

# **WOLVERHAMPTON GRAMMAR SCHOOL**

## **TAKING, STORING AND USING IMAGES OF CHILDREN POLICY**

Wolverhampton Grammar School (WGS) is an open and inclusive community that is very proud of all of the achievements of all of its students in their academic, artistic and sporting endeavours. The school celebrates its diversity and gives all of its many visitors a warm welcome.

The school particularly welcomes parents to its concerts, plays and sporting events as well as to more formal occasions during the school year. The school walls are decorated with examples of students' work, team photographs and photographs of trips and expeditions in which students have participated. The school makes full use of electronic notice boards inside the school to enhance displays. The school's website is updated regularly and all parents are sent regular letters and publications in order to keep them fully abreast with the news of the school's active community.

From time to time the school may be visited by the media who may take photographs or film footage at a School event. Students will often appear in these images which may then appear in local or national media (press and/or TV).

### **THE APPLICATION OF DATA PROTECTION LAWS TO TAKING, USING AND STORING IMAGES OF CHILDREN**

Parents who accept a place for their child at WGS are invited to agree to the school using anonymous photographs of their child and information relating to his/her achievements for promotional purposes which may be published in the prospectus or on the website, as well as displayed within the premises, and in bulletins sent to the school community. Parents are asked for their consent for the use of their child's photograph in these marketing materials on their acceptance form when confirming their place at the school. Full details of the school's Data Protection Policy is available on the school website.

Students like to be photographed and to see their work displayed so the school hopes that parents will feel able to support this by consenting to the school using images in the ways described herewith.

### **USE OF IMAGES: DISPLAYS ETC**

WGS will use photographic images of its students for the following purposes:

- Internal displays (including clips of moving images) on digital and conventional noticeboards within the School premises;
- Communications with the school community (parents, students, staff, Directors, Trustees and alumni) on the school's website;
- Marketing the school digitally through the website and social media accounts and through the school's prospectus and other marketing functions and by other means.

## **USE OF IMAGES: INTERNAL IDENTIFICATION**

All students are photographed on entering the school and, thereafter, at three yearly intervals, for the purposes of internal identification.

These passport-sized photographs identify the student by:

- Name
- Year Group [and form/tutor group]

They are securely stored in the password-protected Management information System where access is restricted to academic, pastoral and school office staff. Any parent who so requests will be sent a copy of his or her son or daughter's photograph.

## **IMAGES THAT THE SCHOOL USES IN DISPLAYS AND ON ITS WEBSITE**

The images that the school uses for displays and communications purposes never identify an individual student by their full name. Instead, they name the event, the term and year that the photograph was taken (for example, 'First XV rugby team' or 'Lent Term 2009'). The school only uses images of school activities, such as plays, concerts, sporting fixtures, prize-giving, school trips etc in their proper context. The school will never use any image that might embarrass or humiliate a student. It will also only use images of students who are suitably dressed. Students are always properly supervised when professional photographers visit the school. Parents are given the opportunity to purchase copies of these photographs.

## **STORAGE AND REVIEW**

Photographic images are stored securely either in locked filing cabinets or in a password-protected section of the School's database. They are reviewed annually and are deleted when no longer required or when a student leaves WGS unless they are kept for alumni purposes. Parents are advised that the school will endeavour to ensure that images of their children will not be published in any new school material once they have left the school. Please note that the school's existing publications, website and archived material may contain these images.

The School has a procedure in place for regularly checking and updating its website annually when expired material is deleted.

The School expressly prohibits the use of images it has taken on any external website (other than the school's own social media accounts) such as YouTube, Twitter, Facebook, Flickr etc.

## **MEDIA COVERAGE**

WGS will always notify parents in advance when it expects the press to attend an event in which its students are participating and it will make every effort to ensure that children whose parents or guardians have refused permission for images of their children to be used are not photographed by the press.

The school will always complain to the Press Complaints Council (PCC) if the media fails to follow the appropriate code of practice for the protection of young people including the children of celebrities.

## **STAFF INDUCTION**

All new teaching and office staff are given guidance on the school's policy on taking, using and storing images of children.

## **USE OF CAMERAS AND RECORDING EQUIPMENT BY PARENTS AND GUARDIANS**

Parents are welcome to take photographs of their own children taking part in sporting and outdoor events. 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 recording devices with consideration and courtesy for the comfort of others.

The school asks parents not to take photographs of other students on their own without the prior agreement of that child's parents.

Flash photography can disturb others in the audience or even cause distress for those with medical conditions; we therefore ask that it is not used at indoor events.

Parents are also reminded that copyright issues may prevent the school from permitting the filming or recording of some plays and concerts. The school always prints a reminder in the programme of events where issues of copyright apply.

WGS records some plays and concerts professionally (not just those where copyright applies). Copies of the DVDs and CDs are available for parents to purchase.

## **CCTV**

WGS would like to inform parents that it has Closed Circuit Television Cameras (CCTV) installed on its premises for the sole purpose of surveillance for security reasons. WGS believes that CCTV offers improved security protection for both students and staff although it is by no means considered to be the School's only means of security surveillance.

At WGS CCTV is located at various areas on the School site both externally and internally. It is not installed in changing rooms or toilets. Notices are clearly displayed in the outside areas where CCTV is used. Information on the use of CCTV within the school is included within the Security, Access Control and Workplace Safety Policy.

WGS is registered with the Information Commissioner's Office and has an appointed data controller who is a member of the School's management team and who oversees all aspects of the use of surveillance CCTV within the School.

The School will respond to any 'Subject Access Requests' within 40 days of receipt of the correct request documentation.

Parents are assured that WGS does not stream images collected via CCTV to any third parties or outside agencies. Please note, however, that the School may be legally required to provide CCTV footage to the Police or other law enforcement agencies if requested.

## TREATING OTHERS WITH RESPECT

Everyone has a right to feel secure and to be treated with respect, particularly the vulnerable. Harassment and bullying will not be tolerated. The school's anti-bullying policy is available on the school website or on request. The school is strongly committed to promoting equal opportunities for all regardless of race, gender, gender orientation or physical disability.

All students are encouraged to look after each other and to report any concerns about the misuse of technology or a worrying issue to a member of the pastoral staff. The use of cameras on mobile phones is not allowed in washing and changing areas, nor should photography be used in a manner that may offend or cause upset. The misuse of cameras in a way that breaches the school's anti-bullying policy is always taken seriously and may be the subject of disciplinary procedures.

**Please also refer to the following policies:**

Health and Safety Policy – Staff network and website	Safeguarding Policy – Staff network and website
Staff Code of Conduct – Website and Employment Manual	Security, Access Control and Workplace Safety – Staff network and website
Privacy Notice (Students and parents) – Staff network and website	Privacy Notice (Staff) – Employment Manual
Data Protection Policy (Students and Parents) – Staff network and website	Data Protection Policy (Staff) – Employment Manual
Risk Assessment Policy – Staff network and website	

### Monitoring and Evaluation of this policy

The school monitors and evaluates its Taking, Using and Storing of Images Policy through the following activities:

- Record keeping of training records for staff in data protection
- Review of regulatory compliance by F&GP Committee
- Review of concerns and complaints registers by SMT and Board of Directors
- Review of safeguarding register by Head and Designated Safeguarding Director

PCR  
September 2017

Next Review  
May 2018