



THE GRAMMAR SCHOOL
AT LEEDS
Be Inspired

Taking, Storing and Using Images of Children Policy

ISI Reference:	
Rationale for the Policy:	This policy is created to ensure that the Grammar School at Leeds, GSAL Transport Ltd, and GSAL Enterprises (together GSAL) meets its data protection obligations, including those provided for in the UK General Data Protection Regulation and Data Protection Act 2018, whilst adhering to statutory requirements already extant within the education sector
Policy aim:	To provide guidance for parents and pupils on how GSAL processes photographic images of children and their responsibilities around taking storing and using images of children.
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Agreed and Authorised by:	GSAL SLT
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**The School runs on FREDIE principles:
Fairness, Respect, Equality, Diversity, Inclusion and Engagement**

1. 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 The Grammar School at Leeds ("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.

It applies in addition to the school's parent contract, and any other information the school may provide about the use of pupil images, including the school's privacy notice. Images of pupils in a safeguarding context are dealt with under the school's [safeguarding and child protection policy](#).

2. General points

- 2.1. 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.
- 2.2. Parents who accept a place for their child at the school are invited to opt out to the school using personal data, including images, for specifically publicity purposes (annex 1).
- 2.3. The school may use 'special categories' of personal data to select pupils whose personal data is subsequently used in publicity activities. The school will only undertake such exercises with the specific and explicit consent of the pupil or parent via the 'use of personal data for internal and external school publicity' form (annex 1).
- 2.4. 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.
- 2.5. Any parent who wishes to limit the use of images of a pupil for whom they are responsible should contact the Data Manager in writing. The school will respect the wishes of parents (and indeed pupils themselves) wherever reasonably possible, and in accordance with this policy.
- 2.6. 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.

3. Use of pupil images in school publications and the media

- 3.1. Unless the relevant pupil or their 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:
 - 3.1.1. in communications with the school community (parents, pupils, staff, governors and alumni) including by email, on the school intranet and by post;
 - 3.1.2. on the school's website and, where appropriate, via the school's social media channels, e.g. Twitter, Instagram and Facebook;
 - 3.1.3. in the school's prospectus, and in online, press and other external advertisements for the school. Such external advertising would not normally include pupils' names; and
 - 3.1.4. in the external media for the purpose of publicising and celebrating individual and school achievements.
- 3.2. 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 suitable images of pupils and the images will be stored securely and centrally.
- 3.3. The school will use only first names when publishing pupil information, or will ensure that any publication of pupil information reflects what has already been made publically available by the external media.

4. Use of pupil images for identification and security

- 4.1. All pupils are photographed on joining the school and, thereafter, at yearly intervals for primary phase pupils and in Year 7, Year 10 and Year 12 for secondary phase pupils, for the purposes of internal identification. These photographs identify the pupil by name, year group, house and form/tutor group and are stored securely in the schools information management system.
- 4.2. Where CCTV (or similar devices) is in use on school premises in appropriate locations or on school transport we will sometimes capture images of pupils. Images captured on the School's recording systems are used in accordance with the Privacy Notice

5. Security of pupil images

- 5.1. 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 held by them securely, responsibly and in accordance with the school's instructions.
- 5.2. 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.
- 5.3. 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.
- 5.4. The school will only keep images and video of pupils for as long as is necessary in accordance with the Data Retention Schedule.

6. Use of cameras and filming equipment (including mobile phones) by parents

- 6.1. 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:
 - 6.1.1. 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.
 - 6.1.2. Parents are asked not to take photographs of other pupils, except incidentally as part of a group shot.
 - 6.1.3. 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 social media platforms), or published in any other way.
 - 6.1.4. 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.
 - 6.1.5. Parents may not film or take photographs in areas which may be deemed to be sensitive, for example changing rooms, the swimming pool where children are likely to be in a state of undress or backstage during school productions or house events, nor in any other circumstances in which photography or filming may embarrass or upset pupils.
- 6.2. 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.
- 6.3. The school's safeguarding and child protection policy stipulates that mobile phones should not be used within the EYFS setting by staff and therefore parents and visitors' use of mobile phones will be monitored closely in these areas.

7. Use of cameras and filming equipment by pupils

- 7.1. 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.
- 7.2. Video, audio and photographic recording must never take place without the consent of the pupil and teacher. Consent must be explicit, not implied.
- 7.3. The use of cameras or filming equipment (including on mobile phones) is prohibited in areas which may be deemed to be sensitive, for example toilets, washing or changing areas, the swimming pool or backstage during school productions or house events.

8. Related policies and documents

- **Anti-Bullying Policy**
- **Data Protection Policy**
- **Data Retention Schedule**
- **Online Safety Policy**
- **Privacy Notice – Parents and Carers**
- **Privacy Notice - Pupils**
- **Safeguarding and Child Protection Policy**

The misuse of images, cameras or filming equipment in a way that breaches this policy, any of the above policies or the school rules is always taken seriously, and may be the subject of disciplinary procedures or dealt with under the relevant policy as appropriate.

Annex 1: The Grammar School at Leeds

Use of personal data for internal and external school publicity



The school uses pupil information (including examination outcomes, coursework, quotations, photographs and video etc) for the purposes of internal and external publicity pursuant to its legitimate interests. Channels include marketing materials, the school website, social media, the press and other third party media.

Internal publicity might include celebrating individual or group successes (e.g. sport, music, special achievements etc) on the school website, in newsletters and magazines, and via social media. External publicity might include disclosing similar information to the media in order to promote the school and the achievements and activities of its pupils. This is likely to involve the use of names and images.

If you wish to opt out of the school's use of pupil information in this way, please complete the relevant section on the form below. Please be aware that it may not be possible to change printed publications following opt out, such as the school magazine or prospectus, or third party publications and electronic media (for example where we have placed an advert or provided an image to a newspaper).

The school may also use sensitive personal information (defined as 'special category' under the General Data Protection Regulation) to select pupils used in publicity activities. The school will only use such information with specific and explicit consent of the pupil or parent/carer, and as such requires an 'opt in'. Examples of this might include the celebration of religious festivals or charitable endeavours, or the publication of stories or examination results in newspapers catering for a specific community.

If you consent to the use of sensitive personal information in the manner described above, please complete the relevant section on the form below. Having provided consent, you may later opt out at any point, although this will not affect the legitimacy of publicity activities prior to this change.

To either opt out of publicity or consent to the use of 'special category' data, please use the form below. For pupils in Year 8 or below a parent must sign the form. For pupils in Year 9 or above, either pupil or parent/carer may sign the form. If you do not return the form we assume consent for general publicity, excluding 'special category'.

Please see the school's [privacy notice](#) and [taking, storing and using images of children policy](#) for further information.

The Grammar School at Leeds - Use of personal data for internal and external school publicity

Please complete this form if you wish **either** to opt out of use of data for general publicity, **or** to opt in to special category publicity use of data. Unless you have received the form by DocuSign, you must print it and sign it. You may then scan the form and email it to the Data Manager on <mailto:datamanager@gsal.org.uk> or return the paper copy to school by mail or by hand.

Pupil name: _____ **Form:** (year group if form unknown) _____

Please select the appropriate box:

Objection (opt out) to use of personal information in school publicity activities

I **do not** wish any information relating to my child to be used in GSAL celebratory or publicity materials

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Consent (opt in) to use of special category in publicity activities

I **give consent** for special categories of personal data (such as religious beliefs or ethnicity) to be used for the purposes of GSAL publicity activities including the disclosure to third parties (examples would include the celebration of achievements or examination results in specific community websites and newspapers)

☐

Parent/guardian signature: _____ **Date:** _____

Parent/guardian printed name: _____

Pupil signature (Year 9 or above): _____ **Date:** _____

All information collected will be held, used and/or stored in accordance with the school's privacy notice. All personal data is held in accordance with applicable Data Protection laws. For more information on how GSAL process your personal data please contact our Data Manager datamanager@gsal.org.uk,