



St. Margaret's-at-Cliffe Community Primary School

Image Use Policy

Date: March 2024

Reviewed and Ratified By: Governing body on 21 March 2024

Review Date: Every three years - March 2027

Signed : _____ Helen King, Chair of Governors

Signed : _____ Helen Comfort, Executive Headteacher

Equality

We recognise our duty and responsibility to establish equality for all pupils, staff, other members of the school community and service users regardless of their ethnicity, gender, disability, sexual orientation; age or beliefs as defined within existing equalities legislation (please see 'Single Equality Scheme').

Data Controller: St Margaret's-at-Cliffe Primary School
School Designated Safeguarding Leads: Rachel Hindle and Helen Comfort
School online Safety Coordinator: Julian Oliver

Official use of Images/Videos of Children by the School

Scopes and aims of the policy

- This policy seeks to ensure that images and videos taken within and by St. Margaret's-at-Cliffe Primary School are taken and held legally and the required thought is given to safeguarding all members of the community.
- This policy applies to all staff, including the governing body, teachers, support staff, external contractors, visitors, volunteers and other individuals who work for or provide services on behalf of the school (collectively referred to as 'staff' in this policy) as well as children and parents/carers.
- This policy must be read in conjunction with other relevant school policies including, but not limited to; safeguarding and child protection, anti-bullying, behaviour, data security, image use, Acceptable Use Policies and relevant curriculum policies including SRE.
- This policy applies to all images, including still and video content taken by St. Margaret's-at-Cliffe Primary School.
- All images taken by the school will be used in a manner respectful of the Data Protection Regulation Principles. This means that images will be:
 - lawfully, fairly and with transparency processed
 - processed for specific, explicit and legitimate purposes only
 - used in a way that is adequate, relevant and necessary
 - accurate and up to date
 - kept on file for as long as is necessary for the purpose
 - kept securely
- The DSL and/or Management team is responsible for ensuring the acceptable, safe use and storage of all camera technology and images within the school. This includes the management, implementation, monitoring and review of the Schools Image Use Policy.

Parental Consent

- Written permission from parents or carers will always be obtained before images/videos of children are taken, used or published by the school.
- Written parental consent will always be sought to take and use photographs offsite for professional, marketing and training purposes. This may be in addition to parental permission sought for onsite images.
- Written consent from parents will be kept by the school where children's images are used for publicity purposes (such as brochures or publications), until the image is no longer in use.
- Parental permission will be sought when children are admitted to the school.
- A record of all consent details will be kept securely on file. Should permission be withdrawn by parents/carers at any time, then all relevant images will be removed from our network and physical copies disposed of and the record will be updated accordingly.

Safety of Images and videos

- All images taken and processed by or on behalf of the school will take place using school provided equipment and devices.
- Staff will receive information regarding the safe and appropriate use of images as part of their safeguarding training and responsibilities.
- All members of staff (including volunteers) will ensure that all images are available for scrutiny and will be able to justify any images in their possession.
- Images will not be kept for longer than is to be considered necessary. A designated member of staff (DSL) will ensure that all photographs are permanently wiped from memory cards, computer hard and portable drives or other relevant devices once the images will no longer be of use.
- All images will remain on site at all times, unless prior explicit consent has been given by both DSL and the parent or carer of any child or young person captured in any photograph.
 - Should permission be given to take any images off site then all relevant details will need to be recorded, for example who, what, when and why and data will be kept securely for example with appropriate protection.
- The DSL reserve the right to view any images taken and/or to withdraw or modify a member of staffs' authorisation to take or make images at any time.
- Only official school owned equipment (e.g. work provided digital or video cameras) will be used by staff to capture images of children for official purposes. Use of personal cameras by staff is prohibited
- Any apps, websites or third party companies used to share, host or access children's images will be risk assessed prior to use.
- The school will ensure that images are held in accordance with the General Data Protection Regulation (GDPR) and suitable child protection requirements (if necessary) are in place.
- Photographs will be disposed of should they no longer be required. They will be returned to the parent or carer, deleted and wiped or shredded as appropriate. Copies will not to be taken of any images without relevant authority and consent from the DSL and the parent/carer.

Publication and sharing of images and videos

- Images or videos that include children will be selected carefully for use, for example only using images of children who are suitably dressed.
- Images or videos that include children will not provide material that could be reused.
- Children's' full names will not be used on the website or other publication, for example newsletters, social media channels in association with photographs.
- The school will not include any personal addresses, emails, telephone numbers, fax numbers on video, on the website, in a prospectus or in other printed publications.

Safe Practice when taking images and videos

- Careful consideration is given before involving very young or vulnerable children when taking photos or recordings, who may be unable to question why or how activities are taking place.
- The school will discuss the use of images with children and young people in an age appropriate way.
- A child or young person's right not to be photographed is to be respected. Images will not be taken of any child or young person against their wishes.
- Photography is not permitted in sensitive areas such as changing rooms, toilets, swimming areas etc.

Use of Closed-Circuit Television (CCTV)

- All areas which are covered by CCTV will be well signposted, and notifications are displayed so that individuals are advised before entering such vicinity.

- Recordings will be retained for a limited time period only and for no longer than their intended purpose. This will generally be a maximum of 30 days. All recordings are to be erased before disposal.
- Regular auditing of any stored images will be undertaken by the Data Controller and/or DSL or other member of staff as designated by the management team.
- If cameras record activities taking place on the premises which are of a criminal nature or give any cause for concern, then information will be referred to the appropriate agency.
- CCTV cameras will be appropriately placed within the school.

Use of Webcams

- Parental consent will be obtained before webcams will be used within the school environment for curriculum or educational purposes.
- All areas which are covered by webcams for security or safeguarding purposes will be well signposted, and notifications are displayed so that individuals are advised before entering such vicinity.
- Recordings will be retained for a limited time period only and for no longer than their intended purpose. This will generally be a maximum of 30 days. All recordings are to be erased before disposal.

Use of photos and videos of children by others

Use of photos and videos by parents/carers

- Parents/carers are permitted to take photographs or video footage of events for private use only.
- Parents and carers who are using photographic equipment must be mindful of others, including health and safety concerns, when making and taking images.
- The opportunity for parents/carers to take photographs and make videos can be reserved by the school on health and safety grounds.
- Parents/Carers are only permitted to take or make recordings within designated areas of the school. Photography is not permitted in sensitive areas such as changing room, toilets, swimming areas etc.
- The right to withdraw consent will be maintained and any photography or filming on site will be open to scrutiny at any time.
- Parents may contact the school/DSL to discuss any concerns regarding the use of images.

Use of photos and videos by children

- The school will discuss and agree age appropriate acceptable use rules with children regarding the appropriate use of cameras, such as places children cannot take the camera (e.g. unsupervised areas, toilets etc).
- The use of non school provided devices e.g. mobile phones, tablets, children's own digital cameras, is covered in the school online safety policy.
- All staff will be made aware of the acceptable use rules regarding children's use of cameras and will ensure that children are appropriately supervised when taking images for official or curriculum use.
- Members of staff will role model positive behaviour to the children by encouraging them to ask permission before they take any photos.
- Photos taken by children for official use will only be taken with parental consent and will be processed in accordance with the General Data Protection Regulation (GDPR) and the Data Protection Act.
- Parents/carers will be made aware that children will be taking photos/videos of other children and will be informed how these images will be managed by the school e.g. will be for internal use by the school only (not shared online or via any website or social media tool).
- Photos taken by children for official use will be carefully controlled by the school and will be checked carefully before sharing online or via digital screens.

- Still and video cameras provided for use by children and the images themselves will not be removed from the school.
- Children will not be permitted to use personal cameras or camera phones in school.
- Children on residential trips will be permitted to take cameras to use during the day time, but cameras will be stored overnight by staff.

Use of images of children by the media

- Where a press photographer is to be invited to celebrate an event, every effort will be made to ensure that the newspaper's (or other relevant media) requirements can be met. A written agreement will be sought by the school requesting a pre-agreed and accepted amount of personal information (e.g. full names) that can be published by the press along with images and videos.
- The identify of any press representative will be verified and access will only be permitted where the event is planned, and where press are to be specifically invited to attend. No authorisation will be given to unscheduled visits by the press under any circumstances.
- Every effort will be made to ensure the press abide by any specific guidelines should they be requested. No responsibility or liability however can be claimed for situations beyond reasonable control, and where the school is to be considered to have acted in good faith.

Use of external photographers

- External photographers who are engaged to record annual portrait pictures and/or any events will be prepared to work according to the terms of the school online Safety policy.
- Photographers will sign an agreement which ensures compliance with the General Data Protection Regulation (GDPR)
- Images will only be used for a specific purpose, subject to parental consent.
- Photographers will not have unsupervised access to children and young people.