

# **WOLVERHAMPTON GRAMMAR SCHOOL**

## **TAKING, STORING AND USING IMAGES OF CHILDREN POLICY**

### **INTRODUCTION**

This Policy is intended to provide information to pupils and their parents, carers or guardians (referred to in this policy as parents) about how images of pupils are normally used by Wolverhampton Grammar School (referred to in this policy as the School). It also covers the School's approach to the use of cameras and filming equipment at School events and on School premises by parents and pupils themselves, and the media.

It applies in addition to the School's Parent Contract, and any other information the School may provide about a particular use of pupil images, including e.g. signage about the use of CCTV; and more general information about use of pupils' personal data, e.g. the School's Privacy Notice for Pupils and Parents. Images of pupils in a safeguarding context are dealt with under the School's relevant Safeguarding Policies.

### **GENERAL POINTS TO BE AWARE OF:**

Certain uses of images are necessary for the ordinary running of the School; other uses are in the legitimate interests of the School and its community and unlikely to cause any negative impact on children. The School is entitled lawfully to process such images and take decisions about how to use them, subject to any reasonable objections raised.

Parents who accept a place for their child at the School are invited to indicate agreement to the School using images of him/her as set out in this Policy, via the Acceptance Form as part of the School's Terms and Conditions and/or from time to time if a particular use of the pupil's image is requested. However, parents should be aware of the fact that certain uses of their child's images may be necessary or unavoidable (for example if they are included incidentally in CCTV, digital capture of a lesson or a photograph).

We hope parents will feel able to support the School in using pupil images to celebrate the achievements of pupils, sporting and academic; to promote the work of the School; and for important administrative purposes such as identification and security.

Any parent who wishes to limit the use of images of a pupil for whom they are responsible for should contact Shona Hemmings, the Finance Director, in writing at any time. The School will respect the wishes of parents (and indeed pupils themselves) wherever reasonably possible, and in accordance with this policy.

Parents should be aware that, from around the age of 12 and upwards, the law recognises pupils' own rights to have a say in how their personal information is used including images.

## **USE OF IMAGES**

### **Use of Pupil Images in School Media**

Unless the relevant pupil or his or her parent has requested otherwise, the School will use images of its pupils to keep the School community updated on the activities of the School, and for marketing and promotional purposes, including:

- on internal displays (including clips of moving images) on digital and conventional notice boards within the School premises;
- in communications with the School community (parents, pupils, staff, Directors and alumni) including by email, on the School Parent, Student and Staff Portals and by post;
- on the School's website and, where appropriate, via the School's social media channels, e.g. Twitter, Instagram, YouTube, TikTok and Facebook. Such images would not normally be accompanied by the pupil's full name without permission; and
- in the School's prospectus, and in online, press and other external advertisements for the School. Such external advertising would not normally include pupil's full names and in some circumstances the School will seek the parent or pupil's specific consent, depending on the nature of the image or the use.

The source of these images will predominantly be the School's staff (who are subject to policies and rules in how and when to take such images), or a professional photographer used for marketing and promotional purposes, or occasionally pupils. The School will only use images of pupils in suitable dress and the images will be stored securely and centrally. Only EYFS staff, JSMT, or marketing staff (including professional photographers) should take photographs of children in the EYFS. Such images should be created using appropriate school-owned devices and should not be produced using mobile phones.

### **Use of Visitor Images in School Media**

The School will occasionally use images of visitors for marketing and promotional purposes (for the purposes as outlined above).

The source of these images will predominantly be the School's staff (who are subject to policies and rules in how and when to take such images), or a professional photographer used for marketing and promotional purposes, or occasionally pupils. The School will only use images of children where explicit permission has been granted by a parent/guardian e.g. School Discovery Day.

### **Use of Pupil Images for Identification and Security**

All pupils are photographed on entering the School and, thereafter, at regular intervals, for the purposes of internal identification. These photographs identify the pupil by name, year group, house and form/tutor group.

Portrait photography is also commissioned by the School every year to enable parents to purchase an official School Portrait of their child. Whole School photographs are also commissioned every five years for parents to purchase from our School supplied photographer.

CCTV is in use on School premises and will sometimes capture images of pupils. Images captured on the School's CCTV system are used in accordance with the Privacy Notice and CCTV Policy and any other information or policies concerning CCTV which may be published by the School from time to time.

## **Use of Pupil Images in Public Media**

Where practicably possible, the School will always notify parents in advance when the media is expected to attend an event or School activity in which School pupils are participating, and will make every reasonable effort to ensure that any pupil whose parent or carer has refused permission for images of that pupil, or themselves, to be made in these circumstances are not photographed or filmed by the media, nor such images provided for media purposes.

The media often asks for the names of the relevant pupils to go alongside the images, and these will be provided where parents have been informed about the media's visit and either parent or pupil has consented as appropriate.

## **Security of Pupil Images**

Professional photographers and the media are accompanied at all times by a member of staff when on School premises. The School uses only reputable professional photographers who can provide contractual assurances that any images of pupils are held by them securely, responsibly and in accordance with the School's instructions.

The School takes appropriate technical and organisational security measures to ensure that images of pupils held by the School are kept securely on School IT systems and protected from loss or misuse. The School will take reasonable steps to ensure that members of staff only have access to images of pupils held by the School where it is necessary for them to do so.

All staff are given guidance on the School's Policy on Taking, Storing and Using Images of Pupils, and on the importance of ensuring that images of pupils are made and used responsibly, only for School purposes, and in accordance with School policies and the law.

In accordance with Data Protection Law, some of the School's processing activity with pupil images is carried out on its behalf by third parties, such as IT systems, web developers or cloud storage providers. This is always subject to contractual assurances that personal data will be kept securely and only in accordance with the School's specific directions.

## **USE OF CAMERAS AND FILMING EQUIPMENT (INCLUDING MOBILE PHONES) BY PARENTS**

Parents, guardians or close family members (hereafter, parents) are welcome to take photographs of (and where appropriate, film) their own children taking part in School events, subject to the following guidelines, which the School expects all parents to follow:

- When an event is held indoors, such as a play or a concert, parents should be mindful of the need to use their cameras and filming devices with consideration and courtesy for cast members or performers on stage and the comfort of others. Flash photography can disturb others in the audience, or even cause distress for those with medical conditions; the School therefore asks that it is not used at indoor events.
- Parents are asked not to take photographs of other pupils, except incidentally as part of a group shot, without the prior agreement of that pupil's parents.
- Parents are reminded that such images are for personal use only. Images which may, expressly or not, identify other pupils should not be made accessible to others via the internet (for example on Facebook), or published in any other way.

- Parents are reminded that copyright issues may prevent the School from permitting the filming or recording of some plays and concerts. The School will always print a reminder in the programme of events where issues of copyright apply.
- Parents may not film or take photographs in changing rooms or backstage during School productions, nor in any other circumstances in which photography or filming may embarrass or upset pupils.
- The School reserves the right to refuse or withdraw permission to film or take photographs (at a specific event or more generally), from any parent who does not follow these guidelines, or is otherwise reasonably felt to be making inappropriate images.
- The School sometimes records plays and concerts professionally (or engages a professional photographer or film company to do so), in which case CD, DVD or digital copies may be made available to parents for purchase. Parents of pupils taking part in such plays and concerts will be consulted if it is intended to make such recordings available more widely.
- Due to regulatory requirements, parents and family members are not permitted to film events and concerts on mobile phones in the EYFS. All visitors to the EYFS (including current parents) are requested to not use mobile phones, and signage exists to reinforce this request.

#### **USE OF CAMERAS AND FILMING EQUIPMENT (INCLUDING MOBILE PHONES AND IPADS) BY PUPILS**

All pupils are encouraged to look after each other, and to report any concerns about the misuse of technology, or any worrying issues to a member of the pastoral staff.

The use of cameras or filming equipment (including on mobile phones and iPads) is not allowed in toilets, washing or changing areas, or the Derry dining hall. Nor should photography or filming equipment be used by pupils in a manner that may offend or cause upset.

The misuse of images, cameras or filming equipment in a way that breaches this Policy, or the School's: Anti-Bullying Policy, Privacy Notice for Pupils and Parents, Acceptable Use Policy for Pupils, Safeguarding Policy or the School Rules is always taken seriously, and may be the subject of disciplinary procedures or dealt with under the relevant safeguarding policy as appropriate.

**Please also refer to the following policies:**

Health and Safety Policy - Staff network and website	Safeguarding Policy - Staff network and website
Staff Code of Conduct - Website and Employment Manual	Security, Access Control and Workplace Safety - Staff network and website
Privacy Notice for Pupils and Parents - Staff network and website	Privacy Notice for Staff - Employment Manual
Privacy Notice for Alumni, Friends and Supporters - Staff network and website	Privacy Notice for Hirers, Visitors and Contractors - Staff network and website
Acceptable Use Policy for Pupils - Staff network and website	CCTV Policy - Staff network and website

### **Monitoring and Evaluation of this policy**

The School monitors and evaluates its Taking, Using and Storing of Images Policy through the following activities:

- Record keeping of training records for staff in data protection
- Review of regulatory compliance by F&GP Committee
- Review of concerns and complaints registers by SMT and Board of Directors
- Review of safeguarding register by Head and Designated Safeguarding Director

DLP  
September 2024

Next Review:  
September 2025