

Taking, Storing and Using Images of Children Policy (Trust including EYFS)

Related Policies

- Trust Privacy Notice
- Child Protection Policy
- Staff Code of Conduct
- Anti-Bullying Policy
- E-Safety Policy
- CCTV Policy
- Acceptable Use Policies

1. Introduction

- I. 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 Bede’s Trust (“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 parents and pupils themselves, and the media.
- II. 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 e.g. signage about the use of CCTV; and more general information about use of pupils’ personal data, e.g. the School’s Privacy Notices. Images of pupils in a safeguarding context are dealt with under the School’s relevant safeguarding policies which can be found on the School website and MyBedes.

2. General points the reader should be aware of

- I. Certain uses of images are necessary for the ordinary running of the School; other uses are in the legitimate interests of the School and its community and unlikely to cause any negative impact on children. The School is entitled lawfully to process such images and take decisions about how to use them, subject to any reasonable objections raised.
- II. Parents who accept a place for their child at the School are invited to indicate their preference to the School using images of their child as set out in this policy, this consent should be indicated in the School’s Terms and Conditions. However, parents should be aware of the fact that certain uses of their child’s images may be necessary or unavoidable (for example if they are included incidentally in CCTV or a photograph).
- III. We hope parents will feel able to support the School in using pupil images to celebrate the achievements of pupils, sporting and academic; to promote the work of the School; and for important administrative purposes such as identification and security.
- IV. Any parent who wishes to limit the use of images of a pupil for whom they are responsible should contact the Data Compliance Manager in writing. The School will respect the wishes of parents and indeed pupils themselves wherever reasonably possible, and in accordance with this policy.

- V. Parents should be aware that, from the age of 13 and upwards, the law recognises pupils' own rights to have a say in how their personal information is used – including images.

3. Use of Pupil Images in School Publications

- I. The School relies on 'legitimate interest' for necessary use of images for the day to day running of the School including identifying pupils, management information systems, safety, recording team activities and other purposes, including:
- a) On internal displays (including clips of moving images) on digital and conventional notice boards within school premises;
 - b) In communications with the School community (parents, pupils, staff, Governors and alumni) including email, on the School intranet and by post; and
 - c) 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 without permission).
- II. The School relies on 'consent' when publishing images or students' full names in external media, requesting consent from parents where appropriate (owing to the pupil's age or nature of the use). The School will also seek the verbal or written consent of a particular pupil or parent before publishing any image where that pupil is a particular focus of the shot, or identified by name, but not usually when included as part of a larger group or team shot, including:
- a) 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 (and in some circumstances the School will seek the parent or pupil's specific consent, depending on the nature of the image or the use).
- III. The source of these images will predominantly be the School's staff (who are subject to policies and rules in how and when to take such images), or a professional photographer used for marketing and promotional purposes, or occasionally pupils. The School will only use images of pupils in suitable dress (and the images will be stored securely and centrally).

4. Use of Pupil Images for identification and Security

- I. All pupils are photographed on entering the School and, thereafter, at regular intervals, for the purposes of internal identification. These photographs identify the pupil by name, year group, house and form group.
- II. CCTV is in use on school premises, and will sometimes capture images of pupils. Images captured on the School's CCTV system will be used in accordance with the School's Privacy Notices and CCTV Policy.

5. Use of Pupil Images in the Media

- I. Where practically possible, the School will always notify parents in advance when the media is expected to attend an event or school activity in which school pupils are participating, and will make every reasonable effort to ensure that any pupil whose parent has refused permission for images of that pupil, or themselves, to be made in these circumstances are not photographed or filmed by the media, nor such images provided for media purposes.

- II. The media often asks for the names of the relevant pupils to go alongside the images, and these will be provided only if the parent or pupil has consented as appropriate.

6. Withdrawal of Consent

- I. Parents and pupils should be aware that they have the right to withdraw their consent at any time subject to certain limitations, including:
 - a. Objecting or withdrawing consent will not necessarily mean that the School will not continue to process images of a pupil that are either necessary for administration of the School, or separately consented by parents or the child, or where the School requires it and is otherwise lawfully entitled to do so.
 - b. In certain circumstances it may not be possible to change printed publications, such as the School magazine or prospectus, or third party publications (for example where the School has placed an advert or provided an image to a newspaper, while there was consent in place and prior to that consent being withdrawn).

7. Security of Pupil Images

- I. Professional photographers and the media are accompanied at all times by a member of staff when on school premises. The School uses only reputable professional photographers and makes every effort to ensure that any images of pupils are held by them securely, responsibly and in accordance with the School's instructions.
- II. The School takes appropriate technical and organisational security measures to ensure that images of pupils held by the School are kept securely on the School systems, and protected from loss or misuse. The School will take responsible 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.
- III. All staff are given guidance on the School's Policy on Taking, Storing and Using Images of Children, and on the importance of ensuring that images of pupils are made and used responsibly, only for school purposes, and in accordance with school policies and the law.

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

- I. Parents, guardians or close family members (hereafter 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:
 - a) 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.
 - b) 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.
 - c) 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.
 - d) Parents are reminded that such images are for personal use only. Images which may, expressly or not, identify other pupils should not be made accessible to others via the internet (for example on Social Media), or published in any other way.

- e) Parents are reminded that copyright issues may prevent the school from permitting the filming or recording of some plays and concerts. The school will always print a reminder in the programme of events where issues of copyright apply.
 - f) Parents may not film or take photographs in changing rooms or backstage during school productions, nor in any other circumstances in which photography or filming may embarrass or upset pupils.
- II. 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.
- III. The School sometimes records plays and concerts professionally (or engages a professional photographer or film company to do so), in which case CD, DVD or digital copies may be made available to parents for purchase. Parents of pupils taking part in such plays and concerts will be consulted if it is intended to make such recordings available more widely.

9. Use of Cameras and Filming Equipment by Pupils

- I. 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.
- II. The use of camera 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.
- III. The misuse of images, cameras or filming equipment in a way that breaches this Policy, or any of the policies listed in the 'Related Policies' section of this document is always taken seriously, and may be the subject of disciplinary procedures or dealt with under the relevant safeguarding policy as appropriate.

Owned by:	Data Compliance Manager
Authorised by:	Exec
Date:	November 2018
Review Date:	November 2020
Circulation:	All Staff, parents, students, website