

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, video and filming equipment at School events and on School premises by parents and pupils themselves, and the media.

It applies in addition to any individual parent or pupil consent forms provided and the School's Parent Contract, and should be understood in the context of any other information the School may provide from time to time about a particular use of pupil images, including signage about the use of CCTV; and more general information about use of pupils' personal data in 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.

Staff are additionally subject to their own training (in accordance with their role) and school policies in this area, including under the Staff Handbook.

GENERAL PRINCIPLES OF IMAGE USE

Certain uses of images, including pupil images, are necessary for the ordinary running of the School; for example, for administration, identification, educational and curricular purposes, and security. It may not be possible to object to such uses, although any concerns in this regard will be duly considered by the school.

Other uses are considered to be 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, although objections may be raised and the school will seek to accommodate any reasonable concerns. Examples are given in this policy.

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. However, for any uses of images which might be considered more intrusive or unexpected – examples of which are set out further in this Policy – we will seek specific consent from parents and, as appropriate, pupils.

Parents who accept a place for their child at the School are invited to indicate that they agree 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).

Any parent who wishes to limit the use of images of a pupil for whom they are responsible 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 AND PUBLICATION OF CERTAIN PUPIL IMAGES

Use of Pupil Images in School Media

In accordance with any consents, notices or objections as may be applicable from time to time, 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;
- as part of school curricular activities for example for physical education or drama, or as a teaching aid, as part of official activities using school devices, tablets and applications;
- on the School's website and, where appropriate, via the School's social media channels, e.g. 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.

The school's policy in respect of the above uses is as follows:

- **Legitimate interests** will be relied upon for any uses which are either essential (for example, security, administration and education) or which fall within a scope of reasonably expected uses. Reasonably expected uses include via internal school or parent communications, on the School Parent, Student and Staff Portals, in printed material such as a school magazine or prospectus, or any uses whereby an individual child cannot reasonably be identified by someone outside the school community: for example, where their face cannot clearly be seen.
- The key effect of the school relying on legitimate interests is that parents and pupils may be entitled to object to such uses, although their specific consent will not be sought beforehand. Any objections will be duly considered by the school, but objections can be overridden by other factors: for example, uses which the school considers essential; or uses which create little or no risk of harm (including where children are not at risk of outside identification).

- **Consent** will be sought for all other external uses of pupil images online. In particular, where any intended use is more intrusive or unexpected – for example, if a child is the focus of the image and their face can clearly be seen – the school will discuss the use with the pupil or parents (as appropriate) in advance.

The school will take reasonable steps following any objection or withdrawal of consent but may not be able to recall or destroy printed materials. Any particular concerns or vulnerabilities relating to a pupil or their family should be drawn to the school's attention in advance. The safeguarding and best interests of pupils will remain the school's priorities at all times.

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, and the location of cameras will be clearly notified, including by signage.

Use of Pupil Images by External 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. It is not the School's policy to provide full or first names in this scenario, and these will only be provided where parents have been informed about the media's visit and either parent or pupil has specifically consented to the sharing of their name, for an appropriate and necessary purpose.

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 and makes every effort to ensure that any images of pupils are in suitable dress and held by such persons 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.

Any external processors of pupil images are engaged only for lawful purposes consistent with those set out in this policy, and subject to proper due diligence and contractual protections.

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, Instagram or by text or WhatsApp), 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, by reference to their dress or activity or any other factor.
- 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 physical 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 2025

Next Review:
September 2026