Website Policy

Policy control			
Title	Website		
Responsibility	Chief Financial Officer		
Review body	Finance, Audit and Risk Committee		
Suite	Business		
Approval date	March 2024		
Review date	March 2025		
Version	V1		
Version	**Date**	**Author**	**Note of revisions**
V1	01/02/24	BBL	New policy [SB] including audit template

Website

Overview

Statement of Intent

AQUINAS Church of England Education Trust (the 'Trust') and its academies value the contribution that a website can make to a school community. The purpose of an academy's website is to:

- Promote the school.
- Provide information to prospective parents, staff, and the wider community.
- Act as the main communication channel between staff, parents, pupils, and the rest of the school community.
- Continuously raise standards of achievement.

The school is required by law to publish certain information to comply with The School Information (England) (Amendment) Regulations 2018. This policy outlines the school's **terms of use** regarding the creation, development, and use of the school website.

The Trust is aware of our responsibility to protect your privacy. As part of this responsibility, we let you know what information we collect using cookies when you use our websites, why we collect it and how we use it to improve your experience. You should read this policy in conjunction with the Privacy Policy for our website.

AQUINAS Church of England Education Trust website is www.aquinastrust.org

1. Legal framework

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

- The UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- Safeguarding Vulnerable Groups Act 2006
- Freedom of Information Act 2000
- Computer Misuse Act 1990 amended by Police and Justice Act 2006
- The Education (Independent School Standards) Regulations 2014
- The School Information (England) (Amendment) Regulations 2018
- The Equality Act 2010 (Specific Duties and Public Authorities) Regulations 2017
- Trade Union (Facility Time Publication Requirements) Regulations 2017
- DfE (2023) 'What academies, free schools and colleges must or should publish online'
- **[UPDATED]** DfE (2023) 'Keeping children safe in education 2023'

This policy operates in conjunction with the following school policies:

- Acceptable Use Agreement
- Anti-bullying Policy
- Behaviour Policy
- Charging and Remissions Policy
- Complaints Policy
- Data Protection and Biometric Information Policy
- Disciplinary Policy and Procedure
- English as an Additional Language (EAL) Policy
- Freedom of Information Policy
- Online Safety Policy
- Safeguarding and Child Protection Policy

2. Roles and responsibilities

The **Trust Board** will be responsible for:

- Holding the school to account for having a website that is fit for purpose and contains all the necessary information.

The **Trust Communications Manager**, in conjunction with the relevant Education Director, will be responsible for:

- Maintaining oversight and undertaking overarching quality assurance of AQUINAS websites.
- Assessing and agreeing all requests to make changes to an AQUINAS website.

- Supporting **Headteachers** and **In-school Website Administrator** with the management of their school website.

The **Advisory Council** will be responsible for:

- Undertaking an annual audit of the school's website (Appendix B).

The **Headteacher** will be responsible for:

- Supporting the **In-school Website Administrator** in ensuring that the school's website meets all statutory requirements, and that content is appropriate for the site.
- Ensuring all content published on the website is only uploaded by the trained In-school Website Administrator or another trained individual.
- Meeting regularly with the AAC to work together to ensure the school website is as effective as possible.
- Ensuring all employees are aware that only the **In-school Website Administrator** can publish content on the school's website.
- Ensuring all employees understand they are not permitted to express personal opinions in any content they submit for publication on the website and are aware of the consequences of doing so.
- Ensuring the appropriate policies and documents are published on the school's website.
- Ensuring policies and documents published on the school's website are current and accurate.

The **In-school Website Administrator** (or equivalent e.g. Administration Officer or Officer Assistant etc.) will be responsible for:

- Assisting the Headteacher in the management of the school website.
- Monitoring and updating the school website content, unless otherwise agreed by the Headteacher.
- Reporting any problems with the school website to the Headteacher and the **Trust Communications Manager**.

3. Access and approval

The **Trust Communications Manager** will ensure a copy of the **terms of use**, which all content will comply with, is present on each website. Parents, pupils, and staff will act in accordance with the **terms of use** at all times.

Before content is published to the school website, it will be approved by the Headteacher.

Only the CMS trained **In-school Website Administrator** will post content on the school website. Any content that is contributed to by other parties or external organisations is

discussed with, and approved by, the **Trust Data Protection Officer**. Permission will be sought from the relevant people before citing or referencing their work.

All written content will go through a quality assurance process before being published to ensure a high standard of quality and accuracy. All content is proofread by the **In-school Website Administrator** or another designated member of staff. Any amendments will be discussed with the author, and the material will be revised appropriately. The **In-school Website Administrator** will ensure the quality assurance process has been carried out and publish the agreed content in a timely manner. Consideration should be given to the language that is used on the school website, ensuring that it is appropriate for the audience.

Staff members will not be permitted to disclose information, make commitments, or engage in activities with third parties on behalf of the school without authorisation from the Headteacher . Links to the school's website from any third-party website must be approved by Headteacher.

Any content written by pupils will be reviewed by their class teacher prior to consideration for publication on the school's website. No personal details about a pupil that could lead to their identification should ever be published on the website.

All content will be checked by the **In-school Website Administrator**, or other delegated member of staff, for its suitability for the intended audience. All content will be reviewed by the **In-school Website Administrator** or other delegated member of staff to ensure that it is in no way defamatory. Content is checked by the **In-school Website Administrator** or other delegated member of staff to ensure (as far as possible) that no copyright or intellectual property rights are infringed. All links to external sites will be checked for the suitability of their content for their intended audience however at the same time we cannot take responsibility for the content found on any linked website.

Parents will be permitted to request a paper copy of any information published on the school website and this will be provided free of charge.

Authors will be accurate, fair, and transparent when creating or altering online sources of information.

Creation of official school website accounts is the responsibility of the **Trust Communications Manager**.

No content on the school website will breach copyright, data protection or freedom of information legislation.

4. Statutory and recommended content

The Trust will update annually an audit tool outlining the required content on each website which includes both statutory and recommended content. The Advisory Council has the responsibility for checking compliance at least once a year.

See **Appendix B**.

5. Information we will not publish

The school will not publish information which could reveal confidential data about individual members of the school community. Information which is exempt under the Freedom of Information Act 2000 or is otherwise properly considered to be protected from disclosure, will not be published. We will not publish any information in draft form.

Information which is no longer readily available as it is contained in files that have been placed in archive storage, or is difficult to access for similar reasons, will not be published.

All information and images that are to be published will be checked by both the **Designated Safeguarding Lead (DSL)** and the **Data Protection Officer (DPO)**, where appropriate, to ensure that the content is in accordance with safeguarding and data protection regulations.

The school will make every effort to maintain confidentiality and guard against unwanted publicity if an allegation is being investigated or considered. As such, no material relating to the allegation will be published that could lead to the identification of an employee at the school who has been accused.

6. Data Protection

Website content will not:

- Identify a pupil by their name, or names, if an image or video is published.
- Publish an accompanying image or video if a pupil's name is used.
- Allow any other identifying information to be published without the specific written consent of a parent or pupil if aged 13 or over.

Images and videos of pupils will not be published without specific written consent from a parent or pupil if aged 13 or over.

Personal details of pupils or staff, such as home addresses, telephone numbers and personal email addresses, will not be published on the school website.

Pupils are only shown in photos where they are suitably dressed – the **Designated Safeguarding Lead** will be consulted before photos are published.

Permission will be obtained from parents before publishing the work of any pupil. Only the pupil's first name and year group will be used to identify the work. Parents or pupils, if aged 13 or over, have the right to refuse permission for the work or document to be published on the school website. Those wishing to exercise this right should express their wishes in writing to the Headteacher, clearly stating whether they object to work, images or both being published.

The school website uses cookies, also known as internet cookies or web cookies, which are a type of message that is given to a web browser by a web server. The school has a duty to

notify users if a cookie is sent to them, which may be stored by their browser on their computer's hard drive. The school may use the information obtained from the cookie in the administration of the school website, to improve the website's usability and for marketing purposes. The school may use the information gathered from the cookie to recognise a user's computer when they visit the school website, and to personalise the school's website for the user – see **Appendix A**.

7. Moderating and reviewing website content

All content is moderated and reviewed, using the **terms of use** as guidance.

Content on the school website is reviewed regularly and at least once a term by either the school, Advisory Council, or the **In-school Website Administrator** to ensure all information is up to date. In case of absence, other members of staff are adequately trained and prepared to maintain and moderate the school website.

Activity on the school website is reviewed regularly and checked against the **terms of use**.

8. Website analytics

An integral part of the school website is tracking, when the website is set up, the school is aware of how to track visitor numbers and the pages they visit. This information is powerful in helping the school to understand which media types are effective in attracting visitors and which pages are the most popular.

The school will use **Google Analytics** as a comprehensive method of tracking website data and to collect information in an anonymous form on how visitors use the school site. Website users can opt out from being tracked by Google Analytics by installing the Google Analytics opt-out browser add-on.

Examples of information collected by Google Analytics include:

- Number of visitors to the website
- Number of website page views
- Time spent viewing website pages
- Types of browsers used to view the website

Setting up Google Analytics will require a small amount of development that will be carried out by technical staff and the school's web designer.

To make the most out of analytic tools, the school's short-term objectives will have a heavy focus on the website and making it as compelling and up to date as possible.

9. Website disclaimer

The information on the school website will be provided free-of-charge, and therefore, the school believes that it would be unreasonable to hold the school liable in respect of the

website and the information on the website. The school endeavours to keep the information on the website up to date as much as possible.

To the maximum extent permitted by applicable law, the school will exclude all representations, warranties, and conditions.

An appropriate disclaimer will feature on the website, outlining the school's legal position and interests in **terms of use** of the website.

The school will not be liable for any direct, indirect, or consequential loss or damage arising under this disclaimer or in connection with the school website, whether arising in tort, contract, or otherwise – including, without limitation, any loss of profit, contracts, business, goodwill, data, income, revenue, or anticipated savings.

The Trust will review and revise this disclaimer annually.

10. License to use the website

Parents and the public may view and download school website content for caching purposes only, and print pages from the website, provided that:

- Material is not republished or reproduced from this website (including republication on another website) in any public or private electronic retrieval system.
- Material on the school website is not reproduced, duplicated, copied, sold, or otherwise exploited for a commercial purpose, without the school's express written consent.

11. Breaches of this policy

For employees, any breach of this policy may lead to disciplinary action being taken against the staff member(s) involved, in line with the school's **Disciplinary Policy**. Any action that is taken against employee breaches of this policy will be in accordance with the relevant disciplinary procedures. Breaches of confidentiality, defamation, libel, or damage to the reputation of the school may also result in disciplinary action or dismissal.

12. Monitoring and review

This policy is reviewed on an **annual** basis by the **Finance, Audit and Risk Committee** and **Chief Executive**. Monitoring is conducted through the Trust's programme of quality assurance and that undertaken by the individual Academy. Changes to this policy are communicated to relevant stakeholders.

The next scheduled review date for this policy is **March 2025**.

Appendix A

Website cookies

What is a cookie?

Cookies are small files that allow a website to recognise and track users. They consist of simple text files of letters and numbers which are downloaded to your computer or mobile device when you visit our website.

Most cookies will not collect information that personally identifies you. They will collect more general information such as how users arrive at and use our website, or a user's general location.

How we use cookies

We use cookies to provide you with a positive experience when you browse through our website. Cookies measure how many people use our website so that we can make it easier to use and ensure there's enough capacity to make pages load quickly.

Generally, our cookies perform up to three different functions:

- **Strictly Essential Cookies** – These are cookies that are required for our website to operate properly. They enhance the site's functionality and provide you with an optimal experience as a website user. They also allow you to make use of our online systems, for example, our online "Contact" form. Without essential cookies, our site won't function properly, and if you set your internet browser to reject all cookies, then some elements of the site may not work for you.
- **Third Party Cookies** – These are cookies found in other companies' internet tools which we are using to enhance our site. For example, we have the school's Twitter feed on our homepage, and use Google Maps to show where our school is located. We have no control over the cookies set by Twitter or Google. You can visit help.twitter.com/en/rules-and-policies/twitter-cookies to find out more about how Twitter uses cookies or policies.google.com/technologies/cookies to find out more about how Google uses cookies.
- **Analytical/Performance Cookies** – These are cookies that allow us to recognise and count the number of visitors to the website and see how visitors move around the website when they are using it. We use Google Analytics cookies to track anonymous usage statistics and do not collect any personal information that can be used to identify you. This helps us to improve the way our website works, for example by ensuring that users are finding what they are looking for easily. For further information see Google's Privacy Policy at www.google.com/policies/privacy.

While there are many legitimate uses for cookies to improve convenience and efficiency, some uses of cookies can lead to privacy concerns. These concerns typically emerge when a cookie holding personal information identifying you (e.g., name, email address, postal address etc.) is used across multiple sites to track users and internet usage.

We are aware of our responsibility to protect your privacy. As part of this responsibility, we let you know what information we collect using cookies when you use our websites, why we collect it and how we use it to improve your experience. You should read this policy in conjunction with the Privacy Policy for our website.

The Aquinas Church of England Education Trust does not use cookies to hold any personal information or track users across multiple sites.

How you can withdraw your consent to the use of cookies

If you do not consent to the use of cookies on our website, you can exit our site now, or you can choose to disable/block cookies through your browser's settings and continue to use our site without cookies. You can learn how to disable cookies, or how to remove cookies that have already been set on your computer/mobile device at:
www.allaboutcookies.org/manage-cookies.

Disabling cookies will, however, impact on the functionality of our website and you may find that some pages fail to display correctly or some of our interactive features do not work for you.

For any queries relating to the use of cookies, please contact our Data Protection Officer:

Data Protection Officer
Aquinas Church of England Education Trust
Magpie Hall Lane
Bromley BR2 8HZ

Or, by email to info@aquinastrust.org.

If you would like a paper copy of this policy, we will provide this free of charge.

Further information on cookies

For more information about how to manage cookies and their uses visit All About Cookies.

For information regarding the updated law on cookies, visit the Information Commissioner's Office (ICO).

Appendix B

Website audit tool

Contact details

	Yes	No	Comment
Contact details of the academy, including the following: • The name of the academy			
• The academy's postal address			
• The telephone number of the academy			
• Email address of the academy			
• The telephone number for Press enquiries			
• The name of the member of staff who deals with queries from parents and other members of the public			
• The name of the Headteacher/Head of School			
• The name and contact details of the chair of the AAC			
• The name and contact details of the SENCo			
Footer details: [Academy name] is part of the Aquinas Church of England Education Trust (Aquinas), a charitable company Limited by guarantee and registered in England and Wales under Company Number 07525735. Its registered office is at Bishop Justus Church of England School, Magpie Hall Lane, BR2 8HZ. This is also the address for the Aquinas offices.			
To appear on every page 'If you would like a paper copy of the information on this website, we will provide this free of charge."			
Terms of Use			
Copyright information			
Website use & Disclaimer			

Opening Hours

	Yes	No	Comment
The academy's compulsory opening hours, including: Opening times, e.g. morning registration			
Closing times, e.g. the official end of the compulsory academy day			
Timings of the school day			
The total time this amounts to in a typical week (this should be no less than 32.5 hours per week)			

Admission arrangements and appeals

	Yes	No	Comment
Admission arrangements must be on the academy website by 15th March each year and displayed for the whole of the offer year. The academy's admission arrangements, including: • How the academy considers applications for every age group.			

• What parents should do if they want to apply for a place for their child at the academy.			
• The academy's oversubscription criteria			
• Clear tie break			
• Admissions Arrangements for the current year of admission			
• Academy admission arrangements for the previous year of admission			
• Admissions arrangements which are being consulted on (for the period of the consultation only)			
• Details of Planned Open Days (primary/secondary/6th Form)			
In-year admission arrangements must be on the academy website by 31st August each year. The academy's in-year admission arrangements, including: • How the academy deals with in-year applications (LBB/ESCC co-ordinated scheme)			
• Information on where parents can find details of the relevant LA in-year coordination scheme.			
Admission appeals must be published on the academy website by 28th February each year. This timetable will: • Outline a deadline for submitting appeals which allows those making an appeal at least 20 school days from the date of notification that their application was unsuccessful to submit a written appeal			
• Include reasonable deadlines for those submitting an appeal to submit additional evidence, for admission authorities to submit their evidence, and for the clerk to send appeal papers to the panel and parties			
• Ensure those making an appeal receive at least 10 school days' notice of their appeal hearing			
• Ensure that decision letters are sent within 5 school days of the hearing, where possible			
• Appeals guidance			
• Admissions Appeal form			
Equality information			
Equality statement including 'as an employer' section.			
Link to the Trust Equality page on the Aquinas website			
Gender pay statement			
Employers are required publish the figures below annually. Link to the Aquinas website to table detailing the following:			

• Proportion of male and female staff in each hourly pay quartile • Mean gender pay gap using hourly pay • Median gender pay gap using hourly pay • Proportion of male and female staff receiving a bonus payment • Mean gender pay gap using bonus pay • Median gender pay gap using bonus pay			
Report, accounts and executive pay			
The following financial information: • **Link** to the audited annual report and accounts (last 3 years, rolling update) • Link to the memorandum of association on the Aquinas website • Link to the articles of association on the Aquinas website • Link to the names of trustees and members on the Aquinas website • Link to the Master Funding Agreement on the Aquinas website • Supplemental Funding Agreement			
Link to the table on the Aquinas website displaying the number of Trust employees, if any, who have a gross annual salary of £100,000 or more, in £10,000 bandings			
Governance information			

The following up-to-date information about the academies AAC in a readily accessible format:
• The structure and remit of the AAC
• Information about each AAC member serving at any point over the past 12 months, including:
  o Their name
  o The date of their appointment
  o Their term of office
  o The date they stepped down (where applicable)
  o Who appointed them
  o Any relevant business and pecuniary interests, including governance roles in other educational institutions
• The attendance records of each AAC member at local AAC meetings over the last academic year
• Current Protocol & Delegation document			

Link to 'Our Governance Structure' on the Aquinas website			
Link to 'Meet the Central team' on Aquinas website			
Link to composite of Trustees and local AAC diversity data on the Aquinas website [this data must not be			

identifiable, particularly where member numbers are low].			
Policies and documents			
Academy policies should be checked against Appendix A & B in the current version of Aquinas Policy Overview ('Must Know', 'Policies', 'General') on the Aquinas website. • All policies marked with an * **must** appear on the academy website			
Link to Trust policies on the Aquinas website			
A statement on the academy's values and ethos			
Statement of British values			
Allocated funding			
PUPIL PREMIUM INFORMATION **This must be on the academy website by 31st December each year.** A pupil premium (including recovery premium) strategy statement for the current academic year, including the following information: • The academy's pupil premium grant allocation amount • A summary of the main barriers to education achievement faced by eligible pupils at the academy • How the academy will spend the pupil premium to address those barriers and the reasons for that approach • How the academy will measure the impact of the pupil premium • The date of the next review of the academy's pupil premium strategy			
The pupil premium (including recovery premium) strategy statement for the previous academic year, including the following information: • How the academy spent its pupil premium allocation • The impact of the expenditure on pupils			
PRIMARY ONLY **PE and sport premium information must be on the academy website by 31st July each year.** Information about the PE and sport premium, including: • The amount of funding received in the current academic year • A breakdown of how the academy spent the funding last year • How it impacted pupils' physical activity, sport participation and attainment			

• How the academy will ensure these improvements are sustainable			

SEND information

The SEN Information Report, updated with any changes as soon as possible after they occur and at least annually, and containing: • The 'SEN information' specified in schedule 1 to the Special Educational Needs and Disability Regulations 2014 • The arrangements for the admission of pupils with SEND • The steps the academy has taken to prevent discrimination and inequality towards pupils with SEND • The facilities provided to ensure pupils with SEND can access the academy • The academy's accessibility plan • The academy's plans to increase curriculum accessibility • How the academy aims to improve the physical environment to ensure pupils with SEND can access all the facilities and services offered • How the academy plans to effectively deliver information to pupils with SEND • Arrangements for handling complaints from parents of pupils with SEND about the support provided by the academy			

PRIMARY ONLY Swimming information

Swimming information must be on the academy website by 31st July each year. Information on the academy's swimming lessons, covering how many pupils within the academy's Year 6 cohort can do each of the following: • Swim competently, confidently, and proficiently over a distance of at least 25 metres • Use a range of strokes effectively • Perform safe self-rescue in different water-based situations			

SECONDARY ONLY Careers information

Information on the academy's careers programme, including: • The name, email address and telephone number of the academy's careers leader • A summary of the careers programme, including how to access information regarding the careers programme • How the academy measures and assesses the impact of the careers programme			

• The date of the academy's next review of the careers programme			
SECONDARY Provider access			
The provider access statement, covering how the academy complies with section 42B of the Education Act 1997 and the circumstances under which providers of technical education and apprenticeships will be permitted contact with pupils in Years 7 to 13.			
Curriculum information			
Information about the curriculum, including: • The content of the curriculum in each academic year, including mandatory subjects • The content of the RE curriculum, even if it is taught as part of other subjects or called something else • How parents and members of the public can find out more about the academy's curriculum • **PRIMARY ONLY** The names of any phonics or reading schemes used in KS1 • Curriculum Overview • Whole academy Progression map per subject • Long-term plan per subject • **SECONDARY ONLY** A list of courses, including GCSEs, offered to pupils in KS4 • **SECONDARY ONLY** A list of courses offered to pupils in the 6th Form (KS5) • **SECONDARY ONLY** 6th Form study programme requirements			
Exam/assessment results and Performance			
PRIMARY ACADEMIES ONLY **Academies do not need to display KS2 results for 2021/2022 on their websites, as this data will not be published. This is because statutory assessments returned for the first time since 2019, without adaptations, after disruption caused by the coronavirus (COVID-19) pandemic.** Details from the 2023 KS2 results, including: • Progress scores in reading, writing and maths • The percentage of pupils who achieved at least the 'expected standard' in reading, writing and maths • The percentage of pupils who achieved at a higher standard in reading, writing and maths • The average 'scaled scores' in reading and maths • **Link** to, the latest accountability measures (Government Compare Schools Performance)			
SECONDARY ACADEMIES ONLY **Details from the 2023 KS4 results, including:**			

A statement that direct comparisons between academic years and academies cannot be drawn due to the impact of the coronavirus pandemic. • The progress 8 score • The attainment 8 score • The percentage of pupils who achieved grade 5 or above in English and maths at the end of KS4 • The EBacc average point score • The percentage of pupils that enter the EBacc • The percentage of pupils staying in education or moving on to employment after KS4			
6th FORM ONLY The most recent 16 to 18 performance measures on attainment, retention, and pupil destinations from the academy's performance table.			
KS4 AND/OR 6th FORM ONLY Information on, or a link to, the latest accountability measures (Government Compare Schools Performance)			
Link to the academy's Ofsted page			
Privacy Notices			
The Trust's privacy statement			
Link to the Trust's privacy notices			
Church Designated academies ONLY			
Copy of most recent SIAMS Report			
Spirituality Statement			