



GREENSHAW
LEARNING TRUST



Greenshaw Learning Trust Communications Policy

**ALWAYS
LEARNING**

Communications Policy

July 2023

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1. Introduction

● 1.1 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.

The Greenshaw Learning Trust, including all the schools in the Trust and the Trust Shared Service, 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 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.

● 1.2 Approval and review

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

This Policy was approved by the Board of Trustees on: ~~February~~ July 2023.

This Policy is due for review by: ~~February~~ July 2026.

● 1.3 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 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.
- Governors and Trustees includes all members of a Governing Body, Trustees, non-Trustee 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 a Trust school or schools.

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 Board of Trustees respectively.

● **1.4 Responsibilities**

It is the responsibility of the Governing Body and Headteacher of each school, and of 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 Policy. In implementing this Policy the Governing Body, Headteacher and school/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

2.1.1 Dealing with complaints

When responding to concerns or complaints, each school in the Trust and the Trust Shared Service will follow this Complaints Policy and the School Complaints Procedure or the GLT Complaints Procedure as appropriate, as agreed by the Board of Trustees.

The Trust will deal with complaints from parents/carers of pupils at its schools in accordance with the Education (Independent Schools Standards) Regulations 2014, SI 2014/3283 and appropriate DfE guidance, and will seek a resolution that is satisfactory to all involved, through the school/GLT Complaints Procedure.

The Trust will handle complaints from people who are not parents of children at its schools respectfully and expeditiously, and as far as is appropriate in line with the school/GLT Complaints Procedure, except that for such complaints the Trust reserves the right to amend the Procedure and omit a hearing before a panel with an independent member.

Complaints about a school in the Trust should be taken up with the school by contacting the school, and will be dealt with through the school's published Complaints Procedure that can be found on the school's website.

Complaints about the Greenshaw Learning Trust as a whole, the Trust Shared Service, an executive officer of the Trust, a governor or Governing Body of any school in the Trust, or a Trustee of the Trust, will be dealt with through the GLT Complaints Procedure that can be found on the Trust website.

2.1.2 Exceptions to the Complaints procedure

Certain matters are dealt with under separate procedures, and not through the School or GLT Complaints Procedure (information on these policies and procedures can be found on the Trust website or by contacting the Trust or school):

- Complaints about child protection matters are handled under the Trust's child protection and safeguarding procedures 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 a pupil's suspension or exclusion from school are dealt with under the Trust's Suspension & Exclusion Procedure and the relevant statutory guidance.
- Complaints from Trust staff will be dealt with under the Trust's internal grievance procedures.
- Complaints about the conduct of Trust staff will be considered under the Trust's staff disciplinary procedures. Complainants will not be informed of any disciplinary action taken against a staff member as a result of a complaint, but will be notified that the matter is being addressed and allowed to progress their complaint through the school's complaints procedure.
- Complaints about the conduct of Trustees or governors or non-Trustee members of Trust Committees will be considered under the Trust's Trustee and Governor disciplinary procedures. Complainants will not be informed of any disciplinary action taken, but will be notified that the matter is being addressed and allowed to progress their complaint through the school's complaint procedure.
- The Trust also has a Whistleblowing Policy for all members of Trust staff, contractors, Trustees and governors.

Concerns about statutory assessments of special educational needs should be raised directly with the relevant local authority.

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

Complaints about third-party users of school/Trust premises or facilities should be taken up with the third party directly, and not through the school/Trust Complaints Procedure. The Headteacher/GLT CEO must ensure that any third party user of their school's/Trust premises or facilities has a published complaints procedure.

2.1.3 The Complaints Procedure

Each school in the Trust and the Trust Shared Service must follow the common GLT Complaints Procedure as approved by the Board of Trustees.

The Complaints Procedure will include:

1. An informal stage that seeks to resolve the matter through discussion with appropriate school/Trust staff.
2. A formal complaint stage where a complaint, that has not been resolved by the informal stage, may be made in writing to the Headteacher of the school/GLT CEO.
3. A hearing before a complaints panel that will include an independent member, if the complainant is not satisfied with the response from the formal stage.

If after it having been dealt with in accordance with the Complaints Procedure the complainant does not feel the matter has been resolved they may then make a complaint to the Education & Skills Funding Agency (ESFA).

The complaints panel may make findings and recommendations to the Headteacher or GLT CEO and/or to the Governing Body or Board of Trustees; 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 and/or Trust premises by the Headteacher or GLT CEO.

The Headteacher/GLT CEO must keep a written record of all complaints to their School/the Trust as a whole or the Trust Shared Service, and whether they are resolved following a formal procedure, or proceed to a 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 must 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.

Each Headteacher, and the GLT CEO for the Trust Shared Service, will appoint a named member of staff as Complaints Contact; they will notify the GLT CEO of that person's name and contact details, which will be maintained in the schedule to the Trust Complaints Procedure, and inserted into the school/Trust copy of the GLT Complaints Procedure that will be published on the school/Trust website.

Associated Procedures:

- GLT Trust Complaints Procedure.
- Schedule to the GLT Complaints Procedure.
- School Complaints Procedures.

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, 16.12.22).

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 Data Retention Procedure.
- GLT Subject Access Request 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 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. Information Security 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 cooperation, 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 Information Security Policy; 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.

Associated Procedures:

- GLT Cyber Security Procedure.

2.6. Whistleblowing Policy

The Greenshaw Learning Trust Whistleblowing Policy provides a procedure for members of staff, volunteers, 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.

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.

2.8. School Websites

It is the responsibility of each Headteacher to maintain their school website to ensure it meets all the following requirements, including but not limited to:

- Publication requirements of the Trust, including those in the GLT Policy Schedule.
- Statutory publication requirements of the DfE and Academy Trust Handbook.
- Accessibility requirements which are considered reasonable adjustments under the Equality Act 2010.
- The School Admissions Code.

Each Headteacher should name a member of staff in their school who is responsible for maintenance of the school website.

To allow the Trust Shared Service to support website maintenance and ensure compliance with this policy all GLT School websites will be hosted by Juniper Education (E 4 Education). GLT Schools and new schools joining GLT will be supported where transition is required.

Associated Procedures:

- GLT Policy Schedule