



Taking, Storing and Using Images of Children

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Responsibilities

Policy Owner: Chris Evans
Governors Committee: Finance

Audit Control

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Document Control and Approval

Version Control

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1.1				
1.2				

Responsibilities

Name	Job Title	Responsible for:

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Policy Purpose and Scope

This Policy is intended to provide information to pupils and their parents, carers or guardians (referred to in this policy as "parents") about how images of pupils are normally used by the School, (referred to as "the School"). It also covers the School's approach to the use of cameras and filming equipment at school events and on school premises by staff, parents and pupils themselves, the media and other schools. Also, the use of closed-circuit television (CCTV) and Internet based remote education.

It applies in addition to the School's terms and conditions, and any other information the School may provide about a particular use of pupil images, including, for example, signage about the use of CCTV; and more general information about use of pupils' personal data.

Parents who accept a place for their child at the School are invited to agree to the School using images of them as set out in this policy by signing the consent requested within the Admissions document. Where the person is over 13, we will seek separate consent. We expect parents and pupils to feel able to support the School in using pupil images to celebrate the achievements of pupils, promote the work of the School, and for important administrative purposes such as identification and security. If consent is not given, the school may make reasonable adjustments to protect your child for safeguarding and or data protection purposes. This may limit their exposure during school events where photography is likely to take place. The reasonable adjustment could be the child wearing a mask and or clothing, so they could not be identified as a data subject, however allowing for inclusion. It could also mean that the child could not play a prominent part in the show in order to ensure protection for safeguarding and or data protection.

Any parent or pupil who wishes to limit the use of images of a pupil for whom they are responsible should contact the School in writing. The School will always respect the wishes of parents/carers/pupils where reasonably possible, and in accordance with this policy.

Certain uses of images are necessary for the ordinary running of the School and its community. The School is entitled lawfully to process such images and take decisions about how to use them, subject to any reasonable objection raised.

Use of Pupil Images in School Publications

The School will seek specific consent to use images of selected pupils to keep the School community updated on the activities of the School, and for marketing and promotional purposes, including:

- on internal displays (including clips of moving images) on digital and conventional notice boards within the School premises;
- in communications with the School community (parents, pupils, staff, governors and alumni) including by email, on the School intranet and by post;
- on the School's website and, where appropriate, via the School's social media channels, e.g. Twitter and Facebook. Such images would not normally be accompanied by the pupil's full name; and
- in the School's prospectus, and in online, press and other external advertisements for the School. Such external advertising would not normally include pupil's names, except where express permission has been sought.

The source of these images is predominantly the School's staff or professional photographer for marketing and promotional purposes, or staff/pupils in relation to school events, sports or trips. The School will only use images of pupils in suitable dress.

Use of Pupil Images for Identification and Security

All pupils are photographed on entering the School and thereafter at various intervals, for the purposes of internal identification. These photographs identify the pupil by name, year group, house and form/tutor group.

CCTV is in use on School premises, and will sometimes capture images of pupils. Images captured on the School's CCTV system are used in accordance with the [Data Protection Act 2018](#), the School's [Data Protection Policy](#), and any other information or policies concerning CCTV which may be published by the School from time to time.

Use of Pupil Images in the Media

When we are aware that pupil images are likely to be used in the media we make best efforts to ensure that pupils and parents are informed that this is the case.

Security of Pupil Images

Professional photographers and the media are expected to be accompanied at all times by a member of staff when on the School premises.

The School takes appropriate technical and organisational security measures to ensure that images of pupils held by the School are kept securely, and protected from loss or misuse, and in particular will take reasonable steps to ensure that members of staff only have access to images of pupils held by the School where it is necessary for them to do so.

All staff receive guidance on the importance of ensuring that images of pupils are made and used responsibly, only for School purposes, and in accordance with the School's policies and the law.

Use of Cameras and Filming Equipment (including mobile phones) by Staff

Many educational activities involve recording images. These may be undertaken for displays, publicity, to celebrate achievement and to provide records of evidence of the activity.

Staff should:

- Only publish images of pupils where they and their parent/carer have given explicit written consent to do so.
- Only take images where the pupil is happy for them to do so.
- Code of conduct for all staff and volunteers
- Only retain images when there is a clear and agreed purpose for doing so.
- Store images in an appropriate secure place in the school or setting.
- Ensure that a senior member of staff is aware that the photography/image equipment is being used and for what purpose.
- Be able to justify images of pupils in their possession.
- Avoid making images in one-to-one situations.
- Not take images of pupils for personal use.
- Not take images of children which could be considered as indecent or sexual

There may be instances when staff record images using their personal device, such as a mobile phone. These should be uploaded to a school domain, such as teams, onenote or sharepoint and deleted from the personal device as soon as possible, and at the latest within 48 hours of the activity.

Use of Cameras and Filming Equipment (including mobile phones) by Parents

Parents are welcome to take photographs of (and where appropriate, film) their own children taking part in School events, subject to the following guidelines, which the School expects all parents to follow:

- Parents are reminded that it may occasionally be necessary for the School not to permit the use of cameras or filming equipment at specific events or productions.
- When an event is held indoors, such as a play or a concert, parents should be mindful of the need to use their cameras and filming devices with consideration and courtesy for cast members or performers on stage and the comfort of others.

- In particular, flash photography can disturb others in the audience, or even cause distress for those with medical conditions; the School therefore asks that it is not used at indoor events.
- Parents are asked not to take photographs of other pupils, except incidentally as part of a group shot, without the prior agreement of that pupil's parents.
- Parents are reminded that such images are for personal use only. Images which may identify other pupils should not be made accessible to others via the internet (for example on Facebook), or published in any other way.
- Parents are reminded that copyright issues may prevent the School from permitting the filming or recording of some plays and concerts.
- Parents may not film or take photographs in swimming pool areas, changing rooms or backstage during school productions, nor in any other circumstances in which photography or filming may embarrass or upset pupils.

The School reserves the right to refuse or withdraw permission to film or take photographs (at a specific event or more generally), from any parent who does not follow these guidelines, or is otherwise reasonably felt to be making inappropriate images.

The School sometimes records plays and concerts professionally (or engages a professional photographer or film company to do so), in which case copies of the DVDs and CDs may be made available to parents for purchase. The specific consent of Parents or pupils taking part in such plays and concerts will be sought if it is intended to make such recordings available more widely.

Use of Cameras and Filming Equipment (including mobile phones) by Pupils

All pupils are encouraged to look after each other, and to report any concerns about the misuse of technology, or any worrying issues to a member of the pastoral staff.

The use of cameras or filming equipment (including on mobile phones) is not allowed in toilets, washing or changing areas, nor should photography or filming equipment be used by pupils in a manner that may offend or cause upset.

The misuse of cameras or filming equipment in a way that breaches this Policy, or the School's Anti Bullying Policy, Data Protection Policies, ICT Policies, or the School Rules is always taken seriously, and may be the subject of disciplinary procedures.

Conditions applying to online learning

As part of our approach to remote learning we use video platforms for interactive sessions.

These conditions should be read alongside our Social Media Policy and our acceptable use policy. In order to create a safe environment for pupils and staff when taking part in an interactive session, the following considerations must be observed:

- By accepting the meeting ID and joining the meeting, with parental responsibility, you agree to the terms set out in this policy.
- It is only to be accessed by a device in a communal family space.
- The session will be supervised at all times by an adult to deal with any technical or safeguarding difficulties or issues.
- Attendees should be dressed appropriately.
- The meeting ID is to remain confidential and not to be shared to anyone that it was not designated to.
- Recording, photos or screenshots of the meeting are not allowed by anyone taking part unless consent has been obtained. Recordings remains the copyright of the School and nothing should be shared with social media.
- For participants some facilities will be disabled by the host teacher. This includes but is not limited to the screen record function, chat and screen share.
- The same behaviour expectations that are set within a classroom apply to the interactive meeting and the teacher retains the right to terminate a pupil's participation.

To make a complaint

Please contact our Data Protection Officer Satswana Ltd, with email of info@satswana.com; telephone number 01252 759177 office address Suite G12 Ferneberga House, Alexandra Road Farnborough, Hampshire, GU14 6DQ

Alternatively, you can make a complaint to the Information Commissioner's Office:

- Call 0303 123 1113
- Or write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF