

Pennine Academies Yorkshire

Marketing and Communications Policy

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Signed by:			
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Statement of intent

Pennine Academies Yorkshire is committed to maintaining effective communication and relationships between parents, pupils and the school/trust as such it has developed a clear communication strategy as detailed in this document.

This policy sets out the aims of the school/trust with regard to internal and external communication, and the responsibilities of the school/trust, its staff members and parents. The policy also outlines the school/trust's marketing strategy and how this will be used to build positive relationships with parents and the wider community.

The school/trust aims to promote effective communication between pupils, members of staff, parents, stakeholders and all members of the school/trust community through the following means:

- Having a clear and professional communication strategy in place to keep parents wellinformed about their child's educational progress and any other matters related to their child's overall wellbeing
- Improving the quality of education by ensuring there is a robust process in place for consultation between the school/trust, parents, staff members and pupils on key areas
- Monitoring and evaluating communication issues through regular meetings with staff, parents and members of the school/trust community
- Developing a strong marketing presence in order to build a positive reputation for the school/trust within the wider community

1. Legal framework

This policy has due regard to all relevant legislation and statutory guidance including, but not limited to, the following:

- Freedom of Information Act 2000
- Education Act 2002
- The Privacy and Electronic Communications Regulations 2003
- UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018

This policy operates in conjunction with the following school/trust policies:

- Data Protection Policy
- Online Safety Policy
- Freedom of Information Policy
- Child Protection and Safeguarding Policy
- Confidentiality Policy
- ICT Security Policy
- Adverse Weather Policy
- Invacuation, Lockdown and Evacuation Policy
- Complaints Procedures Policy
- ICT Acceptable Use Policy

2. Roles and responsibilities

The headteacher is responsible for:

- Placing key policies, documents and procedures in areas that maximise their accessibility and usefulness to the entire school/trust community, e.g. on the school/trust website.
- Communicating important information, e.g. the curriculum, clearly to parents.
- Informing parents of all school/trust events within appropriate timelines.
- Regularly keeping parents informed of their child's progress.
- Informing parents about the types of data that the school/trust holds on pupils, who controls the data, why that data is held and who it may be shared with. This information will be concise, transparent and easily accessible; written in a clear and plain language; and free of charge.
- Ensuring that parents understand their right to access information about their child that is held by the school/trust.
- Ensuring that parents also understand their rights to rectification, to erasure, to restrict processing, to data portability and to object to processing.
- Ensuring that consent obtained from parents, and pupils where appropriate, regarding the
 processing of personal data is freely given, specific, informed, and an unambiguous indication
 of the individual's wishes.
- Ensuring that individuals are informed of their rights to withdraw consent and are provided with easy ways to do so.
- Ensuring that information regarding staff pay and conditions of service is made available to all who are employed at the school/trust.

- Taking steps to ensure parents who do not have access to the internet can still access the information that is included on the school/trust website.
- Approving all marketing and communication-related proposals and materials.
- Setting appropriate timescales within the marketing strategy.
- Nominating an internal marketing officer.
- Overseeing the overall implementation of this policy.

The marketing officer is responsible for:

- Ensuring the communication of key messages and school/trust values.
- Ensuring all platforms of communication are up-to-date with audience-appropriate material and are easily accessible by parents, the LA and the wider community.
- Identifying the promotional value of pupil achievements and school/trust events and promoting them accordingly.
- Developing and managing networking and engagement programmes to enhance the school/trust's relationship with parents, other school/trusts, LAs and the wider community.
- Undertaking appropriate market research, including competitor analysis, demographic and economic reviews, and the examination of educational trends.
- Helping to shape school/trust events which exemplify and communicate the school/trust's values, e.g. prospective parents' evenings.
- Advising on event planning with the aim of improving audience experience.
- Targeting relevant professionals who may issue children with education, health and care (EHC) plans, e.g. education psychologists.
- Meeting the timescales set to complete marketing tasks.
- Setting marketing goals and targets for the school/trust.
- Identifying and targeting specific groups to provide information relevant to them, e.g. information relevant to the parents of pupils with SEND.
- Working with the DPO to ensure that marketing material complies with data protection law and that consent is properly requested and recorded.
- Working with the local media to promote and enhance the reputation of the school/trust, in accordance with the Media Relations Policy.

Staff members are responsible for:

- Ensuring the principles and procedures of this policy are followed.
- Communicating proactively with parents about pupil progress and helping parents to support their child's learning.
- Ensuring that their internal communication with other staff is strong, e.g. passing on relevant information to supply teachers and updating classroom planning files with specific pupil information.
- Being involved in the school/trust's marketing communication as required.

Parents are responsible for:

 Reading the key communications circulated by the school/trust and responding or acting on these communications where required, e.g. by attending meetings.

- Logging on to the school/trust website for detailed information about the school/trust calendar, term dates, exam details, monitoring and assessments, school/trust achievements and other useful downloads.
- Informing the school/trust of important information related to their child, such as:
 - Medical conditions or allergies, supported by medical documentation relating to these conditions.
 - Any SEND or other needs their child has.
 - Child protection matters, legal issues or relevant duties with appropriate documentation.
- Raising any issues or concerns they may have with the appropriate contact, e.g. contacting the class teacher with education-related issues.

3. Internal communication

Communication between members of staff

Staff will ensure their internal communication, i.e. within the school/trust with other members of staff, is strong, effective, and abides by the procedures outlined in the staff induction and Staff Code of Conduct.

Where appropriate, staff maintain a timetable outlining weekly activities on the school google calendar. Written communications to specific staff members are delivered via google chat or google mail.

Communication between members of staff and pupils

Staff will not engage in personal correspondence with pupils. Where pupils do need to be contacted, staff will do so by proxy via external communication with parents, rather than to pupils directly.

4. External communication

Communication from the school/trust to parents

Parents will be contacted through the following methods:

- Letters home
- Text messages
- Phone calls
- The school/trust website
- School/trust newsletters
- In-person meetings

Staff will not communicate or interact with parents or pupils via social networking sites, except in the case of blogs or social media pages set up specifically for the purpose of teaching and learning.

Parents will be given the opportunity to sign up to newsletters and other marketing communication via email.

The school/trust subscribes to an electronic communication system, Arbor App, which is used to achieve effective and consistent communication with parents. The school/trust will ensure that:

- Only the headteacher, and other staff authorised by the headteacher, can access and use the messaging system.
- Parents are asked to provide their consent and details for the use of the system at the beginning of each academic year.
- If any changes are made to the service, or manner in which data is processed on the system, parents are informed and consent is renewed.
- Any parents who cannot be contacted via the messaging system are contacted via another method set out in this policy.

The headteacher will hold meetings for new parents prior to their child's entry to the school/trust.

If a pupil is absent from school/trust and the school/trust has no indication of the reason for the absence, the school/trust will contact the pupil's parent via text or telephone. on the first day of absence in order to find out the reason for the absence. If no contact can be made with any named parent, the school/trust has the right to contact the education welfare officer to ensure the pupil's wellbeing and safety.

Communication from parents to the school/trust

For general and urgent enquiries, parents will be required to ring the school/trust office, which is open from Monday to Friday between 8:00am – 4:00pm, on 01274 636921. For non-urgent enquiries, parents will be required to email the school/trust using office@ghps.paymat.org. All emails to the school/trust will specify the member of staff that the query is addressed to. All emails to the school/trust will be treated as confidential, unless there is a specific reason not to do so.

Communication between teachers and parents

Teachers regularly update parents of pupils' progress, the curriculum content being covered, and how they can support pupils' development and progress through activities to be completed at home.

Teachers will be available to discuss pupils' progress and any concerns with parents before the start and end of each school day.

5. Emergency communication

All parents will ensure that the school has their latest contact details, including their address, telephone number and email address, so that they can be contacted in the event of an emergency.

If a pupil is seriously ill or injured, the school/trust will attempt to contact the pupil's emergency contacts via telephone. In the event of a larger serious incident requiring invacuation, lockdown, or evacuation, the school/trust will follow its Invacuation, Lockdown and Evacuation Policy — parents will routinely receive updates on how the school/trust will communicate with them during an invacuation, lockdown or evacuation via the school.

Where an incident affects the whole school/trust community, such as power failure or snow, the school/trust will send all parents Click or tap here to enter text.with information on how the

school/trust will be operating, e.g. reduced hours or closure. If the school/trust is closed for more than one day due to adverse weather or similar problem, an update will be posted on the school/trust website at least once a day. The school/trust will also ask the local radio station, to broadcast a closure announcement.

6. Email communication

Email and internet access will be used in line with the school/trust's Data Protection Policy, Online Safety Policy, and Data and Cyber-security Breach Prevention and Management Plan.

All staff will have their own email account, which will be used to conduct all school/trust-related communication — staff will not use their personal email addresses. Emails will not be used as a substitute for face-to-face communication. Staff will consider the best way to communicate according to each individual situation.

The school/trust will aim to respond to all email enquiries within five working days. Staff and parents will be made aware that part-time staff may take longer to reply due to the nature of their work schedule.

Chain emails will not be allowed. Staff will ensure that the sending of attachments is limited to only work-related emails. Under no circumstances will adverts be embedded into emails.

The following processes will be implemented to assist with the management of email communication:

Using a centralised email address

- Parents will be provided with one email address to use as a main point of contact for general home-school/trust communication, e.g. informing the school/trust that their child is ill.
- Office staff will track communication sent to this email address and ensure emails are dealt with promptly and consistently.
- Office staff will first seek to handle the enquiry themselves, e.g. if the email is in relation to dates of upcoming trips, uniform queries, sickness.
- If the message requires more specific support, it will be forwarded to appropriate member of staff.
- Parents will only use staff-specific email addresses if they need to contact a specific member of staff directly.

Implementing set times for responding to emails

- The school/trust will establish a set window of time that staff can be expected to respond to emails, which will be communicated to the school/trust community.
- Parents will be made aware that staff are not able to check emails consistently throughout the day.
- The school/trust community will be encouraged to only send emails during this window and informed that if emails are sent outside of this window, they should not expect an immediate response in most cases.
- The school/trust will not expect work emails to be checked outside of working hours.

Providing support to staff

- Guidance will be provided to staff regarding email good practice, including in relation to prioritising emails, using filters, and carrying out regular inbox housekeeping.
- Staff will be provided with training in the email systems used by the school/trust, so they are able to implement time saving functions such as Rules, Quick Parts, and view by conversation thread.
- Staff members will be advised not to subscribe to any junk type email chains, in order to reduce emails received.

7. Meetings with staff and parents

Meetings between members of staff

A programme of regular staff meetings will be set out in the school/trust calendar at the beginning of each academic year. Additional meetings will be added to the calendar as required, with appropriate notice to prepare. Time will be set aside for structured opportunities for staff to engage in team working and to contribute to the school/trust's reflection on priorities, activities and future plans.

For all formal meetings, attendees will be invited to contribute to the agenda, minutes will be taken, action points will be progressed, and feedback will be given to relevant staff. Minutes of meetings will be copied to staff members as appropriate, as well as the SLT, and a copy will be saved in a clearly marked folder in the appropriate shared drive.

Meetings between staff and parents

When parents wish to organise meetings with members of staff, they will first contact the school office before communicating with the appropriate member of staff directly. Parents will be required to organise meetings with members of staff with adequate preparation time, i.e. at least two working days before the meeting. Lessons will not be interrupted to accommodate parents needing to speak to a teacher.

If parents urgently need to meet with a member of staff, they will phone the school office as soon as possible – the office staff will aim to find a senior member of staff to see parents before the end of the day. For non-urgent meetings between parents and staff, the school/trust will aim to meet parents within five working days. The school/trust will determine the level of urgency in requests for meetings.

8. Data protection and consent

The school/trust will abide by its Data Protection Policy and related documentation in all of its communication and when carrying out marketing activities.

Staff members' personal details will not be shared with other members of staff or external agencies without a lawful basis for data processing as outlined in the UK GDPR. Under no circumstances will staff members' personal details be shared with parents.

Consent

The school/trust will ensure its consent mechanisms meet the standards of the UK GDPR in accordance with the school/trust's Data Protection Policy. The school/trust will only accept consent where:

- It has been positively indicated consent will not be inferred from silence, inactivity or preticked boxes.
- It is given freely, specific, informed, and an unambiguous indication of the individual's wishes.

The DPO and marketing officer will ensure a record of consent is kept, documenting how and when consent was given. The DPO will manage all requests to withdraw consent.

Where the school/trust requests consent for marketing purposes, the request will clearly outline and explain that consent can be withdrawn by the individual at any time. The DPO will vet all consent requests relating to marketing before they are sent out to ensure they comply with the UK GDPR.

Individual's consent will always be sought for the following:

- Written marketing material, including emails, text messages, and letters home.
- Direct social media marketing material, e.g. tagging individuals in posts.
- The use of images and/or videos of pupils, e.g. in the school/trust prospectus, social media, website, and other promotional material.

The school/trust reserves the right to use any data, e.g. photos, that was processed before consent was withdrawn, as consent was given at the point of processing; however, the school/trust will take all reasonable measures to remove any data for which consent was provided before the consent was withdrawn, e.g. photos on social media.

Consent will be reviewed at least annually. Where necessary, the school/trust will request that individuals refresh their consent in light of any changes to data processing.

Right to object

In accordance with the UK GDPR, all individuals have the right to object to receiving direct marketing correspondence. The school/trust will make the individual's right to object clear when requesting consent.

Where an individual exercises their right to object, the school/trust will stop processing personal data for direct marketing purposes as soon as the objection is received. The school/trust will not refuse an individual's objection regarding personal data that is being processed for direct marketing purposes.

Right to erasure

In accordance with the UK GDPR, all individuals have the right to request the deletion or removal of personal data where there is no compelling reason for its continued processing, e.g. where a parent's child has left the school/trust.

In requests for consent, the marketing officer and DPO will ensure the reasons for processing are clear, e.g. by ensuring they are not obscured by lengthy procedures or small print. In its requests for consent, the school/trust will make it clear all individuals have the right to erasure in the following circumstances:

- Where the personal data is no longer necessary in relation to the purpose for which it was originally collected or processed
- When the individual withdraws their consent

- When the individual objects to the processing and there is no overriding legitimate interest for continuing the processing
- The personal data was unlawfully processed
- The personal data is required to be erased in order to comply with a legal obligation
- The personal data is processed in relation to the offer of information society services to a child

Right of access and SARs

In accordance with an individual's right of access under the UK GDPR, personal information, confirmation of data processing, and other supplementary information will be shared with individuals who request access.

The procedure below will be followed for SARs:

- The requests will be made to the board of trustees and will be responded to within one month of receipt.
- The period of compliance may be extended by a further two months where the requests are complex or numerous. If this is the case, individuals will be informed within one month of receipt of the request, with an explanation of why an extension is required.
- A pupil, or the parent of a pupil, will have the right to access the information that the school/trust holds about the pupil in question.
- Individuals have the right to access their personal data free of charge.
- Where requests are manifestly unfounded or excessive, a reasonable charge for the administrative costs of providing the information will be applied, or the request will be refused.
- If any request is refused, the individual will be informed of their right to complain to the supervisory authority and to a judicial remedy without delay within one month.

Under the UK GDPR, remote access to a secure self-service system will be given to provide individuals with direct access to their personal information.

Freedom of information requests

In line with the Freedom of Information Act 2000, private data and public records can potentially be accessed through lodging a freedom of information (FOI) request. The procedure below will be followed in terms of FOI requests:

- The requests will be made in writing to the school/trust, stating the name and address of the requester, and a description of the information requested.
- Successful FOI requests will be responded to within 20 working days from receipt of the request, unless the request does not comply with the procedure set out in the school/trust's Freedom of Information Policy.
- The school/trust holds the right to charge the requester a fee, if complying with the request would cost the school/trust an excess of £450.
- Certain information will not be shared, such as that explained in Part 2 of the Freedom of Information Act 2000.

9. Marketing

Individuals will not receive any marketing materials until after the school/trust has received their consent, in line with the school/trust's Data Protection Policy.

Marketing correspondence sent by the school/trust will solely pertain to school/trust-run or school/trust-assisted events and causes. The school/trust will not pass any personal data on to its suppliers or third parties for marketing purposes.

The marketing officer is responsible for creating suitable marketing materials which fit the needs and aims of the school/trust. Marketing materials will be targeted at parents and LAs, and be used to communicate the school/trust's ethos, values, and vision, with a clear link to the local area and wider community.

All marketing materials will receive approval from the headteacher prior to publication. The board of trustees will set a marketing budget at the beginning of each academic year that the marketing officer must work within.

For the purposes of this policy, "direct marketing" is defined as the communication of any advertising or marketing material which is directed to particular individuals. The school/trust will only directly market to parents through written correspondence, e.g. emails and letters home, and only where explicit consent has been provided for the school/trust to do so. Only the parents of current and prospective pupils will receive direct marketing.

Parents will automatically cease to receive marketing materials from the school/trust six months after their youngest child has left the school/trust.

The school/trust prospectus

The prospectus will be used to communicate information regarding the following:

- Clubs and activities
- School/trust hours
- School/trust uniform
- Term dates
- The school/trust calendar
- Ofsted reports
- Exam information

The school/trust prospectus will be updated each Summer term. The content of the prospectus will complement the work of the school/trust and contain information about the most recent activities and successes of the school/trust, including progress, priorities and performance.

The school/trust website and social media

In accordance with the School/trust Website Policy, the school/trust will ensure its website meets the requirements of the UK GDPR.

The marketing officer is responsible for creating and uploading the content of the school/trust's website and any social media accounts. The marketing officer will routinely monitor and review the

use of school/trust social media accounts, developing the school/trust's social media presence to achieve maximum optimisation.

All school/trust news, press releases and announcements will be regularly uploaded to the school/trust website, posted on social media, and, where necessary, sent to local news outlets. The school/trust's website and relevant social media accounts will also be used to connect with the wider community, for example through advertising enrichment activities.