

# Hope SENTAMU LEARNING TRUST

## PHOTOGRAPHY AND VIDEOS AT SCHOOLS POLICY

THIS POLICY APPLIES TO THE HOPE SENTAMU LEARNING TRUST BOARD, THE CENTRAL TEAM,  
ALL TRUST SCHOOLS/ACADEMIES AND THE WORKFORCE DEVELOPMENT TEAM

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## Policy updates

Date	Page	Policy updates
April 2022	Whole document	Reference to the Trust's Data Protection Policy, updated to read Data Protection (UK GDPR) Policy and reference to GDPR, updated to read UK GDPR
April 2022	Whole document	Carers added in addition to parents
April 2022	Whole document	Change to student from pupil
April 2022	Whole document	Addition of LAC and PLAC student information
April 2022	Whole document	Drive changed to Google Drive / Network
April 2022	p4, item 1.2	Point has been removed
April 2022	p4, <i>new</i> item 1.2	Policy listings have been updated
April 2022	p4, item 2	Definition of Camera added
April 2022	p4, item 2.2	Additional information added regarding social media posts for parents/carers
April 2022	p5, item 3.3	Definition of consent form added
April 2022	p6, item 4	Additional information added to strengthen Consent section
April 2022	p7, item 4.3	Additional information added re processing of data relating to students
April 2022	p7, item 4.5	Additional information added re timescales for valid consent form
April 2022	p8, item 5.9	Additional information added re consent being provided
April 2022	p9, item 7	Additional information added to strengthen School/Academy owned devices section including guidance
April 2022	p10, item 8	Section added
April 2022	p11, item 10	Initial section wording removed
April 2022	p11, item 11	Section added
April 2022	p12, item 12	Sections 12.3, 12.4 and 12.5 added to provide further guidance on Storage and Retention
April 2022	p13, item 13	Section added regarding legislation changes and guidance
April 2022	p14, item 14	Section updated regarding scheduled reviews

## Statement of Intent

At **Hope Sentamu Learning Trust (HSLT)**, we use imagery and videos for a variety of purposes, including prospectuses, display boards, educational purposes, conferences and the school/academy and Trust websites. We understand that parents/carers may also wish to take videos or photos of their children participating in school/academy events for personal use.

Whilst we recognise the benefits of photography and videos to our school/academy community, we also understand that these can have significant risks for those involved. Under the legal obligations of the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act (DPA) 2018, the school/academy has specific responsibilities in terms of how photos and videos are taken, stored and retained.

The Trust has implemented a policy on the safe use of cameras and videos by staff, students and parents/carers within all Trust schools/academies to reflect the protective ethos of the school/academy with regard to student safety.

In order to ensure that, as far as possible, the use of photography and video is used safely at all times, the policy provided below should be followed. This policy is applicable to all forms of visual media, including film, print, video, DVD and websites.

**Signed by:**

\_\_\_\_\_ **Chief Executive Officer**      **Date:** \_\_\_\_\_

\_\_\_\_\_ **Chair of Resources  
Committee**      **Date:** \_\_\_\_\_

# 1. Legal framework

- 1.1 This policy has due regard to all relevant legislation and guidance, including, but not limited to, the following:
- The UK General Data Protection Regulation (UK GDPR)
  - The Data Protection Act 2018
  - The Freedom of Information Act 2000
  - The Freedom of Information and Data Protection (Appropriate Limit and Fees) Regulations 2004
  - The School Standards and Framework Act 1998
  - The Children Act 1989
  - The Children Act 2004
  - The Equality Act 2010
- 1.2 This policy operates in conjunction with the following Trust policies, including, but not limited to:
- Special Educational Needs and Disability (SEND) Policy
  - Data Protection (UK GDPR) Policy and Data Retention Schedule
  - Anti-Bullying Policy
  - Social Media Policy
  - E-Safety and Acceptable Use Policy - Staff and Authorised Users
  - E-Safety and Acceptable Use Policy - Students

# 2. Definitions

For the purpose of this policy:

- 2.1 **“Camera”** is used to refer to mobile phones, tablets, webcams, portable gaming devices and any other equipment or devices which may be used to take photographs.
- 2.2 **“Personal use”** of photography and videos is defined as the use of cameras and/or mobile devices (including but not limited to: smartphones, mobile phones, tablets and laptops) to take images and recordings of children by relatives, friends or known individuals, e.g. a parent taking a group photo of their child and their friends at a school/academy event. These photos and videos are only for personal use by the individual taking the photo, and are not intended to be passed on to unknown sources. Parents/carers will be advised that they **MUST NOT** share photos and videos of school events, which include children who are not their own, on social media. The principles of the UK GDPR and the Data Protection Act 2018 do not apply to images and videos taken for personal use.
- 2.3 **“Official school/academy use”** is defined as photography and videos which are used for school/academy purposes, e.g. for building passes and identity cards. These images are likely to be stored electronically alongside other personal data. The principles of the UK GDPR and the Data Protection Act 2018 apply to images and videos taken for official school/academy use.
- 2.4 **“Media use”** is defined as photography and videos which are intended for a wide audience, e.g. photographs of children taken for a local newspaper. The principles of the UK GDPR and the Data Protection Act 2018 apply to images and videos taken for media use.
- 2.5 Staff may also take photos and videos of pupils for **“educational purposes”**. These are not intended for official school/academy use, but may be used for a variety of reasons, such as school/academy displays,

special events, assessment and workbooks. The principles of the UK GDPR and the Data Protection Act 2018 apply to images and videos taken for educational purposes.

- 2.6 “The **school/academy**” is defined as Hope Sentamu Learning Trust and all schools/ academies within the Trust.

### 3. Roles and responsibilities

- 3.1 The **Headteacher/Principal** is responsible for:

- Submitting consent forms to parents/carers, and where appropriate, student’s, at the beginning of the academic year with regards to photographs and videos being taken whilst at school.
- Ensuring that all photos and videos are stored and disposed of correctly, in line with the UK GDPR and the Data Protection Act 2018.
- Deciding whether parents/carers are permitted to take photographs and videos during school/academy events.
- Communicating this policy to all the relevant staff members and the wider school/academy community, such as parents/carers.

- 3.2 The Designated Safeguarding Lead (DSL) is responsible for:

- Liaising with social workers to gain consent for photography and videos of students who are Looked After Children (LAC).
- Liaising with the **Data Protection Officer (DPO)**, to ensure there are no data protection breaches.
- Informing the **Headteacher/Principal** of any known changes to a student’s security, e.g. child protection concerns, which would mean that participating in photography and video recordings would put them at significant risk.

- 3.3 Parents/carers are responsible for:

- Completing the Consent Form (**Appendix A**) on an **annual** basis, which will indicate whether or not they allow their child/ward to participate in photos and videos.
- Informing the school/academy in writing where there are any changes to their consent.
- Acting in accordance with this policy.

- 3.4 In accordance with the Trust’s requirements to have a **Data Protection Officer (DPO)**, the **Data Protection Representative** in the school/academy, who reports to the **DPO** is responsible for:

- Informing and advising the school/academy and its employees about their obligations to comply with the UK GDPR in relation to photographs and videos at school.
- Monitoring the school/academy’s compliance with the UK GDPR in regards to processing photographs and videos.
- Advising on data protection impact assessments in relation to photographs and videos at school.
- Conducting internal audits, in regards to the school’s/academy’s procedures for obtaining, processing and using photographs and videos.
- Providing the required training to staff members, in relation to how the UK GDPR impacts photographs and videos at school.

## 4. Consent

All photos and video content are classified as personal data under the UK GDPR and the DPA 2018; images or video content may be used for publicity or other purposes only once informed consent has been provided, and it has not been withdrawn. Staff, students and parents/carers are encouraged to read the Data Protection (UK GDPR) Policy for more information on the Trust's approach to data protection.

**[Primary schools only]** Parents/carers are responsible for providing consent on their child's behalf, except where the processing is related to preventative or counselling services offered directly to children.

**[Secondary schools only]** Where the school opts to provide an online service directly to a child, the child is aged 13 or over, and the child understands what they will be consenting to, the school will obtain consent directly from the child; otherwise, consent will be obtained from whoever holds parental responsibility for the child, except where the processing is related to preventative or counselling services offered directly to children.

**[Secondary schools only]** In all other instances with regard to obtaining consent, an appropriate age of consent will be considered by the school on a case-by-case basis, taking into account whether the child understands what they will be consenting to.

Parents and students are required to be aware that their child/they may be photographed at school and they have the right to withdraw consent for:

- Photos or videos taken by members of staff for school-based publicity and promotional purposes or for anonymous use on the school/academy website.
- Photos or videos taken by parents/carers and other family members of children at the school during school concerts, performances, sports events and other similar events organised by the school/academy.
- Photos or video taken by members of the press who are on the school premises by invitation in order to celebrate individual, group or school success.

4.1 The school/academy understands that consent must be a positive indication. It cannot be inferred from silence, inactivity or pre-ticked boxes. Consent will only be accepted where it is freely given, specific, informed and an unambiguous indication of the individual's wishes. Where consent is given, a record will be kept documenting how and when consent was given and last updated.

4.2. The school/academy ensures that consent mechanisms meet the standards of the UK GDPR and the Data Protection Act 2018. Where the standard of consent cannot be met, an alternative legal basis for processing the data will be found, or the processing will cease.

4.3 Where a child is under the age of 16, the consent of parents/carer will be sought prior to the processing of their data, except where the processing is related to preventative or counselling services offered directly to a child. In special circumstances an appropriate age of consent will be considered by the school on a case-by-case basis, taking into account whether the child understands what they will be consenting to.

4.4 All parents/carers will be asked to complete the Consent Form on an annual basis, which will determine whether or not they allow their child/ward to participate in photographs and videos.

- 4.5 The Consent Form will be valid for the full academic year, unless the student's circumstances change in any way, e.g. if their parents separate, or consent is withdrawn. Additional consent forms will be required if the student's circumstances change. It is the responsibility of the parents or carers to advise the school/academy of any change in circumstances, and therefore change in consent.
- 4.6 If there is a disagreement over consent, or if a parent/carer does not respond to a consent request, it will be treated as if consent has not been given, and photographs and videos will not be taken or published of the student whose parents/carer have not consented.
- 4.7 All parents/carers are entitled to withdraw or change their consent at any time during the school/academy year. Parents/carers who wish to withdraw their consent must notify the school in writing.
- 4.8 Parents/carers will be required to notify the school/academy if their child's circumstances change in any way, or if they wish to withdraw their consent.
- 4.9 For any LAC students, Previously Looked After Child (PLAC) or students who are adopted, the Designated Safeguarding Lead will liaise with the student's social worker, carers or adoptive parents to establish where consent should be sought. Consideration will be given as to whether identification of a LAC or PLAC student, or student who are adopted, would risk their security in any way.
- 4.10 Consideration will also be given to any students for whom child protection concerns have been raised. Should the Designated Safeguarding Lead believe that taking photographs and videos of any students would put their security at further risk, greater care will be taken towards protecting their identity.
- 4.11 A list of all the names of students for whom consent was not given will be created by the Data Protection Representative and will be circulated to all staff members. This list will be updated annually, when new consent forms are provided.
- 4.12 If any parent/carer withdraws or changes their consent, or the Designated Safeguarding Lead reports any changes to a student's security risk, or there are any other changes to consent, the list will also be updated and re-circulated.

## 5. General procedures

- 5.1 Photographs and videos of students will be carefully planned before any activity.
- 5.2 The **Data Protection Representative** will oversee the planning of any events where photographs and videos will be taken.
- 5.3 Where photographs and videos will involve LAC students, PLAC students, adopted students, or students for whom there are security concerns, the Headteacher/Principal will liaise with the Designated Safeguarding Lead to determine the steps involved.
- 5.4 When organising photography and videos of students, the Headteacher/Principal, as well as any other staff members involved, will consider the following:
  - Can general shots of classrooms or group activities, rather than individual shots of students, be used to fulfil the same purpose?

- Could the camera angle be amended in any way to avoid students being identified?
  - Will students be suitably dressed to be photographed and videoed?
  - Will students of different ethnic backgrounds and abilities be included within the photographs or videos to support diversity?
  - Would it be appropriate to edit the photos or videos in any way? E.g. to remove logos which may identify students?
  - Are the photographs and videos of the students completely necessary, or could alternative methods be used for the same purpose? E.g. could an article be illustrated by students' work rather than images or videos of the students themselves?
- 5.5 The list of all students of whom photographs and videos must not be taken will be checked prior to the activity. Only students for whom consent has been given will be able to participate.
- 5.6 The staff members involved, alongside the **Headteacher/Principal** and **Data Protection Representative**, will liaise with the **Designated Safeguarding Lead** if any LAC students, PLAC students, adopted students, or a student for whom there are security concerns is involved. (See **section 6** of this policy).
- 5.7 School/academy equipment will be used to take photographs and videos of students. Exceptions to this are outlined in **section 7** of this policy.
- 5.8 Staff will ensure that all students are suitably dressed before taking any photographs or videos.
- 5.9 Where the school/academy uses images of individual students, the name of the student **will not** be disclosed unless consent has been provided. Where an individual student is named in a written publication, a photograph of the student **will not** be used to accompany the text unless consent has been provided.
- 5.10 If, for example, a student has won an award and their parent/carer would like their name to be published alongside their image, **separate consent** will be obtained prior to this.
- 5.11 The school/academy will not use images or footage of any student who is subject to a court order.
- 5.12 The school/academy will not use photographs of children or staff members who have left the school /academy, without parental consent or, where appropriate, the children themselves.
- 5.13 Photos and videos that may cause any distress, upset or embarrassment will not be used.
- 5.14 Any concern relating to inappropriate or intrusive photography or publication of content is to be reported to the Data Protection Officer.

## 6. Additional safeguarding procedures

- 6.1 The school/academy understands that certain circumstances may put a student's security at greater risk and, thus, may mean extra precautions are required to protect their identity.
- 6.2 The **Designated Safeguarding Lead** will, in known cases of a student who is an LAC, PLAC or who has been adopted, liaise with the student's social worker, carers or adoptive parents to assess the needs and

risks associated with the student.

- 6.3 Any measures required will be determined between the **Designated Safeguarding Lead**, social worker, carers, **Data Protection Representative**, adoptive parents and, where applicable, the **Data Protection Officer** with a view to minimise any impact on the student's day-to-day life. The measures implemented will be one of the following:
- Photos and videos can be taken as per usual school/academy procedures
  - Photos and videos can be taken within school/academy for educational purposes and official school/academy use, e.g. on registers, but cannot be published online or in external media
  - No photos or videos can be taken at any time, for any purposes
- 6.4 Any outcomes will be communicated to all staff members in writing and the list outlining which students are not to be involved in any videos or photographs, held in the **school/academy office**, will be updated accordingly.

## 7. School/academy-owned devices

- 7.1 Staff are allowed to take photos and videos of students **ONLY** using school/academy-owned equipment, (such as school/academy-owned cameras and mobile devices, ie. iPads). Given the ever-changing world of technology it should be noted that this list gives examples only and is not exhaustive. Staff can record and maintain pictorial evidence of the lessons, behaviour, activities and events related to their students. Photos and videos may only be taken for educational purposes and in "school or educational provision settings" as mentioned above. Where school-owned devices other than digital cameras are used, images and videos will be provided to the school/academy at the earliest opportunity and then removed from the devices. Images taken on school cameras must be downloaded as soon as possible on to the Google Drive/Network, ideally once a week.
- 7.2 Members of staff are responsible for making sure that the camera is locked away after use. Members of staff are not allowed to take school cameras or memory cards home.
- 7.3 Staff will not use their personal mobile phones, or any other personal device, to take images and videos of students. Please refer to the Mobile Phone and Bring Own Your Device (BYOD) Policy.
- 7.4 Photographs and videos taken by staff members on school/academy visits may be used for educational purposes, e.g. on displays or to illustrate the work of the school/academy, where consent has been obtained.
- 7.5 Digital photographs and videos held on the school/academy's Google Drive/Network are accessible to staff only. Photographs and videos are stored in labelled files, annotated with the date, and are only identifiable by year group/class number – no names are associated with images and videos.
- 7.6 Cameras are not permitted to be taken into toilets, swimming pools or changing areas. If necessary (e.g. photos of students washing their hands), then prior permission needs to be sought from the Headteacher/Principal. Staff members are required to be supervised while carrying out this activity.
- 7.7 Staff or other adults are not permitted to take photos of students in vulnerable circumstances, such as when they are upset or inappropriately dressed. Members of staff and the school community are

required to report inappropriate use of equipment and images to the Headteacher/Principal. If it is found that any incidents raise child protection concerns, immediate action will be taken in consultation with the DSL.

- 7.8 The school/academy is not responsible for lost, stolen or damaged camera equipment. This remains the responsibility and obligation of the individual who has borrowed the equipment.

## 8. Use of cameras and filming equipment by students

- 8.1 All students 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.
- 8.2 The use of cameras, or filming equipment, including on mobile phones, is not allowed in toilets or changing areas, nor should photography or filming equipment be used by students in a manner that may offend or cause upset.
- 8.3 Misuse of images, cameras, or filming equipment in a way that breaches this policy, or the Trust's Anti-bullying Policy, E-Safety and Acceptable Use Agreement, and Social Media Policy is always taken seriously and may be the subject of disciplinary procedures or dealt with under the relevant safeguarding policy as appropriate.

## 9. Use of a professional photographer

- 9.1 If the school/academy decides to use a professional photographer for official school/academy photos and school/academy events, the **Headteacher/Principal** will:
- Provide a clear brief for the photographer about what is considered appropriate, in terms of both content and behaviour.
  - Issue the photographer with identification, which must be worn at all times.
  - Let students and parents/carers know that a photographer will be in attendance at an event and ensure they have previously provided consent to both the taking and publication of videos or photographs.
  - Not allow unsupervised access to students or one-to-one photo sessions at events.
  - Communicate to the photographer that the material may only be used for the school/academy's own purposes and that permission has not been given to use the photographs for any other purpose.
  - Ensure that the photographer will comply with the requirements set out in the UK GDPR and DPA 2018 in the form of a signed third party contract.
  - Ensure that if another individual, such as a parent/carer or governor, is nominated to be the photographer, they are clear that the images or videos are not used for any purpose other than that indicated by the school/academy in the brief.

## 10. Permissible photography and videos during school/academy events

- 10.1 Parents/carers or family members are welcome to take photos of (and where appropriate, film) their

own children taking part in school/academy events, subject to the following guidelines, which the schools expects all parents/carers to follow. Parents/carers will:

- Remain seated while taking photographs or videos during concerts, performances and other events.
- Minimise the use of flash photography during performances.
- In the case of all school/academy events, make the focus of any photographs or videos their own children.
- Avoid disturbing others in the audience or distracting students when taking photographs or recording video.
- Ensure that any images and recordings taken at school/academy events are exclusively for personal use and are not uploaded to the internet, posted on social networking sites or openly shared in other ways.
- Refrain from taking further photographs and/or videos if and when requested to do so by staff.
- Unless the photography is **solely** of their own child/children, images must **not** be uploaded to any form of social media/websites/electronic platforms.

## 11. Sharing of images

- 11.1 All images taken by members of staff or volunteers at school or during school activities remain the property of the school/academy and images must not be shared with anyone outside the school/academy or held for private use.
- 11.2 No digital image will be uploaded onto any internet/intranet system without the express permission of the child's parent/carer. Members of staff and volunteers will not post school images on personal pages of social networking sites or other websites.
- 11.3 Images will not be emailed or shared via private email accounts unless a parent/carer has asked for a photo of their child/ward to be sent to them.

## 12. Storage and retention

- 12.1 As per the UK GDPR and the DPA 2018, images obtained by the school/academy will not be kept for longer than necessary; retention periods for the different types of personal data are outlined in the Trust's Data Retention Schedule.
- 12.2 Hard copies of photos and video recordings held by the school/academy will be annotated with the date on which they were taken and will be stored in the **school/academy office**. They will not be used other than for their original purpose, unless permission is sought from the **Headteacher/Principal** and parents/carers of the students involved and the **Data Protection Officer** has been consulted.
- 12.3 Digital photos and videos held on the Trust's Google Drive/Network are accessible only to the staff who need to have access to the images/recordings. Photos and videos are stored in labelled files, annotated with the date, and are only identifiable by year group or class number - no names are associated with

images and videos. Members of staff are responsible for ensuring that images are safely stored. They must take reasonable measures to ensure that they do not come into the possession of unauthorised persons.

- 12.4 If the memory card for individual school-owned cameras needs to be replaced, then the replaced memory card will be destroyed to ensure that no images can be recovered. Members of staff must remember that, even when images are physically deleted from a camera or memory card, the camera or the memory card must be appropriately disposed of to ensure that no imprint remains.
- 12.5 No digital image will be altered or enhanced in any way by any member of staff, unless given prior permission by the Headteacher/Principal to do so. The school/academy may require images to be deleted or edited as appropriate and may choose to use images taken by members of staff or volunteers for other purposes, provided the processing conditions and consent requirements of this policy are met. Staff members are responsible for ensuring that edited images do not mislead or misrepresent. They must not edit images which result in their subject being vulnerable to embarrassment, teasing, bullying or abuse.
- 12.6 Paper documents will be shredded or pulped, and electronic memories scrubbed clean or destroyed, once the retention period has ended.
- 12.7 The **Data Protection Representative** will review stored images and videos on a **termly** basis to ensure that all unwanted material has been deleted.
- 12.8 Parents/carers must inform the school/academy in writing where they wish to withdraw or change their consent. If they do so, any related imagery and videos involving their children will be removed from the school/academy Google Drive/Network immediately. When a parent/carer withdraws consent, it will not affect the use of any images or videos for which consent had already been obtained. Withdrawal of consent will only affect further processing.
- 12.9 Where a student's security risk has changed, the **Designated Safeguarding Lead** will inform the **Headteacher/Principal** immediately. If required, any related imagery and videos involving the student will be removed from the school/academy Google Drive/Network immediately. Hard copies will be removed by returning to their parents/carers or by shredding, as appropriate.
- 12.10 Official school/academy photos are held on the school/academy's **information management systems** alongside other personal information, and are retained for the length of the student's attendance at the school/academy, or longer, if necessary, e.g. due to a police investigation.
- 12.11 Some educational records relating to former students of the school/academy may be kept for an extended period for legal reasons, but also to enable the provision of references or academic transcripts.

## 13. Appropriate use of images under UK GDPR and the DPA 2018

- 13.1 Photos are used in school for many reasons and the different uses for the same image should be considered separately, as each photograph and use will potentially have different conditions for processing. As a public body, the school/academy **must** consider whether the processing is taking place in the performance of its duties as a public authority. Where this is the case, the legal basis for

processing will be recorded as 'public task', not 'legitimate interests' – public authorities cannot use legitimate interests as a lawful basis if the processing is in the performance of their tasks as a public authority.

- 13.2 The Trust uses Privacy Notices with declarations attached to inform staff, students and parents/carers about how their personal data may be collected and as one method of gaining consent. To judge whether legitimate interest can be used as the basis for processing data, the school/academy will carry out three different tests. These are:
- A purpose test - establishing the reasons for using the data, what will be achieved and whether the benefits are justifiable.
  - A necessity test - establishing whether the processing of students' data will be useful and whether there is a less intrusive way of reaching a means to an end.
  - A balance test - establishing the impact it will have on the data subject by processing the data for said reason.
- 13.3 These three tests make up a 'legitimate interest assessment' (LIA) – the school/academy will carry out an LIA prior to obtaining the data and it will be recorded in a physical copy in compliance with the UK GDPR and the DPA 2018.
- 13.4 **Photos used in identity management**  
These are likely to be essential for performing the public task of the school/academy, but they will be deleted once the child is no longer in attendance – as they are no longer needed for the purpose for which they were held.
- 13.5 **Photos used for marketing purposes**  
Photos will not be used for marketing purposes unless the school/academy has specific informed consent for the images and the images are only used in line with the consent provided.
- 13.6 The school/academy recognises that when images are posted on the school website anyone may view the images, and consequently this may result in a greater risk of misuse of images. The school/academy will therefore give specific consideration to the suitability of images for use on the school's/academy's / Trust website.
- 13.7 **Photos in the school environment relating to education**  
These photos may be essential for performing the public task of the school/academy, but once the student has left the school this argument is insufficient. If the school/academy wishes to display the image beyond the student's time at the school, the school/academy will obtain the parent's/carer's or student's (if applicable) permission. If permission is not granted, the image will be removed.

When gaining consent, including when initially taking the photograph or when the purpose of the image has changed, the student, or where appropriate their parents/carers, will be informed of the retention period pertaining to the use of the image. If the image is still on display after the retention period stated in the privacy notice used to gain consent, the school/academy will be in breach of data protection obligations and may be subject to a fine.

## 14. Monitoring and review

This policy will be reviewed on an **annual** basis by the **Data Protection Officer**. The next scheduled review date for this policy is listed on the cover page of the policy. Any changes to this policy will be communicated to all staff members and, where appropriate, parents/carers.

## Appendix A - Consent Form

# SCHOOL/ACADEMY LOGO

## Images and videos parental consent form

This form explains the reasons why and how the name **of school/academy** may use images and videos of your child. Please read the form thoroughly and outline your agreement as appropriate.

Name of parent/guardian:	
Name of pupil:	
Year:	

### Why do we need your consent?

**Name of school/academy** will periodically request the consent of parents/guardians to use images and videos of their child for a variety of different purposes. Without your consent, the school/academy will not use images and videos of your child. Similarly, if there are only certain conditions under which you would like images and videos of your child to be used, the school/academy will abide by the conditions you outline in this form.

### Why do we use images and videos of your child?

**Name of school/academy** uses images and videos of pupils, individually or as a group, as part of school/academy displays to celebrate school life and pupils' achievements; to promote the school/ academy on social media and on the school's website; and for other publicity purposes in printed publications, such as newspapers.

### What are the conditions of use?

- It is the responsibility of parents/guardians to inform the school/academy, in writing, if consent needs to be withdrawn or amended (\*).
- The school/academy will not include personal emails, postal addresses or telephone numbers on images or videos on our website, in our school/academy prospectuses or any other printed publications.
- The school/academy may use work created by pupils.
- The school/academy may use group or class images or videos with general labels, e.g. 'sports day', 'awards evening' etc.
- The school/academy will only use images and videos of pupils who are suitably dressed, i.e. it would not be suitable to display an image of a pupil in swimwear.
- The school/academy will take class images of your child which are available to purchase annually. This may include a class/form or year group photograph which could be displayed within the school/academy environment.

## Providing your consent

Please read the following conditions thoroughly and provide your consent as appropriate by ticking either 'Yes' or 'No' for each criteria. The school/academy will **only** publish images and videos of your child for the conditions that you provide consent for.

**This policy excludes any consent for remote learning provision. The guidance and consent forms for remote learning will be issued separately, if required.**

**Identified** - Photographic image is published with a name and/or identifiable features.

**Unidentified** - Photographic image is published without the name or any identifiable information.

I provide consent to:	Yes	No
<b>In School/Academy use</b>		
I agree to my child's <b>individual</b> photograph being used on notice boards and displays inside the school/academy.		
Identified	<input type="checkbox"/>	<input type="checkbox"/>
Unidentified	<input type="checkbox"/>	<input type="checkbox"/>
I agree to my child's photograph (as part of a <b>group</b> photograph) being used on notice boards and displays inside the school/academy.		
Identified	<input type="checkbox"/>	<input type="checkbox"/>
Unidentified	<input type="checkbox"/>	<input type="checkbox"/>
The school/academy may make recordings of my child (on video or webcam) for teaching and learning purposes, for use <u>only</u> inside school/academy and/or the Trust.		
Identified	<input type="checkbox"/>	<input type="checkbox"/>
Unidentified	<input type="checkbox"/>	<input type="checkbox"/>
<b>Marketing Materials /Publications/School Photographs</b>		
I agree to my child's photograph being used in marketing material, e.g: brochures/prospectus and/or marketing literature.		
Identified	<input type="checkbox"/>	<input type="checkbox"/>
Unidentified	<input type="checkbox"/>	<input type="checkbox"/>
I agree to the school/academy sharing the following data with the school's official external photography company for official school images. This will be applicable to individual and group photographs. This includes the following:		
<ul style="list-style-type: none"> <li>● Pupil's Name, Class and Roll number</li> <li>● Parent/Carer's name and email address</li> </ul>	<input type="checkbox"/>	<input type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>
<b>Press</b>		
I agree to the local media using images of my child to publicise school/academy events and activities.		
Identified	<input type="checkbox"/>	<input type="checkbox"/>
Unidentified	<input type="checkbox"/>	<input type="checkbox"/>

I agree to the local media using videos of my child to publicise school/academy events and activities.	Identified <input type="checkbox"/>	<input type="checkbox"/>
	Unidentified <input type="checkbox"/>	<input type="checkbox"/>
<b>Social Media</b>		
I agree to my child's photograph and/or videos of my child being published on Social Media (NB: Social Media may include: School Newsletter, Twitter, Facebook, Instagram).	Identified <input type="checkbox"/>	<input type="checkbox"/>
	Unidentified <input type="checkbox"/>	<input type="checkbox"/>
<b>Websites</b>		
I agree to my child's photograph being published on the Hope Sentamu Learning Trust (HSLT) and/or school/academy website.	Identified <input type="checkbox"/>	<input type="checkbox"/>
	Unidentified <input type="checkbox"/>	<input type="checkbox"/>

	Yes	No
I agree to videos which include my child, taken during events at the school/academy to be used on the school/academy website and/or the HSLT website.		
Identified <input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Unidentified <input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>Right to Withdraw</b>		
I understand that consent for this is voluntary and I may withdraw my consent at any time*.	<input type="checkbox"/>	
I understand no additional personal details (such as phone number and address) will be published.	<input type="checkbox"/>	

## Refreshing your consent

This form will be updated periodically. Consent will also be refreshed where any changes to circumstances occur - this can include, but is not limited to, the following:

- Changes to a pupil's circumstances, e.g. safeguarding requirements mean a pupil's image cannot be used
- Changes to parent/guardian consent, e.g. amending the provisions for which consent has been provided for

Where you would like to amend the provisions for which consent has been provided, you must submit your request in writing to the school/academy, either by post or via **school/academy email**. A new form will be supplied to you to amend your consent accordingly and provide a signature.

## \*Withdrawing your consent

Parents/guardians have the right to withdraw their consent at any time. Withdrawing your consent will not affect the legality of processing images or videos that were shared prior to withdrawal; however, the school/academy will make every effort to remove images of the pupil where possible, e.g. images of the pupil on the school's website will be removed. **If you would like to withdraw your consent, you must submit your request in writing to the school/academy, either by post or via **school/academy email**.**

## Declaration

I hereby understand that I have provided my consent above as appropriate, and the school/academy will only use images and videos of my child in line with my requirements. I can amend or withdraw my consent at any time and must do so in writing to the school/academy, either by post or via **school/academy email**.

I have read and understood the contents of this form:	
Name of Parent/Guardian (IN CAPITALS):	
Signature of Parent/Guardian:	
Date:	

If you have any questions regarding this form, please do not hesitate to contact the school's **Data Protection Representative**. For more general queries please contact the HSLT's Data Protection Officer via [dpo@hslt.academy](mailto:dpo@hslt.academy) or call 01904 560053.