



# Wakefield Grammar School Foundation

<b>Document Reference</b>	<b>Use of Images of Pupils Policy</b>
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<b>Quality Assurance</b>	
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**VALIDITY** – Policies should be accessed via FireFly to ensure the current version is used.

## CHANGE RECORD - REVIEW PERIOD 2 YEARS

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V1.02	June 2023	Reviewed Vicky Weeks
V1.03	April 2025	Reviewed and updated Vicky Weeks

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## WGSF Use of Images of Pupils Policy

### 1. Introduction

- 1.1 This Policy is intended to provide guidance to staff and 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 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.
- 1.2 It applies alongside any individual parent or pupil consent forms provided, e.g. the Foundation Terms and Conditions for parents *where this includes terms around image use and marketing*, 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 e.g. signage about the use of CCTV; and more general information about use of pupils' personal data in the school's Privacy Notice.
- 1.3 Safeguarding and online safety issues are more specifically dealt with under the WGSF Safeguarding and Child Protection Policy (listed below).
- 1.4 Related Policies and Procedures

This policy should be read alongside the following policies:

[WGSF Safeguarding and Child Protection Policy](#)

[WGSF Staff Code of Conduct](#)

[WGSF Data Retention and Storage Policy](#)

[WGSF ICT Acceptable Use Policy](#)

[WGSF CCTV Policy](#)

[WGSF Privacy Notices](#)

[WGSF Parental Terms and Conditions](#)

[Schools' Behaviour Policies](#)

[Schools' Anti-Bullying Policies](#)

### 2. General principles of Image Use

- 2.1 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.
- 2.2 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.
- 2.3 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.

- 2.4 Parents who accept a place for their child at the school are invited to indicate that they agree to the school using images of them as set out in this policy, via the parental consent form and/or from time to time if a particular use of the pupil's image is requested (**see the Appendices**). However, parents should be aware that certain uses of their child's images may continue to be necessary for example, administration, education or security, or will be unavoidable for example if they are included incidentally in CCTV or as a part of a whole-school photograph.
- 2.5 Any parent who wishes to limit the use of images of a pupil for whom they are responsible should contact the School Office in writing.
- 2.6 The school will respect the wishes of parents/carers (and indeed pupils themselves) wherever reasonably possible, and in accordance with this policy.
- 2.7 Parents should be aware that, from around 12 years old / secondary school age, the law recognises pupils' own rights to have a say in how their personal information is used – including images.
- 2.8 Where remote video provision for pupils (via e.g. Google, Zoom or Teams) is necessary, whether for lessons or e.g. counselling, the school will notify its policies in respect of monitoring, recording and retention of such sessions (along with policies on appropriate dress and supervision).

### **3. Use and Publication of Certain Pupil Images**

- 3.1 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 and notice boards within the school premises;
  - as part of the school's email system, management information system and intranet, and in appropriate communications by whatever means with the school community (parents, pupils, staff, Governors and alumni);
  - as part of school curricular activities for example for physical education or drama, as a teaching aid, as part of official activities using school devices, tablets and applications;
  - in printed material, such as school magazines and printed marketing material, including the school's prospectus;
  - on the school's website and, where appropriate and in line with relevant policies, via the school's social media channels e.g. X (formerly) Twitter, Instagram and Facebook; and
  - exceptionally, in the press and other external advertisements for the school.
- 3.2 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 FireFly (the School's intranet), 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 and may seek a specific, *ad hoc* consent (**see Appendix 2 and 3**).

- 3.3 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.

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

- 4.1 All pupils are photographed when entering a school within the Foundation for the purpose of internal identification. The photographs identify the pupil by name, year group and form.

- 4.1.1 WGPPS pupils have their photographs taken every year (September).

- 4.1.2 QEGS have photographs taken every year in the Junior Section and then in Year 7, 10 and 12 in the Senior Section.

- 4.1.3 WGHS have photographs taken every year for both the Junior Section and Senior Section pupils.

- 4.2 CCTV is in use on school premises (for certain notified purposes, including security), and in certain cases is likely to capture images of pupils. Images captured on the school's CCTV system are used in accordance with the [Privacy Notice and CCTV Policy](#). The location of cameras are clearly notified by signage.

#### **5. Use of Pupil Images by External Media**

- 5.1 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.

- 5.2 The media may ask 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.

#### **6. Security of Pupil Images**

- 6.1 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.

- 6.2 The school takes appropriate technical and organisational security measures to ensure that images of pupils held by the school are kept securely on school 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.

- 6.3 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.
- 6.4 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.
- 6.5 Pupils are also given mandatory and age-appropriate training on their own privacy online and with their peers, including image use and social media safety.

## **7. Use of Cameras and Filming Equipment (including mobile phones) by Parents**

- 7.1 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 online (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.
- 7.2 The school reserves the right to refuse or withdraw permission to film or take photographs, at a specific event or more generally, either for all attendees/parents (e.g. where a safeguarding risk to an individual child has been identified) or from any individual parent who does not follow these guidelines, or is otherwise reasonably felt to be making inappropriate images.
- 7.3 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.
- 7.4 Should remote video provision at home (by Zoom, teams or otherwise) be required or facilitated by the school in any context, specific guidelines and instructions will be provided to ensure privacy and safety, including around dress and recording of video.

## **8. Use of Cameras and Filming Equipment by Pupils**

- 8.1 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.

- 8.2 The use of cameras or filming equipment (including on mobile phones) is not allowed in toilets, washing or changing areas, nor should photography or filming equipment be used by pupils in a manner that may offend or cause upset.
- 8.3 The misuse of images, cameras or filming equipment in a way that breaches this Policy, or the Schools' Anti-Bullying Policies, WGSF Data Protection Policy, WGSF ICT Acceptable Use Policy, WGSF Safeguarding and Child Protection 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.

## **Annex 1: Use of Images of Pupils by the School - General consent by parents cover sheet**

Dear Parent

The School makes various uses of images of pupils during their time at school as set out in our Privacy Notice, CCTV Policy and Use of Images of Pupils Policy. While we will not always require your consent for such uses, we do want to ensure that you are both properly informed about how your child's image will be used and fully understand your choices.

### Essential use of images

Some uses are necessary for education, administration and the safety of pupils, such as (CCTV and for your child's school security ID). Generally, the school relies on its legitimate interests for such purposes.

### Internal use of images within the school community

Other uses may not be strictly necessary, but do contribute to our school community, and we anticipate that most parents and pupils will want to support such use. These include images of pupils in school uniform or games kit, but never swimming costumes, at work or playing games or other activities, for: internal use within the school community: for example, internal school mail, school magazines, notice boards, printed or digital newsletters and FireFly.

Again, we consider these legitimate interest uses. We ask you to confirm below that you understand we may use images of your child for these purposes and to let us know if you object to such use.

### External use of images

We may also use images of pupils to celebrate achievements and promote the school externally, in printed publications and online, including on the School website or on its social media channels e.g. Facebook, Instagram and X (formerly) Twitter. This generally involves photos of pupils in school uniform or games kit, but never in swimming costumes, at work or playing games or other activity. Care will be taken to limit the scope for any child to be prominently featured in such images, unless this is consented to and appropriate in the circumstances. Please note, we are not seeking consent for images where your child cannot reasonably be identified to anyone outside the school community.

We ask below for your general consent to the use of images of your child in (i) printed material (such as the school magazine or prospectus) and/or (ii) for certain limited online or external media uses (where your child may be featured as part of a group shot, but is not a prominent or central focus of an image).

From time to time the school may seek a specific additional consent from you (and/or, as appropriate, your child) for any more prominent online or external media uses. These will as far as possible be specifically described to your and/or your child before being published.

### **Objection, withholding or withdrawal of consent**

Please be aware that objecting or opting out does not prevent the School from continuing to process images of your child that are essential (as set out above). If you do object to non-essential internal uses, these will be considered by the school, and reasonable steps will be taken (for example, to digitally blur or crop group shots). You can always opt out of marketing uses, although it may not be possible to recall materials that already have gone to physical publication based on earlier permissions.

Please complete the form below regarding the use of your child's image (photo or video) in the manner set out above, and as described in the school's Privacy Notice.

**NAME OF CHILD:**

**Internal use of images within the school community** – *please refer to cover sheet*

**I understand that the School will use my child's image for internal purposes (namely, within the school community) in the manner described and I do not object to such use.**

If you wish to object to such uses until further notice, please indicate below. So that we can best support your child's needs in considering your request, it will also assist us if you are able to give reasons.

**No [ ], I object to non-essential school uses of my child's image without specific consent.**

Please give reasons and/or explain what you specifically object to [optional]:

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**External use of images** – *please refer to cover sheet*

**[Tick either or both to indicate consent]**

**YES, I consent to my child's image being used in in the manner described above for:**

[ ] Printed marketing material, such as the school's prospectus or advertisements

[ ] Limited online uses in the manner described above (namely, large group or wide-angle shots where the subject is not a prominent or central focus of an image).

The school may seek further specific consents for uses of images not covered by the above from time to time. You may withdraw consent at any time in the future, subject to the notice at the bottom of this form. Please also be aware that it may not be possible to change already-printed publications, such as our prospectus or school magazines, and we will not be able to control third party publications (for example where we have placed an advert, or provided an image to media, based on a prior consent).

**NAME OF PARENT OR GUARDIAN:**

**ADDRESS:**

**Signed:** \_\_\_\_\_

**Counter-signed by pupil (if Y7 or above):** \_\_\_\_\_



## **Annex 2: Use of Your Image by the School - Specific ad hoc consent by pupils**

Dear [Pupil's name]

The School wishes to use your image or photograph in the following manner:

DESCRIPTION OF USE:

**[To be filled in by member of staff: description of use, e.g. where and what image, posted where and for what purpose – state if online and/or on a named basis.]**

Please indicate below if you understand the above and are happy to consent for the time being to your image being used in this way.

You do not need to sign this form if you do not agree. Please consult a member of staff if you have any concerns or questions about how an image may be used. You may withdraw your consent at any time in the future, but please be aware that it may only be possible to remove online images and the School cannot change printed materials once published.

**Yes, I agree – please sign to confirm**

NAME: [to be filled in by pupil]

SIGNATURE:

DATE OF BIRTH: [to be filled in by pupil]

### **[SUGGESTED FOOTER]**

***Please be aware that the School will not always seek your permission to use photographs and video, for example where necessary for the running of the school (such as educational use, security ID, or CCTV) or for other internal school uses. Please see our Privacy Notice for further details, or enquire with the Director of Finance and Operations.***

### **Annex 3 - Use of Your Child's Image by the School - Specific ad hoc consent by parents**

Dear [PARENT NAME]

In line with its Use of Images of Pupils Policy, the School wishes to use your child's image or photograph in the following manner:

DESCRIPTION OF USE:

[To be filled in by member of staff: description of use, e.g. where and what image, posted where and for what purpose – state if online and/or on a named basis.]

Please indicate below if you understand the above and are happy to consent for the time being to your child's image being used in this way.

You do not need to sign this form if you do not agree. Please contact us if you have any concerns or questions about how an image may be used. You may withdraw your consent at any time in the future, but please be aware that it may only be possible to remove online images and the School cannot change printed materials once published.

**Yes, I agree – please sign to confirm**

NAME:

SIGNATURE:

DATE OF BIRTH OF PUPIL:

#### **SUGGESTED FOOTER**

Please be aware that the School will not always seek permission to use photographs and video, for example where necessary for the running of the school (such as educational use, security ID, or CCTV) or for other internal school uses. Please see our Privacy Notice, CCTV Policy and Use of Images of Pupils Policy for further details, or enquire with the Director of Finance and Operations.