



# **PHOTOGRAPHS AND MEDIA POLICY**

Approved By: Trust Board  
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## **1. INTRODUCTION AND AIMS**

The Girls' Learning Trust (the "Trust") and the schools within the Trust are obliged to comply with the General Data Protection Regulation (GDPR) and the Data Protection Act 2018 when taking or publishing photographs, videos, CCTV (closed circuit television) or media images of its students.

The Trust will not normally seek consent for any internal use of photographs as the processing of such personal data is in accordance with the statutory functions of the Trust in providing an education to the pupil and is therefore lawful on the grounds of public interest. However the Trust will take into account any parental preferences expressed. The pupil may also exercise their data protection rights in respect of photographs as set out in the privacy notice for pupils and the Trust Data Protection and Freedom of Information Policy. We will respond appropriately to any pupil or parental request to exercise those rights.

If you wish to express a preference for the school to avoid taking or publishing photographs of an individual in certain circumstances, then you need to indicate your preferences using the forms found in Appendix A and Appendix B.

If no preferences are expressed, then the Trust/School will act in accordance with the principles expressed in this policy.

## **2. LEGISLATION AND GUIDANCE**

This policy meets the requirements of:

- UK General Data Protection Regulation (UK GDPR), as amended by the Data Protection, Privacy and Electronic Communications (Amendments etc) (EU Exit) Regulations 2020.
- Data Protection Act 2018 (DPA 2018).
- Freedom of Information Act 2000

It is based on guidance from the Information Commissioner's Office (ICO) and the Department for Education (DfE) regarding records management and retention.

The policy also takes into account the Protection of Freedoms Act 2012 for the retention of biometric data and aligns with the ICO's guidance on the use of surveillance cameras and the management of personal information. In addition, this policy complies with the Trust's funding agreement and articles of association.

The policy should be read in conjunction with the following other relevant policies:

- Data Protection and Freedom of Information Policy
- CCTV policy
- Safeguarding and Child Protection Policy
- IT Policy
- Staff Code of Conduct

## **3. ROLES AND RESPONSIBILITIES**

### Chief Executive Officer (CEO)

The CEO has overall accountability for ensuring the Photographs and Media Policy is effectively implemented and adhered to across the Trust.

### Data Protection Officer (DPO)

The DPO is responsible for overseeing the implementation of this policy, ensuring compliance with data protection legislation, and providing guidance on the use, retention, and disposal of photographs and media. Key responsibilities include:

- Overseeing the implementation of the Photographs and Media Policy across the Trust.
- Ensuring compliance with UK GDPR, the Data Protection Act 2018, and other relevant legislation concerning the capture and use of images and media.
- Providing guidance to staff on the lawful and secure storage, use, and disposal of photographs and media.
- Monitoring and auditing the Trust's practices related to the capture, storage, and sharing of images to ensure adherence to the policy.
- Acting as the point of contact for any queries or concerns about the use of photographs and media, including responding to data subjects' rights.

### Headteacher

Each Headteacher is responsible for ensuring the proper management of photographs and media within their school, ensuring staff understand and comply with the policy. Key responsibilities include:

- Providing leadership to ensure staff are aware of and follow the Photographs and Media Policy.
- Ensuring staff are trained on the principles of data protection as it relates to photographs and media, including consent and secure storage.
- Liaising with the DPO and CEO to address any issues related to the use and management of photographs and media within the school.

### All Staff

All Trust staff are responsible for managing photographs and media they capture or handle in accordance with this policy. Key responsibilities include:

- Ensuring the secure storage of photographs and media, both electronic and paper-based, to prevent unauthorised access.
- Disposing of media securely in line with the Trust's retention schedule and guidelines.
- Consulting with the DPO or IT Team for guidance on the appropriate use, storage, or deletion of photographs and media where necessary.

## **4. PHOTOGRAPHS FOR INTERNAL USE**

The Trust will take photographs and media images for its own use. Usually these will be unnamed (or first name only) photographs and will generally be for internal use, but may also include photographs for publication to promote the positive image of the schools in the Trust, such as photos for website materials, social media, school prospectus, newsletters or to show as slides at an event for parents. Unnamed photographs (or first name only) may also be used on display boards which can be seen by visitors to the school.

When the photograph is taken, the students will generally be informed that a photograph is being taken and, when appropriate, told what it is for so that they can object if they wish.

If the school wants to use named photographs (first name & surname) then it will obtain specific consent in writing first. For most students, this consent may be given by the student themselves, as

explained in the Trust Data Protection and Freedom of Information Policy (available on the Trust & school websites).

## **5. MEDIA USE**

The Trust/School will give proper consideration to the interests of its pupils when deciding whether to allow external organisations to take photographs or to film.

When the media are allowed to be present in school or at Trust/School events, this will be on the condition that they observe this policy and the Trust Data Protection and Freedom of Information Policy which can be found on the Trust and school websites.

Where the media are allowed to be present at a particular event the Trust/school will endeavour to inform students and their parents or carers of the media presence. If no objection is received, then the Trust/School will assume that unnamed (or first name only) photographs may be published.

If the media want to publish named photographs then they must obtain specific consent from students in year 8 and above with capacity to consent or the parents of year 7 students or those without capacity (refer to the Trust Data Protection and Freedom of Information Policy). The Trust/School will require the media entity to check with the school before publication so that the school can check that any objections have been taken into account.

## **6. FAMILY PHOTOGRAPHS AT TRUST/ SCHOOL EVENTS**

It shall be at the discretion of the Trust/School whether photographs may be authorised to be taken at a school event e.g. by friends and family. The Trust/school will endeavour to communicate this to those attending.

Photos taken by family and friends are not covered under the Trust's Data Protection and Freedom of Information Policy.

Where the Trust/school decides to allow photographs to be taken, the family and friends will be asked not to publish any photographs showing children other than their own children via social media, the internet or any other means.

## APPENDIX A - EXPRESSION OF PARENTAL PREFERENCES FOR STUDENTS IN YEAR 7

Use if you wish to express a preference for the Trust/School to avoid taking or publishing photos).

Name of Student	
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### Unnamed/first name only photographs

Tick	Please select those statements that apply
	I would prefer that unnamed photographs of the student are not used in the Trust/School.
	I would prefer that unnamed photographs of the student are not used for Trust/School use for wider publication: <ul style="list-style-type: none"><li>• Trust/School prospectus and similar information</li><li>• Trust/School website and social media</li><li>• Display boards</li></ul>
	I would prefer that unnamed photographs of the student do not appear in any external publications

### Named Photographs (first name and surname)

Tick	Please select those statements that apply
	I would prefer that named photographs of this student are not used in the Trust/School
	I would prefer that named photographs of this student are not used in any Trust/School publication.
	I would prefer that named photographs of this student do not appear in any external non-Trust/School publication.

### Declaration

I understand that the Trust and school will try to take my preferences into account and that the school must comply with General Data Protection Regulation (GDPR) and the Data Protection Act 2018 which will give the child rights in their own data when they have adequate capacity and understanding to make decisions about the publication of their photographs for themselves.

Signature	
Name	
Relationship to Pupil	

**APPENDIX B - EXPRESSION OF PARENTAL PREFERENCES FOR STUDENTS IN YEAR 8 AND ABOVE**

Use if you wish to express a preference for the Trust/School to avoid taking or publishing photos).

Name of Student	
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**Unnamed/first name only photographs**

Tick	Please select those statements that apply
	I would prefer that unnamed photographs of the student are not used in the Trust/School.
	I would prefer that unnamed photographs of the student are not used for Trust/School use for wider publication: <ul style="list-style-type: none"> <li>• Trust/School prospectus and similar information</li> <li>• Trust/School website and social media</li> <li>• Display boards</li> </ul>
	I would prefer that unnamed photographs of the student do not appear in any external publications

**Named Photographs (first name and surname)**

Tick	Please select those statements that apply
	I would prefer that named photographs of this student are not used in the Trust/School
	I would prefer that named photographs of this student are not used in any Trust/School publication.
	I would prefer that named photographs of this student do not appear in any external non-Trust/School publication.

**Declaration**

I understand that the Trust and school will try to take my preferences into account and that the school must comply with General Data Protection Regulation (GDPR) and the Data Protection Act 2018.

Signature	
Name	
Relationship to Pupil	