



Ocker Hill Academy

Website Linking Policy

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Statement of intent

Ocker Hill Academy welcomes links to our website made in accordance with the terms of this policy. The academy, at times, may also provide links to third parties, such as community links like a sporting team, and this policy should be followed in regards to this.

Sometimes, the academy may wish to use photographs or videos of pupils on the academy's website. To ensure the privacy and safety of pupils at the academy, this policy will be followed at all times.

This policy is intended to set out the principles the academy will adhere to, in regards to the academy's website, which should assist visitors to the website when linking to our website.

1. Legal framework

1.1. This policy has due regard to legislation, including, but not limited to, the following:

- The General Data Protection Regulation
- Education Act 2011

1.2. This policy operates in conjunction with the following academy policies:

- Data Protection Policy
- Photography and Videos at the Academy Policy
- Child Protection and Safeguarding Policy
- GDPR Compliant Records Management Policy

2. Roles and responsibilities

2.1. The principal is responsible for:

- The overall implementation of this policy.
- Liaising with the data protection officer (DPO), reviewing this policy and ensuring its compliance.
- Submitting consent forms to parents at the beginning of the academic year with regards to photographs and videos being taken whilst at the academy.
- Deciding whether parents are permitted to take photographs and videos during academy events.
- Communicating this policy to all the relevant staff members and the wider academy community, including parents.
- Reviewing any text written by staff or pupils before it is published on the academy's website.
- Determining the appropriate link text which will be used when directly linking to the academy's website.

2.2. The DPO is responsible for:

- Informing and advising the academy and its employees about their obligations to comply with the GDPR in relation to this policy.
- Monitoring the academy's compliance with the GDPR in regards to data processing on the academy's website.
- Ensuring that all photos and videos are stored and disposed of correctly, in line with the GDPR and the academy's Records Management Policy.
- Completing data protection impact assessments in relation to this policy.
- Conducting internal audits in regards to the academy's procedures for obtaining, processing and using photographs and videos on the academy's website.
- Providing the required training to staff members, in relation to how the GDPR impacts the academy's website.
- Dealing with any queries in regards to this policy.

3. Links to our website

- 3.1. Links directed to the academy's website will not be misleading, such as being ambiguous of the destination.
- 3.2. Appropriate link text, as determined by the principal, will always be used in links directed to the academy's website.
- 3.3. Unless the academy agrees in writing otherwise, all links should direct to URL.
- 3.4. The academy's logo will not be used to link to the website without the principal's written permission.
- 3.5. The academy's website will not be linked to using any inline linking techniques.
- 3.6. The content of the academy's website will not be used, nor will any similar technology in relation to the content of the website.

4. Links from our website

- 4.1. The academy's website includes links to other websites which are owned and operated by third parties – these links are not endorsements or recommendations.
- 4.2. The academy may link to third parties for the following reasons:
 - To direct visitors to a pupil assessment website.
 - To direct visitors to a feedback forum, such as Ofsted's Parent View.
- 4.3. The academy has no control over the contents of third party websites, and the academy accepts no responsibility for them or for any loss or damage that may arise from using them.
- 4.4. The academy is not responsible for the privacy policies of third parties.

5. Removal of links

- 5.1. If the academy requests the deletion of a link to our website, and it is within an individual's control, the link will be deleted promptly.
- 5.2. If an individual or organisation wishes for a link to their website to be removed from the academy's site, please contact the academy's Business Manager, Mrs Andrea Foster, on office@ockerhill.academy or 0121 556 0445.

6. Cookies

- 6.1. Cookies are small text files placed on a visitor's computer. The academy may send a cookie, which may be stored by an individual's browser on their computer's hard drive. It will be possible for an individual to both accept and reject the cookie.

- 6.2. Under the GDPR, when cookies can identify an individual via their device, it is considered personal data – meaning that this will not be processed unless there is a lawful ground for doing so.
- 6.3. ‘By using the academy website, you accept cookies’ messages will not be used as valid consent, in accordance with the GDPR. For consent to be valid, there must be an option to decline the cookies.
- 6.4. The academy will not use any information obtained by cookies for analysis, marketing or advertising purposes, without there being a lawful ground for doing so.

7. Privacy

- 7.1. Individuals have the right, under the GDPR, to withhold consent. In which case, the academy will not process an individual’s personal data, unless there is a legal requirement for them to do so.
- 7.2. Individuals have the right to withdraw consent at any point.
- 7.3. Ocker Hill Academy may, with consent, collect, use and store the following types of personal data:
 - Information about your visits to and use of the website
 - Information about any transactions carried out between an individual and the academy on, or in relation to, the academy’s website
 - Information that is provided to the academy for the purpose of registering with the academy, and/or leaving guestbook comments, and/or subscribing to the academy’s website services, and/or email notifications

8. Names, pictures and consent

- 8.1. Consent will be obtained in line with the academy’s Data Protection Policy and Photography and Videos at Academy Policy.
- 8.2. Consent will only be accepted where it is freely given, specific, informed and an unambiguous, positive, indication of the individual’s wishes. Consent will not be inferred from silence, inactivity or pre-ticked boxes.
- 8.3. Where consent is given, a record will be kept by the academy office documenting how and when consent was given.
- 8.4. The academy ensures that consent mechanisms meet the standards of the GDPR. Where the standard of consent cannot be met, an alternative legal basis for processing the data will be found, or the processing will cease.
- 8.5. Consent accepted under the Data Protection Act (DPA) 1998 will be reviewed to ensure it meets the standards of the GDPR; however, acceptable consent obtained under the DPA will not be reobtained.
- 8.6. Consent can be withdrawn by the individual at any time.

- 8.7. If the law requires it, pupils as young as 13 may be permitted to provide consent to the processing of their data.
- 8.8. The principal will oversee the planning of any events where photographs and videos will be taken.
- 8.9. A list of all pupils of whom photographs and videos will not be taken will be checked prior to the activity. Only pupils for whom consent has been given will be able to participate.
- 8.10. The academy will not use photographs of children or staff members who have left the academy, without seeking the proper consent.
- 8.11. By observing the following points, the academy ensures that visitors to the website cannot link images of pupils to their names:
 - Where pupils are named, only their first names are given
 - Where a name is given, no photograph of that pupil is displayed
 - Where a photograph of a pupil is used, no name is displayed
 - No other private information about pupils is ever published on the website such as surnames or contact details
- 8.12. Pupils will only be shown in photos where they are suitably dressed.
- 8.13. Personal details of pupils or staff, such as home addresses, telephone numbers, personal email addresses, etc., will not be released via the website.
- 8.14. Any text written by pupils or staff will be reviewed by the principal before inclusion to ensure that no personal details are accidentally included that could lead to the identification of the individual, e.g. membership to after-academy clubs.
- 8.15. All written work will be reviewed by the principal to ensure that it is in no way defamatory.
- 8.16. Written work will be checked by the principal to ensure (as far as possible) that no copyright or intellectual property rights are infringed.
- 8.17. All written material will be checked by the principal for its suitability for its intended audience.

9. Our details

- 9.1. The academy's website is owned and operated by Ocker Hill Academy with the help of Midland Technology Solutions Ltd.
- 9.2. The academy's principal place of business is Gospel Oak Road, Tipton, West Midlands, DY4 0DS.
- 9.3. The academy can be contacted by calling 0121 556 0445 or by emailing the Business Manager on office@ockerhill.academy.

Monitoring and review

- 9.4. The Principal is responsible for reviewing this policy in line with Ocker Hill Academy Policy Guidelines.
- 9.5. The effectiveness of this policy will be monitored and evaluated by all members of staff. Any concerns regarding this policy will be reported to the DPO immediately.
- 9.6. The academy may amend this policy at any time and publish the updated version on the academy website.
- 9.7. Any changes to this policy will be communicated to all members of staff and parents.

Consent Form

The academy may collect, use and store the following types of personal data:

- Information about your visits to and use of the website
- Information about any transactions carried out between an individual and the academy on, or in relation to, the academy's website
- Information that is provided to the academy for the purpose of registering with the academy, and/or leaving guestbook comments, and/or subscribing to the academy's website services, and/or email notifications

The academy will only do this where it has obtained your consent. Please complete the form below and return it to the academy office.

Name:	
Relation to the academy:	
Date completed:	

The data collected from your visit to Ocker Hill Academy and the use of our website will only be kept in line with Health and Safety regulations for the time specified in our retention policy. Details would not be used for anything else without prior consent and will not be passed on to any other parties.

I, _____, consent to the academy collecting, using and storing data in relation to my visits to and use of the academy's website.

Signature: _____