



LIGHTHOUSE

SCHOOLS PARTNERSHIP

FREEDOM OF INFORMATION POLICY (including Model publication scheme) Statutory

Policy Approved by the Board of Trustees

Signed:

Date: 1 December 2020

Name: Adele Haysom

Chair of Board of Trustees

Authorised for Issue

Signed:

Date: 1 December 2020

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Chief Executive

Document History

Version	Author/Owner	Drafted	Comments
1.0	Clare Sanders	Published 31 st August 2016	Based on DfE Model Policy
2.0	Clare Sanders	July 2017	Policy amended - Policy applies to LSP Central Team. Adopted by Board of Trustees 11 July 2017
3.0	Louise Malik	February 2019	Updated in line with ICO model publication scheme and guidance
4.0	Louise Malik	October 2020	Scheduled review

Date Policy Adopted	
Review cycle	Biennial
Review date	February 2023

This Policy applies to all schools and employees within the Lighthouse Schools Partnership.

FREEDOM OF INFORMATION POLICY

1. The Board of Trustees are required to adopt the Model publication scheme, produced by the Information Commissioner's Office (ICO), without modification. The Model publication scheme is provided as Appendix A.
2. The Board of Trustees are also required to produce a Guide to the information available from the Trust and a Schedule of charges. This is provided as Appendix B.

3. How to Request Information

- 3.1. If you require a paper version of any of the documents within the scheme, please contact the Trust by letter or email to Lighthouse Schools Partnership, St Mary's Road, Portishead, Bristol BS20 7QR (foi@lsp.org.uk).
- 3.2. To help us process your request quickly, please clearly mark any correspondence "PUBLICATION SCHEME REQUEST" (in CAPITALS).
- 3.3. Any requests for Freedom of Information paperwork will be charged in line with the schedule of charges detailed in Appendix B.
- 3.4. If the information you are looking for is not detailed in the Guide to the information available (Appendix B), you can still contact the Trust. Requests should be made in by letter or email to Lighthouse Schools Partnership, St Mary's Road, Portishead, Bristol BS20 7QR (foi@lsp.org.uk), and include the enquirer's name and correspondence address with a description of the information requested.
- 3.5. On receipt of a request the designated person will:
 - 3.5.1. decide whether the Trust holds the information or whether the request should be transferred to another body if the information is not held by the Trust
 - 3.5.2. provide the information if it has already been made public
 - 3.5.3. consider whether a third party's interests might be affected by disclosure and if so consult them
 - 3.5.4. consider whether any exemptions apply and whether they are absolute or qualified. An absolute exemption means there is no obligation under the FOIA to release the requested information. A qualified exemption means

that we must assess the balance of the public interest for and against disclosure. This consideration will include identifying if a request is exempt because responding would exceed the cost limit, explaining how, or if, the request can be adapted to be below the cost limit and whether to offer to process the request at a charge (as detailed in Appendix B).

- 3.5.5. carry out a public interest test to decide if applying the qualified exemption outweighs the public interest in disclosing the information
- 3.5.6. consider whether the request is vexatious or repeated.
- 3.6. Requests will be dealt with within twenty working days of receipt excluding school holidays.
- 3.7. The FOIA covers all information held and is retrospective.
- 3.8. The enquirer is entitled to be told whether the Trust or individual school holds the information (the duty to confirm or deny) except where certain exemptions apply.
- 3.9. The enquirer will be informed if the information is not held.
- 3.10. All information held by the Trust, or individual school within the Trust, must be recorded legibly.
- 3.11. The Trust schools maintain well managed records and management information to aid the Trust to meet requests.
- 3.12. The Trust and its schools will not wilfully conceal, damage or destroy information in order to avoid answering an enquiry.

4. Subject access request

- 4.1. Details relating to an information subject access request (SAR) made under Section 7 of the Data Protection Act 1998 (DPA) are available in the Trust's Data Protection Policy.

5. Feedback and Complaints

- 5.1. 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 Chief Financial and Operating Officer via The Lighthouse Schools Partnership, St Mary's Road, Portishead, Bristol BS20 7QR.

- 5.2. If you are not satisfied with the assistance that you get, or if we have not been able to resolve your complaint and you feel that a formal complaint needs to be made, then this should be handled through the Trust's complaints procedure. If this still doesn't achieve a satisfactory outcome a formal complaint 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 or Enquiry/Information Line: 01625 545 700
E Mail: publications@ic-foi.demon.co.uk.
Website : www.informationcommissioner.gov.uk

6. Conclusion

- 6.1. This Policy should be read in conjunction with the DfE Freedom of Information Act 2000. Adherence to these guidelines will ensure that the Trust complies with the Freedom of Information Act 2000.

<https://www.legislation.gov.uk/ukpga/2000/36/contents>

Model publication scheme

Freedom of Information Act

This model publication scheme has been prepared and approved by the Information Commissioner. It may be adopted without modification by any public authority without further approval and will be valid until further notice.

This publication scheme commits an authority to make information available to the public as part of its normal business activities. The information covered is included in the classes of information mentioned below, where this information is held by the authority. Additional assistance is provided to the definition of these classes in sector specific guidance manuals issued by the Information Commissioner.

The scheme commits an authority:

- To proactively publish or otherwise make available as a matter of routine, information, including environmental information, which is held by the authority and falls within the classifications below.
- To specify the information which is held by the authority and falls within the classifications below.
- To proactively publish or otherwise make available as a matter of routine, information in line with the statements contained within this scheme.
- To produce and publish the methods by which the specific information is made routinely available so that it can be easily identified and accessed by members of the public.
- To review and update on a regular basis the information the authority makes available under this scheme.
- To produce a schedule of any fees charged for access to information which is made proactively available.
- To make this publication scheme available to the public.
- To publish any dataset held by the authority that has been requested, and any updated versions it holds, unless the authority is satisfied that it is not appropriate to do so; to publish the dataset, where reasonably practicable, in an electronic form that is capable of re-use; and, if any information in the dataset is a relevant copyright work and the public

authority is the only owner, to make the information available for re-use under the terms of the Re-use of Public Sector Information Regulations 2015, if they apply, and otherwise under the terms of the Freedom of Information Act section 19.

The term 'dataset' is defined in section 11(5) of the Freedom of Information Act. The term 'relevant copyright work' is defined in section 19(8) of that Act.

Classes of information

Who we are and what we do.

Organisational information, locations and contacts, constitutional and legal governance.

What we spend and how we spend it.

Financial information relating to projected and actual income and expenditure, tendering, procurement and contracts.

What our priorities are and how we are doing.

Strategy and performance information, plans, assessments, inspections and reviews.

How we make decisions.

Policy proposals and decisions. Decision making processes, internal criteria and procedures, consultations.

Our policies and procedures.

Current written protocols for delivering our functions and responsibilities.

Lists and registers.

Information held in registers required by law and other lists and registers relating to the functions of the authority.

The services we offer.

Advice and guidance, booklets and leaflets, transactions and media releases. A description of the services offered.

The classes of information will not generally include:

- Information the disclosure of which is prevented by law, or exempt under the Freedom of Information Act, or is otherwise properly considered to be protected from disclosure.
- Information in draft form.
- Information that is no longer readily available as it is contained in files that have been placed in archive storage, or is difficult to access for similar reasons.

The method by which information published under this scheme will be made available

The authority will indicate clearly to the public what information is covered by this scheme and how it can be obtained.

Where it is within the capability of a public authority, information will be provided on a website. Where it is impracticable to make information available on a website or when an individual does not wish to access the information by the website, a public authority will indicate how information can be obtained by other means and provide it by those means.

In 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 an authority is legally required to translate any information, it will do so.

Obligations under disability and discrimination legislation and any other legislation to provide information in other forms and formats will be adhered to when providing information in accordance with this scheme.

Charges which may be made for information published under this scheme

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

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

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

Charges may be made for actual disbursements incurred such as:

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

Charges may also be made for information provided under this scheme where they are legally authorised, they are in all the circumstances, including the general principles of the right of access to information held by public authorities, justified and are in accordance with a published schedule or schedules of fees which is readily available to the public.

Charges may also be made for making datasets (or parts of datasets) that are relevant copyright works available for re-use. These charges will be in accordance with the terms of the Re-use of Public Sector Information Regulations 2015, where they apply, or with regulations made under section 11B of the Freedom of Information Act, or with other statutory powers of the public authority.

If a charge is to be made, confirmation of the payment due will be given before the information is provided. Payment may be requested prior to provision of the information.

Written requests

Information held by a public authority that is not published under this scheme can be requested in writing, when its provision will be considered in accordance with the provisions of the Freedom of Information Act.

Freedom of Information Policy - Appendix B



LIGHTHOUSE
SCHOOLS PARTNERSHIP

Guide to information available from the Lighthouse Schools Partnership under the model publication scheme

Information available	How the information can be obtained	Possible cost
Class 1 - Who we are and what we do - current		
Company documents		
<ul style="list-style-type: none"> Articles of Association 	LSP Website	Nil
<ul style="list-style-type: none"> Certificate of Incorporation 	LSP Website	Nil
<ul style="list-style-type: none"> Funding Agreement 	LSP Website	Nil
<ul style="list-style-type: none"> Memorandum of Understanding with the Bath and Wells Diocesan Board of Education 	LSP Website	Nil
<ul style="list-style-type: none"> Annual Report 	LSP Website	Nil
Who's who in the Lighthouse Schools Partnership		
<ul style="list-style-type: none"> Members 	LSP Website	Nil
<ul style="list-style-type: none"> Trustees 	LSP Website	Nil
<ul style="list-style-type: none"> Central Team 	LSP Website	Nil
<ul style="list-style-type: none"> Contact details 	LSP Website	Nil
Who's who in the school	School website	Nil

Who's who on the governing body / board of governors and the basis of their appointment	School website	Nil
Contact details for the Head teacher and for the governing body, via the school (named contacts where possible).	School website	Nil
School prospectus (if any)	School website	Nil
Staffing structure	School website	Nil
School session times and term dates	School website	Nil
Address of school and contact details, including email address.	School website	Nil
Class 2 - What we spend and how we spend it - current and previous year		
Financial statements - last complete financial year	LSP Website	Nil
Financial statements - previous complete financial year	LSP Website	Nil
Annual budget plan	Request made to Chief Financial and Operating Officer for the Trust or the Headteacher for an individual school	Yes *
Capital funding	Request made to Chief Financial and Operating Officer	Yes *
Financial audit reports	Request made to Chief Financial and Operating Officer	Yes *
Details of expenditure items over £2000 - published at least annually but at a more frequent quarterly or six-monthly interval where practical.	Request made to Chief Financial and Operating Officer	Yes *
Procurement and contracts the Trust/School has entered into, or information relating to / a link to information held by an organisation which has done so on its behalf (for example, a local authority or diocese).	Request made to Chief Financial and Operating Officer for Trust led contracts or the Headteacher for School led contracts	Yes *
Pay policy	Request made to Chief Financial and Operating Officer	Yes *

Staff allowances and expenses that can be incurred or claimed, with totals paid to individual senior staff members (Senior Leadership Team or equivalent, whose basic actual salary is at least £60,000 per annum) by reference to categories.	Request made to Chief Financial and Operating Officer	Yes *
Staffing, pay and grading structure. As a minimum the pay information should include salaries for senior staff (Senior Leadership Team or equivalent as above) in bands of £10,000; for more junior posts, by salary range.	Request made to Chief Financial and Operating Officer	Yes *
Governors' allowances that can be incurred or claimed, and a record of total payments made to individual governors.	Request made to Chief Financial and Operating Officer	Yes *
Class 3 - What our priorities are and how we are doing - current		
Lighthouse Schools Partnership Strategic Plan	LSP Website	Nil
Performance data	School website	Nil
The latest Ofsted	School website	Nil
Performance management policy and procedures adopted by the governing body.	Request made to Chief Financial and Operating Officer	Yes *
The Trust/School's future plans; for example, proposals for and any consultation on the future of the school, such as a change in status	Request made to Chief Financial and Operating Officer	Yes *
Safeguarding and child protection	LSP Website	Nil
Class 4 - How we make decisions - Current and previous three years		
Admissions policy (not individual admission decisions) - where applicable	LSP Website	Nil
Admissions decisions (not individual admission decisions) - where applicable	Request made to Chief Financial and Operating Officer	Yes *
Trust's Structure and Governance	LSP Website	Nil
Scheme of Delegation	LSP Website	Nil
Trust's Terms of Reference	LSP Website	Nil
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).	Request made to Chief Financial and Operating Officer for the Board of Trustees or the Headteacher for the Local Governing Body	Yes *

Class 5 - Our policies and procedures - current		
Accessibility Plan	School website	Nil
Principal Accounting Policies - Including Investment, Reserves and depreciation	LSP Website	Nil
Behaviour	School website	Nil
Business Ethics - Incorporating Register of Business and Pecuniary Interests, Gifts and Hospitality, Anti Fraud and Whistleblowing (Finance) Policy and Procedures	LSP Website	Nil
Charging and remissions	LSP Website	Nil
Complaints	LSP Website	Nil
Code of Conduct - Trust	LSP Website	Nil
Code of Conduct - School	School website	Nil
Disciplinary	LSP Website	Nil
Early years Foundation Stage Policy	School website	Nil
Equality & Diversity	LSP Website	Nil
Finance	LSP Website	Nil
Freedom of Information	LSP Website	Nil
Grievance	LSP Website	Nil
Health & Safety Policy Statement	LSP Website	Nil
Health & Safety Policy for individual schools	School website	Nil
Members, Trustees & Governors Allowances	LSP Website	Nil
Preventing Extremism & Radicalisation	LSP Website	Nil
Records management and personal data policies, including: <ul style="list-style-type: none"> • Information security policies • Records retention, destruction and archive policies • Data protection (including information sharing policies) 	LSP Website	Nil
Recruitment	LSP Website	Nil
Register of Business and Pecuniary Interests - Members, Trustees and Central Team	LSP Website	Nil
Register of Business and Pecuniary Interests - Schools	School website	Nil
Risk Management	LSP Website	Nil

Safeguarding (model policy)	LSP Website	Nil
Safeguarding policy for individual schools	School website	Nil
Relationships and Sex Education Policy	School website	Nil
Special Education Needs Policy	School website	Nil
Supporting pupils with medical conditions Policy	School website	Nil
Whistleblowing (safeguarding)	LSP Website	Nil
Class 6 - Lists and Registers - current		
Curriculum circulars and statutory instruments	Request made to Headteacher	Yes *
Disclosure logs	Request made to Headteacher	Yes *
Asset register	Request made to Headteacher	Yes *
Any information the school is currently legally required to hold in publicly available registers	Request made to Headteacher	Yes *
Class 7 - The services we offer - current		
Extra-curricular activities	School website	Nil
Out of school clubs	School website	Nil
Services for which the school is entitled to recover a fee, together with those fees	Request made to Headteacher	Yes *
School publications, leaflets, books and newsletters	School website	Nil
Additional Information		
If the information you are requesting is not included in the above please contact the Chief Financial and Operating Officer if it relates to the Lighthouse Schools Partnership or the individual school Headteacher directly.		

*There may be a charge for some requests due to the costs associated with responding to the request. These are detailed in the Schedule of Charges below.

Schedule of charges

Type of Charge	Description	Charge
Disbursement costs	For any hard copies of information produced:	
	Photocopying/ printing @ pence per sheet (black and white)	5 pence per page
	Photocopying/ printing @ pence per sheet (colour)	Not available
	For any information posted	Full cost of postage incurred

Staff time	For any requests, that are not refused, that take over 18 hours to: <ul style="list-style-type: none"> ▪ determine if the information is held; ▪ locate the information; ▪ retrieve the information; ▪ redact exempt information; and/or ▪ extract the information from a document containing it. 	Staff time calculated on the basis of £25 per hour
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Please note that some information may only be available by inspection

www.lsp.org.uk Please note that the LSP website contains a link to the website for each of the schools in the Trust

This guide is based on the ICO's template guide to information for schools version 3 20130830