

**Greenshaw Learning Trust
Communications Policy**

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1. Introduction

Application

This GLT Communications Policy applies to the Greenshaw Learning Trust as a whole and to all the schools in the Trust and the Trust Shared Service, in accordance with and pursuant to the Communications Policy of the Greenshaw Learning Trust.

The Greenshaw Learning Trust, including all the schools, their Trustees, governors and staff, must abide by this GLT Communications Policy.

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

In implementing this policy and associated policies and procedures the governing body, Headteacher and school staff, and Trust Shared Service staff, must take account of any advice or instruction given to them by the GLT CEO or Board of Trustees.

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

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

Approval and review

Maintenance of this Policy is the responsibility of the GLT CEO.

This Policy was approved by the Board of Trustees on: 17 December 2021.

This Policy is due for review by: December 2024.

Terminology

The Trust means the Greenshaw Learning Trust (GLT).

- School means a school within the Greenshaw Learning Trust.
- Headteacher means the headteacher or principal of the school.
- CEO means the chief executive officer of the Greenshaw Learning Trust.
- Trust Shared Service 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
- Governors and Trustees includes governors, Trustees, non-governor members of Trust Committees and members of the Trust Panel.

- Governing body means the committee of the Board of Trustees to which Trustees have delegated appropriate powers and functions relating to the governance of the school.

In this policy references to the Greenshaw Learning Trust will be read as including the Greenshaw Learning Trust shared service and all schools in the Greenshaw Learning Trust.

References in this Policy to a school in the Trust should also be read as the Trust Shared Service for services, functions and staff of the Trust that are not contained within a school budget and/or are not the responsibility of a Headteacher and/or Governing Body. With respect to the Trust Shared Service, references in this Policy to the responsibilities of the Headteacher and Governing Body should be read as the GLT CEO and the Trust Shared Services Committee respectively.

Responsibilities

It is the responsibility of the governing body and Headteacher of each school, and the Board of Trustees and GLT CEO for the Trust Shared Service, to ensure that their school/service and its staff adhere to this GLT Communications; in implementing this Policy the governing body, Headteacher and Trust staff must take account of any advice given to them by the GLT CEO and/or Board of Trustees.

2. Policies and procedures

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

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 within it will always deal with complaints in accordance with the Trust Complaints Procedure and the Education (Independent Schools Standards) Regulations 2014, SI 2014/3283, 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 (as approved by the Board of Trustees, 17 December 2021).

Comments about or complaints against a school in the Greenshaw Learning Trust will be dealt with through the school's complaints procedure, and should be taken up with the school 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 GLT CEO.

School pupils who have comments or complaints should in the first instance take them up through their school tutor or head of house, rather than through the Complaints Procedure.

Certain matters are dealt with under specific procedures, and not through the complaints procedure:

- Complaints about child protection matters are handled under the Trust's child protection and safeguarding policy and in accordance with relevant statutory guidance.
- Complaints about the administration of the appeals process for admissions to schools within the Trust are dealt with through the Trust Admissions Appeals Procedure.
- Representations against exclusions from school are dealt with under the Trust's exclusions procedures and the relevant statutory guidance.
- Complaints from staff will be dealt with under the school's internal grievance procedures.
- Complaints about staff conduct will be considered under the Trust's staff disciplinary procedures, if appropriate, but complainants will; not be informed of any outcomes.
- The Trust also has a Whistleblowing Policy for all employees, contractors, Trustees and governors.

Information on these procedures can be found on the Trust website or by contacting the Trust or school.

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 Headteacher of 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.

The complaints committee of the school's governing body and the Complaints Panel of the Trust may make findings and recommendations; a copy of those findings and recommendations will be provided to the complainant and, where relevant, the person complained about; and made available for inspection on the school premises by the proprietor and the head teacher.

A written record will be kept of all complaints and whether they are resolved following a formal procedure, or proceed to a committee or panel hearing; and the action taken by the school/Trust as a result of those complaints (regardless of whether they are upheld).

All correspondence, statements and records relating to individual complaints will be kept confidential, except where the Secretary of State or a body conducting an inspection under section

109 of the 2008 Act requests access to them, and retained in line with the GLT Data Retention Policy and Part 7 of the Education (Independent School Standards) Regulations 2014.

2.2. Data Protection Policy

The Greenshaw Learning Trust is the 'data controller' in terms of the Data Protection Act 2018, and is thereby required to ensure that the Trust and the schools within it comply with the Act.

The Trust and all schools within it will abide by the GLT Data Protection Policy (as approved by the Board of Trustees, 23.07.21).

The GLT Data Protection Officer is: Judicium Consulting Limited.

Email: dataservices@judicium.com

Address: 72 Cannon Street, London, EC4N 6AE

Telephone: 0203 326 9174

Lead Contact: Craig Stilwell

Associated Procedures

- GLT Data Breach Procedure
- GLT Subject Access Request Procedure
- GLT CCTV Use Procedure
- GLT Privacy Notices

2.3. 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 academies within the Trust.

The Trust and the all the schools within the Trust will abide by the GLT Freedom of Information Policy (as approved by the Board of Trustees, 23.07.21).

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

Associated Procedures

- GLT Freedom of Information Request Procedure

2.4. 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 all the schools within the Trust will abide by the GLT / School Publication Scheme for the provision of information online.

2.5. 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.

All staff, governors, Trustees and volunteers of the schools and services of the Greenshaw Learning Trust must comply with the GLT Cyber Security Procedure; failure to follow the Procedure will be considered a disciplinary matter.

All the schools and services within the Trust must follow the GLT CCTV Use Procedure.

All the schools and services within the Trust must adopt their own ICT Usage Policy based on the GLT Model School ICT Policy.

Associated Procedures

- GLT Cyber Security Procedure

2.6. Whistleblowing Policy

The Greenshaw Learning Trust Whistleblowing Policy provides a procedure for employees, trustees and governors of the Trust and of all the schools 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 within the Trust will follow the GLT Whistleblowing Policy (as approved by the Board of Trustees, 06.09.2019).

2.7. External communications

To manage the image of and to protect the reputation of the Trust and the schools within it, the Trust executive and Board of Trustees will need to be able to monitor and in some cases

approve communications from schools directed to external organisations partners and the media.

The schools in the Trust, their staff and governors, must not speak, or give the impression that they speak, on behalf of the Trust without the specific authorisation of the GLT CEO; and must not make any statement that is likely to damage or brings into disrepute the Trust or the schools within it.

The Trust and all the schools within the Trust will follow the GLT External Communications Policy (to be agreed).

If there is any ambiguity or conflict between this policy and any of these associated procedures, this GLT Communications Policy takes precedence.

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

3. Associated Policies and procedures

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

- Staff Code of Conduct
- Governors and Trustees Code of Conduct

