



FOREST SCHOOL

Privacy Notice for Photographs & Images (Pupils 12 and above)

v1.2

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Use of your images by Forest School

Whenever we take, store, and use any photographs, videos or other recordings that include our pupils, we are collecting and using information about you.

Information about you is called "personal data". The school uses all sorts of personal data, for lots of different purposes. This document explains when we might use photos, videos, broadcasts like streamed lessons, or sound recordings of you (called "images" in the rest of the document), so that you are clear about what will happen to those images, and what you can do if you are not happy with what we are doing.

1 Why we collect and use images of you

There are a number of reasons why we want and need to collect and use images of you. These are:

- To enable the School to identify you
- To support your development and participation Forest School community
- To promote and advertise the School
- To record or stream lessons or events at the School
- To investigate issues where we have images that are relevant.

We explain these reasons in more detail below and give you some information about the legal bases we rely on to collect and use images of you.

2 Why we use your images and our lawful bases for doing so

We can only use your personal data if we have a good reason to do so. This is about having a "lawful basis" to use your personal data. Our lawful basis for using images could be:

- Legitimate interest - because we have a legitimate reason to use the information for that purpose;
- Public task - which is where we are using your image for something that is necessary for teaching or looking after you. Teaching you, and keeping you safe, is a public task, that we carry out in the public interest.
- Vital interests - this is where we need to use the information to protect you or someone else, to prevent you being seriously harmed.
- Legal obligation - where we are required by law to do something.
- Consent – where you have given us explicit permission to use an image.

We explain in more detail below the reasons for using your images, and what the lawful bases for them are.

- To enable the School to identify you

We use photographs on Tuck Shop/Printer cards and on iSAMS (our school registration, tracking and internal communications system). This is to ensure that we can identify you whilst you are in School, and to ensure that we are communicating with or about you correctly. This is in to keep you safe, so is a public task.

Not all members of staff will always know who you are. We use photographs of you to identify you to members of staff, where they need to be able to recognise who you are. For example, if you have a food allergy, we will let people know about this to protect you, if they are providing you with food. This would be to protect your vital interests. We may also share your photograph with a member of staff who needs to identify you, for example, because they are taking you on a school trip. This is necessary for teaching and keeping you safe, so this is a public task.

- To support your personal development and participation in the Forest School community

We use images to celebrate your achievements and to share your experiences with your friends, family, and the school community, as part of your growth journey at school. This is to foster friendships and participation, and to support your personal, social, and emotional, development and wellbeing. Sometimes we may share images with other organisations in our community, for example if you take part in an outreach activity, for them to share as well. This is a legitimate interest of the school.

Images capture the school's history, and your place in that history, by keeping them in the school's archives when you leave the school. You may want to see them when you are older, or to reconnect to your time and friends at Forest. You may also go on to make history through your achievements after school, and people may be interested in your school history and achievements here. You and other Old Foresters will be able to access these images, and we may use these to celebrate your time and achievements with Old Foresters or the wider community, or for historic research. It is a legitimate interest of the school to maintain and share these images within the Forest School community.

- To promote and advertise the School

You will have seen that we use images and videos of pupils on our website, on our social media channels, and in our prospectus. This is to promote the school and encourage new students to join us. We also use images of you to celebrate your achievements and show the community when we are proud of something that you have accomplished. Promoting the School and celebrating you are both legitimate interests of the school. We therefore rely on these legitimate interests to use images for these purposes.

When we are intending to put photographs of you onto the school website, onto our Facebook, Instagram, Twitter, School Magazine, Alumni Magazine (OF News), YouTube account or in the prospectus, we will usually check with you first that you are happy with this. If at any point you are concerned about images that we have used, please speak to your

form tutor in the first instance. If your concern is urgent, please send an e-mail to helpdesk@forest.org.uk together with a link or description of where the image is, and ask for the image to be removed. We will do our best to remove the images where we are able to, as quickly as possible. In some cases, it may not be possible to do this, but we will talk to you about why this is the case.

Our interests in promoting the School and your achievements do not end when you leave the School, so we may continue to use images of you even after you have left.

Sometimes we are asked by third parties to supply images, or we want to supply images to other third parties for promotional purposes. For example, a local newspaper may ask us to provide images to celebrate exam achievements, which they will use in print, on their website and on their own social media channels. Promoting the School in this way is still a legitimate interest, but we will do our best to speak to you about this before the images are shared, so that you are aware that this might happen.

- To record or stream lessons, performances, or events

We may need to record or stream lessons that you are participating in. This will be because there are students working at home, or because we think the lesson will be helpful for you for revision purposes, or because we are using the lesson as a means of assessing your teachers. We will always tell you when we are recording or streaming, and the reasons for this.

Recording and streaming lessons is always carried out for the purpose of teaching you or your classmates, or for ensuring that we are providing an excellent lesson, so this is a public task.

Sometimes we will use recordings of you for exam purposes, for example, a video for drama, or audio recording of a musical performance. If these are required for a public exam, the school must provide the information, it is as a public task. Where they are used for internal assessments or learning in other situations, the school has a legitimate interest to do so. For example, a video recording of you doing gymnastics, may be used to give you feedback, or football coaches may use a specialised video recording to analyse your performance.

We may also live stream or record events such as award evenings or sports fixtures, so that parents who are not able to attend can still participate. This is a legitimate interest of the School, to ensure that everyone who wants to participate can take part, if they cannot physically be at the School for any reason.

- To investigate issues where we have images that are relevant to an issue raised

Sometimes, we may be investigating a complaint or an incident that has occurred, and we will be provided with images of you that relate to the complaint or incident. We will use the images for the purposes of investigating and responding to the complaint or incident and may need to hold onto the images in case there are any future questions about it.

Keeping you safe and investigating and responding to complaints are both public tasks, and we rely on that legal basis when using images for this purpose. In some cases, we might have legal duty to respond to respond to complaints, and where that is the case, our legal basis for using your image is legal obligation.

3 How long we store your images

Images that we hold for a specific purpose - such as notifying your food allergies to staff, will only be kept for as long as they are needed for that purpose.

Images we hold for the purposes of promoting and advertising the school, will be kept after you leave and may continue to be used after you leave. We usually refresh images on the website every 2 years, but images of you may still be available on social media sites for extended periods of time. If you ask us to remove these, we will do our best to take them down, but where these images are held by third parties, we may not be able to remove all trace of the image.

We keep a record of your photograph as a record of your attendance at the School after you have left. These are held in our archives and may be used if someone is researching the history of the School. We also keep images of your participation in school life after school, to share with you and other Old Foresters after you have left school, and for archival purposes.

When events are live streamed, recordings may be kept for archival purposes.

Recordings of lessons will be held for 60 days unless they have been archived as exemplar lessons to be used for training our teachers.

Images we hold that relate to investigations that have a safeguarding element will be held indefinitely for as long as we are required to do so by the Independent Inquiry into Child Sexual Abuse.

Contact the Privacy Officer if you would like more information.

4 Transfers of Information abroad

When the school sends images outside of the UK, we must consider if the other country has the same level of protection for those images as there is in the UK. Some countries are considered by the UK Government to have adequate rules, and this includes all European Union countries.

The images that the school holds are stored on servers in the UK and Ireland.

In certain circumstances, we may send your personal data to countries which do not have the same level of protection for personal data as there is in the UK. For example, we may:

- store your personal data in cloud computer storage with servers in the USA; and
- provide your image to a third party who may store it outside of the UK.

If it is felt necessary to, we will provide you with additional details about where we are sending your images, whether the country has an adequacy finding and if not the safeguards which we have in place outside of this privacy notice.

If you have any questions about the safeguards that are in place, please contact marketing@forest.org.uk.

5 Decisions you can make about your images

Data protection legislation gives you rights about your personal data, and this includes the images that we hold. Your rights are as follows:

- **Rectification:** if personal data that we hold about you is incorrect or incomplete you can ask us to correct it.
- **Access:** you can also ask what personal data we hold about you and be provided with a copy. This is commonly known as making a Subject Access Request. We will also give you extra information, such as why we use this information about you, where it came from and who we have sent it to.
- **Erasure:** you can ask us to delete the personal data that we hold about you in certain circumstances. For example, where we no longer need the information.
- **Portability:** you can request the transfer of your personal data to you or to someone else in a format that can be read by computer, in certain circumstances. This applies where (a) you provided the personal data to us; (b) we are relying on a contract or your consent to use your personal data (please see " Why we collect and use images of you " above); and (c) the personal data is being held by us on a computer.
- **Restriction:** you can request that we restrict how we use your personal data in certain circumstances. Please contact your form tutor or the Privacy Officer if you would like to know more.
- **Object:** you may object to us using your personal data where:
 - the lawful basis on which we are relying is either legitimate interests or public task. Please see the section "Our lawful bases for using your personal data" above.
 - if we use your personal data for scientific or historical research purposes or statistical purposes.

The Privacy Officer can give you more information about your data protection rights. You can find the Privacy Officer's details and further information below.

6 Further information and guidance

Like other organisations we need to keep your personal data safe, up to date, only use it for what we said we would, destroy it when we no longer need it and most importantly - treat the information we get fairly.

Please speak to your form tutor if:

- you would like to exercise any of your rights listed above; or
- you would like us to update the information we hold about you; or
- you have any concerns about how your personal data is used or shared.

The Privacy Officer oversees the school's data protection compliance. You can ask your form tutor to speak to the Privacy Officer or speak to the Privacy Officer yourself (by email to privacy@forest.org.uk, by calling 0208 509 4652, or in person by visiting the IT Centre).

Alternatively, you can ask your parents to speak to us on your behalf if you prefer.

You have a right to lodge a complaint with the Information Commissioner's Office (ico.org.uk). The ICO is the data protection regulator which means that they enforce the rules that we must obey.

If you have any concerns about how we have handled your personal data, we kindly ask that you contact us first before you speak to the ICO so that we have an opportunity to put things right.