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Marketing and Communications Policy

#GN15

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**Statement of intent**

Three Counties Academy Trust (TCAT), and our schools, are committed to maintaining effective communication and relationships between parents, pupils and TCAT.

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

TCAT aims to promote effective communication between pupils, members of staff, parents, stakeholders, and all members of the TCAT 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 each TCAT school, parents, staff members and pupils on key areas
* Monitoring and evaluating communication issues through regular meetings with staff, parents, and members of the TCAT community
* Developing a strong marketing presence in order to build a positive reputation for TCAT and our schools within the wider community

For the purpose of clarity, the term ‘parent’ refers to anyone with parental responsibility or carer responsibilities.

# 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 TCAT and school policies:

* Data Protection Policy
* Online Safety Policy
* Freedom of Information Policy
* Data and Cyber-security Breach Prevention and Management Plan
* Child Protection and Safeguarding Policy and Procedures
* Staff and Volunteer Confidentiality Policy
* School Website Policy
* Social Media Policy
* Media Relations Policy
* Adverse Weather Policy
* Invacuation, Lockdown and Evacuation Policy
* Complaints Procedures Policy
* Staff Handbook
* Parent Code of Conduct
* Staff Code of Conduct
* Home-school Communication Policy

# Roles and responsibilities

The Executive Headteacher/CEO is responsible for:

* Placing key policies, documents and procedures in areas that maximise their accessibility and usefulness to the entire community, e.g., on the TCAT and school websites
* 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 TCAT
* 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
* If not fulfilling the role themselves, appoint a Marketing Officer with the appropriate skills and knowledge required to fulfil the role
* Approving all marketing and communication-related proposals and materials
* Setting appropriate timescales within the marketing strategy
* Overseeing the overall implementation of this policy

The Headteacher/Head of School is responsible for:

* Communicating important information, e.g., the curriculum, clearly to parents
* Informing parents of all school events within appropriate timelines.
* Regularly keeping parents informed of their child’s progress.
* 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
* Ensuring the communication of key messages and school values
* Identifying the promotional value of pupil achievements and school events
* 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
* Targeting relevant professionals who may issue children with education, health, and care (EHC) plans, e.g., education psychologists.
* Identifying and targeting specific groups to provide information relevant to them, e.g., information relevant to the parents of pupils with SEND

The Marketing Officer is responsible for:

* 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 TCAT’s relationship with parents, other schools, LAs and the wider community
* Undertaking appropriate market research, including competitor analysis, demographic and economic reviews, and the examination of educational trends
* Advising on event planning with the aim of improving audience experience
* Meeting the timescales set to complete marketing tasks
* Setting marketing goals and targets for each TCAT school
* 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 TCAT and our schools, 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’s marketing communication as required

Parents are responsible for:

* Reading the key communications circulated by TCAT and our schools, and responding or acting on these communications where required, e.g., by attending meetings
* Logging on to the individual school website for detailed information about the school calendar, term dates, exam details, monitoring and assessments, school achievements and other useful downloads
* Informing TCAT and the individual 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

# Internal communication

**Communication between members of staff**

Staff will ensure their internal communication, i.e., across TCAT or within their 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 daily bulletin or meeting for daily messages. Written communications to specific staff members are delivered via pigeonholes or by 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.

The only exception relates to contact to facilitate swift completion of examined coursework for Year 11 pupils, and in this instance, all communication must be approved by the Headteacher/Head of School in advance and only be conducted via TCAT email systems. All email communication as such must be retained by the staff member.

# External communication

**Communication from TCAT or the school to parents**

Parents will be contacted through the following methods:

**TCAT**

* Letters home via individual TCAT schools
* Phone calls where requested on TCAT business only
* The TCAT website (<https://www.threecountiesacademytrust.com/>)
* TCAT newsletters
* In-person meetings where requested on TCAT business only
* The TCAT Facebook page
* Interaction with social media channels

**Queen Elizabeth High School**

* Letters home
* Text messages
* Phone calls
* The school website (<http://qehs.co/>)
* School newsletters
* In-person meetings
* The Parent and Carer Facebook page

**St. Peter’s Primary School**

* Letters home
* Text messages
* Phone calls
* The school website (<https://st-peters.hereford.sch.uk/>)
* School newsletters
* In-person meetings
* The Parent and Carer Facebook page

**Bredenbury Primary School**

* Letters home
* Text messages
* Phone calls
* The school website (<https://bredenbury.hereford.sch.uk/>)
* School newsletters
* In-person meetings
* The Parent and Carer Facebook page

**Stoke Prior Primary School**

* Letters home
* Text messages
* Phone calls
* The school website (<https://www.stokeprior.hereford.sch.uk/>)
* School newsletters
* In-person meetings

In line with TCAT’s 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, e.g., official TCAT sanctioned Parent and Carer Facebook groups.

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

TCAT schools subscribe to an electronic communication system, which is used to achieve effective and consistent communication with parents. Each TCAT school will ensure that:

* Only the Headteacher/Head of School, and other senior staff authorised by the headteacher, can access, and use the messaging system. Associate staff can use the system at the direction of a senior member of staff
* 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/Head of School, or a designated member of their senior leadership team will hold meetings for new parents prior to their child’s entry to any TCAT 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 will contact TCAT’s Education Welfare Officer to ensure the pupil’s wellbeing and safety.

**Communication from parents to TCAT or a TCAT school**

For general and urgent enquiries, parents will be required to ring TCAT or the individual TCAT school office.

All emails to TCAT or an individual TCAT school will specify the member of staff that the query is addressed to. All emails 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 may have a home-school planner/diary which can be used by parents to record information that they wish to share regularly with the pupils’ teacher. Home-school planners/diaries will be used to record key education-related information for parents, e.g., homework assignments, and as a regular channel for communication with parents.

Teachers **may** be available to discuss pupils’ progress and any concerns with parents before the start and end of each school day subject to their commitments.

# Emergency communication

All parents will ensure that their 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 Procedures and the TCAT Policy – parents will routinely receive updates on how the school and TCAT will communicate with them during an invacuation, lockdown or evacuation.

Where an incident affects the whole TCAT or school community, such as power failure or snow, each affected TCAT school will send all parents an email or 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 posted on the school website at least once a day. The school will also ask the local radio station, to broadcast a closure announcement. Parents should also access the Herefordshire Council School Closure Page on their website.

# Email communication

Email and internet access will be used in line with TCAT’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 TCAT and 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.

Although in many circumstances responses to emails will be on the same day, each TCAT school will commit to respond to all email enquiries within 2 school 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 communication, e.g., informing the school 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**

* TCAT will establish a set window of time that staff can be expected to respond to emails, which will be communicated to the TCAT and school community, nominally this is between 8.00am and 6.00pm
* Parents will be made aware that staff are not able to check emails consistently throughout the day
* The TCAT and 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
* TCAT does 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 TCAT and where they differ, 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

# Meetings with staff and parents

**Meetings between members of staff**

A programme of regular staff meetings will be set out in the individual 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 each school’s reflection on priorities, activities, and future plans.

Regular meetings between staff within schools are at the discretion of the Headteacher/Head of School.

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 for future reference. All meetings at SLT level and above must have agenda and minutes lodged with the PA to the Trust SLT.

**Meetings between staff and parents**

When parents wish to organise meetings with members of staff, they should first contact the appropriate 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 school 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 individual 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, each TCAT school will aim to meet parents within five working days. The individual 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, requests to record a meeting immediately prior to commencement will be denied and the offer to reschedule a meeting will be made allowing enough time to consider the request to record. The individual TCAT school will decide if recording requests are appropriate, in consideration of the meeting’s subject matter and the TCAT Confidentiality Policy.

Each TCAT 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 individual TCAT school.

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

# Data protection and consent

TCAT and our schools will abide by the TCAT Data Protection Policy and related documentation in all 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**

TCAT and our schools will ensure consent mechanisms meet the standards of the UK GDPR in accordance with the TCAT Data Protection Policy. TCAT 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/or Central Team administrative functions 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 TCAT or an individual TCAT 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 or TCAT Central Team 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 TCAT or school prospectus, websites, and other promotional materials

TCAT reserves the right to use any data, e.g., photos, that were processed before consent was withdrawn, as consent was given at the point of processing; however, TCAT 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 every Phase change. Where necessary, TCAT 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. TCAT will make the individual’s right to object clear when requesting consent.

Where an individual exercises their right to object, TCAT and the individual TCAT school will stop processing personal data for direct marketing purposes as soon as the objection is received. TCAT 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, TCAT 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 Local Governing Body 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 TCAT or an individual TCAT 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 TCAT or an individual TCAT school, stating the name and address of the requester, and a description of the information requested. For all requests received the Executive Headteacher/CEO must be informed
* 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 TCAT’s Freedom of Information Policy
* TCAT holds the right to charge the requester a fee, if complying with the request would cost TCAT in excess of £450, including time to facilitate the request charged at £25.00 per hour per staff member involved
* Certain information will not be shared, such as that explained in Part 2 of the Freedom of Information Act 2000

# Marketing

Individuals will not receive any marketing materials until after TCAT has received their consent, in line with TCAT’s Data Protection Policy.

Marketing correspondence sent by TCAT or an individual TCAT school will solely pertain to school-run or school-assisted events and causes. TCAT 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 TCAT and our family of schools. Marketing materials will be targeted at parents and LAs and be used to communicate both TCAT’s and the school’s ethos, values, and vision, with a clear link to the local area and wider community.

All marketing materials will receive approval from the Executive Headteacher/CEO prior to publication. The Trust Board 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. TCAT will only directly market to parents through written correspondence, e.g., emails and letters home, and only where explicit consent has been provided for TCAT to do so. Only the parents of current and prospective pupils will receive direct marketing.

Parents will automatically cease to receive marketing materials from TCAT six months after their youngest child has left the TCAT family of schools.

**The TCAT and school prospectus**

The TCAT and individual TCAT school prospectus will be updated each academic year. The content of the prospectus will complement the work of TCAT and our schools and contain information about the most recent activities and successes of TCAT and our schools, including progress, priorities, and performance.

**The TCAT and school websites and social media**

In accordance with the School Website Policy, TCAT and each TCAT school will ensure its website meets the requirements of the UK GDPR. The Executive Headteacher/CEO will maintain the TCAT website and social media platforms, and individual Headteachers/Heads of School will maintain those specific to their school.

Content should be shared with the designated staff with ability to upload and maintain content.

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

# 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 conjunction with Headteachers/|Heads of School and the Trust Board. Any changes made to the policy will be amended by the Executive Headteacher/CEO and will be communicated to all members of staff.

The next scheduled review date for this policy is 31st August 2027.

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| Signed by: | | | |
|  | Executive Headteacher | Date: |  |
|  | Chair of the Trust Board | Date: |  |