

**Three Counties Academy Trust**



# Two-Way Radio Policy

## #FI23

Last amended 12<sup>th</sup> December 2025

To be reviewed no later than August 31<sup>st</sup> 2028

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## Common abbreviations and acronyms

<b>AA</b>	Admissions Authority	<b>HASH</b>	Herefordshire Association of Secondary Heads
<b>AAI</b>	Adrenaline Auto-Injector (Epi Pen)	<b>HBV</b>	Honour Based Violence
<b>ACM</b>	Asbestos Containing Materials	<b>HR</b>	Human Resources
<b>AFH</b>	Academies Financial Handbook	<b>H&amp;S</b>	Health and Safety
<b>AHT</b>	Assistant Headteacher	<b>HoS</b>	Head of School
<b>AIR</b>	Attendance Intervention Reviews	<b>HSE</b>	Health and Safety Executive
<b>APIs</b>	Application Programme Interfaces	<b>ICO</b>	Information Commissioners Office
<b>BAME</b>	Black, Asian and Minority Ethnic Backgrounds	<b>IHP</b>	Individual Healthcare Plan
<b>BCP</b>	Business Continuity Plan	<b>IRMS</b>	Information and Records Management Society
<b>BFR</b>	Budget Forecast Return	<b>IWF</b>	Internet Watch Foundation
<b>CAMHS</b>	Child and Adolescent Mental Health Services	<b>KCSIE</b>	Keeping Children Safe in Education
<b>CEO</b>	Chief Executive Officer	<b>KS1/2/3/4</b>	Key Stage 1/2/3/4
<b>CFO</b>	Chief Financial Officer	<b>LAC</b>	Looked After Child
<b>CIF</b>	Condition Improvement Fund	<b>LADO</b>	Local Authority Designated Officer
<b>CIN</b>	Child in Need	<b>LGB</b>	Local Governing Body
<b>CLA</b>	Children Looked After	<b>LLC</b>	Low-Level Concerns
<b>CMIE</b>	Child Missing in Education	<b>LSA</b>	Learning Support Assistants
<b>COO</b>	Chief Operating Officer	<b>MASH</b>	Multi-Agency Safeguarding Hub

<b>COSHH</b>	Control and Substances Hazardous to Health	<b>MAT</b>	Multi-Academy Trust
<b>CP</b>	Child Protection	<b>MFA</b>	Multi-Factor Authentication
<b>CPD</b>	Continuing Professional Development	<b>MFL</b>	Modern Foreign Language
<b>CSCS</b>	Children's Social Care Services	<b>NCSC's</b>	National Cyber Security Centres
<b>CSE</b>	Child Sexual Exploitation	<b>NPQEL</b>	National Professional Qualification in Executive Leadership
<b>CTIRU</b>	Counter-Terrorism Internet Referral Unit	<b>PA</b>	Persistent Absence
<b>CWD</b>	Children with Disabilities	<b>PAN</b>	Published Admission Number
<b>DBS</b>	Disclosure and Barring Service	<b>PECR</b>	Privacy and Electronic Communications Regulations
<b>DDSL</b>	Deputy Designated Safeguarding Lead	<b>PEP</b>	Personal Education Plan
<b>DfE</b>	Department for Education	<b>PEEP</b>	Personal Emergency Evacuation Plan
<b>DHT</b>	Deputy Headteacher	<b>PEx</b>	Permanent Exclusion
<b>DSE</b>	Display Screen Equipment	<b>PLAC</b>	Previously Looked After Child
<b>DSL</b>	Designated Safeguarding Lead	<b>PP</b>	Pupil Premium
<b>DPO</b>	Data Protection Officer	<b>PSHE</b>	Personal, Social and Health Education
<b>EAL</b>	English as an Additional Language	<b>PSED</b>	Public Sector Equality Duty
<b>ECT</b>	Early Career Teacher	<b>PTFA</b>	Parent, Teacher and Friends Association
<b>EHA</b>	Early Help Assessment	<b>RIDDOR</b>	Reporting of Injuries, Diseases and Dangerous Occurrences Regulations
<b>EHCNA</b>	Education, Health and Care Needs Assessment	<b>RHE</b>	Relationships and Health Education

<b>EHCP</b>	Education, Health and Care Plan	<b>RSHE</b>	Relationships, Sex and Health Education
<b>EHE</b>	Elective Home Education	<b>SALT</b>	Speech and Language Therapist
<b>ELSA</b>	Emotional, Literacy and Support Assistant	<b>SARC</b>	Sexual Assault Referral Centre
<b>ESFA</b>	Education and Skills Funding Agency	<b>SBM</b>	School Business Manager
<b>EVC</b>	Educational Visit Coordinator	<b>SCCs</b>	Standard Contractual Clauses
<b>EWO</b>	Education Welfare and Safeguarding Support Officer	<b>SDQ</b>	Strengths and Difficulties Questionnaire
<b>EYFS</b>	Early Years Foundation Stage	<b>SEMH</b>	Social, Emotional, and Mental Health
<b>FBV</b>	Fundamental British Values	<b>SENCO</b>	Special Educational Needs Coordinator
<b>FGM</b>	Female Genital Mutilation	<b>SEND</b>	Special Educational Needs and Disabilities
<b>FOI</b>	Freedom of Information	<b>SLA's</b>	Service Level Agreements
<b>FSM</b>	Free School Meals	<b>STEM</b>	Science, Technology, Engineering and Maths
<b>FTS</b>	Find a Tender Service	<b>TA</b>	Teaching Assistant
<b>GAG</b>	General Annual Grant	<b>TCAT</b>	Three Counties Academy Trust
<b>GDPR</b>	General Data Protection Regulation	<b>VSH</b>	Virtual School Headteacher
<b>GIAS</b>	Get Information about Schools		
<b>GPA</b>	Government Procurement Arrangement		

## **Statement of intent**

At Three Counties Academy Trust (TCAT) our schools may use two-way radios as a means of instant communication between staff members. Two-way radios are not subject to delay or connection problems, making them a time-saving device in situations that require a rapid response.

We recognise that the use of two-way radios is not without risk of interference from external sources. Other radio users from outside our schools can tune in to communications and all staff are aware that no conversation is completely private.

This policy outlines the acceptable use of two-way radios to ensure that communication is as safe as possible and compliant with data protection legislation.

## 1. Legal framework

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

- The UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- Ofcom 'Radiocommunications licences'
- The Equality Act 2010

Where legislation has been passed or updated during the shelf life of this policy, we will always apply the latest version available irrespective of the version quoted here.

This policy operates in conjunction with the following policies:

- Data Protection Impact Assessment
- Data Protection Policy (FI20)
- Complaints Policy and Procedure (GN9)
- Disciplinary Policy and Procedure (HR3)

Central TCAT policies have the policy number identified, e.g. "SG1". Where no policy number is identified this indicates the policy is a school specific policy available from an individual TCAT school's website.

## 2. Roles and responsibilities

The Trust Board, and where delegated, Local Governing Bodies have overall responsibility for the implementation of this policy.

Headteachers/Heads of School are responsible for the day-to-day implementation and management of this policy in their schools if they are using two-way radios, as well as for handling complaints regarding this policy in line with TCATs Complaints Policy and Procedure. Before requesting purchase of two-way radios, they are required to undertake a Data Protection Impact Assessment (DPIA) with the Chief Finance Officer.

Where an authorised user to whom a two-way radio is issued has a need for adjustments as a result of their own individual need, the Headteacher/Head of School will liaise with the Trust Estate Manager to make reasonable adjustments in line with our commitment to the Equality Act 2010, e.g. adjustable volume controls.

The Trust Estate Manager is responsible for the general upkeep and security of the two-way radios, and for training and demonstrating correct use of the two-way radios to staff members.

All staff are responsible for using two-way radios appropriately and in accordance with this policy.

### **3. Maintenance and storage**

TCAT primary settings do not routinely use two-way radios as a form of communication. Use in our primary settings would only be where a demonstrable safeguarding need required their deployment.

In our secondary settings, a number of base and mobile units may be used and are kept by staff as directed by the Headteacher/Head of School.

Each radio is assigned its own unique identification code which is used to keep track of them.

Each radio will be signed out when it is issued to a member of staff, and they have sole responsibility for that unit whilst in their possession. The Trust Estate Manager will make a record of the ID code, name of user, and date of issue.

The Trust Estate Manager has the overall responsibility for the two-way radios. Staff to whom a two-way radio are issued should keep them fully charged and must retain the base charging unit within locations not accessible to pupils.

There is a risk of radio users, both external users and non-authorised internal users, who use the same frequency being able to tune in to staff radio conversations. The radio frequency will not be shared publicly and will only be shared with staff members permitted to use two-way radios. The channel used for communication must be changed each week and only communicated to authorised users in advance by a named person and only in writing via an email communication, e.g. the Headteacher/Head of School. To prevent interference from external radio users, radios will be switched off when not in use or being charged.

Two-way radios will not be taken off school premises at any time. Where communication off site is required, this must be planned for, and risk assessed in advance and will not include the use of two-way radios under any circumstances.



If a two-way radio is lost or damaged this must be reported immediately to the Trust Estate Manager and the Headteacher/Head of School. No further communication on the network should take place until the misplaced two-way radio has been located. If the unit cannot be located a new set of two-way radios using a different frequency must be procured. It may be necessary to discipline users where avoidable damage or loss of a two-way radio takes place.

#### **4. Acceptable use**

Our two-way radios are license free, low frequency radios that comply with the PMR446 standard.

The Trust Estate Manager is responsible for keeping up to date with relevant licensing laws and ensuring all two-way radios remain compliant. Staff will be trained in the correct use of two-way radios, and the Trust Estate Manager will demonstrate how to use them appropriately, in line with the manufacturer's instructions.

Prior to purchasing two-way radios, TCAT will consider whether the radios are able to scramble or encrypt information transmitted, and if this technology can be utilised during their use to mitigate the risk of unpermitted persons listening in to conversations.

TCAT acknowledges that there is a certain level of risk that comes with using a two-way radio. To mitigate potential risks to safeguarding and data protection, two-way radios are only used for the following reasons:

- To contact staff for support or assistance in an emergency or security incident and to support the school's Behaviour Policy
- To contact support staff, such as technicians and the Trust Estate Manager, for assistance or technical support
- For organisational purposes, e.g. on sports day, open days or school fairs
- For grounds staff to keep in contact easily throughout the day

Every effort must be made by two-way radio users to not reveal sensitive, confidential or identifiable information over radio communication, including people's full names, addresses, or personal details.

Radio users will have due regard for TCATs Data Protection Policy whilst using the two-way radios.

Radio users will only use pupils initials, staff members surnames and will use clear, unambiguous instruction when making contact with other staff over the two-way radios, for example "All SLT to the Dining Room" or "Evacuate all pupils and staff to the school field".

Under no circumstance will staff:

- Use profanity or crude language when using a two-way radio
- Use two-way radios for any other purpose not outlined in this policy
- Allow pupils to use the two-way radios
- Use the two-way radios for personal reasons
- Interfere with other local radios on the same frequency
- Take radios home or outside of the school premises

The following communication guidelines will be followed when using two-way radios:

- Messages are kept concise, simple and to the point
- Staff speak clearly, slowly and in a normal tone
- There is no casual conversation on two-way radios
- Interruptions are avoided unless absolutely necessary

Two-way radios must be checked by the user at the beginning of every school day to ensure they are in good working condition. Two-way radios will be maintained and repaired in line with the manufacturer's instructions. Where a fault is identified, the user must contact the Trust Estate Manager without delay who will repair or replace the unit.

The Headteacher/Head of School will liaise with users at least termly to assess the proficiency and effectiveness of the two-way radios, the systems that they are used within and any adjustments needed locally to improve their use, e.g. a review of users against need, reflection on incidents where two-way radios were used etc.

Any breaches of this policy on the acceptable use of two-way radios will be managed in line with TCATs Disciplinary Policy and Procedure, where necessary.

## Monitoring and review

This policy will be reviewed in line with the published schedule at the front of this document and at any point material changes require it by the Executive Headteacher/CEO in collaboration with the Board appointed Trustee, the Trust Board and Executive and Senior Leadership.

Any changes made to the policy will be amended by the Executive Headteacher/CEO and will be communicated to Executive Leaders, the TCAT Central Team and to Headteachers/Heads of School, who, in turn, will alert school-based staff.

The next scheduled review date for this policy is 31<sup>st</sup> August 2028.

Signed by:

\_\_\_\_\_ Executive Headteacher/CEO

Date: \_\_\_\_\_

\_\_\_\_\_ Board appointed Trustee

Date: \_\_\_\_\_