

# Image Use Policy



**William Hulme's Grammar School**  
The best in everyone™  
Part of United Learning

We hold a photograph of each pupil on our secure management information system for identification purposes. Our legal basis for doing so is the legitimate interests of the data controller. We will not use photographs of your child for any other purpose without your consent.

## How the School Uses Your Data

The data controller for personal information held by William Hulme's Grammar School is United Learning Trust (ULT). ULT is registered with the Information Commissioner's Office (ICO). The registration number is Z7415170. The Company Secretary, Alison Hussain, is responsible for ensuring that ULT complies with the Data Protection Law. She can be contacted on [company.secretary@unitedlearning.org.uk](mailto:company.secretary@unitedlearning.org.uk) or 01832 864538.

## Official Use of Images/Videos of Children by the School

- All images taken by the school will be used in a manner respectful of the eight Data Protection Principles. This means that images will be:
  - fairly and lawfully processed.
  - processed for limited, specifically stated purposes only.
  - used in a way that is adequate, relevant and not excessive.
  - accurate and up to date.
  - kept on file for no longer than is necessary.
  - processed in line with an individual's legal rights.
  - kept securely.
  - adequately protected if transferred to other countries.
- The Designated Safeguarding Lead (DSL) and E-Safety Lead, Mr Ben Howarth, and the ICT Management team are responsible for ensuring the acceptable, safe use and storage of all camera technology and images within the school. This includes the management, implementation, monitoring and review of the School's Image Use Policy.
- Written parental permission will be sought on entry to the school, except in the case of Sixth Form students, who will be asked to sign their own consent forms.
- A record of all consent details will be kept securely on file. Should permission be withdrawn by parents/carers at any time records will be updated and the relevant staff informed.
- The ICT Management Team and the DSL reserve the right to view any images taken and/or to withdraw or modify a member of staffs' authorisation to take or make images at any time.
- Children's full names will not be used on the website in association with photographs.
- The school will not include any personal addresses, email addresses, telephone numbers, fax numbers on video, on the website, in a prospectus or in other printed publications.
- The school will only use images of children who are appropriately dressed.

- Staff will receive information regarding the safe and appropriate use of images as part of their safeguarding training and responsibilities.
- All members of staff (including volunteers) will ensure that all images are available for scrutiny and will be able to justify any images in their possession.
- Only official school owned equipment (eg work provided phones, digital or video cameras) will be used by staff to capture images of children for official purposes.
- Use of personal cameras by staff is prohibited at all times, unless consent has been given by a member of the Leadership Team for a specific event. Images will be removed from the device as soon as is possible and transferred to the school's network.
- The school will ensure that images on any apps, websites or third party companies used to share, host or access children's images are held in accordance with the Data Protection Act and suitable child protection requirements (if necessary) are in place.
- When taking photos or recordings, careful consideration is given before involving very young or vulnerable children who may be unable to question why or how activities are taking place.
- The school will discuss the use of images with children and young people in an age appropriate way.
- Images will not be taken of any child or young person against their wishes. A child or young person's right not to be photographed is to be respected.
- Photography is not permitted in sensitive areas such as changing room, toilets, swimming areas etc.

### **Use of Photos/Videos by Parents/Carers**

- Parents/Carers are permitted to take photographs or video footage of events for private use only. They are therefore not allowed to share such photographs on social media.
- Parents/Carers are only permitted to take or make recording within designated areas of the school. Photography is not permitted in sensitive areas such as changing rooms, toilets, swimming areas etc.
- Parents and Carers who are using photographic equipment must be mindful of others when making and taking images.
- The right to withdraw consent will be maintained and any photography or filming on site will be open to scrutiny at any time.
- Parents and Carers may contact the school's DSL to discuss any concerns regarding the use of images.

### **Use of Photos/Videos by Children**

- The school will discuss and agree age appropriate acceptable use rules with children regarding the appropriate use of cameras, such as places children cannot take the camera (eg unsupervised areas, toilets etc).
- The use of non-school devices eg mobile phones, children's own digital cameras, is covered in the school's mobile phone, Responsible Use and Online and E-Safety Policy.
- All staff will be made aware of the acceptable use rules regarding children's use of cameras and will ensure that children are appropriately supervised when taking images for official or curriculum use.

- Members of staff will role model positive behaviour to the children by encouraging them to ask permission before they take any photos.
- Photos taken by children for official use will be processed in accordance with the Data Protection Act 2018.
- Photos taken by children for official use will be carefully controlled by the school and will be checked carefully before sharing online or via digital screens.
- Still and video cameras provided for use by children and the images themselves will not be removed from the school.

## **Use of Images of Children by the Media**

- Where a press photographer is to be invited to celebrate an event, every effort will be made to ensure that the newspaper's (or other relevant media) requirements can be met.
- The identity of any press representative will be verified, and access will only be permitted where the event is planned, and where press are to be specifically invited to attend. No authorisation will be given to unscheduled visits by the press under any circumstances.
- Every effort will be made to ensure the press abide by any specific guidelines should they be requested. However, no responsibility or liability can be claimed for situations beyond reasonable control, and where the school is to be considered to have acted in good faith.

## **Use of Professional Photographers**

- Professional photographers who are engaged to record any events will be prepared to work according to the terms of the school's Online and E-Safety Policy.
- Photographers will sign an agreement which ensures compliance with the General Data Protection Regulations (GDPR), May 2018 and that images will only be used for a specific purpose, subject to parental consent.
- Photographers will not have unsupervised access to children and young people.

## **Use of Closed-Circuit Television (CCTV)**

- All areas which are covered by CCTV will be well signposted, and notifications are displayed so that individuals are advised before entering such a vicinity.
- Recordings will be retained for a limited time period only and for no longer than their intended purpose. This will generally be a maximum of 30 days.
- Regular auditing of any stored images will be undertaken by the ICT Management team or other member of staff as designated by the management team.
- If cameras record activities taking place on the premises which are of a criminal nature or give any cause for concern, then information will be referred to the appropriate agency.
- CCTV cameras will be appropriately placed within the school.

## Use of Webcams

- Parental consent will be obtained before webcams will be used within the school for curriculum or educational purposes.
- All areas which are covered by webcams for security or safeguarding purposes will be well signposted, and notifications are displayed so that individuals are advised before entering such a vicinity.
- Recordings will be retained for a limited time period only and for no longer than their intended purpose. This will generally be a maximum of 30 days. All recordings are to be erased before disposal.

## Use of Technology for Online / Virtual Teaching

- The school will only use a provider that has the appropriate level of security.
- Wherever possible staff should use school devices and will only contact children via the pupil's school email address / log in. This ensures that the school's filtering and monitoring software is enabled.
- Virtual lessons will be timetabled and senior staff, safeguarding lead and heads of departments are able to drop in to any virtual lessons at any time.
- Staff engaging in online learning will display the same standards or dress and conduct that they would in school.
- Further guidelines are included in the school's Acceptable User Policy and Appendix 5 of the Child Protection Policy

## Photographing Children: Frequently Asked Questions for Parents/Carers

### Why do we need a policy?

Schools, playgroups and youth groups have always used photographs as a way of celebrating achievement or seeking publicity for fundraising etc. Parents and families and the children themselves often derive great pleasure from seeing their loved ones in print or on a website. We want to ensure that everyone can continue to enjoy these activities safely. However, parents need to be aware that placing any identifying information in the public domain has risks. Parents need to understand these issues in order to give properly considered consent. It is important that parents and schools have the opportunity to fully consider the issues before any problems can arise.

### So what are the risks?

The most highly publicised and worrying risk is that a child who appears in the paper or on a web site may become of interest to a predatory sex offender. Locating people through the internet has become extremely easy, using widely available software, so if there is a picture and the name of a setting or youth group and the name of the child it could be quite easy to find out the child's address and even work out their likely route to school. There are also other specific groups of children and families whose safety could be put at risk if identified eg families fleeing domestic abuse.

To limit these potential risks, we will take appropriate steps, as outlined in the attached consent form, to safeguard children and the wider community.

## Isn't this just scaremongering?

Sadly no. There have been cases of families receiving unwelcome phone calls following appearances in the press. However, this is rare so it is important to have a sense of proportion in these matters. Remember we want to celebrate success and achievement but parents must be aware of risks in order to make an informed decision.

## What about school websites?

The same concerns apply to school controlled sites and there is an added concern that images of children may be copied directly from a site which can then be manipulated or changed by another person. Schools can copy protect images and use lower quality images which means they cannot be usefully enlarged but this can be bypassed so it must not be relied upon to keep images safe.

## I want to do my own recording of the school play/event is this ok?

Taking pictures or recordings of your own children for your own personal use is ok. The difficulty arises with plays or other events in that other children may also be filmed. It is important that we are all aware that some members of the community (children or adults) may be vulnerable and must not have their image shared online as they could be put at risk from harm. You may not always know who these people are and we need everyone's support to protect the whole community. It is also important for us all to role model positive behaviour for children, so it might be a sensible idea to check first before posting any images online which contain other children than your own.

Parents/carers should not copy images from the school's site without appropriate permission from the school.

## Policy Information and Review

<b>Designated Lead Person/s</b>	Mr B A Howarth, Vice Principal / Head of Sixth Form / DSL / E-Safety Lead
<b>Reviewed</b>	Annually
<b>Date of last review and by whom</b>	July 2022 – Miss J Moran, Director of Safeguarding
<b>Nominated Governor</b>	Miss S Bagguley
<b>Ratification by Local Governing Body</b>	N/A
<b>Next Review Date</b>	July 2023



## Image Use Booklet for Parents, Carers and Students



**William Hulme's Grammar School**  
The best in everyone™

Part of United Learning

**Our Ref:** AVB/Resources/Image Use.docx

**Date:**

Dear Parent/Carer

### General Data Protection Regulation (GDPR) - Parental Consent for Image Use

This letter explains why we will need to ask for your consent before we are able to take photographs of your child during their time at William Hulme's Grammar School.

Generally, photographs are a source of pleasure and pride. We believe that the taking and use of photographs can enhance the self-esteem of children and their families and therefore is something to be welcomed and appreciated.

We may take photographs for a number of reasons whilst your child is with us, including:

- documenting and recording education activities.
- recording their learning and development progress.
- recording special events and achievements.

We will also encourage children to be active learners, and to become involved in using cameras themselves by taking photos of their surroundings, activities and of each other.

We do, however, recognise that with the increased use of technologies, particularly digitally and online, the potential for misuse has become greater and we understand that this can give rise to concern. We will therefore endeavour to put effective safeguards in place to protect children and young people by minimising risk.

We are mindful of the fact that some families may have reasons why protecting a child's identity is a matter of particular anxiety. If you have special circumstances either now or at any time in the future, which would affect your position regarding consent, please let us know immediately in writing.

We include the safe use of Cameras and Images as part of our Online and E-Safety Policy, which you are welcome to view or take a copy of at any time.

To comply with GDPR, we need your permission before we can photograph or make any recordings of your child. If your children are old enough to express their own views, you may want to consult with them about categories of consent, and we invite you to use this letter to explore their feelings about being photographed at school.

Please read and complete the attached forms in the booklet and return to us as soon as possible. Please do not hesitate to contact us should you have any queries.

Yours sincerely

Mr P Mulholland  
Principal and GDPR Lead

Mrs S Turner  
Executive Business Manager and GDPR Lead



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**Our Ref:** AVB/Resources/Image Use.docx

**Date:**

Dear Parent/Carer

### **Group Activity Permission Letter and Form**

You may be aware that we have a policy in place regarding the taking, making and use of images and you may previously have signed a consent form stating whether or not your child could be photographed. As you also know, we regularly stage productions, assemblies and other special events in school, and we know that parents/carers like to take photographs/videos on these occasions. Please be aware that parents/carers are not permitted to take photographs or to make video recordings on such occasions.

We all enjoy and treasure images of our family and friends and we now have the exciting dimension of adding our images and videos to our online social network, such as Facebook, YouTube and many other websites. This means that we can easily share our photos and video with family and friends.

Whilst this can be very useful to all of us we must ensure we protect and safeguard all children and staff, including those who do not want to have their images stored online.

- Once posted and shared online any image or video can be copied and will stay online forever.
- Some children are at risk and **MUST NOT** have their image put online. Not all members of the community will know who they are.
- Some people do not want their images online for personal or religious reasons.
- Some children and staff may have a complex family background which means that sharing their image online can have unforeseen consequences.
- Therefore, in order to keep all members of the community safe we must all **'Think Before We Post'** online.

At William Hulme's Grammar School, we are very happy for parents and carers to take photos and videos of events for personal use but we request that these images are not distributed or put online. This is to protect all members of the community.

### **Further Information on the Use of Images and video:**

- NSPCC: <https://www.nspcc.org.uk/keeping-children-safe/online-safety/http://tinyurl.com/yc7nmnv>
- Think U Know: <https://www.thinkuknow.co.uk/parents/>
- Get Safe Online: [www.getsafeonline.org](http://www.getsafeonline.org)

## Parental Consent for Images - Conditions of Use

An online version of the Image Consent form is available on the school website:

[www.whgs-academy.org/image\\_consent](http://www.whgs-academy.org/image_consent)

- We will not use the personal details or full names (which means first name and surname) of any child or adult in a photographic image, on video/DVD, on our website, in our prospectus or in any of our other printed publications.
- We will not include personal addresses, email addresses, telephone numbers, fax numbers on video, on our website, in our prospectus or in other printed publications.
- If we use photographs of individual children, then we will not use the name of that child in the accompanying text or photo caption. If we name a child in any text, then we will not use a photograph of that child to accompany the article.
- We may include pictures of children and staff that have been drawn by the children.
- We may use group photographs or footage with general labels, such as 'Making Christmas decorations'.
- We will only use images of children who are suitably dressed.
- We will discuss the use of images with children in an age appropriate way to role model positive behaviour.
- This consent can be withdrawn by a parent/carer at any time by informing the school in writing.

### Images of children may be used in the following ways:

- On walls and displays around school.
- On our website, our social media sites and other electronic communications.
- In our prospectus and other printed publications that we produce for educational and promotional purposes.
- In the media, e.g. if a newspaper photographer or television film crew attend and event organised by the school.

I have read and understood the conditions of use and I am also aware of the following:

- Websites can be viewed throughout the world and not just in the United Kingdom where UK law applies.
- The press are exempt from the Data Protection Act and may want to include the names and personal details of children and adults in the media.
- I/we will discuss the use of images with our child/ren to obtain their views, if appropriate.
- As the child's parents/carers, we/I agree that if we/I take photographs or video recordings of our child/ren which include other children then we will only use these for personal use.

## Consent for Image Use

**Student Name:**

(Block Capitals)

.....

**Form:**

.....

I give permission for images of the above-named student to be used for the purposes stated on this page.

Yes	No
<input type="checkbox"/>	<input type="checkbox"/>

Student's Signature:

.....

Date:

.....

Parent/Carer's Signature:

.....

Date:

.....

**Please return this form to Miss G Murphy (Communications Officer)  
in the Executive Suite, Donner Centre.**



# **Respect and Care for the Whole Community when taking Photos and Videos**

**We are happy for parents and carers to take photos and videos for personal use but request that these images are not distributed or put online if they contain images of other children, adults or staff without consent. This will help protect all members of the community.**

**Thank you for your support.**

### Consent Form for Using Photographs of Staff

To comply with General Data Protection Regulation (GDPR), we need your permission to use photographs of you.

#### Your image may be used in the following ways:

- On walls and displays around school.
- On our website, our social media sites and other electronic communications.
- In our prospectus and other printed publications that we produce for educational and promotional purposes.
- In the media, e.g. if a newspaper photographer or television film crew attend and event organised by the school.

I consent to William Hulme's Grammar School using photographs and/or video recordings including images of me both internally and externally to promote the school. These images could be used in print and digital media formats, including print publications, websites, e-marketing, posters, banners, advertising, film, social media, teaching and research purposes.

I understand that images on websites can be viewed throughout the world and not just in the United Kingdom and that some overseas countries may not provide the same level of protection to the rights of individuals as EU/UK legislation provides.

I understand that some images or recordings may be kept permanently once they are published and be kept as an archive of school life.

I have read and understand the conditions and consent to my images being used as described.

**Please return the completed form, even if you have chosen not to give your consent.**

**Staff's Full Name:** .....

I give permission for my images to be used for the purposes stated on this page.

Yes	No
<input type="checkbox"/>	<input type="checkbox"/>

**Staff's Signature:** .....

**Date:** .....

William Hulme's Grammar School is committed to processing information in accordance with the General Data Protection Regulation (GDPR). The personal data collected on this form will be held securely and will only be used for administrative purposes.