



# Athena Learning Trust Communications Policy

## **Review**

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Reviewed by: Board

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## 1. Introduction

### 1.1 Application

This Athena Learning Trust Communications Policy applies to Athena Learning Trust as a whole, including all schools and the shared service.

Athena Learning Trust, including all schools, the shared service, trustees, governors and staff, must abide by this policy.

This policy is subject to the [scheme of delegation](#). If there is any ambiguity or conflict then the scheme of delegation and any specific alteration or restriction to the scheme approved by the board of trustees takes precedence.

In implementing this policy and associated policies and procedures the governing body, any principals/head teachers and school staff, and shared service staff, must take account of any advice or instruction given to them by the Athena Learning Trust CEO or board of trustees.

Where appropriate policies and procedures relating to trustees, governors and/or governance have been approved by the board of trustees, they override relevant references to governors within the these policies and procedures.

If there is any question or doubt about the interpretation or implementation of this Policy, the Athena Learning Trust CEO should be consulted.

### 1.2 Approval and review

Maintenance of this Policy is the responsibility of the Athena Learning Trust CEO.

This Policy was approved by the Board of Trustees on: 24th October 2025.

This Policy is due for review by: End of October 2028.

### 1.3 Terminology

The Trust means Athena Learning Trust (Athena Learning Trust).

- School means a school within Athena Learning Trust.
- Principal means the Principal or principal of the school.
- CEO means the chief executive officer of Athena Learning Trust.
- Trust Shared Service means services, functions and staff that are not contained within a school budget and/or are not the responsibility of a Principal and/or Governing Body.
- Governors and Trustees includes all members of a governing body, Trustees, non-trustee members of Trust Committees.
- Governing body means the committee of the Board of Trustees to which Trustees have delegated appropriate powers and functions relating to the governance of a Trust school or schools.

In this Policy references to Athena Learning Trust will be read as including Athena Learning Trust Shared Service and all schools within Athena Learning Trust.

References in this Policy to a school should also be read as the Shared Service for services, functions and staff that are not contained within a school budget and/or are not the responsibility of a Principal and/or Governing Body. With respect to the shared service, references in this Policy to the responsibilities of the Principal and Governing Body should be read as Athena Learning Trust CEO and trustees respectively.

## **1.4 Responsibilities**

It is the responsibility of the governing body and Principal of each school, and of the Board of Trustees and Athena Learning Trust CEO for the Shared Service, to ensure that their school/service and its staff adhere to this Athena Learning Trust Communications Policy. In implementing this Policy the governing body, Principal and school/Trust staff must take account of any advice given to them by the Athena Learning Trust CEO and/or Board of Trustees.

## **2. Policies and procedures**

The following Trust policies and their associated procedures are an integral part of this Communications Policy:

### **2.1. Complaints Policy**

#### ***2.1.1 Dealing with complaints***

When responding to concerns or complaints, each school and its governing body will follow this policy and the Athena Learning Trust Complaints Procedure as agreed by the Board of Trustees.

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

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

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

Complaints about Athena Learning Trust as a whole, the Shared Service, an executive officer, a governor or governing body of any school, or a Trustee, will be dealt with through the Trust's published Complaints Procedure that can be found on the Athena Learning Trust website.

### ***2.1.2 Exceptions to the Complaints procedure***

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

- Complaints about child protection matters are handled under the Trust's child protection and safeguarding procedures and in accordance with relevant statutory guidance.
- Complaints about the administration of the appeals process for admissions to schools within the Trust are dealt with through schools' admissions appeals procedures.
- Representations against a pupil's suspension or exclusion from school are dealt with under each school's exclusions procedures and the relevant statutory guidance.
- Complaints from Trust staff will be dealt with under the Trust's internal grievance procedures.
- Complaints about the conduct of Trust staff will be considered under the Trust's staff disciplinary procedures. Complainants will not be informed of any disciplinary action taken against a staff member as a result of a complaint, but will be notified that the matter is being addressed and allowed to progress their complaint through the school's complaints procedure.
- Complaints about the conduct of Trustees or governors or non-Trustee members of Trust Committees will be considered under the Trust's Trustee and Governor code of conduct, if appropriate, but complainants will not be informed of any outcomes.
- The Trust also has a Whistleblowing Policy for all members of Trust staff, contractors, Trustees and governors.

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

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

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

### ***2.1.3 The Complaints Procedure***

Each school and the shared service must follow the common Athena Learning Trust Complaints Procedure as approved by the Board of Trustees.

The Athena Learning Trust Complaints Procedure will include:

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

If, after it having been dealt with in accordance with the Complaints Procedure, the complainant does not feel the matter has been resolved, they may then make a complaint to the DfE.

The complaints panel may make findings and recommendations to the CEO and/or Board of Trustees; a copy of those findings and recommendations will be provided to the complainant and, where relevant, the person complained about; and made available for inspection by the CEO.

The CEO must keep a record of all complaints to the Trust as a whole or the Shared Service, and whether they are resolved following a formal procedure, or proceed to a panel hearing; and the action taken by the Trust as a result of those complaints (regardless of whether they are upheld).

All correspondence, statements and records relating to individual complaints must be kept confidential, except where the Secretary of State or a body conducting an inspection under section 109 of the 2008 Act requests access to them, and retained in line with the Athena Learning Trust Data Retention Policy and Part 7 of the Education (Independent School Standards) Regulations 2014.

Associated Procedures:

- Athena Learning Trust Trust Complaints Procedure.
- School Complaints Procedures.

## **2.2. Data Protection Policy**

The Athena Learning Trust is the 'data controller' in terms of the Data Protection Act 2018, and is thereby required to ensure that the Trust and the schools within it comply with the Act.

The Trust and all schools within it will abide by the Athena Learning Trust Data Protection Policy (as approved by the Board of Trustees).

The Athena Learning Trust Data Protection Officer is: Judicium Consulting Limited.

Email: [dataservices@judicium.com](mailto:dataservices@judicium.com)

Address: 72 Cannon Street, London, EC4N 6AE

Telephone: 0203 326 9174

Associated Procedures:

- Athena Learning Trust Data Breach Procedure
- Athena Learning Trust Subject Access Request Procedure
- Athena Learning Trust CCTV Use Procedure
- School Privacy Notices

### **2.3. Freedom of Information Policy**

The Athena Learning Trust is the 'public authority' under the terms of the Freedom of Information Act 2000 and is thereby subject to the Act and responsible for the information held by the Trust and by the schools within the Trust.

The Trust and all the schools within the Trust will abide by the Athena Learning Trust Freedom of Information Policy (as approved by the Board of Trustees).

The Trust and the schools within the Trust will make information available to the public as part of their normal business activities. The Trust will endeavour to make the maximum amount of information readily available at minimum inconvenience and cost to the public; if charges have to be made, they will be justified and transparent and kept to a minimum.

The Trust and the schools within the Trust will each adopt and follow their own Publication Scheme, in accordance with the Trust Freedom of Information Policy, the Act and guidance issued by the Department for Education and the Information Commissioner.

Associated Procedures:

- Athena Learning Trust Freedom of Information Request Procedure

### **2.4. Provision of information online**

Athena Learning Trust is required to ensure that certain information about the Trust as a whole and individual schools within the Trust is made available online.

The Trust and all the schools within the Trust will abide by the Athena Learning Trust / School Publication Scheme for the provision of information online.

### **2.5. ICT Usage Policy**

All staff, governors, Trustees and volunteers of the schools and services of the Athena Learning Trust are bound by Athena Learning Trust policies and procedures with regard to their use of Trust and school ICT systems, and must ensure that the ICT facilities of the Trust are used legally, securely,

effectively and in a spirit of cooperation, trust and consideration for others, so that they remain available.

All staff, governors, Trustees and volunteers of the schools and services of the Athena Learning Trust must comply with the Athena Learning Trust Cyber Security Procedure; failure to follow the Procedure will be considered a disciplinary matter.

All the schools within the Trust must follow the Athena Learning Trust CCTV Use Procedure.

Associated Procedures:

- Athena Learning Trust Cyber Security Procedure

## **2.6. Whistleblowing Policy**

The Athena Learning Trust Whistleblowing Policy provides a procedure for members of staff, volunteers, trustees and governors of the Trust and of all the schools within the Trust to raise any concerns they may have about the Trust's work, such as malpractice or wrongdoing.

The Trust and all the schools within the Trust will follow the Athena Learning Trust Whistleblowing Policy.

## **2.7. External communications**

To manage the image of and to protect the reputation of the Trust and the schools within it, the Trust executive and Board of Trustees will need to be able to monitor and, in some cases, approve communications from schools directed to external organisations, partners and the media.

The schools in the Trust, their staff and governors must not speak, or give the impression that they speak, on behalf of the Trust without the specific authorisation of the Athena Learning Trust CEO; and must not make any statement that is likely to damage or bring into disrepute the Trust or the schools within it.

The Trust and all the schools within the Trust will follow the Athena Learning Trust External Communications Policy.

If there is any ambiguity or conflict between this policy and any of these associated procedures, this Athena Learning Trust Communications Policy takes precedence.



### **3. Associated Policies and Procedures**

The following Trust policies and procedures are directly related to and complement this Athena Learning Trust Communications Policy:

- Staff Code of Conduct
- Governor and Trustees Code of Conduct