



## CAMERA AND IMAGE POLICY

This policy should be reviewed biennially or as required by legislation.		
Action	Reviewer	Date
Review	EG/MZ	Nov 2023, Jan 2025
Approved by Chair of COM	DD	Jan 2025
Date for next internal review		Jan 2027

### Camera and Image Policy

**This Policy must be considered with the school's other policies governing use of ICT and devices within the school:**

- Acceptable Use Policy
- Data Protection Policy
- Online Safety Policy
- Mobile and Electronic Device Policy
- Data Retention Policy
- CCTV Policy
- Staff Code of Conduct
- Whistleblowing Policy

#### **Introduction:**

This policy covers all pupils in the school, including those in the Early Years Foundation Stage.

The use of cameras should be considered part of everyday life. As such, children and staff should be encouraged to use this technology in a positive and responsible way. Practical steps must be taken to ensure that the use of cameras and images will be managed sensitively and respectfully. A proactive and protective ethos is to be reflected which will aim to promote effective safeguarding practice. It is acknowledged that technology itself will not present the greatest risks, but the behaviours of individuals using such equipment. Dedicated cameras are rarely used except by professional school photographers. All images are taken using cameras on School iPads. Staff do not take photographs using personal mobile phones or other personal electronic devices with imaging and sharing capabilities and parents, carers, visitors and contractors are not permitted to use mobile phones (cameras) in any areas of the School.

**Aim:**

The Camera and Image policy will aim to ensure safer and appropriate use of cameras (iPads) and images through agreed and Acceptable IT Use procedures.

**Scope:**

The Camera and Image Policy will apply to all individuals who are to have access to and/or be users of work-related photographic equipment. This will include children, staff, volunteers, students, Council of Management members, visitors, contractors and community users. This list is not to be considered exhaustive.

This policy will apply to use of any photographic equipment. This will include mobile phones, cameras and any other form of digital technology and resources for sharing, storing and printing images.

**How we may use images:**

- We may use photographs or videos of your child for the School's website and social media sites or prospectus to show prospective pupils what we do here and to advertise the School. We may continue to use these photographs and videos after your child has left the School.
- Sometimes we use photographs and videos for teaching purposes, for example, to record a drama lesson.
- We use CCTV to make sure the School site is safe. CCTV is not used in private areas such as changing rooms or toilets, is sign posted throughout the School and is needs assessed.
- Use photographs for the school newsletter, distributed to existing parents through iSAMs
- Fundraise, market and promote the School. For example, by using photographs of our pupils in the School prospectus, on the School's website or in social media.

**Responsibilities:**

The Designated Safeguarding Lead is to be responsible for ensuring the acceptable, safe use and storage of all camera technology and images, including the management, implementation, monitoring and review of this policy.

**Legislative Framework:**

This policy complies with the requirements of the [Data Protection Act 2018](#), [Freedom of Information Act 2000](#), [Human Rights Act 1998](#), the Statutory Framework for the Early Years Foundation Stage (Information and Records).

All images will be used in a manner respectful of the eight Data Protection Principles.

This means that images will be:

- Fair and lawful
- 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 (N/A)

#### **Code of Conduct:**

All staff must adhere to the Staff Code of Conduct at all times.

The use of cameras and photographic equipment is only to be authorised by the DSL. Staff should only use such equipment for purposes as designated by the DSL. It must be recognised that individuals may be given different levels of responsibility in terms of authorised use.

Cameras, tablets and other photographic equipment will be designated for work related purposes only. Such equipment must be used only for agreed purposes. The use of personal photographic equipment is not permitted. Should it be decided that for an exceptional reason personal photographic equipment is to be used, explicit authorisation must be obtained from the Headteacher/DSL.

The Headteacher/DSL will be responsible for ensuring that the following occurs when staff are using cameras.

- Each class to have their designated class iPad for teacher use only.
- Each class teacher to use their class designated tablet on school trips.
- Tablets taken out of the school on trips to be noted on the risk assessment.
- Any difficulties encountered or concerns reported.

The use of personal USB sticks, the transferring of images via unfiltered web mail or via mobile media is not permitted. Should remote access be given to servers or systems where images are to be stored, access will only be given as authorised by the DSL. The DSL must reserve the right to view any images taken and/or to withdraw or modify an individual's authorisation to take or make images at any time. Staff must ensure that all images are available for scrutiny and be able to justify any images in their possession. The DSL will be responsible for ensuring the safe storage of all images in accordance with this Policy.

Staff have a duty to report any concerns relating to potential misuse. Clear whistleblowing procedures are to be in place. An anonymous reporting system will also be promoted and used to facilitate this process.

## **CONSENT**

### **Statement of intent:**

Consent to take photographs or record images of children is obtained through the privacy notice that parents receive with the parent contract. The parents or carer will reserve the right to refuse or withdraw their consent at any time by emailing the school office. Partial or restricted consent may also be given where deemed necessary by the parents or carer.

Consent must be requested because an image of a child is considered to be personal data under the Data Protection Act and consent must be obtained as a requirement of the Act. Although children cannot give consent themselves until the age of 12 years, the child's view is however, to be considered at all times, regardless of age.

It should be recognised that some children are more vulnerable than others, for example, disabled children, children in care, those with a child protection or child in need plan, children with EAL, black, minority and ethnic children and those who have been subject to domestic abuse. For a range of reasons such children's security may be compromised more than others, and therefore extra precautions must be considered in such circumstances.

### **Procedures:**

Prior consent from each parent will always be obtained before the child starts school. If it should not be possible to obtain prior consent, no images will be taken involving the individual child.

Parents may opt out of their children's photographs being used in way stated above in the "How we may use images" section. Please refer to our Privacy and Data Retention Policies.

## **IMAGES**

### **Statement of intent:**

It must be recognised that children and young people could be exposed to potential risk should images be misused, including:

- The making, taking and distribution of inappropriate and indecent images
- Grooming (the process by which child sex offenders and paedophiles will befriend victims through direct or indirect contact, often preceded by attempts to get personal information about a child.

It must be remembered that such incidents are very rare but a full understanding of what constitutes a risk is the first step towards minimising danger.

Protective and precautionary measures must therefore be considered when taking, making and using images of children. All staff will be expected to agree and sign up to the Acceptable Use Policy.



### **Procedures:**

The purpose and content of all proposed images must always be considered. Is taking a photograph or video the most effective option?

Careful consideration must be given before involving young and vulnerable children who may be unable to question why or how activities are to take place

Sensitivity must be shown to any child who is to appear uncomfortable. Images will therefore not be taken of any child against their wishes. Coercion must not be used to encourage a child to participate when it has been clearly indicated they do not want to be involved. A child's right not to be photographed is to be respected.

The taking or making of images of a child in a one to one situation is to be avoided whenever possible, unless there is an agreed and specified reason for doing so. This event may be seen as intrusive and open to misinterpretation. It leaves both the adult and child in a vulnerable position and is therefore not to be considered accepted practice.

Individual close ups of children often provide little context or purpose. A group of children will show an activity or situation to better affect. Unnecessary close-up pictures of an individual child with no surrounding context or purpose are to be avoided.

Group photographs need consent from parents and carers. No child can appear in a group photograph without parental permission and they should not be taken in this case.

Photographs are not to be taken of injuries, whether accidental or non-accidental. Where necessary medical help will be sought and in the case of suspected non-accidental injury the Safeguarding Policy will be implemented with immediate effect.

All images should reflect the diversity of the children who attend the school. No child is to be favoured in photographs.

Images which could be considered to cause distress, upset or embarrassment must not be used.

Images of children must only be taken when they are in suitable dress. No child should ever be photographed, in whatever circumstances, in a state of undress. Photographs of children doing sporting activities must be taken with care and appropriateness, in particular the angle of shots taken.

Taking photos in sensitive areas e.g. the toilets, is not permitted.

No child's full name or other identifying information should be paired with their photograph on captions or accompanying text. This applies to displays, documentation panels, name cards, and similar materials. Extra care must be taken in public areas, such as the noticeboard in the Upper School playground or the entrance hall at the Elmore Street site. Best practice is to avoid having names and photos together, as this makes children easily identifiable. Instead, we mix photos on displays for added security.



## The Children's House

It must be ensured that if a child's name is mentioned (for any agreed reason) e.g. a prospectus, a photograph will not appear.

The minimum amount of information possible is to be provided to preserve the identity of children at all times. No personal details such as home telephone numbers, email or home addresses are to be disclosed.

### **USES OF IMAGES OF CHILDREN BY THE MEDIA**

#### **Statement of intent:**

There may be occasions where the press are invited to a planned event to take photographs of the children who are to take part. It should be noted that the press enjoy special rights under the Data Protection Act, which permit them to publish material for journalistic purposes.

Generally, parents take pride in 'press cuttings'. For the majority, pride will often outweigh any fears about the image and/or information being subject to abuse. However, some parents may object to information about, and images of, their own children being published. As a result, it is to be ensured that parental/carer consent will be sought before the press is to be given any access to children. Should a parent/carer choose not to give permission for their child to be photographed in such circumstances, this right must be observed at all times.

#### **Procedures:**

The manner in which the press will use images is to be controlled through relevant industry codes of practice as well as law. In this way a check is to be put on the potential improper use of images of children by the press. Additional checks will also be carried out by the Headteacher/DSL or IT manager. This will ensure that broadcasters and press photographers are to be made aware of the sensitivity which must be considered in respect of detailed captioning, one to one interviews, and close up sports photography.

Where a press photographer is to be invited to celebrate an event, every effort will be made in advance to ensure that the newspaper's (or other relevant media) requirements are able to be met. Where, for example, a newspaper is to be invited to take photographs of children it is unacceptable for their names to be completely withheld. Newspapers will be very unlikely to print anonymous photos. An agreement will therefore be sought between parents and carers and the press which will request that first names only will be published. Responsibility and liability however cannot be held for the actions of a third-party organisation, should they choose not to abide by any such agreement once in place.

Consideration will therefore be given to the requirements of the press before any planned event. Parental/carer permission/opinion will be the key factor in making a decision as to whether the press will be invited or not. This may mean that only those children whose parents or carers will be happy for photographs and names to be published, can be given the opportunity to be involved in such events.



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Should it not be considered possible or appropriate to limit the children who are to be photographed, for example, because a specific group of individuals are to have achieved something special (and parental permission regarding the publication of first names is to be withheld by one or more of the group) efforts will be made to negotiate a revised agreement with the press which must be deemed acceptable to all parties. Should it not be possible for such an agreement to be reached, the option of newspaper publicity will have to be foregone.

The identity of any press representative will be verified. Access will only be permitted where the event is to be planned, and where the press have been specifically invited to attend. No authorisation will be given to unscheduled visits by the press under any circumstances. In the event that the press should turn up uninvited, for reasons beyond the control of the setting, every reasonable effort will be made to ensure that children, parents and carers are protected from press intrusion.

Every effort will be made to ensure the press abide by any specific guidelines should they be requested by the setting. No responsibility or liability however can be claimed for situations beyond reasonable control, and where the setting is to be considered to have acted in good faith.

### **USE OF A PROFESSIONAL PHOTOGRAPHER**

#### **Statement of intent:**

It will be ensured that any professional photographer who is to be engaged to record any events will be prepared to work according to the terms of this policy document and the following guidelines:

- In the context of data protection legislation, the photographer will be considered a 'data processor' and any agreement with them will be in accordance with the Data Protection Act 1998
- Photographers will only be used where they will guarantee to act appropriately to prevent unauthorised or unlawful processing of images' and will insure against accidental loss or destruction of, or damage to, personal data.

#### **Procedures:**

Photographers will be asked to ensure:

- Images are only to be used for a specified purpose and will be used in any other context
- Images will not be disclosed to any third party unless it is to be a specific requirement to do so in order to fulfil the requirements of the agreement, such as a third-party printing company.

Details of any checks regarding suitability, which are to include evidence of the DBS checks will be requested. Photographic identity will be checked on arrival. Should there be any concerns in respect of the authenticity of the photographer, entry will be refused. Such concerns will be reported as deemed appropriate.



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Photographers are to be treated as any visitor. As such, appropriate levels of supervision will be in place at all times. This will ensure that no unsupervised access to children will be given.

### **CHILDREN PHOTOGRAPHING EACH OTHER**

Children will on occasion be given the opportunity to photograph each other and their surroundings. This practice will often occur during off-site activities and for most children it will be normal practice to take photographs to record a trip or event. Children may also be given access to cameras (iPads) within the school to support their learning and development needs. These activities will be encouraged in a safe and enabling environment. Pupils whose parents have consented for them to travel to or from school alone will hand in personal devices to the School office on arrival and pick these up before they leave at the end of the day.

### **PARENTS AND CARERS PHOTOGRAPHING CHILDREN**

Parents may wish to take photographs or make recordings of their child taking part in school events to which families are invited, such as concerts, Wheelies, or the summer fair. On joining the school, parents will be required to sign their agreement not to share, distribute or put online through social network platforms, any photographs or film taken in school performances or events. The sharing of such images is in contravention of the Data Protection Act 1988 without the express permission from every other parent for all children present in the image.

Parents using photographic equipment must be mindful of others when making and taking such images. Care must be taken to ensure the view of others will not be obscured and intrusive photography or filming must be avoided at all times. The right to withdraw consent will be maintained and any images or filming must be open to scrutiny at any time.

The school is unable to grant permission to children's nannies or extended family members for photographing or recording school events since we are unable to seek individual agreements not to share or distribute these images online or via social networks.

Every effort must be made to ensure that individuals with no connection to the school are to be given no opportunity to film covertly. Staff are to be given authority to question anybody they do not recognise (subject to their own safety being ensured) should they be observed using any photographic equipment at events and productions or within the general vicinity. Care will be taken at all times to prevent any opportunist photography or filming taking place.

### **CLOSED CIRCUIT TELEVISION**

#### **Statement of intent:**

CCTV is to be used, and use must be justified, for the following purposes:

- To control access through the main gate/door into both sites, and the church courtyard at the Upper School
- To monitor security





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- For site management, for example monitoring delivery arrivals and for areas out of sight e.g. the entrance corridor in the Nursery.
- For safeguarding purposes, e.g. to monitor playground incidents and improve safety
- To act as an effective deterrent to prevent crime and to discourage trespass

### **Procedures:**

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

Should CCTV be used within the school it must be ensured that the manufacturer's instructions and data protection and information sharing guidelines are to be followed at all times. This is to include the appropriate storage and disposal of all recordings, please see our [Data Retention Policy](#).

Recordings will be retained for a limited time period only and for no longer than their intended purpose. This is for 3 weeks, by which time the CCTV will record over the same tape in a loop fashion.

Regular auditing of any stored images will be undertaken by the ICT Co-ordinator or Headteacher/DSL.

Every effort will be made to avoid inadvertently taken inappropriate images and therefore the cameras will be placed and positioned sensitively. There are no cameras in the toilet areas.

During operational and out of hours periods, if a camera records any inappropriate activities of a criminal nature or would give cause for concern, the information will be referred to the appropriate agency.

Images taken outside operational hours will be erased in accordance with the procedures previously identified.

### **WEB CAMS – Zoom/MS Teams**

#### **Statement of intent:**

Web cams (through Zoom or MS Teams) will only be used in school for educational purposes. These sessions will not be recorded.

#### **Procedures:**

Calendar invitations are sent directly to staff members through their Office365 account and the links to the external participant accessed directly through Office365. Office365 is password or biometrically protected, with two factor authentication for access through new devices.

#### **Mobile phones:**

The Mobile Phone and Electronic Device Policy is to be referred to.



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### **Use of internet/intranet sites:**

The Online Safety Policy is to be referred to.

### **THE WEBSITE AND SOCIAL MEDIA ACCOUNTS (Instagram and X)**

#### **Statement of intent:**

It is to be understood that the posting of images on websites and social media may raise particular issues and concerns.

It must be recognised that there will be a risk that such images could be subject to manipulation and circulation without consent or even knowledge. The risk that children could be exploited in some way after having their image displayed must also be acknowledged.

#### **Procedures:**

Images must not include names of children; however we may state what year group the children are in.

Parents may "Opt Out" and ask the school to remove images of their child from the website or social media policy. An Opt Out form will be sent to the whole parent body periodically and the school will retain on iSAMS a record of children whose parents do not wish them to appear on social media.

### **LEARNING JOURNEYS**

#### **Statement of intent:**

Staff track children's progress and have a system for channelling the wealth of information gathered about individual children into a manageable summary. Detailed individual observations of self-initiated activity in a particular context, photos and special moments contained in a child's portfolio all document the child's unique 'learning journey'. Such portfolios will often be known as Learning Journeys and recorded in children's Special Books to document and monitor children's individual progress.

#### **Procedures:**

The information contained within each learning journey/special book is to relate to an individual identifiable child therefore it is to be treated as personal data. This means that such information is to be stored securely when not in use, the aim being to avoid unauthorised access to potentially sensitive data.

Photographs used in children's special books will often contain images of other children as well as the child whose book it is. On joining the school, parents will be required via the school's permission slips to sign their agreement to this and to agreeing that photographs in special books will be for personal use only and not for publication or distribution.



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Parents and carers must be given the option to view any images before they are to be included in any learning journey, should they request to do so. Parents and carers will also be permitted to restrict their consent. This may mean that a group image can only be included in specified learning journeys, for example, those which are to belong to close friends. Should it not be possible to gain consent the relevant image must not be shared across learning journeys with other children.

### **ECT AND STAFF TRAINING PORTFOLIOS**

#### **Statement of intent:**

During training, staff may be required to compile portfolios which will be used to document and evidence their own learning. Part of this documentation is likely to include images of the staff member working alongside children participating in various activities. Should such evidence be required parent or carer consent will be requested.

The Headteacher/DSL is to have a duty of care to ensure staff are to act responsibly in compiling images to be included in training portfolios. Staff will therefore be monitored in their taking, making and use of such images. All images will be subject to scrutiny and regular audits will be carried out to ensure that all relevant policies and procedures are to be adhered to.

#### **Procedures:**

The DSL will oversee the compilation of images which are to be used by staff when completing training portfolios. Any images which are deemed to be unsuitable for any reason will not be included.

Should images be considered inappropriate, the DSL, will ensure the ICT Misuse Policy is to be applied.

### **DISPLAYING IMAGES**

#### **Statement of intent:**

It must be ensured that still images (including those which are to be displayed in digital photo frames –should the school acquire them) and video clips are to depict children in an appropriate way. The identity of individual children should also be protected. Particular caution should be taken where images are to be displayed in a public place. (The definition of public place is to include any areas where parents and carers, members of the public and visitors are to be given access).

#### **Procedures:**

Slideshows (e.g. on Whiteboards) of children at play. Specific consent must be obtained from parents and carers.

Increased sensitivity and security procedures are to be observed when displaying images on the whiteboard e.g. during Open Morning.



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Documentation panels are to be encouraged and will include, for example, photographs, observation notes and transcripts of children's communications. Information included may be personal to an individual child and should not be considered public information. Care should therefore be taken to ensure individual children will not be identifiable. Children should not be named if their photograph is to be displayed and transcripts of communications are to be placed randomly across the documentation panel. They are not to be attributed to individual children. Any observational notes must observe confidentiality at all times. Where necessary, this is to involve the removal of personal information.

Where photographs are to be displayed in any context, the use of close up images of children should be avoided (particularly against a blank background). Photographs of children must be purposeful and show them in an appropriate context.

### **STORAGE AND DISPOSAL OF IMAGES**

#### **Statement of intent:**

Images will be securely stored and managed using iCloud Photo Stream and the iPads used within the school. The aim is to prevent unauthorised access, ensure confidentiality, and protect identity. All images will be deleted at the end of each academic year or sooner if they are no longer required.

#### **Procedure:**

The DSL is responsible for ensuring all photographs are permanently deleted from iPads and iCloud once they are no longer of use. At the end of each academic year, all images will be deleted from iCloud Photo Stream and iPads as part of regular maintenance.

If images need to be retained for a short period, they will remain securely stored on iPads and within iCloud, or on Office365 within SharePoint for specific use such as for marketing. Both devices and cloud storage are protected by encryption and restricted access passwords. Images will not be downloaded to other devices or portable storage systems. Portable storage devices will not be used for temporary storage of photographs.

Security measures will be implemented to ensure the same level of protection as any personal data. Images are classified as confidential and must be marked for secure disposal when no longer needed. Images will not be removed from the school site.

All images will remain on-site unless explicit consent is given by both the Headteacher/DSL and the parent or carer of the child in the image. If permission is granted to take images off-site, all relevant details, such as who, what, when, and why, must be recorded.

Photographs that are no longer required must be securely deleted from iPads, iCloud or from Office365. No copies will be retained or shared without explicit authority from the DSL and consent from the parent or carer. In cases where images need to be disposed of physically, they will be returned to parents or carers, securely shredded, or wiped as appropriate.



All images, including those held within learning journeys will remain on site at all times, unless prior explicit consent has been given by both the Headteacher/DSL and the parent or carer of any child 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.

Photographs must be disposed of should they no longer be required. It must be ensured that they will be returned to the parent or carer, deleted and wiped or shredded as appropriate. Copies are not to be taken of any images without the relevant authority and consent from the DSL and parent or carer.

All record of consent details should be kept on file. Should permission be withdrawn at any time, all relevant images will be removed and disposed of. The record will be updated accordingly.

## **SECURITY**

### **Statement of intent:**

All images are to be handled as personal data and deemed to be of a sensitive and confidential nature. It is to be recognised that damage or distress could be caused if security is to be breached. The responsibility of being in a position of trust handling such data must therefore be taken seriously.

The DSL is to be responsible for ensuring all information is being handled appropriately and securely.

Should there be any concerns over breaches of security the Data Protection Lead in conjunction with the ICT Coordinator will be required to undertake an investigation as is to be deemed appropriate. All such incidents are to be recorded and where necessary reported to the relevant authorities. Any actions which are identified as a result of any investigations must be implemented with immediate effect.

### **Procedures:**

Security procedures are to be monitored and reviewed periodically by the ICT Coordinator and the governing body.

Under the Data Protection Act 2018, reasonable steps must be taken to ensure the reliability and suitability of any individual who is to have access to personal data. Staff are therefore to be considered to be in a responsible position of trust.

To this effect, effective safer recruitment procedures are to be applied. Rigorous and regular checks are also to be undertaken to ensure the on-going suitability of all new and existing staff. All relevant checks must be completed before any new employee, volunteer or student is to be given access to children and /or their personal data.

All staff are to be required to follow confidentiality and information sharing procedures, which must be agreed to at the time of induction.



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The following aspects of security are to be managed accordingly:

- Physical security-effective measures are to be put in place to ensure physical security and to protect against theft, including that of laptops, computers, cameras and any personal data, including photographic images.
- Computer security-stringent measures are to be implemented to ensure computer security. Awareness will be raised in respect of technological advancements which could put on line systems at risk. Security will be updated as and when it is to be required.
- Security procedures are to be proportionate to the potential risks involved and must be subject to constant monitoring and review.

### **Authorisation and review:**

This Policy was reviewed, amended and agreed by the Council of Management in January 2025. It will be reviewed again in two years' time or more regularly as required by legislation.

Danielle Dufey

Agreed by \_\_\_\_\_ Chair of the Council of Management