



COMMUNICATION & GDPR POLICY

2024-25

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HBEP GDPR Policy

Introduction

This policy outlines the commitment HBEP ("the service") to protect the privacy and personal data of our students, staff, and other individuals associated with the School. The service complies with the UK GDPR and the Data Protection Act 2018.

Scope

This policy applies to all personal data processed by the service, including data of students, parents, guardians, staff, and other stakeholders.

Roles and Responsibilities

- **Data Protection Officer (DPO):** Karen Wicks* (please note that SEIPs operate on behalf of schools who have their own arrangements)
- **Data Controllers:** Lorraine Gough
- **Data Processors:** Behaviour Watch, CLM, LEBC, AP Providers, My Concern, HBEP schools, exam boards

Principles

The service adheres to the principles of data protection outlined by the UK GDPR, which require that personal data shall be:

1. **Processed lawfully, fairly, and transparently**
2. **Collected for specified, explicit, and legitimate purposes**
3. **Adequate, relevant, and limited to what is necessary**
4. **Accurate and kept up to date**
5. **Stored no longer than is necessary**
6. **Processed in a manner that ensures appropriate security**

Rights of Individuals

Individuals have the right to:

- Access their personal data
- Rectify inaccurate data
- Erase data
- Restrict processing
- Data portability
- Object to processing
- Rights in relation to automated decision-making and profiling

Data Subject Access Requests (DSARs)

Requests for access to personal data by data subjects should be made in writing and addressed to the DPO. The service will respond within one month of receipt of the request.

Data Breaches

Any data breaches will be reported to the Information Commissioner's Office (ICO) within 72 hours of discovery, and affected individuals will be notified accordingly.

Training and Awareness

All staff members will receive training on this policy and the service's data protection obligations.

Review and Updates

This policy will be reviewed annually and updated as necessary to reflect best practices and legal requirements.

Privacy Notice

The legal grounds for using your information

- This is common for all personal and sensitive data we collect and process about pupils and staff.
- Some data is more sensitive than other types of data. These special categories are as follows: personal information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic information, biometric information, health information, and information about sex life or orientation.
- The only data that we collect in this category is health information.

Consent

- The referring school will ask for consent to process data about a pupil via the admission process. The type of data that is to be used, and how it is to be used will be specified on the consent forms.
- You have the choice to opt in for certain types of data usage, and this is made clear. However, some data that is collected and processed in schools is not optional.

Legitimate interests

This means that the processing is necessary for legitimate interests except where the processing is unfair to you. HBEP relies on legitimate interests for many of the ways in which it uses information.

Specifically, HBEP has a legitimate interest in:

- Providing educational services to pupils
- Safeguarding and promoting the welfare of pupils and staff
- Promoting the objects and interests of the schools who commission our services
- Ensuring the efficient operation of the service
- Compliance with all relevant legal obligations of the schools who commission our services

Vital interests

For example, to prevent someone from being seriously harmed or killed.

Public interest

- HBEP considers that it is acting in the public interest when providing education.
- Certain regulations, DfE and Local Authority, health and other guidance may require the school via HBEP to process data in the public interest.

Legal claims:

- The processing is necessary for the establishment, exercise or defence of legal claims. This allows us to share information with our legal advisors and insurers.

HBEP Communication Policy

Purpose:

The purpose of this communication policy is to establish clear guidelines for effective communication between HBEP and parents/guardians. By adhering to these principles, we aim to foster a positive and transparent relationship.

Channels of Communication:

1. **Email:** Our primary mode of communication will be email. Parents can expect timely responses during business hours (Monday to Friday, 8:30 AM to 3:30 PM).
2. **Text Messages:** We will use text messages for urgent or time-sensitive matters, such as class cancellations or emergencies.

Response Time:

- **Emails:** We strive to respond to emails within 24 hours (excluding weekends and holidays).
- **Text Messages:** Urgent text messages will receive immediate attention.

Content of Communication:

1. **General Updates:** We will communicate important updates, such as class schedules, curriculum changes, and events. All timetables are emailed to parents and school when they are set up or there are amendments made.
2. **Behavioural Issues:** If there are any behavioural concerns, we will address them promptly and keep parents informed by telephone call or text.
3. **Absence:** We will seek reasons for absence via text or telephone call.
4. **Progress Reports:** Parents will receive regular progress reports for their child by email if requested.

Confidentiality:

- All communication will be treated confidentially. Personal information about students and families will not be shared without consent.

Parent-Teacher Meetings:

- We encourage parents to schedule meetings with HBEP staff to discuss their child's progress, concerns, or any other relevant matters. The Lead Site staff contacts are listed in the Appendix.
- Parents are also provided with contact numbers for any alternative provision settings being used to enable direct communication where needed; this information is emailed to parents with the initial timetable.

Emergency Communication:

- In case of emergencies (e.g., sudden class cancellations, safety alerts), we will promptly notify parents via text message.

Respectful Communication:

- Parents and guardians are expected to communicate with our staff in a respectful and professional manner. Any concerns or feedback should be expressed constructively, keeping in mind the well-being and morale of our dedicated team.
- **Verbal abuse or aggression by email or telephone will not be tolerated by any of our staff and the communication will be terminated.**

Website Communication:

Safeguarding Incident Reporting:

Any safeguarding concerns can be reported direct to us via the link on our website at www.hinckleyandboswortheeducationpartnership.co.uk

Term Dates and Calendar:

Term dates are available on the website homepage and there is also a downloadable calendar for parents

HBEP Contacts:

Numbers and emails for key HBEP staff are available on the homepage.

Parent Resources:

Information about attending provision with HBEP is provided on the website along with links to other LA services and SEND support resources.

Reminder Communication:

Attendance Policy:

Please notify Lorraine Gough if your child is going to be absent; our Attendance Policy is viewable on the website.

Behavioural Expectations:

Our Behaviour Policy is visible on our website, we alert parents immediately by text or telephone call if their child is missing from provision or has been unsafe in their behaviour and caused a risk to self or others.

Emergency Procedures:

Information regarding the provision's invacuation, evacuation and lockdown procedures will be shared with parents/carers via www.hinckleyandboswortheeducationpartnership.co.uk

In the event of an emergency incident requiring an invacuation, evacuation or lockdown, parents/carers will be notified as soon as is reasonably possible via text message.

Parents/carers will be advised not to telephone (or come into) the provision as this may interfere with emergency services or put themselves in danger.

The provision will keep parents/carers up to date via text message as regularly as possible throughout the emergency incident and certainly once the emergency threat has been lifted.

Parents/carers will receive a letter within 24 hours of the incident so that they are fully informed of what happened and the provision's response.

Parents/carers will be notified of their role in an emergency procedure annually.

Holiday Schedule Announcement:

HBEP will send an email or text message to parents well in advance, informing them of any holiday closures. We will include the dates when the centres will be closed and when classes will resume.

Emergency Contact Information:

HBEP staff have intermittent access to emails in the school holidays – in case of emergency call the school that your child attends or contact First Response on 0116 305 0005

Reminders for Upcoming Sessions:

A few days before classes resume after holidays, we will remind parents about the upcoming sessions. We email any changes in schedules, if applicable.

Appendix:

Lead Site Staff contacts:

HBEP Contact Numbers:

Attendance and Transport: Lorraine Gough tel: 07585 442162 Email: lgough@hbep.co.uk
Mon-Fri 9-1pm, Wed 9-3pm

Behaviour and Timetable Queries, Safeguarding : Marcus Snook tel 07379091054 Email msnook@hbep.co.uk

Transition visits, Safeguarding: Martyn Pawley tel: 07920 522941 Email: mpawley@hbep.co.uk
Mon-Wed 8.30-4pm

Director: Karen Wicks tel 07920 522903 Email: kwicks@hbep.co.uk Tues-Fri 7-4pm

HBEP Sites:

Glenfield Tuition Centre Glenfield Annexe, Station Road, Glenfield. LE3 8BQ

Contact: Jo Seager tel: 07867 413280 Email: jseager@hbep.co.uk

The Stute Earl Shilton Social Institute, 12-14 Station Rd, Earl Shilton, LE9 7GA

Contact: Adam Wheldon tel: 07920 522964 Email: awheldon@hbep.co.uk

Carr House Hinckley Unit 5 Carr House, Hawley Road, Hinckley, LE10 0PR

Contact: Marcus Snook tel 07379091054 Email msnook@hbep.co.uk

**Details for external AP providers will be provided separately by email*

Useful Links

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Leicestershire SEND IASS <https://sendiassleicestershire.org.uk/>

ADHD Solutions <https://www.adhdsolutions.org/>

SENA SENAService@leics.gov.uk

Turning Point (Drugs/Alcohol) www.turning-point.co.uk/services/leicestershire

First Response Call 0116 305 0005

Young Minds <https://www.youngminds.org.uk>