



# Wakefield Grammar School Foundation

<b>Document Reference</b>	<b>Use of Images of Pupils Policy</b>
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<b>Consultation</b>	Jo Dell / Niall Williams - Marketing
<b>Checker Person Name / Title Quality Assurance</b>	Jenny Cocker, Director of Finance and Operations
<b>Name of Approver / Approval Committee Date Approved</b>	Exec Group 31.08.2023 (Full Governing Board)
<b>Date of Next Review (3 yearly)</b>	June 2026

**VALIDITY** – Policies should be accessed via the Foundation intranet to ensure the current version is used.

## CHANGE RECORD - REVIEW PERIOD 3 YEARS

Version	Date	Change details
V1.00	May 2018	Written, SWM
V1.01	Jan 2021 Sept 2022	Reviewed, SWM Reviewed J Cocker
V1.02	June 2023	Reviewed Vicky Weeks

To be published on the following:

<b>Staff shared</b>	<b>X</b>	<b>School website</b>	<b>X</b>	<b>ISI Portal</b>	
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## **1. Introduction**

Wakefield Grammar School Foundation (WGSF), referred to as 'the Foundation', is a family of single-sex independent day schools incorporating Queen Elizabeth Grammar School (QEGS), Wakefield Girls' High School (WGHS) and Wakefield Pre-Preparatory School (WPPS).

## **2. The purpose of this policy**

The purpose of this policy is to:

- protect children and young people who take part in WGSF's services, events and activities, specifically those where photographs and videos may be taken
- set out the overarching principles that guide our approach to photographs/videos being taken of children and young people during our events and activities
- to ensure that we operate in line with our values and within the law when creating, using and sharing images of children and young people.

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 the Foundation. It also covers the Foundation'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 Foundation Terms and Conditions for parents, and any other information the schools or the Foundation 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 Foundation's Privacy Notices.

This policy statement applies to all staff, volunteers and other adults associated with WGSF.

## **3. Legal Framework**

This policy has been drawn up on the basis of legislation and guidance that seeks to protect children in England (summaries of which are on the NSPCC website [Children and the Law](#)).

## **4. Risks of sharing images online**

The Foundation is aware of the risks associated with sharing images online, including:

- Pupils may become vulnerable for grooming if a photograph is shared alongside information that makes them identifiable (eg their school uniform);
- Images may be copied, downloaded, screenshotted or shared by anyone;
- photographs or videos may appear in internet search results.

## **5. Safeguarding and Recognition when using images of pupils**

We believe that:

- children and young people should never experience abuse of any kind
- We have the responsibility to promote the welfare of all children and young people and to take, share and use images of pupils safely.

We recognise that:

- sharing photographs and films of our activities can help us celebrate the successes and achievements of our pupils, provide a record of our activities and raise awareness of the WGSF;
- the welfare of our pupils taking part in our activities is paramount;
- pupils, their parents and carers have a right to decide whether their images are taken and how these may be used, regardless of age, disability, gender reassignment, race, religion or belief, sex or sexual orientation;
- consent to take images of pupils is only meaningful when children, their parents and carers understand how the images will be used and stored, and are fully aware of the potential risks associated with the use and distribution of these images;
- there are potential risks associated with sharing images of children online.

We will seek to keep pupils safe by:

- asking for written consent (using the WGSF annual data collection form) to photograph a child and use their image for social media / publicity;
- explaining what images will be used for, how they will be stored and what potential risks are associated with sharing images of children (information contained within this policy);
- making it clear that if a child or their family withdraw consent for an image to be shared, it may not be possible to delete images that have already been shared or published;
- limiting publishing personal information about individual children;
- making sure pupils, their parents and carers understand how images of children will be securely stored;
- using images that positively reflect young people's involvement in the activity.

## **6. General points to be aware of**

- Certain uses of images are necessary for the ordinary running of the Foundation; other uses are in the legitimate interests of the schools or the Foundation and our community which we believe are unlikely to cause any negative impact on children. The Foundation will take decisions on how to process such images including how to use them, based on lawful purposes, and subject to any reasonable objections raised.
- We hope parents will feel able to support the Foundation 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.
- Parents should be aware that, from around the age of 13 and upwards, the law recognises pupils' own rights to have a say in how their personal information is used – including images.

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

Unless the relevant pupil or their parent has requested otherwise, the Foundation will use images of pupils to keep the schools' community updated on the activities and for marketing and promotional purposes, including:

- on internal displays (including clips of moving images) on digital and conventional notice boards within the Foundation premises;

- in communications with the school community (parents, pupils, staff, governors and alumni) including by email, on the school intranet and by post;
- on the Foundation's websites (Wakefield Grammar School Foundation, Queen Elizabeth Grammar School, Wakefield Girls' High School and Wakefield Grammar Pre-Prep) and, where appropriate, via the Foundation's social media channels, e.g. Twitter, Instagram and Facebook; and
- in the Foundation's prospectus, and in online, press and other external advertisements for the schools and the Foundation. Such external advertising would not normally include pupil's 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 Foundation's staff (who are subject to policies and rules in how and when to take such images), a professional photographer used for marketing and promotional purposes, or occasionally pupils.

The schools will only use images of pupils in suitable dress and the images will be stored securely and centrally. The Schools will retain images in line with the principles of the data retention policy.

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

- All pupils are photographed on entering the school and, thereafter, at yearly intervals, for the purposes of internal identification. These photographs identify the pupil by name, year group, house and form/tutor group.
- CCTV is in use on Foundation premises, and will sometimes capture images of pupils. Images captured on the Foundation's CCTV system are used in accordance with the Privacy Notice and CCTV Policy.

## **9. Use of Pupil Images in the Media**

- We 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 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.
- Occasionally the Foundation is asked to share images with local or national media, we ask for consent to share images of pupils as part of our annual data collection consent.

## **10. Security of Pupil Images**

Professional photographers and the media are accompanied by a member of staff when on the Foundation premises. The Foundation only uses reputable professional photographers and make every effort to ensure that any images of pupils are held by them securely, responsibly and in accordance with the Foundations' instructions. Professional photographers who attend regularly are checked through the Disclosure and Barring Service (DBS).

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

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

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

Parents or close family members are welcome to take photographs of (and where appropriate, film) their own children taking part in Foundation events, subject to the following guidelines, which the schools 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; spectators may be asked that this is not used at indoor events.
- Parents should not 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 Foundation from permitting the filming or recording of some plays and concerts. The Foundation will always notify parents 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 Foundation 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 Foundation sometimes records plays and concerts (or engages a professional photographer or film company to do so), in which case 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.

## **12. Use of Cameras and Filming Equipment 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) 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.

The misuse of images, cameras, or filming equipment in a way that breaches this Policy, related policies (see section10) or the Schools' Rules, is always taken seriously, and may be the subject of disciplinary procedures or dealt with under the relevant safeguarding policy as appropriate.

## **13. Consent**

Parents who accept a place for their child at the Foundation are asked to indicate agreement (annually on the data consent form) to the Foundation using images of their child as set out in this policy 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 when exam boards require film evidence for public qualifications or if they are included incidentally in CCTV, moving image or a photograph).

Any parent who wishes to limit the use of images of a pupil for whom they are responsible should contact the school office (at which the pupil attends) in writing. The Foundation will respect the wishes of parents/carers (and indeed pupils themselves) wherever reasonably possible, and in accordance with this policy.

#### **14. Storing Images**

We will store photographs and videos of children securely, in accordance with data protection law and the WGSF Data Retention Policy.

WGSF does not permit staff and volunteers to use any personal equipment to take photos and recordings of children (unless prior permission has been given, for example on school trips / tours). Only cameras or devices belonging to the WGSF should be used.

#### **15. Related Policies and Procedures**

This policy should be read alongside the following WGSF policies:

- Safeguarding Policy
- Staff Code of Conduct
- Data Retention
- IT Acceptable Use Policy
- Social Media Policy
- Privacy Notices
- Terms and Conditions
- Behaviour Policy
- Anti-Bullying Policy