



## Photos and Images Policy

**Primary person responsible for this policy:** Lucy Ritchie/Karen Etherington

**Job title:** Deputy Head/ Assistant Head

**Last review date:** July 2021

**Next review date:** June 2022

**Circulation:** This policy has been adopted by the governors and is available to parents on request. It is addressed to all members of staff and volunteers and applies wherever they are working with children.

'Parents' refers to parents, guardians and carers.



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## Scope and definitions

The purpose of this policy is to set out general rules about the capture and distribution of images and photographs of children and to give staff and parents guidelines on the subject. It applies to activities on school premises or as part of off-site events or trips.

“Image capture”, “photography” and “videoing” refer to any kind of image capture, still or moving, obtained by any photographic device including still image cameras, video cameras, webcams and photographic enabled mobile telephones, and any other type of image capture device not specified here, whether digital or not, using technology existent at this time or in the future. The storage of such images includes film negative, film positive (e.g. transparencies and slides, movies, etc.), photographic paper, digital media, magnetic tape, and any other kind of storage method able to be used for the storage of images, still or moving, available now or in the future.

This short policy is part of our strategy for safeguarding children within our care. It complies with *Keeping Children Safe in Education*<sup>1</sup> and should be read in conjunction with our other policies, notably:

- E-safety
- Mobile Phones and Personal Electronic Devices
- Safeguarding
- Anti-Bullying (including cyber-bullying)
- ICT Usage
- PSHEE
- Social Media

## General principles for staff

Every reasonable effort must be made to minimise risk of inappropriate capture and distribution of photos and images. This includes:

- securing parental consent for the use of images of their children.
- not using photographs of children or staff who have left the school without their consent.
- ensuring that children and staff are appropriately dressed.
- ensuring that children’s names are not used alongside images in publicly available material.
- not using an image of any child who is subject to a court order.
- storing images securely and accessible only by those authorised to do so.
- storing images securely (whether physical or digital) with appropriate access controls.
- ensuring staff are appropriately informed about this policy.

## Safeguarding

There may be a risk to the welfare of children when individual children can be identified in photographs. For that reason, we have developed this policy to make every effort to minimise risk.

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<sup>1</sup> 2016 until 3rd September, at which point it will comply with Keeping Children Safe in Education 2018



Where the capture or distribution of images of children raises a safeguarding concern, the Designated Safeguarding Lead (DSL) must be contacted immediately. Further details on safeguarding procedures are available in our *Safeguarding policy*.

### **Data Protection Act**

Photographs and video images of pupils and staff are classed as personal data under the terms of the Data Protection Act 2018. Therefore, using such images for school publicity purposes requires the consent of either the individual concerned or in the case of pupils under 13, their legal guardians. In line with the Data Protection Act, everyone responsible for using data has to follow strict rules called 'data protection principles. They must make sure the information is:

- used fairly and lawfully
- used for legitimate and specifically stated purposes
- used in a way that is adequate, relevant, and not excessive
- accurate and kept up to date
- kept for no longer than is necessary
- handled according to people's data protection rights
- kept safe and secure

### **Photography and image capture in school**

Images of children may be captured as part of the educational process. Recordings of pupils for school purposes will only ever be taken using official school equipment or by a designated external professional. Staff must not take or transmit any recording of pupils on any personal device. Staff should also be aware that taking photographs of colleagues using personal devices should only happen with the permission of that member of staff.

Images of pupils or staff must not be displayed on websites, in publications or in a public place without specific consent. The definition of a public place includes areas where visitors to the school have access. Where photographs are taken at an event attended by large crowds, this is regarded as a public area, so it is not necessary to get permission of everyone in a crowd shot. However, every effort will be made to inform attendees that photographs are being taken (for example, through signage).

On occasions, commercial video films may be made of children on educational visits and performing in school productions. The school will inform parents where arrangements have been made for a commercial photographer to film such an event.

Media permissions must be kept on file (see the permission form at the end of this document). They will be processed in line with Alpha Plus Group's [Privacy Notice](#), which is available on request or can be accessed via the Group's public portal.

### **Photography and image capture by parents**

As a rule, no parent or visitor is permitted to use a camera (including a mobile phone's camera facility) whilst on school premises. However, the Data Protection Act does not apply to photographs or films taken for personal use by family and friends and it is usual for parents to want to take photographs and videos of children at school events.



Exceptions to this rule are therefore made for some<sup>2</sup> specific events such as plays, recitals, concerts, sporting events, open days, or other promotional events. We strongly advise parents against the publication of any such photographs on the internet (e.g. on social media), and we will request parents to remove any such material if we deem it illegal, harmful, or inappropriate in any way.

Where appropriate, our policy regarding this matter should be explained clearly to parents by a member of staff before difficult situations arise.

### **Photography and image capture by pupils**

Staff will supervise and maintain control over any photographing or recording those pupils do during on school or off-site activities.

### **Publicity**

Schools need and welcome publicity. Children's photographs add colour, life and interest to articles promoting school activities and initiatives. Making use of photographs for publicity materials and to promote the school in the press can increase pupil motivation, staff morale, and help parents and the local community identify and celebrate the school's achievements. However, photographs must be used in a responsible way. Schools need to respect children's and parents' rights of privacy and be aware of potential child protection issues.

### **Monitoring**

It is the responsibility of all school staff to support and monitor this policy. Any concerns should be brought to the attention of the Head.

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<sup>2</sup> We reserve the right to prohibit the use of cameras for some events if deemed inappropriate by staff.



## Appendix 1 – Parental Permission Letter

### FORM 3 Data & Media Parental Permission Document (2021-2022)

This form is for all pupils in Chepstow House School and Little Chepstow Nursery. In order for the School to run effectively and to cater for your child every day, the use of personal data is essential as well as using technology and e-learning resources.

Storing data allows us to be in loco parentis whilst your child is in our care. Data is collected and used for: booking trips and sports fixtures, catering to your child's individual needs by using assessment data, providing food considering dietary requirements and allergies and allowing children with medical conditions to be taught in a safe environment.

All subjects in the curriculum and our daily activities make use of e-learning. Images, recordings and personal data will be used to inform learning, allow your child's needs to be catered for and celebrate our achievements. The following online and hard copy applications are used: School website and Learning Platform (Frog), Tapestry for EYFS Learning Journey's (photos, observations, date of birth and summative data), the Internet, podcasts, digital videos, YouTube, photography, e-mail, recordings and online collaborations such as blogging, online subscriptions using a child's name, date of birth and class (including Mathletics, Maths Whizz, Spellodrome), Alpha Plus website, school Twitter, Facebook and Instagram pages, internal displays, newsletters and prospectus.

In addition, personal data is stored on Evolve (trip information), SIMS (billing information, register and reports), ParentPay, together with the school network and paper files in school. Data is collected from parents at registration and upon entering Chepstow House School. During the year you will be asked to provide data for school trips. Additional data is obtained: following a head injury or accident within school, when requested to administer your child's medication, any medical letters you provide the school regarding your child and music lesson contracts.

Your data will be processed in line with Alpha Plus Group's Privacy Notice, which is available on request or can be accessed via the Group's [public portal](#).

The use of media with technology (listed above) allows us to provide parents with an insight into school life and sharing special events such as: assemblies, concerts, Christmas concerts and Nativity plays, Easter activities, school plays, the school day, residential trips, music festivals, competitions, blogs, sports days, clubs, sports matches and competitions, activity days and parent fundraising events.

In order for your child to engage in all parts of school life, permission is needed for use of personal data and images. To ensure maximum security for all pupils, only first names, class names, year group and/or school name will accompany any of the online photographs or videos. No other personal information will be used.

Schools are legally required to keep children's personal data on file for 25 years, even if a child has left the school. Once your child leaves, media used for marketing or display purposes during your child's time at the school will remain in use until updated. Media of your child may continue to be used within school and for marketing purposes, unless we are informed in writing otherwise.

**Without this permission, we will be unable to cater for your child at Chepstow House School. This permission will be valid for your child's school career with us. Please complete and return the reverse of this form.**



**PERSONAL DATA CONSENT, PHOTOGRAPHY & USE OF IMAGES OR RECORDINGS CONSENT**

I give permission for my child's personal data to be stored and used as detailed above.

I give permission for my child to be photographed and videoed for school purposes. I understand that only first names, class names, year group and/or school name will be linked to any photographs or videos displayed online in the external community.

We/I have read the school's policy on taking, using and storing of images of children, and we/I agree that the data and media can be used as detailed in the policy.

We/I understand that the school will always try to contact us in advance when a visit by the media is expected.

We/I understand that we/I may revoke or amend this consent at any time by giving written notice to the school.

Student's Name: \_\_\_\_\_ Year Group : \_\_\_\_\_

Parent's signature: \_\_\_\_\_ Date: \_\_\_\_\_

Print Name: \_\_\_\_\_