

# **St John Bosco Catholic** **Primary School**

## Communications Policy

Date policy last reviewed:

7<sup>th</sup> February 2024

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## **Statement of intent**

St John Bosco Catholic Primary School is committed to maintaining effective communication and relationships between parents, pupils and the school.

This policy sets out the aims of the school with regard to internal and external communication, and the responsibilities of the school, its staff members and parents. Staff well-being and workload has been taken into account when devising this policy.

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

- Having a clear and professional communication strategy in place to keep parents well-informed 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, parents, staff members and pupils on key areas
- Monitoring and evaluating communication issues through regular meetings with staff, parents and members of the school 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 policies:

- Data Protection Policy
- Online Safety Policy
- Freedom of Information Policy
- Data and Cyber-security Plan
- Child Protection and Safeguarding Policy
- Confidentiality Policy
- Social Media Policy
- Invacuation, Lockdown and Evacuation Policy
- Complaints Procedures Policy
- Staff Handbook
- Parent Code of Conduct

## **2. Roles and responsibilities**

The Executive Principal and Head of School are responsible for:

- Placing key policies, documents and procedures in areas that maximise their accessibility and usefulness to the entire school community, e.g. on the school website.
- Communicating important information, e.g. the curriculum, clearly to parents.
- Informing parents of all school events within appropriate timelines.
- Ensuring class teachers are regularly keeping parents informed of their child's progress through parent evenings, termly report cards and end of year audio reports.
- Informing parents about the types of data that the school 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.
- 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.
- Taking steps to ensure parents who do not have access to the internet can still access the information that is included on the school website and weekly class newsletters.
- Approving all marketing and communication-related proposals and materials.
- Setting appropriate timescales within the marketing strategy.
- Overseeing the overall implementation of this policy.

The member of staff responsible for communications is responsible for:

- Ensuring the communication of key messages and school 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 events and promoting them accordingly.
- Developing and managing networking and engagement programmes to enhance the school's relationship with parents, other schools, LAs and the wider community.
- Helping to shape school events which exemplify and communicate the school's values, e.g. prospective parents' evenings.
- Advising on event planning with the aim of improving audience experience.
- 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.

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.

Parents are responsible for:

- Reading the key communications circulated by the school and responding or acting on these communications where required, e.g. by attending meetings.
- Logging on to the school website for detailed information about the school calendar, term dates, the curriculum, school achievements and other useful downloads.
- Informing the school 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 with other members of staff, is strong, effective, and abides by the procedures outlined in the Staff Handbook and Staff Code of Conduct.

Staff maintain a timetable outlining weekly activities and a whiteboard for daily messages in the staff room. Written communications to specific staff members are delivered via email.

#### **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 to parents**

Parents will be contacted through the following methods:

- Letters home
- Emails
- Text messages
- Phone calls
- The school website
- Marvellous Me
- School Facebook page
- School newsletters
- In-person meetings

In line with the Social Media Policy, 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 subscribes to an electronic communication system, which is used to achieve effective and consistent communication with parents. The school will ensure that:

- Only the Executive Principal and Head of School, and other staff authorised by the Executive Principal and Head of School, 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 Executive Principal and Head of School will hold meetings for new parents prior to their child's entry to the school.

If a pupil is absent from school and the school has no indication of the reason for the absence, the school will contact the pupil's parent via 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 has the right to contact the education welfare officer to ensure the pupil's wellbeing and safety.

### **Communication from parents to the school**

For general and urgent enquiries, parents will be required to ring the school office, which is open from **Monday to Friday** between **8:00am and 4.30pm**, on **0121 556 0228**. For non-urgent enquiries, parents will be required to **email** the school using the correct **email address**.

Mandy.Grubham@st-johnbosco.sandwell.sch.uk = Executive Principal

Jacky.Briscoe@st-johnbosco.sandwell.sch.uk = Head of School/SENCO

Elaine.Kenny@st-johnbosco.sandwell.sch.uk = Office Administrator

Sarah.Brierley@st-johnbosco.sandwell.sch.uk = Office Manager

All emails to the school 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.

Pupils have a home-school diary which can be used by parents to record information that they wish to share regularly with the pupils' teacher. Class newsletters will be used to record key education-related information for parents, e.g. homework assignments, and as a regular channel to update parents on what their child is learning about in school.

Teachers will be available to discuss pupils' progress and any concerns with parents at the 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 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 will follow its Invacuation, Lockdown and Evacuation Policy – parents will routinely receive updates on how the school will communicate with them during an invacuation, lockdown or evacuation via the school newsletter.

Where an incident affects the whole school community, such as power failure or snow, the school will send all parents an email and text message with information on how the school will be operating, e.g. reduced hours or closure. If the school is closed for more than one day due to adverse weather or similar problem, an update will be emailed out at least once a day.

## **6. Email communication**

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

All staff will have their own email account, which will be used to conduct all school-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 will aim to respond to all email enquiries within two 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:

### **Implementing set times for responding to emails**

- The school will establish a set window of time that staff can be expected to respond to emails, which will be communicated to the school community. This is between 8am and 4pm Monday to Friday.
- Parents will be made aware that staff are not able to check emails consistently throughout the day.
- The school 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 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, 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 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's reflection on priorities, activities and future plans.

### **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 will aim to meet parents within five working days. The school will determine the level of urgency in requests for meetings.

### **Recording meetings**

If parents and/or other individuals wish to record a meeting, whether the meeting is virtual or in person, they will discuss their intentions with the school no less than 24 hours before the meeting commences. The school will decide if recording requests are appropriate, in consideration of the meeting's subject matter and the school's Confidentiality Policy.

The school will accept all recording requests in exceptional circumstances, e.g. if parents are hard of hearing or have a memory-related disability.

For meetings to be recorded, consent will need to be obtained from all participants. The final decision to permit any individual and/or parental recording of meetings will reside with the school.

If parents and/or other individuals fail to obtain the school's permission to record before the meeting begins, and insist on recording without permission, the school will be permitted to suspend the meeting.

Any complaints surrounding the school's rejection of a request to record a meeting, or the school's suspension of a meeting due to permission not being granted, will be managed in line with the school's Complaints Procedures Policy.

## **8. Data protection and consent**

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

- It has been positively indicated – consent will not be inferred from silence, inactivity or pre-ticked 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 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 prospectus, website, and other promotional material.

The school 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 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 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 will make the individual's right to object clear when requesting consent.

Where an individual exercises their right to object, the school will stop processing personal data for direct marketing purposes as soon as the objection is received. The school 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.

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 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 in writing to the governing board 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 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, 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's Freedom of Information Policy.
- The school holds the right to charge the requester a fee, if complying with the request would cost the school an excess of £450.
- Certain information will not be shared, such as that explained in Part 2 of the Freedom of Information Act 2000.

### **The school website and social media**

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

The Executive Principal is responsible for delegating the responsibility for creating and uploading the content of the school's website and any social media accounts. This allocated person will routinely monitor and review the use of school social media accounts, developing the school's social media presence to achieve maximum optimisation.

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

## **9. Monitoring and review**

The efficiency of this policy will be continually monitored throughout the year by the Executive Principal and Head of School and governing board. This policy will be reviewed annually by the governing board. The next scheduled review date for this policy is February 2025.