

# The PGS Parent Photography and Sharing Images Policy

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## The PGS Parent Photography and Sharing Images Policy

#### Introduction

This is the Parent Photography and Sharing Images Policy for The Portsmouth Grammar School (the School).

The Portsmouth Grammar School routinely takes images of pupils in various events and activities that occur during day-to-day life at the School. We use these images to celebrate achievement and to publicise the various successes of our pupils, and the School as a whole. We believe it is important that pupils feel their achievements are captured on camera and in photographic or video form, and the School wishes to support parents in that aim, also.

This policy sets out the ways in which the School takes, uses and shares such images, and of the restrictions placed upon parents when recording images of their own and other children at the School.

#### 1. Definitions

- 1.1 **Social media** refers to websites and applications that enable users to create and share content or to participate in social networking.
- 1.2 **Staff** includes all those who work for or on behalf of the school, regardless of their employment status, including contractors, volunteers and governors, unless otherwise indicated.
- 1.3 **Use or using** means any actions related to the activity in question; this might include, for example, the taking, displaying, editing and storing of images, or the viewing, downloading, uploading or sharing of digital materials on social media.
- 1.4 **The School** means The Portsmouth Grammar School.
- 1.5 **Image** means any photographs and video footage of any type, recorded/taken on any electronic device, and any other item of photographic equipment, including equipment not connected to the internet such as SLR cameras.
- 1.6 **Parents** means any adult who has parental responsibility for the child(ren), including guardians and carers.
- 1.7 **Visitors** means any other adults, such as friends or family known to parents. When such people are invited by parents, it is the parents' responsibility to ensure that such people understand the various aspects of this policy and to assist the School in enforcing it.
- 1.8 **Pupils** means all children registered at The Portsmouth Grammar School, including any who are over the age of 18.

#### 2. The Purpose and Scope of this Policy

This policy applies to all parents, guardians, carers, and any other visitors such as friends and family, who accompany them to any School event, whether on the School site, or at any other venue, public or otherwise, at any time, including holiday periods.

The purpose of the policy is to:

- 2.1 Protect children and young people who take part in School events and activities, specifically those where images may be recorded
- 2.2 Set out the overarching principles that guide our approach to the taking, using and sharing of images of our pupils
- 2.3 Ensure that we operate within our values and within the law when taking, using or sharing images of our pupils and other children

In particular, parents, and any other friends or family who accompany parents to any school events, whether onsite or offsite, should be aware of the following:

- 2.4 Some families may not have provided consent for their child(ren) to be photographed
- 2.5 There may be occasions when a child would not want their image published publicly, such as when the child has been the victim of a crime, or abuse
- 2.6 Families may have religious or cultural reasons for wanting to avoid being photographed
- 2.7 Safeguarding is paramount and always takes priority over anyone's desire to take photographs.

#### 3. Guidance on School Practice

- 3.1 **Consent**: On entry to the School, parents who accept a place for their child are invited to consent to the School using anonymous photographs of their child, which may be published in the prospectus, on the website and in social media, as well as in a variety of physical and electronic displays and advertising spaces. The name(s) of any pupils for whom consent has not been provided is circulated to all staff at the start of the academic year, and as and when changes occur. Where the School wishes to identify pupils by full name in any publication, specific consent is always sought directly from the child's parent(s).
- 3.2 **Images for identification**: All pupils are photographed on entering the School and, thereafter, biennially in the Senior School and annually in the Junior School, and these photographs are intended only for the purposes of internal identification on the School's Management Information System.
- 3.3 **Storage and Review of Digital Images**: All images, including those taken by externally commissioned photographers, are stored in designated, restricted, secure and password-protected PGS hard drive/cloud spaces. All staff may record and share images of pupils, provided they do so with a PGS registered device, that the consent covered in 3.1 has been provided and that those photos are anonymous. Once such images are no longer required on the image capture or editing device, they must be transferred to the PGS Hard/Cloud drive space and deleted from devices.

- 3.4 **Alteration of Digital Images**: Images that are used for public presentation, such as in a school brochure, or on the website or social media, may be altered digitally for colour balance, contrast, exposure and on occasion to remove unwanted background items and names. This is intended to maximise the quality of the image and the viewing experience of the user; at no time does the School change the physical appearance of the people photographed in an image. Equally, parents should not alter any images the school has published using software including the use of artificial intelligence.
- 3.5 **External Agencies, such as Journalists**: If people such as journalists, work experience students, researchers or charities wish to take images of our pupils, particularly where those images are to be circulated, the School will ensure that their purpose is clear, and that photographs fall within the School's standard consent. In the same way, the School will seek specific consent for pupils being named in publications. If the School becomes aware of unknown individuals photographing our children at School events, that person will be asked for identification and if the School is not confident in their legitimacy to be present, they will be asked to leave, and the School's safeguarding policy followed as appropriate.
- 3.6 **School Trips**: While the School will seek to minimise images taken by members of the public on school trips, it is likely that images will be taken in busier public areas that will be beyond the School's control (e.g. in a marketplace etc).
- 3.7 Use of External Photographers: The School regularly commissions photographers to capture images at a range of events and activities and when this is the case, we will keep children safe by ensuring their purpose is clear and they photograph in line with the School's standard image consent signed by parents. The photographer will also wear identification at all times.

#### 4. Guidelines for Parents Wishing to Take, Use and/or Share Images

- 4.1 **General Guidance**: It is not appropriate to share images of other children without permission from the parent of the child(ren) as there may be very good reasons why a family does not want images of their child published online. Parents and visitors must understand that it is not appropriate for the School to share with them the identities of pupils for whom image consent has not been provided, and that such pupils may be involved in various activities and/or events. The School will normally give verbal guidance via an announcement, or written guidelines, for example, in the programme, about whether photography is permitted at an event, and any restrictions imposed by the School, and will always do so when there are particular concerns about a pupil for whom consent has not been provided.
- 4.2 **Ensuring Images are Appropriate**: Parents must reduce the risk of images being used inappropriately by ensuring that any images taken show children in an appropriate state of dress and avoid full face and body images of children taking part in activities such as swimming or gymnastics where there may be a heightened risk of images being misused. Images should always reflect a child's positive involvement in an activity.

- 4.3 Advice Regarding Privacy Settings: The School risk assesses social media coverage of all trips, and reserves the right not to publish real-time posts, but instead to post only once the pupils have returned to the school site, or travelled home. Where parents wish to publish images of their own children, including where they have photographed them on a school trip, it is advisable to check privacy settings to ensure images are only viewable by the intended audience, and that geo-location settings are as desired, for example, to ensure that a child's location is not publicised inadvertently.
- 4.4 Seeking Permission from the Child to Publish Images Online: Parents, where feasible, should also ask their child(ren)'s permission before they post an image online and should consider the long-term implications of sharing an image before making it public.
- 4.5 **Concerns about Images Being Taken**: If parents have any concerns about the way in which images have been recorded by any other person present at a School event, they should not hesitate to contact the Designated Safeguarding Lead: Mrs Laura Ryan (Deputy Head Pastoral) l.ryan@pgs.org.uk, or one of her deputies, Mr Richard Bristow (Senior Deputy Head) r.bristow@pgs.org.uk in the Senior School or Mr Jason Ashcroft (Deputy Head of the Junior School) j.ashcroft@pgs.org.uk,
- 4.6 **Purchasing School Images**: Parents may purchase a selection of images through the school website, via SmugMug, a third-party organisation. Full details on the provider are available from their website: www.smugmug.com. SmugMug will be provided with, and will process, personal data for this purpose.

#### 5. Associated Policies

- 5.1 A Guide for Visitors to The Portsmouth Grammar School
- 5.2 The PGS Safeguarding and Child Protection Policy and Procedure
- 5.3 The PGS Data Protection Policy
- 5.4 The PGS Staff Social Media and Digital Images Policy
- 5.5 The PGS AI Protocol

### 6. Allocation of Tasks and Version Control

#### Allocation of Tasks

Task	Allocated to	When / frequency of review
Keeping the policy up to date and compliant with the law and best practice	Senior Deputy Head	Annually
Monitoring the implementation of the policy, relevant risk assessments and any action taken in response and evaluating effectiveness	Senior Deputy Head	As required
Maintaining up to date records of all information created in relation to the policy and its implementation as required by the GDPR	Senior Deputy Head	As required
Receiving / reviewing input from interested groups (such as pupils, staff, Parents) to consider improvements to the School's processes under the policy	Senior Deputy Head	As required
Formal annual review	The Safeguarding Committee of the Governing Body	Annually

#### Version Control

Date approved	16 <sup>th</sup> May 2025 (Safeguarding Committee)
Date Reviewed	24 <sup>th</sup> April 2025 (Senior Management Team)
Next review date	Summer 2026
Policy author (SMT)	Senior Deputy Head
Status	External
Report	IT and Data Report

Ph4230625