



## Website Policy

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## 1. Introduction

The Diocese of Bristol Academies Trust (DBAT) is a multi-academy trust with a faith designation and a Christian religious ethos that is both distinctive and inclusive. Distinctive in the sense that all decisions about the nature and purpose of the Academy are taken through the lens of Christian values, inclusive in the sense that all students and staff are equally valued for their uniqueness in the eyes of God and their belonging to the school community.

## 2. Ethos statement

### **Vision**

The Diocese of Bristol Academies Trust (DBAT) shares the Church of England’s Vision for Education 2016, “Deeply Christian, Serving the Common Good”, which includes four basic elements wisdom, hope, community and dignity. We aim to deliver values-led education with the very best outcomes for children and young people.

### **Purpose**

To provide high quality education enabling young people to flourish and grow: spiritually, in love and in understanding.

### 3. Scope

This policy applies to anyone who accesses any website within our Trust. This policy applies to all schools within the Trust. Where the policy refers to the Trust carrying out activities or duties, the relevant school is interchangeable.

### 4. Introduction

4.1 We are committed to safeguarding the privacy of our website visitors and service users.

4.2 This policy applies where we are acting as a data controller with respect to the personal data of our website visitors and service users; in other words, where we determine the purposes and means of the processing of that personal data.

4.3 Our website incorporates privacy controls which affect how we will process your personal data.

4.4 In this policy, "we", "us" and "our" refers to our above school or Trust name only.

### 5. Credit

5.1 This document was created using a template from SEQ Legal (<https://seqlegal.com>).

### 6. How we use your personal data

6.2 In this Section we have set out:

- i. the general categories of personal data that we may process;
- ii. the purposes for which we may process personal data; and
- iii. the legal bases of the processing.

6.3 We may process data about your use of our website. The usage data may include your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths, as well as information about the timing, frequency and pattern of your service use. This usage data may be processed for the purposes of analysing the use of the website. The legal basis for this processing our legitimate interests, namely monitoring and improving our website.

6.4 We may process information that you provide to us for the purpose of subscribing to our email notifications and/or newsletters. The notification data may be processed for the purposes of sending you the relevant notifications and/or newsletters. The legal basis for this processing is our legitimate interests, namely the proper administration of our communications with users.

6.5 We may process information contained in or relating to any communication that you send to us. The correspondence data may include the communication content. The correspondence data may be processed for the purposes of communicating with you and record-keeping. The legal

basis for this processing is our legitimate interests, namely the proper administration of our communications with users.

6.6 We may process any of your personal data identified in this policy where necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure. The legal basis for this processing is necessary for compliance with a legal obligation to which the controller is subject.

6.7 We may process any of your personal data identified in this policy where necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, or obtaining professional advice. The legal basis for this processing is our legal obligation to protect our schools against risks.

6.8 In addition to the specific purposes for which we may process your personal data set out in this section, we may also process any of your personal data where such processing is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

6.9 Please do not supply any other person's personal data to us, unless we prompt you to do so.

## 7. Retaining and deleting personal data

7.1 This Section sets out our data retention policies and procedure, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal data.

7.2 Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.

7.3 Notwithstanding the other provisions of this Section, we may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

## 8. Your rights

8.4 In this Section, we have summarised the rights that you have under data protection law. Some of the rights are complex and not all of the details have been included in our summaries. Accordingly, you should read the relevant laws and guidance from the regulatory authorities for a full explanation of these rights.

8.5 Your principal rights under data protection law are:

- i. the right to access;
- ii. the right to rectification;
- iii. the right to erasure;
- iv. the right to restrict processing;
- v. the right to object to processing;
- vi. the right to data portability;

- vii. the right to complain to a supervisory authority; and
- viii. the right to withdraw consent.

8.6 You have the right to confirmation as to whether or not we process your personal data and, where we do, access to the personal data, together with certain additional information. That additional information includes details of the purposes of the processing, the categories of personal data concerned and the recipients of the personal data. Providing the rights and freedoms of others are not affected, we will supply to you a copy of your personal data.

8.7 You have the right to have any inaccurate personal data about you rectified and, taking into account the purposes of the processing, to have any incomplete personal data about you completed.

8.8 In some circumstances you have the right to the erasure of your personal data without undue delay. Those circumstances include: the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed; you object to the processing under certain rules of applicable data protection law. However, there are exclusions of the right to erasure. The general exclusions include where processing is necessary: for exercising the right of freedom of expression and information; for compliance with a legal obligation; or for the establishment, exercise or defence of legal claims.

8.9 In some circumstances you have the right to restrict the processing of your personal data. Those circumstances are: you contest the accuracy of the personal data; processing is unlawful but you oppose erasure; we no longer need the personal data for the purposes of our processing, but you require personal data for the establishment, exercise or defence of legal claims; and you have objected to processing, pending the verification of that objection. Where processing has been restricted on this basis, we may continue to store your personal data. However, we will only otherwise process it: with your consent; for the establishment, exercise or defence of legal claims; for the protection of the rights of another natural or legal person; or for reasons of important public interest.

8.10 You have the right to object to our processing of your personal data on grounds relating to your particular situation, but only to the extent that the legal basis for the processing is that the processing is necessary for: the performance of a task carried out in the public interest or in the exercise of any official authority vested in us; or the purposes of the legitimate interests pursued by us or by a third party. If you make such an objection, we will cease to process the personal information unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing is for the establishment, exercise or defence of legal claims.

8.11 You have the right to object to our processing of your personal data for scientific or historical research purposes or statistical purposes on grounds relating to your particular situation, unless the processing is necessary for the performance of a task carried out for reasons of public interest.

8.12 If you consider that our processing of your personal information infringes data protection laws, you have a legal right to lodge a complaint with a supervisory authority responsible for data protection. You may do so in the EU member state of your habitual residence, your place of work or the place of the alleged infringement.

8.13 To the extent that the legal basis for our processing of your personal information is consent, you have the right to withdraw that consent at any time. Withdrawal will not affect the lawfulness of processing before the withdrawal.

8.14 You may exercise any of your rights in relation to your personal data by contacting us.

## 9. About cookies and web storage

9.1 A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored on your computer/device by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.

9.2 Cookies may be either "persistent" cookies or "session" cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.

9.3 Cookies do not typically contain any information that personally identifies a user, but personal information that we store about you may be linked to the information stored in and obtained from cookies.

9.4 Web storage is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored on your computer/device by the browser. Web storage supports persistent data storage, similar to cookies but with a greatly enhanced capacity and is more secure.

## 10. Cookies and web storage that we use

10.1 We use cookies for the following purposes:

- i. Authentication - we use cookies to identify you when you visit our website and as you navigate our website (cookies used for this purpose is: sessionid)
- ii. Status - we use cookies [to help us to determine if you are logged into our website (cookies used for this purpose is: sessionid)
- iii. Security - we use cookies as an element of the security measures used to protect user accounts, including preventing fraudulent use of login credentials, and to protect our website and services generally (cookies used for this purpose is: csrftoken)
- iv. Analysis - we use cookies to help us to analyse the use and performance of our website and services (cookies used for this purpose are: style and piwik visitor)
- v. Cookie consent - we use web storage to store your preferences in relation to the use of cookies more generally (web storage used for this purpose is: cookiecheck)

## 11. Cookies used by our service providers

- 11.1 Our service providers use cookies and those cookies may be stored on your computer when you visit our website.
- 11.2 We use Twitter to supply our twitter feed. This service uses cookies to allow the Twitter module to function correctly. You can view the privacy policy of this service provider at <https://help.twitter.com/en/rules-and-policies/twitter-cookies> The relevant cookies are: guest id and k
- 11.3 We use YouTube to embed YouTube videos. This service uses cookies for YouTube embedded videos to run correctly. You can view the privacy policy of this service provider at <https://policies.google.com/technologies/cookies>

## 12. Managing cookies

- 12.1 Most browsers allow you to refuse to accept cookies and to delete cookies. The methods for doing so vary from browser to browser, and from version to version. You can however obtain up-to-date information about blocking and deleting cookies via these links:
- i. <https://support.google.com/chrome/answer/95647?hl=en> (Chrome);
  - ii. <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences> (Firefox);
  - iii. <http://www.opera.com/help/tutorials/security/cookies/> (Opera);
  - iv. <https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies> (Internet Explorer);
  - v. <https://support.apple.com/en-gb/guide/safari/manage-cookies-and-website-data-sfri11471/> (Safari); and
  - vi. <https://privacy.microsoft.com/en-us/windows-10-microsoft-edge-and-privacy> (Edge).

12.2 Blocking all cookies will have a negative impact upon the usability of many websites.

12.3 If you block cookies, you will not be able to use all the features on our website.

## 13. Our Ethos and Values

As identified at the opening of this policy, our structure and approach here is underpinned by our Christian ethos and values, focused on an ethos that is both distinctive and inclusive.

In our adoption and subsequent adaptation of this policy we have asked ourselves two clear questions: “Is this policy and practice underpinned by our vision and values?” and “What is the impact of our vision and values on those subject to the policy?”. This is a key focus of our ongoing development of policy and practice.

## History of most recent policy changes and review period

Date	Page	Change(s) made	Origin of Change (e.g. TU request, change in legislation)
March 2023	Whole document	New policy	Website updates

Policy Owner	<b>Operations Directorate</b>
Policy Approval	<b>Business Functions committee</b>
Date Adopted	<b>March 2023</b>
Latest Review Date	-
Next Review Date	<b>March 2024</b>
Level	<b>Level 1</b>
<b>DBAT Policy levels:</b>	
LEVEL 1	DBAT policy for adoption (no changes can be made by the Academy Council; the Academy Council must adopt the policy)
LEVEL 2	DBAT policy for adoption and local approval, with areas for the Academy to update regarding local practice (the main body of the policy cannot be changed)
LEVEL 3	DBAT model policy that the Academy can adopt if it wishes
LEVEL 4	Local policy to be approved by the Academy Council