

# PHOTOGRAPHY AND FILMING AT SCHOOL POLICY

## I. STATEMENT OF INTENT

At Manchester High School for Girls we believe taking photographs and films of our pupils is a valuable way of recording school life, as well as celebrating the achievements of both individuals and groups. Recognising various successes and milestones has been proven to enhance the self-esteem of girls and as a school it is therefore something we are committed to doing.

As noted in the school's Terms and Conditions and Data Protection Policy, photographs and video are necessary for the school's activity and legitimate interests. Photos are stored in the schools Information System for the purposes of pupil identification.

This policy, therefore, relates to the taking, storage and use of photographs and/or videos for **other** purposes, including marketing and promotional activities.

As a school we recognise the benefits of photography and videos to our school community but we also understand that these can have significant risks for those involved. Under the legal obligations of UK General Data Protection (GDPR), the School knows it has specific responsibilities in terms of how photos and videos are taken, stored and retained.

## 2. DEFINITIONS

For the purpose of this policy:

- 2.1 **'Personal use'** of photography and videos is defined as the use of cameras to take images and recordings of children by relatives, friends or known individuals (for example, a parent taking a group photo of their child and their friends at a school 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. The principles of GDPR do not apply to photos and videos taken for personal use.
- 2.2 **'Official school use'** is defined as photographs and videos which are used for the school's administrative, functional educational and pastoral purposes including archives. These images are likely to be stored electronically alongside other personal data. The principles of GDPR apply to photos and videos taken for official school use.
- 2.3 **'Media use'** is defined as photography and videos which are intended for a wide audience (for example, photographs taken for School literature, marketing promotion and school's social media platforms). The principles of GDPR apply to photos and videos taken for media use.
- 2.4 **'Educational use'** is defined as photography and videos taken for a variety of uses, such as school displays, assessment and workbooks. The principles of GDPR apply to photos and videos taken for media use.

### 3. ROLES AND RESPONSIBILITIES

#### 3.1 The **Head Mistress** is responsible for:

- Supplying a digital consent form via the SIMS Parent service to parents/guardians upon their child joining MHSG in regards to photographs and videos being taken at school
- Informing all relevant staff members about their obligations to comply with GDPR in relation to photographs and videos at school and providing any necessary training
- Communicating this policy to all relevant staff members and the wider school community as deemed appropriate
- Determining which members of staff are granted access to files storing photographs and videos
- Reminding parents/guardians that any photographs and videos taken during school events must not be shared on social media channels
- Reviewing the policy every three years or should legislation change

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

- Liaising with social workers to gain consent for photography and videos of pupils categorised as 'Looked After Children' (LAC)
- Informing the Head Mistress, Director of Development and Marketing and any other staff for who need to know if there are any changes to a child's circumstances which would mean participating in photography and video recordings would put them at risk

#### 3.3 The **Compliance and Privacy Officer (CPO)** is responsible for:

- Ensuring stored images and videos are reviewed on a suitable basis to ensure that all unnecessary material has been deleted and GDPR is adhered to
- Conducting internal audits in regards to the School's procedures for taking and using photographs and videos

#### 3.4 **Parents/Guardians** are responsible for:

- Completing and submitting the consent form to school
- Informing the school in writing where there are any changes to their consent
- Acting in accordance with this policy
- Telling their child that they must alert photographers to the fact that they must not appear in photos if necessary

#### 3.5 **All members of MHSG staff** are responsible for:

- Ensuring they understand how GDPR impacts their use of photography and videos of pupils in school and seeking clarification/training where necessary
- Acting in accordance with this policy

## **4. PARENTAL CONSENT**

- 4.1 The School understands that consent must be a positive indication. It cannot be inferred from silence, inactivity or pre-ticketed boxes.
- 4.2 Consent will only be accepted where it is freely given, specific, informed and an unambiguous indication of the individual's wishes.
- 4.3 Where consent is given, a record will be kept documenting how and when consent was given and last updated.
- 4.4 The School ensures that the consent mechanisms meet the standards of GDPR in the context of photography and film / videos. Where the standard of consent cannot be met, an alternative legal basis for processing the data will be found, or the processing will cease.
- 4.5 Where a pupil is under the age of 18, the School will seek the consent of parents/guardians for the taking of photographs and videos.
- 4.6 All parents/guardians will be asked to complete the Consent Form upon their child joining the School. This will determine whether or not their child is allowed to participate in photographs and videos.
- 4.7 The Digital Consent Form is valid for the period of time that the child attends the School, unless the pupil's circumstances change in any way or consent is withdrawn. Parents/guardians are required to notify the school in writing of any change of circumstances or if they wish to withdraw their consent.
- 4.8 All parents/guardians are entitled to withdraw or change their consent at any time but must do so in writing.
- 4.9 If there is a disagreement over consent, or if a parent does not respond to a consent request, it will be treated as though consent has not been given, and photos and videos will not be taken or published of the pupil in question.
- 4.10 For any Local After Children (LAC) or adopted pupils, the Designated Safeguarding Lead (DSL) will liaise with the pupil'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 adopted pupil would risk their security in any way.
- 4.11 Consideration will also be given to any pupils for whom child protection concerns have been raised. Should the DSL believe that taking photos or videos of such pupils would put their security at further risk, then the pupils will not be included.
- 4.12 Consent status will be stored and amended on the secure SIMS system, which constitutes the single point of real time data and should be referred to by all staff members.

## **5. GENERAL PROCEDURES AND PRINCIPLES**

- 5.1 Photographs and videos will be carefully planned before any activity.
- 5.2 The list of all pupils of whom photos and videos must not be taken will be checked by the member of staff responsible for the activity in advance. Only pupils for whom consent has been given will be able to participate in the photography or video.
- 5.3 Only School equipment will be used to take photographs and videos of pupils.
- 5.4 When organising photography and videos of pupils, staff members involved will consider the following:
  - Can classroom or group shots be used rather than shots of individual pupils?
  - Are pupils suitably dressed to be photographed and videoed?
  - Do pupils selected for the photos and/or video reflect the diversity of the school?
  - Are the photos and/or videos totally necessary or could alternative methods be used for the same purpose? For example, could an article be illustrated by the work of the pupils rather than the pupils themselves?
- 5.5 Only photos and videos of pupils in suitable dress will be taken/used. Children in swimming costumes are not to be photographed unless they are in the swimming pool. Where pupils are in PE kit, the focus should be on the activity and close up shots should be avoided.
- 5.6 Photography and videos will only be taken in adequately supervised areas. Members of staff should not take one-to-one photos/videos of pupils unless in a public area.
- 5.7 Photos and videos that may cause distress, upset and embarrassment will not be used.
- 5.8 Photos and videos will be stored centrally and securely by the school at the earliest possible opportunity and then removed from the device used promptly.
- 5.9 Staff will not use any personal devices to take photographs or videos of pupils.
- 5.10 Photographs and videos taken by staff members may be used for educational purposes only where the appropriate consent is in place.
- 5.11 Photographs and videos held on the school's storage drives are accessible to only members of staff for whom the Head Mistress deems access is a necessary part of their role.
- 5.12 Photographs and videos are stored in labelled files, tagged with pupil / form names for ease of media management.
- 5.13 The school will not take or use photos or videos of any pupil that is subject to a court order.
- 5.14 The school will not use photos or videos of children who have left the school without obtaining parental consent (for a pupil under 18) or consent from an alumna aged 18 years or over. Individual consent will be obtained for images used of alumna for large campaigns.

5.15 MHSB Archives related to the use of photos and videos to showcase MHSB throughout its history (including alumnae images and videos) for marketing and promotional purposes falls under this policy and consents as stated within 5.14.

5.16 All members of staff should challenge and report any inappropriate or intrusive photography.

## **6. USE OF A PROFESSIONAL PHOTOGRAPHER / DESIGN AGENCY VIDEOGRAPHER**

6.1 If the School decides to use a professional photographer / design agency / videographer for official school photographs, videos and events, the member of staff responsible for booking the photographer will:

- Provide a clear brief for the photographer / design agency / videographer about what is considered appropriate in terms of content and behaviour
- Issue the photographer / design agency / videographer with identification which must be worn at all times
- Publicise at the time of the session that a photographer / design agency / videographer is working
- Not allow unsupervised access to pupils or one-to-one photography sessions
- Communicate to the photographer / design agency / videographer that the material may only be used for the School's own purposes and that permission has not been given for the photographs and/or videos to be used for any other purposes
- Ensure that the photographer / design agency / videographer will comply with GDPR requirements

## **7. PERMISSIBLE PHOTOGRAPHY AND VIDEOS DURING SCHOOL EVENTS**

7.1 If the Head Mistress permits parents to take photographs and videos during a school event, parents will:

- Remain seated while taking the photograph and/or video so as not to spoil the experience of others
- Minimise the use of flash photography
- Make the focus of any photographs their own child
- Ensure that any photos or videos taken at a school event are for their own personal use and are not uploaded to the internet, posted on a social networking site or openly shared in any other way
- Refrain from taking further photos/videos as and when requested by staff

## **8. STORAGE AND RETENTION**

8.1 Images obtained by the school will not be kept for longer than necessary and in accordance with the Data Retention Policy.

- 8.2 Photos and videos will be stored securely electronically. Hard copy photos may be annotated with their date, event, form or pupil names and held in the school archive.
- 8.3 Photographs and videos contributing to the history of the school, its pupils, activities or the wider school community can be retained indefinitely in the school's archives. These become the responsibility of the school archivists and it is their responsibility to comply with GDPR.
- 8.4 Photographs and videos used for marketing and promotional activities are the responsibility of the Development and Marketing Team who also comply with GDPR. Photographs and videos used by this team and those photographs taken by others and used for marketing and promotion purposes will only be accessible by them.
- 8.5 The school's Compliance and Privacy Officer (CPO) is responsible for ensuring stored images and videos are reviewed on a suitable basis to ensure that all unnecessary material has been deleted and GDPR is adhered to.

## **9. MONITORING AND REVIEW**

- 9.1 This policy will be reviewed every three years, or should legislation change, by the Director or Development and Head Mistress.
- 9.2 Any changes to this policy will be communicated to all staff members and, where appropriate, parents and pupils.

**Drafted by the Head Mistress, Helen Jeys, May 2021**  
**Reviewed and Approved by the Full Governing Body June 2021**  
**Minor Updates August 2021**



## APPENDIX I: PHOTOGRAPHY AND FILMING CONSENT FORM

At Manchester High School for Girls, we believe taking photographs and films of our pupils is a valuable way of recording school life, as well as celebrating the achievements of both individuals and groups.

As noted in the school's Terms and Conditions and Data Protection Policy, photographs and video are necessary for the school's administrative, functional educational and pastoral purposes.

This consent form, therefore, relates to the taking, storage and use of photographs and/or videos of your child for **other** purposes related to MHSG, including marketing and promotional activities. We are committed to ensuring that:

- Any images used will be carefully and sensitively chosen and will not be used out of context
- From this point on, pupils will be identified by first name only when photographs and video are used. If, for example, a pupil has won an award and a newspaper would like to publish their full name alongside their image, the school will contact you and obtain an **additional consent** for this. Groups of pupils may be referred to collectively by year, house or team name
- If a third party, such as a design agency or photographer that the school has engaged, wishes to use an image/video of your child for their own promotional activities, again, **additional consent** will be obtained
- If we wish to use a photograph/video of your child in any situation not covered below, we will contact you to request **additional consent**
- For marketing activities that the School would consider 'high profile', such as billboard adverts or the front cover of the school's prospectus, pupils themselves will also be consulted as to the use of their image
- Once a pupil is 18 years old, the school will seek their consent for the taking, storage and use of photographs/video. This will override any consent previously given (or not) by a parent/guardian
- If a parent does not respond to this consent request, photographs and videos of their child will not be taken or published
- We are sensitive to the fact that some families may have reasons why protecting a child's identity is a matter of particular concern. If you have a special circumstance either now, or in the future, that you have not yet made the school aware of, please contact Mrs Goddard, Deputy Head (Pastoral): [agoddard@mhsg.manchester.sch.uk](mailto:agoddard@mhsg.manchester.sch.uk)
- Photographs and videos that contribute to the history of the school, its pupils, activities or the wider school community are retained in the school's archives. Storage of photographs and videos in the school's archives comply with GDPR requirements



**PROVIDING YOUR CONSENT**

**Name of pupil:** .....

**Form:** .....

**Name of parent/guardian:** .....

**Signature of parent/guardian:** .....

Please read the following carefully and provide your consent by selecting either ‘Yes’ or ‘No’ as appropriate.

The level of consent you do or do not provide is valid for the period of time that your child attends Manchester High School for Girls.

MHSG will **only** publish photographs and videos of your child for the conditions that you have provided consent for.

**Only** the first names of children will be used to accompany any photographs or videos, unless **additional consent** to feature the full name of the child has been sought.

If you have more than one child at MHSG, please complete a separate consent form for each child.

<b>I consent to:</b>	<b>Yes</b>	<b>No</b>
My child being photographed by a member of MHSG staff		
My child being filmed by a member of MHSG staff		
Photographs of my child appearing on the school website		
Videos of my child appearing on the school website		
Photographs of my child appearing on the school’s social media channels (Facebook, Twitter, Instagram, LinkedIn)		
Videos of my child appearing on the school’s social media channels (Facebook, Twitter, Instagram, LinkedIn)		
Photographs of my child appearing in the school’s printed publications such as the prospectus, school magazines and event programmes		
Photographs of my child appearing in the school’s marketing campaigns including billboards, newspaper / magazine advertisements and online marketing		
Videos of my child appearing in the school’s marketing campaigns including billboards, newspaper / magazine advertisements and online marketing		
Photographs of my child accompanying press releases about their achievements and activities at school		
Videos of my child accompanying press releases about their achievements and activities at school		



Photographs of my child being displayed within the school premises, including places that may be seen by visitors (reception areas, corridor noticeboards etc.)		
Videos of my child being displayed within the school premises, including places that may be seen by visitors (for example reception areas, corridor noticeboards)		

**WITHDRAWING CONSENT**

All parents/guardians are entitled to withdraw or change their consent at any time. To do so, they must notify the school in writing.

Should a parent/guardian withdraw consent, it will not affect the use of any photographs or videos for which consent has already been given. Withdrawal of consent will only apply to use of photographs or videos from that point on.

**REFRESHING CONSENT**

We seek to keep marketing and promotional activities fresh and current. Where a photograph, video or sound recording is more than 5 years old, it will only be used for marketing and promotional purposes.

For pupils who have left the school, we will ensure that further consent is communicated for use of photographs.

**PLEASE COMPLETE AND RETURN THIS FORM TO XXX NO LATER THAN XXX.**

Lucy Barnwell  
March 2021