

## 1. Aims

- 1.1 It is important that children and young people feel happy with their achievements and have photographs and films of their special moments. Family and friends also want to be able to share the successes of their children when they have been part of a special event or activity. However, it is also important to be aware of child protection and safeguarding issues when people are taking photos or filming at events.
- 1.2 The Trust aims to reduce the potential for misuse of images by being aware of the potential risks and dangers and putting appropriate measures in place.
- 1.3 The Trust aims to ensure that all personal data collected about staff, pupils, parents/carers, Trustees, Local Board members, visitors and other individuals is collected, stored and processed in accordance with the [General Data Protection Regulation \(GDPR\)](#) and the expected provisions of the Data Protection Act 2018 (DPA 2018) as set out in the [Data Protection Bill](#).
- 1.2 This policy applies specifically to the taking, displaying and sharing of images of the registered pupils of Trust academies.

## 2. Legislation and guidance

- 2.1 This policy meets the requirements of the GDPR and the expected provisions of the DPA 2018. It is based on guidance published by the Information Commissioner's Office (ICO) on the [GDPR](#) and the ICO's guidance [taking photographs in schools](#).
- 2.2 We will only collect and use a pupil's personal data, which includes photographs, when the law allows us to.
- 2.3 The Trust may retain photographs on curricular records for assessment purposes and the lawful basis for this will be "public task".
- 2.4 For all other uses of images the Trust will seek consent using the applicable standard form in **Appendix 1**.

## 3. Obtaining consent

- 3.1 A standard consent form will be obtained for each current pupil/student for use after 25 May 2018.
- 3.2 For primary academies a consent form will be sent for completion by a parent/carer and return to the academy at the point at which the pupil is first admitted to the academy. If there is any disagreement between parents/carers it will be treated as if consent has not been given.
- 3.3 For secondary academies a consent form will be sent for completion by a parent/carer in conjunction with their child and return to the academy at the point at which the pupil is first admitted to the academy. If there is any disagreement between parents/carers and students it will be treated as if consent has not been given.
- 3.4 Consent for the use of photographs and images must be:
  - Freely Given
  - Specific
  - Informed
  - Unambiguous

3.5 Consent can be withdrawn at any time by notifying the academy.

## **4. Use of photographs**

### **4.1 In the academy**

4.1.1 The academy will use images of pupils such as working towards achieving learning objectives or participating in an off-site activity in displays in classrooms or corridors. Accompanying captions will not contain a full name for any of the pupils. Consent for the taking and displaying of these images will be obtained.

4.1.2 Only images of pupils wearing suitable clothing will be used.

### **4.2 Social media**

4.2.1 Images of pupils must only be uploaded with exceptional caution; no individual or close up images should be used where the student could be identified. Likewise, no image which might reasonably be judged to cause embarrassment to the pupil should be published. Pupil names must not be included. Consent for the taking and using of these images will be obtained.

4.2.2 Additional information regarding the use of images on social media can be found in Trust Policy A2 – Social Media

### **4.3 Marketing**

4.3.1 The Trust uses pupil and student images in marketing materials which may be in printed format or available on-line.

4.3.2 The Trust uses video filming for promotional purposes which may be shown in the academy or on-line. Still images taken from videos may also be used and can then be in printed format or available on-line.

4.3.3 No image or video will be published without the written prior consent of the parent/carer and, in the case of a secondary student, the consent of the student as well.

4.3.4 Images for marketing purposes will be withdrawn from use within 2 years of the pupil or student leaving the academy.

### **4.4 Use of video and sound recording for training purposes**

4.4.1 The Trust uses the IRIS Connect system for supporting the continual professional development and reflective practice of staff.

4.4.2 Videos are held on a secure server with security and encryption in place to ensure that these are only shared with those who have a direct and expressed entitlement to see them.

4.4.3 The Trust will ensure that the appropriate consent is in place for pupils or students before the IRIS Connect system is used.

4.4.4 The Trust, as the data controller for the recordings, will follow the Organisation Administrator Agreement with IRIS Connect at all times. Details of the agreement can be found [here](#).

### **4.5 Image taking by parents/carers and family members**

4.5.1 Whilst the taking and sharing of images by parents/carers and family members at academy events isn't specifically covered by the GDPR the use of such images **must** be considered in terms of child protection and safeguarding purposes.

- 4.5.2 Parents/carers and family members will be advised at the start of an event if filming or taking pictures is permitted. If it is permitted then this will be on the strict understanding that any such images/video are for personal use only and will not be shared publicly or on social media.
- 4.5.3 Academies may decide to film or photograph events and make the images available to parents once the consents for all children have been checked to ensure that all consents are in place.

## 5. Links with other policies

This policy is linked to the following Trust policies:

- Data protection
- Safeguarding in Education and Child Protection policy
- Freedom of information publication scheme
- ICT acceptable use policy
- Social Media policy
- Document retention schedule

## 6. Policy status and review

<b>Written by:</b>	<b>Governance Manager</b>
<b>Owner:</b>	<b>Data Protection Officer</b>
<b>Status:</b>	<b>Approved</b>
<b>Approval date:</b>	<b>FRC = 10-05-2018</b>
<b>Review Date:</b>	<b>2020</b>

**Primary – opt in to all / opt out of all**

Academy headed paper

Dear [parent/carer name],

At [academy name], we take photographs and video or audio recordings of pupils for our records and administrative systems, to support the safe and effective management of our academy, and to support the assessment of pupils. These are held securely, with access limited to our staff and key stakeholders.

We also sometimes take photographs or recordings of pupils to use in the academy's prospectus, on the website, on display boards around the academy and to help with staff training. We would like your consent to take photos and recordings of your child and use them for these purposes. If you're not happy for us to do this, that's no problem – we will accommodate your preferences.

We really value using photos and recordings of our pupils, to be able to showcase what pupils do in the academy and show what life at our academy is like to others. Where photographs are used, any accompanying caption will not contain the full name of any pupils. We are committed to using any materials sensitively and responsibly.

**Consent**

Please tick the relevant box below, sign the section immediately below it and return this form to the academy as soon as possible.

- I am happy for the academy to take photographs or recordings of my child. I understand that this may include the following:
- Using them on internal displays
  - Using them to help with staff and student teacher training
  - Participating in school or class photos
  - Publishing them on the Academy's/Trust's website
  - Publishing them in the Academy's/Trust's printed and online promotional materials (e.g. in our prospectus or in news articles distributed to the media)
  - Using them on the Academy's/Trust's social media accounts (e.g. Twitter or Facebook)

OR

- I am **not** happy for the academy to take photographs or recordings of my child.

Pupil's name: \_\_\_\_\_ Class: \_\_\_\_\_

Parent's/carer's signature \_\_\_\_\_ Date: \_\_\_\_\_

If you change your mind at any time, you can let us know by emailing [email address], calling the academy on [phone number], or just popping in to the office to complete a new form.

If you have any other questions, please get in touch.

Yours faithfully

[Name]  
[Role]

Dear [parent/carer name],

At [academy name], we take photographs and video or audio recordings of pupils for our records and administrative systems, to support the safe and effective management of our academy, and to support the assessment of pupils. These are held securely, with access limited to our staff and key stakeholders.

We also sometimes take photographs or recordings of pupils to use in the academy’s prospectus, on the website, on display boards around the academy and to help with staff training. We would like your consent to take photos and recordings of your child and use them for these purposes. If you’re not happy for us to do this, that’s no problem – we will accommodate your preferences.

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**Consent**

Please complete the table below, sign the section immediately below it and return this form to the academy as soon as possible.

	Please circle your answer
I am happy for photos / recordings of my child to be used within the academy (e.g. on display boards, in class photos or for staff and student teacher training purposes)	Yes / No
I am happy for photos / recordings of my child to be used on the Academy’s/Trust’s website and in printed or online promotional materials (e.g. in our prospectus or in news articles distributed to the media)	Yes / No
I am happy for photos of my child to be used in the Academy’s/Trust’s social media accounts (e.g. Twitter or Facebook)	Yes / No

Pupil's name: \_\_\_\_\_ Class: \_\_\_\_\_

Parent's/carer's signature \_\_\_\_\_ Date: \_\_\_\_\_

If you change your mind at any time, you can let us know by emailing [email address], calling the academy on [phone number], or just popping in to the office to complete a new form.

If you have any other questions, please get in touch.

Yours faithfully

[Name]  
[Role]

**Secondary – opt in to all / opt out of all**

Academy headed paper

Dear [student name] & parent/carer

At [academy name], we take photographs and video or audio recordings of students for our records and administrative systems, to support the safe and effective management of our academy, and to support the assessment of students. These are held securely, with access limited to our staff and key stakeholders.

We also sometimes take photographs or recordings of students to use in the academy's prospectus, on the website, on display boards around the academy and to help with staff training. We would like your consent to take photos and recordings of you and use them for these purposes. If you're not happy for us to do this, that's no problem – we will accommodate your preferences.

We really value using photos and recordings of our students, to be able to showcase what students do in the academy and show what life at our academy is like to others. Where photographs are used, any accompanying caption will not contain your full name. We are committed to using any materials sensitively and responsibly.

We consider that the students at our academy are sufficiently mature to make decisions regarding their own data protection rights. However, in the interests of transparency we ask that these decisions are discussed and also consented to by a parent/carer.

**Consent**

Please tick the relevant box below, sign the section immediately below it and return this form to the academy as soon as possible.

I am happy for the academy to take photographs or recordings of me/my child. I understand that this may include the following:

- Using them on internal displays
- Using them to help with staff and student teacher training
- Publishing them on the Academy's/Trust's website
- Publishing them in the Academy's/Trust's printed and online promotional materials (e.g. in our prospectus or in news articles distributed to the media)
- Using them on the Academy's/Trust's social media accounts (e.g. Twitter or Facebook)

OR

I am **not** happy for the academy to take photographs or recordings of me/my child.

Student's name: \_\_\_\_\_

Year group: \_\_\_\_\_

Student's signature: \_\_\_\_\_

Date: \_\_\_\_\_

Parent's/carer's signature \_\_\_\_\_

Date: \_\_\_\_\_

If you change your mind at any time, you can let us know by emailing [email address], calling the academy on [phone number], or just popping in to the office to complete a new form.

If you have any other questions, please get in touch.

Yours faithfully

[Name]  
[Role]

Dear [student name] & parent/carer

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We really value using photos and recordings of our students, to be able to showcase what students do in the academy and show what life at our academy is like to others. Where photographs are used, any accompanying caption will not contain your full name. We are committed to using any materials sensitively and responsibly.

We consider that the students at our academy are sufficiently mature to make decisions regarding their own data protection rights. However, in the interests of transparency we ask that these decisions are discussed and also consented to by a parent/carer.

**Consent**

Please complete the table below, sign the section immediately below it and return this form to the academy as soon as possible (and by Friday 8 June latest).

	Please circle your answer
I am happy for photos / recordings of me/my child to be used within the academy (e.g. on display boards, or for staff and student teacher training purposes)	Yes / No
I am happy for photos / recordings of me/my child to be used on the Academy's/Trust's website and in printed or online promotional materials (e.g. in our prospectus or in news articles distributed to the media)	Yes / No
I am happy for photos of me/my child to be used in the Academy's/Trust's social media accounts (e.g. Twitter or Facebook)	Yes / No

Student's name: \_\_\_\_\_ Year group: \_\_\_\_\_

Student's signature: \_\_\_\_\_ Date: \_\_\_\_\_

Parent's/carer's signature \_\_\_\_\_ Date: \_\_\_\_\_

If you change your mind at any time, you can let us know by emailing [email address], calling the academy on [phone number], or just popping in to the office to complete a new form.

If you have any other questions, please get in touch.

Yours faithfully

[Name]  
[Role]