

Image Use Policy

Written by: Marcus Link Date: November 2017
Approved by: College of Management Date: November 2017
Council of Trustees Date: November 2017

Date for next review: October 2019

Those with specific responsibilities:

- Data Controller: Marcus Link – School Business Manager
- Designated Safeguarding Leads (DSL): Gaby Wood
- Trustee with Safeguarding Responsibility: Juliet Crittenden

Official Use of Images/Videos of Children by the School

All images taken by the school will be used in a manner respectful of the eight Data Protection Principles. This means that images will be:

- fairly and lawfully processed
- processed for limited, specifically stated purposes only
- used in a way that is adequate, relevant and not excessive
- accurate and up to date
- kept on file for no longer than is necessary
- processed in line with an individual's legal rights
- kept securely
- adequately protected if transferred to other countries

Procedure

The Designated Safeguarding Leads (DSL) and the Data Controller are 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 school's Image Use Policy.

Consent

- Parental permission will be sought for the use of photos and videos on admission to the school and on an annual basis via the annual consents form as follows:
 - In publications and publicity produced by the school: non-electronically (e.g. prospectus, leaflets, notice board, posters, Friday Flier)
 - On the school website, electronic prospectus etc.

- For externally produced publications (e.g. local or national newspapers, magazine) – this may mean their photo and name is used in print
- To be recorded on video/ film or web-cam and used on the school website
- To be recorded on video/ film or web-cam and the film be available on DVD
- Photographs/ film on school social media sites (e.g. Facebook, Instagram)
- 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- Should permission be withdrawn by parents/carers at any time, then all relevant images will be removed and disposed of and the record will be updated accordingly. The class teacher / guardian will be notified.
- Written permission from parents or carers will be obtained before images/videos of children are electronically published by the school.

Storage of Images

- Images will not be kept for longer than is to be considered necessary. The Data Controller will ensure that all photographs are permanently wiped from memory cards, computer hard and portable drives or other relevant devices once the images are no longer in use. The receptionist will physically undertake the task for the school owned devices.
- All images will remain on site at all times, unless prior explicit consent has been given by both the Data Controller / DSL and the parent or carer of any child or young person captured in any photograph. Should permission be given to take images off site, all relevant details are to be recorded, for example who, what, when and why and data will be kept securely (e.g. with appropriate encryption) by the Data Controller.

Controlling Data

- The Data Controller and/or 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.
- Any memory stick, CD or storage device containing images of children to be taken offsite for further work will be where possible suitably encrypted and will be logged in and out by the Data Controller and/or DSL and monitored to ensure it is returned within the expected time scale.
- Images or videos that include children will be selected carefully when used online and will not provide material that could be reused.
- Children's' full names will not be used on the website 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.
- The school will only use images of children who are suitably dressed.
- Children's work will only be published with their permission or their parents' consent.
- 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.
- Only specific school owned equipment (e.g. work provided digital or video cameras) will be used by staff to capture images of children for official purposes. Should staff need to use their personal

equipment they must seek prior permission from the Data Controller and to contain school owned memory cards or devices.

- Children's images will not be published or shared with any apps, websites or third party companies without the explicit consent of the Data Controller, this includes any facebook or social media platform bearing the name of South Devon Steiner School. The school will ensure that images are held in accordance with the Data Protection Act and suitable child protection requirements (if necessary) are in place.
- 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.
- Images will not be taken of any child or young person against their wishes. A child or young person's right not to be photographed is to be respected.
- Photography is not permitted in restricted areas which includes changing rooms, toilets etc
- 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 be taken of any images without relevant authority and consent from the Data Controller and/or DSL and the parent/carers.
- All parents/carers agree as part of enrolment to the school to adhere to the schools Image Use Policy.

Use of Photos/ Videos by Parents/ Carers

- The use of mobile devices (phones, MP3 players, tablet devices) is explicitly not allowed to capture any image of any pupil engaged in a school lead activity.
- The online publication of any image of any pupil with the exception of own children by a parent/ carer is expressly forbidden without the written consent of the Data Controller.
- Parents/ carers are permitted to take photographs or video footage of their own child/ren in events for private use only and with written prior permission sought from the class teacher/ guardian. *Please be mindful of our **Mobile Camera, Phone & ICT Devices Policy**, as mobile phones are not to be used under any circumstances for taking images at the school without express permission.*
- 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 rooms, toilets etc.
- The opportunity for parents/ carers to take photographs and make videos can be refused by the school at any time.
- Parents and carers who are using photographic equipment must be mindful of others when making and taking images.
- 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 Data Controller/ DSL to discuss any concerns regarding the use of images.

Use of Photos/ 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, children’s own digital cameras, is covered in the school’s **Mobile Camera, Phone & ICT Devices** and **e-Safety** policies.
- 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 prior parental consent and will be processed in accordance with the Data Protection Act 1998.
- 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 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.

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.
- The school will attempt to arrange for a written agreement between parents/ carers and the press which will request that a pre-agreed and accepted amount of personal information (e.g. first names only) can be published along with images and videos. The school will always require that any photograph is first agreed with the school so that permissions can be checked and any information can be checked.
- The identity 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 Professional Photographers

- Professional photographers who are engaged to record any events will be prepared to work according to the terms of the school’s e-Safety policy.
- Photographers will sign an agreement which ensures compliance with the Data Protection Act and that images will only be used for a specific purpose, subject to parental consent. The images will remain the property of the school.

- Photographers will not have unsupervised access to children and young people.

Use of Closed-Circuit Television (CCTV)

The school currently does not operate CCTV technology. However, the following arrangements will be put in place when applicable:

- 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 Senior Leadership 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. (The school does not currently make use of webcams for security or safeguarding purposes.)
- 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.

Monitoring

Where there is a serious concern that a member of staff or pupil is not adhering to this policy the Designated Safeguarding Lead and/or the Data Controller will ask to check the particular device (i.e. smart phone, PC, laptop, camera) in order to ensure that no breaches of protocol are in place.

Related policies:

- Safeguarding and Child Protection Policy
- E-Safety Policy
- Mobile Camera, Phone & ICT Devices Policy
- Data Protection and Information Sharing Policy