FOREST SCHOOL

Privacy Notice for Photographs & Images (Pupils aged 4-11)

v1.2

Approved (Date):	**8 October 2021**
Next review (Date):	**September 2026**
Owner (Name, Title):	**Director of Operations and Compliance and Data Protection Lead**
Classification:	
Comment:	19.01.26 – Updated staff responsibilities July 26 – Updated logo

Use of your images by Forest School

Whenever we take, store, and use any photographs or videos that include our students, weare collecting and using information about your child.

Information about your child is their "personal data". The School uses all sorts of personal data, for lots of different purposes. This document explains when we might use photos and videos of your child (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 yourchild. These are:

- To enable the School to identify your child;
- 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 have explained these reasons in more detail below, and also given you some information about the legal basis for these purposes.

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

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

- legitimate interests - because we have a legitimate reason to use the information for that purpose;
- public task - which is where we are using images for something that is necessary for teaching or looking after your child. Teaching your child, and keeping your child 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 your child or someone else, to prevent your child being seriously harmed; or
- legal obligation- where we are required by law to do something.

We have explained in more detail below the reasons for using images, and what the lawful basis for this is.

- To enable the School to identify your child;

  We use photographs on Tuck Shop/Printer cards and on iSAMS (our School registration, tracking and internal communications database). This is to ensure that we can identify the child whilst they are in School, and to ensure that we are communicating with or about the correct child. This is in order to keep your child safe, so is a public task.

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

- 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 your child to celebrate theirachievements and show the community when we are proud of something that they have accomplished. Promoting the School and celebrating your child 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 your child 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're happy with this. If at any point you are concerned about images that we have used, please speak to your child's form teacher in the first instance, and we will do our best toremove the images where we are able to. 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 child's achievements do not end when your child leaves the School, so we may continue to use images of you even after they have left.

  Sometimes we are asked by third parties to supply images, or we want to supply imagesto 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 or events

  We may need to record or stream lessons that your child is participating in. This will be because there are students working at home, or because we think the lesson will be helpful for your child for revision purposes, or because we are using the lesson as a means

of assessing the teacher. We will always tell your child when we are recording or streaming, and the reasons for this. Recording and streaming lessons is always carried out for the purpose of teaching yourchild or to ensure that we are providing the best possible education for your child, so this is a public task.

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 interestof 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 your child 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 your child 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 isthe case, our legal basis for using your child's 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 your child leaves and may continue to be used after your child leaves. We usually refresh images on the website every 2 years, but images of your child 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 child's photograph as a record of your child's attendance at the School after you have left. This is held in our archives and may be used if someone is researching the history of the School.

Recordings of lessons will be held for 1 year unless they have been archived as exemplar lessons to be used for further professional learning and development.

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

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

More information can be found by contacting dpl@forest.org.uk.

4 Transfers of Information overseas

When the School sends images outside of the UK, we have to 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 of the European Union and someother countries, such as, New Zealand, Norway, Switzerland and Argentina.

The images that we hold at the School are held on servers based in the UK.

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 felt necessary to, we will provide you with additional details about where we are sending your child's 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 a number of rights regarding your child's personal data, and this includes the images that we hold. Your rights are as follows:

- **Correction**: if personal data the School holds about your child is incorrect or incomplete you can ask us to correct it.
- **Access:** you can also ask what personal data we hold about your child 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 your child, where it came fromand who we have sent it to.
- **Deletion:** you can ask us to delete the personal data that we hold about your child in certain circumstances. For example, where we no longer need the information.
- **Portability:** you can request the transfer of your child's personal data to you or to a third party in a format that can be read by computer in certain circumstances. This applies where (a) the personal data has been provided by you; (b) the basis that we are relying on to process your personal data is consent or contract (please see "Our purposes and lawful bases in more detail" above); and (c) the personal data is being processed by us on a computer.
- **Restriction:** you can request that we restrict how we use your child's personal data in certain circumstances. Please contact your child's form teacher if you would like to know more.
- **Object:** you may object to us using your child's 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 ever use your child's personal data for scientific or historical research purposesor statistical purposes.

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 child's form teacher or James Sanderson, Head of Prep School if:

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

The Data Protection Lead is in charge of the School's data protection compliance, and they can becontacted by dpl@forest.org.uk

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 therules that we have to obey.

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