

Greenshaw Learning Trust Communications Policy

May 2018

This Greenshaw Learning Trust Strategic Policy applies to the Greenshaw Learning Trust as a whole and to all the schools and service units in the Trust. The Greenshaw Learning Trust, including all the schools and services within the Trust, their Trustees, governors and staff, must abide by this GLT Communications Policy and the associated policies and procedures described herein.

It is the responsibility of the local governing body and Headteacher of each school, and the Board of Trustees and GLT Executive Headteacher for Trust central services, to ensure that their school/service and its staff adhere to this GLT Communications Policy. In implementing the policy and associated policies and procedures the local governing body, Headteacher and Trust staff must take account of any advice given to them by the GLT Executive Headteacher and/or Board of Trustees.

This Policy is subject to the Scheme of Delegation approved for the school or service. If there is any ambiguity or conflict then the Scheme of Delegation and any specific Scheme or alteration or restriction to the Scheme approved by the Board of Trustees takes precedence.

If there is any question or doubt about the interpretation or implementation of this Policy, the GLT Executive Headteacher should be consulted.

Approval and review:

This Policy is the responsibility of the GLT Executive Headteacher.
This Policy was agreed by the Board of Trustees on: 23 May 2018.
This Policy is due for review by: May 2021.

The Greenshaw Learning Trust is a charitable company limited by guarantee registered in England & Wales, company number 7633694, registered at Greenshaw Learning Trust, Grennell Road, Sutton, Surrey, SM1 3DY.

GLT Communications Policy

May 2018

1.1 Introduction

This Communications Policy and its associated policies and procedures apply to all schools and service units in the Greenshaw Learning Trust and over-ride any existing or school-approved policies where they differ.

Where appropriate policies and procedures relating to governors and/or governance have been approved by the Trustees they override relevant references to governors within these policies and procedures.

If there is any question about the interpretation or implementation of this policy, the GLT Executive Headteacher should be consulted.

Terminology:

- The Trust means the Greenshaw Learning Trust.
- School means a school or academy within the Greenshaw Learning Trust.
- Headteacher means the headteacher or principal of the school/academy.
- Executive Headteacher means the chief executive officer (CEO) of the Greenshaw Learning Trust.
- Central Trust staff means staff employed by the Trust to provide central or Trust- wide services, as distinct from staff employed to work in a specific school or schools.
- Local governing body (LGB) means the committee of the Board of Trustees to which Trustees have delegated appropriate powers and functions for the governance of the school.

1.2 Responsibilities, approval and review

This Policy is the responsibility of the GLT Executive Headteacher. This Policy was agreed by the Board of Trustees on: 23 May 2018. This Policy is due for review by: May 2021.

1.3 Application

Where there is any conflict between a school or service communications policy or procedure and this GLT Communications Policy, this GLT Communications Policy overrides. If there is any doubt or question about the application of this Policy, the GLT Executive Headteacher should be consulted. Pending the approval by the Board of Trustees of specific policies and procedures for the Trust central service, the appropriate policies and procedures of Greenshaw High School, qualified and amended by this GLT Communications policy, will apply to the Trust central services.

Pending their review, references in pre-existing school policies will be read as follows:

- i. 'Governing body' to be read as 'local governing body' (LGB).
- ii. 'Local authority' / local authority departments and staff, in general to be read as GLT or GLT Executive Headteacher.

1.4 Associated Policies and Procedures

The following Trust policies and procedures are an integral part of this GLT Communications Policy:

- GLT Trust Complaints Procedure
- School and Trust Central Service Complaints Procedures
- GLT Data Protection Policy
- GLT Data Retention Procedure
- GLT Subject Access Request Procedure
- GLT Data Breach Procedure
- School and Trust Central Service ICT Usage Policies / Procedures
- GLT Freedom of Information Policy
- School and Trust Central Service Publication Schemes
- GLT Freedom of Information Request Procedure
- GLT Whistleblowing Policy

The following Trust policies and procedures are directly related to and complement this GLT Communications Policy:

- GLT Staff Code of Conduct
- GLT Admissions Policy.

2 Communications Policies and Procedures

2.1 Complaints Policy

The Greenshaw Learning Trust welcomes comments and recognises that comments and complaints enable us to put things right and to learn and improve. The Trust and the schools and services within it will always deal with complaints in accordance with the Trust Complaints Policy and the Education (Independent Schools Standards) Regulations 2010, SI 2010/1997, and will seek a resolution that is satisfactory to all involved.

Complaints about the Trust or the services it provides will be dealt with in accordance with the GLT Trust Complaints Procedure.

Comments about or complaints against a school in the Greenshaw Learning Trust should be taken up with the school and will, if necessary, be dealt with through the school's Complaints Procedure, by contacting the school.

Complaints about a governor of a school in the Trust will be dealt with under the Trust Complaints Procedure and should be directed to the Executive Headteacher of the Trust.

A school pupil who has a comment or complaint should in the first instance take it up through their school tutor or head of house, rather than through the Complaints Procedure.

Complaints about the administration of the process for admissions to schools within the Trust are dealt with through the Trust admissions appeals procedure as set out in the GLT Admissions Policy.

Each school in the Trust will agree a Complaints Procedure for handling complaints against the school that must be consistent with the Trust Complaints Policy and Procedure.

Specifically, the school Complaints Procedure must include:

- An informal stage that seeks to resolve the matter through discussion with appropriate senior school staff.
- A formal complaint stage when a complaint that has been unresolved may be made in writing to the school.
- A hearing before a complaints committee of the school's governing body, if the complainant is not satisfied with the response from the formal stage.
- An opportunity to make an appeal to a Complaints Panel of the Trust, in accordance with the Trust Complaints Procedure.
- Information about making a complaint to the Education & Skills Funding Agency (ESFA) where a matter has not been resolved, having been dealt with in accordance with the Trust Policy and school Procedure.

2.2 Data Protection Policy

The Greenshaw Learning Trust recognises and accepts its responsibility as set out in the General Data Protection Regulation (GDPR) (2016) and Data Protection Act 2018 and sub- legislation contained therein. The Trust, as a Data Controller, will take all reasonable steps to meet this responsibility and to promote good practice in the handling and use of personal information, in accordance with the GLT Data Protection Policy.

The Trust and all schools and services within it will abide by the GLT Data Protection Policy. The Greenshaw Learning Trust collects, holds, stores and creates significant amounts of data and information, and is committed to the principles of data protection including the principle that information is only to be retained for as long as necessary for the purpose concerned. The Greenshaw Learning Trust will ensure that records are managed effectively and in compliance with data protection and other regulations.

The Board of Trustees will appoint a Data Protection Officer for the Trust, and each school and the Trust central service will appoint a named role of member of staff as the school's data protection lead to be the point of contact in the school for data protection matters and for the GLT Data Protection Officer.

The Trust and all schools and services within it must follow the GLT Data Retention Procedure.

The Data Retention Procedure sets out the main categories of information that the Greenshaw Learning Trust holds, the length of time that the Trust intends to hold them, and the reason for this, and provides a framework for the retention and disposal of categories of information and documents. In accordance with this Procedure, the Trust and all schools and services within it follow the Information and Records Management Society's Information Toolkit for Schools, 2016.

The Trust and all schools and services within it will provide information to any individual from which it collects personal data in accordance with the GLT Data Protection Policy using the GLT Model Privacy Notices.

A person who makes a request to see any personal information held about them by the Greenshaw Learning Trust is making a 'subject access request'. When responding to or dealing with a subject access request the Trust and all schools and services within it must follow the GLT Subject Access Request Procedure.

Any and all breaches of the GDPR, including a breach of any of the data protection principles, shall be reported to the GLT Data Protection Officer as soon as it is discovered, and must be dealt with in accordance with the GLT Data Breach Procedure.

All Trust staff are bound by the GLT Staff Code of Conduct, which itself requires them to follow the GLT Data Protection Policy and associated policies and procedures.

2.3 ICT Usage Policy

All staff, governors, Trustees and volunteers of the schools and services of the Greenshaw Learning Trust are bound by GLT policies and procedures with regard to their use of Trust and school ICT systems, and must ensure that the ICT facilities of the Trust are used legally, securely, effectively and in a spirit of co-operation, trust and consideration for others, so that they remain available.

The Trust and all the schools and services within the Trust must abide by the GLT ICT Usage Policy; pending the adoption of a Trust ICT Usage Policy the schools and services in the Trust will adopt their own ICT Usage Policy based on the GLT Model School ICT Policy.

2.4 Freedom of Information Policy

The Greenshaw Learning Trust is the 'public authority' under the terms of the Freedom of Information Act 2000 and is thereby subject to the Act and responsible for the information held by the Trust and by the schools and services within the Trust.

The Trust and all the schools and services within the Trust must abide by the GLT Freedom of Information Policy.

The Trust and the schools within the Trust will make information available to the public as part of their normal business activities. The Trust will endeavour to make the maximum amount of information readily available at minimum inconvenience and cost to the public; if charges have to be made they will be justified and transparent and kept to a minimum.

The Trust and the schools and services within the Trust will each adopt and follow their own Publication Scheme, in accordance with the GLT Freedom of Information Policy, the Act and guidance issued by the Department for Education and the Information Commissioner.

Requests for information under the Freedom of Information Act that is not already published or readily available under the relevant Publication Scheme will be dealt with in accordance with the GLT Freedom of Information Requests Procedure. The Trust and all the schools and services within the Trust will follow the GLT Freedom of Information Requests Procedure.

2.5 Whistleblowing Policy

The Greenshaw Learning Trust Whistleblowing Policy provides a procedure for employees, trustees and governors of the Trust and of all the schools and services within the Trust to raise any concerns they may have about the Trust's work, such as malpractice or wrongdoing.

The Trust and all the schools and services within the Trust will follow the GLT Whistleblowing Policy.

2.6 Provision of information online

The Greenshaw Learning Trust is required to ensure that certain information about the Trust as a whole and individual schools within the Trust is made available online.

The Trust and the schools within the Trust will ensure that their websites contain the necessary information in accordance with the requirements of the Trust's Funding Agreements, the Academies Financial Handbook, the Independent Schools Regulations, DfE guidance, and companies and charities law; and in so doing must follow the GLT procedures and guidance for the publication of information and the advice of the GLT Executive Headteacher.

2.7 External communications

To manage the image of and to protect the reputation of the Trust and the schools within it, the Trust senior executive and Board of Trustees will need to be able to monitor and in some cases approve communications from or about the Trust or its schools or services directed to external organisations, partners and the media.

Members of staff of, volunteers in, and governors and Trustees of, the Trust central service or any Trust school, must not speak, or give the impression that they speak, on behalf of the Trust without the specific authorisation of the Executive Headteacher; and must not make any statement that may damage the reputation of, or bring into disrepute, the Trust or any of the schools or services within it.