsibilities

The Trust has delegated the day to day responsibility for compliance with FOIA to the respective Headteachers. The Freedom of Information Policy will be reviewed biennially by each local Governing Body.

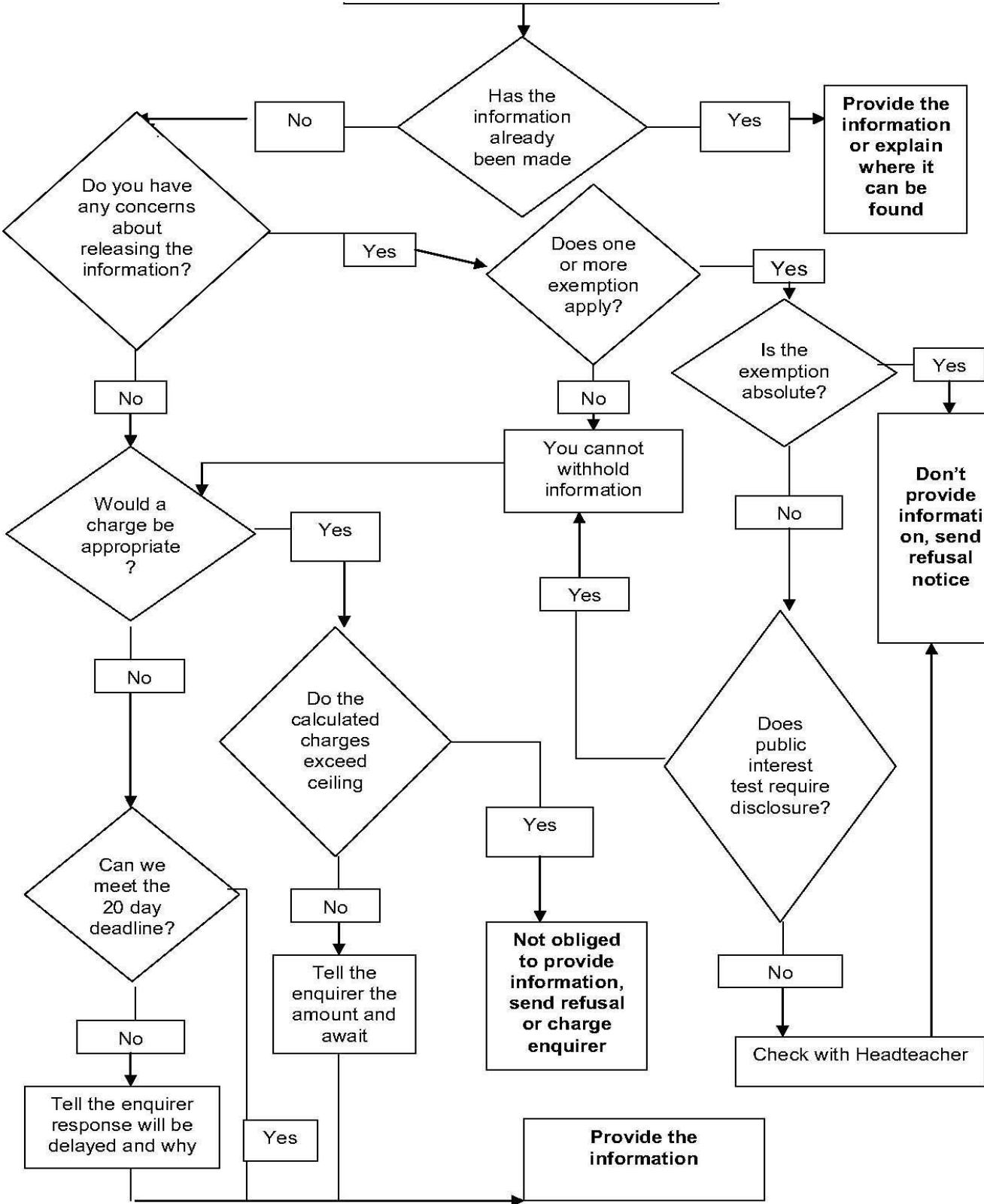
8 FEEDBACK AND COMPLAINTS

- 8.1 We welcome any comments or suggestions you may have about the scheme. If you want to make any comments about this publication scheme or if you require further assistance or wish to make a complaint then initially this should be addressed to the CEO, Ambition Education Trust, The Ridgeway, St Albans, Hertfordshire AL4 9NX.
- 8.2 If you are not satisfied with the assistance that you get or if a resolution to your complaint has not been found and you feel that a formal complaint needs to be made then this should be addressed to the Information Commissioner's Office. This is the organisation that ensures compliance with the Freedom of Information Act 2000 and that deals with formal complaints. They can be contacted at: Information Commissioner, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.
- 8.3 Enquiry/Information Line: 0303 123 1113 Or <https://ico.org.uk/global/contact-us/contact-us-public/public-advice/>

Process Map 1 – Procedures for dealing with FOI requests



Process Map 2 – Procedures for dealing with FOI requests



CLASSIFICATION OF INFORMATION CURRENTLY PUBLISHED ON AET SCHOOLS WEBSITES

Class 1 - Who we are and what we do	(hard copy and / or website)	Individual AET schools' websites	Cost
Who's who in the school		Website for Faculty information	
Who's who on the Governing Body and the basis of their appointment		Website	
School Prospectus	Paper and electronic	Website or on application	
School session times and term dates		Website	
Location and contact information		Website	
GCSE results		Website	
Class 2 - What we spend and how we spend it Financial information about projected and actual income and expenditure, procurement, contracts and financial audit Current and previous two financial years as a minimum.	(hardcopy and / or website)		
Annual budget plan and financial statements	Annual Financial Statement as submitted to the DfE	On application	To be advised
Capital Funding	Statutory Accounts: Sources of funding & income eg. Funding, grants and investment income	On application	To be advised
Additional Funding	Income generation schemes and other sources of funding	On application	To be advised
Procurement and projects	Details of procedures used for acquisition of goods and services. Details of contracts that have gone through a formal tendering process	On application	To be advised
Pay Policy		On application	To be advised
Staffing and grading structure	Pay bands applicable. May be provided as part of the staff structure and should indicate for most posts the level of pay rather than individual	On application	To be advised

	salaries		
Governors' Allowances	N/A		
Class 3 -What our priorities are and how we are doing (Current strategies and plans, performance indicators, audits, inspections and reviews. (Current information as a minimum)	(hard copy and/ or website)		
School profile • Government supplied performance data • The latest OFSTED report (Summary/full report)	Link to DfE website Link to OFSTED website	Website Website	
Performance Management Information		On application	To be advised
School's future plans	Plan for School Improvement	On application	To be advised
Every Child Matters / Child Protection Policies and procedures	Existing policies	Website or on application	
Class 4 - How we make decisions Decision-making processes and records of decisions. Current and previous three years as a minimum.	(hard copy and/or website)		
Admissions policy / decisions (not individual admission decisions)	Current Admissions Policy	Website	
Agenda and Minutes of meetings of the Governing body and its sub-committees (nb: this will exclude information that is properly regarded as private to the meetings)	Agendas and minutes where key decisions are made about the Academy	On application	To be advised
Class 5 - Our policies and procedures Current written protocols, policies and procedures for delivering our services and responsibilities.	(hard copy and/or website)		

<p>Trust/School policies including:</p> <ul style="list-style-type: none"> • Charging and Remissions • Health and Safety • Complaints Procedure • Behaviour Management <ul style="list-style-type: none"> • Equality and Diversity (including Race, Gender and Disability) • Safer Recruitment <p>Pupil and Curriculum policies including:</p> <ul style="list-style-type: none"> • Home School Agreement • Curriculum • Sex Education • Special Educational Needs • Accessibility • Collective Worship • Careers Education <p>Records management and personal data policies</p> <ul style="list-style-type: none"> • Data Protection / Privacy Notice • Records Management 	Existing policies	Website	
	Existing policies	Website	
	Existing policies Records Management Society recommendations	Website On application	To be advised
<p>Class 6 - Lists and registers Any information the schools are currently legally required to hold in publicly available registers - Currently maintained lists and registers only.</p>	(hard copy and/or website; some information may only be available for inspection)		
<ul style="list-style-type: none"> • Disclosure logs • Asset values / register 	Log Statutory accounts only	On application On application	To be advised To be advised
<p>The services we offer Information about the services the schools provide including leaflets, guidance and newsletters. Current information only.</p>	(hard copy or website; some information may only be available by inspection)		
<ul style="list-style-type: none"> • Extra-curricular activities • Out of school clubs • School publications • Leaflets, booklets and newsletters. 	Where available Where available Where available Where available	On application On application On application On application	To be advised

Our website is: www.ambitioneducationtrust.org

FREEDOM OF INFORMATION PUBLICATION SCHEME - APPENDIX A

APPLYING THE PUBLIC INTEREST TEST

Having established that a qualified exemption definitely applies to a particular case, we 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 case law will play a part, individual circumstances will vary and each case will need to be considered on its own merits.

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.

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 school?	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 school 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 policy?	Is disclosure likely to seriously jeopardise the schools' legal or contractual position?
Is disclosure likely to increase public participation in decision making?	Is disclosure likely to infringe upon other legislation eg: Data Protection Act
Is disclosure likely to increase public participation in the political processes in general?	Is disclosure likely to create a controversial precedent on the release of information or impair our 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 schools' 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?

Note also that:

- Potential or actual embarrassment to, or loss of confidence in, the schools, staff or Governors is not a valid factor to consider

- The fact that the information is technical, complex to understand and may be misunderstood may not for 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, ie: 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
- Each school will record the answers to these questions and the reasons for these answers. Deciding on the public interest is not simply a matter of adding up the number of relevant factors on each side. The school will decide how important each factor is in the circumstances and make an overall assessment. The assessment will be reviewed by the Headteacher.

DECISION FOR DISCLOSURE

Where the balance of the public interest lies in disclosure, the enquiry will be dealt with and the information required will be made available.

DECISION AGAINST DISCLOSURE

After carrying out the public interest test if it is decided that the exemption should still apply, the school will reply to the request with the appropriate reply under the circumstances.

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, we will contact the enquirer within 20 working days stating that a particular exemption applies, but we will include an estimate of the date by which a decision on the public interest test will be made. This will be within a reasonable time, normally no more than 10 working days beyond the 20 days.

FREEDOM OF INFORMATION PUBLICATION SCHEME - APPENDIX B

CHARGING

Different charges apply for requests under the Data Protection Act.

CAN A CHARGE BE LEVIED?

FOI does not require charges to be made but the Trust/school has the discretion to charge applicants a fee in accordance with the Fee Regulations, available on the DCA website www.dca.gov.uk/foi/secleg.htm

CHARGING CONSIDERATIONS

Step 1 – Is the information exempt for the purposes of the FOIA? – If the information is exempt, then charges do not apply. The Trust/school would contact the enquirer to inform them that the information is exempt. There will be no charge.

Step 2 – Does the Trust/school wish to calculate whether the cost of the request would exceed the appropriate limit (currently £450)? – In many cases, it will be obvious that the request would cost less than the appropriate limit, so we would not make the calculation.

Step 3 – We will calculate the appropriate limit? – Staff costs are calculated at £25 per hour, regardless of which member of staff gathers the information. When calculating whether the limit is exceeded, the Trust/school take into account the costs of determining whether the information is held, where it is held, retrieving the information and extracting the information from other documents. As per the guidelines, the school do not take into account the costs involved with considering whether information is exempt under the Act.

Step 4 – Does the request cost less than the limit? – If a request costs less than the limit, as per the guidelines, we will 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).

Step 5 – Does the request exceed the limit? If a request would cost more than the limit, the Trust/school can turn the request down, answer and charge a fee, or answer and waive the fee. If the school chooses to comply with a request where the estimated cost exceeds the threshold the Trust/school will calculate the charge as per step 3, plus the costs from step 4.

Step 6 – For all requests, the Trust/school will consider the following points:

- The duty to provide advice and assistance to applicants. If the Trust/school plans to turn down a request for cost reasons it will contact the applicant in advance to discuss whether they would prefer the scope of the request to be modified so that it would cost less than the appropriate limit, or,
- If the Trust/school plans to suggest charging the applicant a high fee, the Trust/school will contact the applicant in advance to discuss the amount of the charge and whether they would prefer the scope of the request to be modified so that it would cost less than the appropriate limit.
- Maximum amount that can be charged. The Regulations set out the maximum amount that can be charged. They do not set out a minimum charge nor prevent the Trust/school from charging no fee. We may, for simple and straightforward requests, waive a fee.

CAN COSTS BE AGGREGATED WHERE THERE ARE MULTIPLE REQUESTS?

Where two or more requests are made to the Trust/school by different people who appear to be acting together or as part of a campaign, the estimated costs of complying with any of the requests are to be taken to be the estimated total cost of complying with them all, provided that:

A) The two or more requests referred to in that section are for information which is on the same subject matter or is otherwise related;

B) The last of the requests is received by the Trust/school by the twentieth school day following the date of receipt of the first of the requests, and,

It appears to the Trust/school that the requests have been made in an attempt to ensure that the prescribed costs of compiling separately with each request would not exceed the appropriate limit.

If multiple requests for the same information are received, the Trust/school may decide to include it in the publication scheme.

HOW WILL THE APPLICANT BE INFORMED OF THE CHARGE

Where we intend to charge a fee for complying with a request for information, the Trust/school will give the person requesting the information notice in writing (the 'fees notice') stating that a fee of the amount specified in the notice is to be charged for complying.

The Trust/school will require proof of delivery of a fees notice, either signed for in the post or emailed with a return receipt request. Where a fees notice has been given to the person making a request, the Trust/school will not comply with the request until the fee is paid within three months of the notice being received.

