



# TAKING, STORING AND USING IMAGES OF PUPILS POLICY

Date: Sep-20

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## INTRODUCTION

At Sarum Hall School, we always celebrate the achievements of all of our pupils in their academic, artistic and sporting endeavours.

We particularly welcome parents to our concerts, plays and sporting events, as well as to more formal occasions during the school year. The school walls are decorated with examples of pupils' work, team photographs and photographs of trips and expeditions in which our pupils have participated. Our external website and school portal is updated regularly, and all parents are sent our weekly news in order to keep them fully abreast of the events of our active community.

We respect young people's and adults' rights of privacy and are aware of child protection issues. We recognise that there are risks involved in using photographs, images and video clips of children. Risks can be minimised by following the guidelines detailed in this policy. The term 'image' refers to any still or moving recorded image.

## THE APPLICATION OF DATA PROTECTION LAWS TO TAKING, USING AND STORING IMAGES OF CHILDREN

Photographs and video images of pupils and staff are classed as personal data under Data Protection legislation, including the EU's General Data Protection Regulation.

Parents who accept a place for their child at the school will be asked for consent before we can take photographs or make recordings of your child via the **CONSENT FORM: PHOTOGRAPHY AND USE OF IMAGES OF CHILDREN (Appendix A)**. However, parents should be aware of the fact that certain uses of their child's images maybe necessary or unavoidable (for example, if they are included incidentally in CCTV or a photograph).

Consent for use of images for other events, such as those run by external organisations, will be sought if and when appropriate via **Appendices B, C and D**. See below for more information.

Full details of the school's Data Protection Policy and of its Retention of Records Policy are available on request.

## USE OF IMAGES BY THE SCHOOL

### INTERNAL SCHOOL DISPLAYS

- Images, still and moving, maybe used on displays, noticeboards or screens within the school premises. These images will never identify an individual pupil with their name. Full names of girls are never displayed on any display or noticeboard around school.

### SCHOOL PORTAL

- Communications are regularly shared with the school community (parents, pupils, staff, Governors and alumni) via an e-newsletter and the School Portal. The photographs on the portal are stored on a password protected website. Accounts are only provided to members of the school community.

### SCHOOL WEBSITE, SOCIAL MEDIA/NETWORKING SITES AND OTHER MARKETING PUBLICATIONS

- Occasionally, images of the children may be used in marketing the school by website ([www.sarumhallschool.co.uk](http://www.sarumhallschool.co.uk)), by prospectus, by displays at educational fairs and other marketing functions, and by other means. No pupil's names, first or full names, will appear with their photograph on the external website or leaflets that school may send out. Only children with permission from parents obtained from the Consent Form will be used (**Appendix A**)

### MEDIA COVERAGE AND EXTERNAL EDUCATORS

- Our school may occasionally be visited by the media or external educators who will take photographs or film footage of a high-profile event for newspapers or websites. We will notify parents in advance where possible. We will obtain additional permission from the Headmistress and the parents before images can be used (**Appendix B - CONSENT FORM: PHOTOGRAPHY AND USE OF IMAGES OF CHILDREN BY EXTERNAL PHOTOGRAPHERS AND ORGANISATIONS**). A new consent form must be signed by the parents for each request from an external organisation.
- We will always complain to the Press Complaints Council (PCC) if the media fails to follow the appropriate code of practice for the protection of young people, including the children of celebrities.

### iSAMS AND IDENTIFICATION

- All pupils are photographed on entering the school and, thereafter, at yearly intervals, for the purposes of internal identification. These passport-sized photographs identify the pupil by:
  - Full Name
  - Year Group

- They are securely stored in the password-protected area of the staff database, where access is restricted to academic, pastoral and school office staff. Any parent who so requests will be sent a copy of his or her daughter's photograph.

#### STORAGE AND RETENTION

- Our images are kept securely on our password protected school network. They are reviewed annually and are deleted when no longer required. Photographs and videos of former pupils may be retained for as long as necessary for the purpose for which they were originally taken.
- Learning Journals are used across the school to record and celebrate children's progress. Photographs of individuals, groups or classes of children may appear in these records. On some occasions, photographs of children may be uploaded onto online services such as Google Drive. All of these will be stored on password protected accounts that are encrypted.

#### OFFICIAL SCHOOL PHOTOGRAPHS

- We will periodically invite an official photographer into school to take portraits/photographs of individual children and/or class groups. Appropriate safeguarding checks on the photographer will be undertaken. The digital photographs can then be purchased and printed by parents.

#### GOOGLE MEET

- During the Covid-19 pandemic, individual or small group sessions of 5 or fewer pupils may take place using Google Meet. These sessions will be recorded to protect both the pupil and member of staff. The recordings will be deleted immediately after each session unless something of concern had occurred during the session.

#### CCTV

- CCTV is in use on school premises and will sometimes capture images of pupils. Images captured on the School's CCTV system are used in accordance with the Privacy Notice and CCTV Policy.

#### **USE OF IMAGES BY PARENTS**

##### SCHOOL PERFORMANCES AND EVENTS

- During school performances, matches, Open Days or other school events, photographs and images can be taken on the understanding that **images that contain other parents' children are not posted onto social media/networking sites or otherwise shared.** We

ask parents not to take photographs of other pupils on their own without the prior agreement of that child's parents.

- When an event is held indoors, parents should be mindful of the need to use their cameras and recording devices with consideration and courtesy for the comfort of others. Flash photography can disturb others in the audience, or even cause distress for those with medical conditions; we therefore ask that it is not used at indoor events.

#### PERSONAL USE ONLY

- Apart from school performances and major events, **parents are prohibited from taking any photographs of children in the school and/or the Early Years setting.**
- Any photographs taken by parents within school should only be for personal use only. Parents are not permitted to take photographs or to make a video recording for uses other than their own personal use (e.g. with a view to selling videos of a school event). If photographs are taken for personal use only they are not covered by the GDPR.
- Parents are not permitted to take photographs of other pupils on their own, without the prior agreement of that child's parents.

#### USING IMAGES FROM THE SCHOOL PORTAL

- Parents may download images from the School Portal providing they respect the right to privacy that the girls are entitled to under GDPR and adhere to the following terms and conditions for use:
  - The image is for your personal use only, e.g. you may share it with your immediate family and close circle of friends;
  - Other than your close circle of friends and family, you should not share it with anyone else or publish it in any way (either electronically, through social media or in physical print);
  - You must store the image in a secure place which is password protected;
  - If you do share with your close circle of friends and family, you should ensure that they also understand the need to keep the image secure and private.

#### USE OF SCHOOL PHOTOGRAPHS AND IMAGES BY PARENTS

- Occasionally parents may want to create albums or other items with images to share with other parents. The following criteria must be followed:
  - Parents wishing to use school images must sign a form agreeing to the terms and conditions of using images via **Appendix C - AGREEMENT FORM FOR PARENT TO USE SCHOOL PHOTOS;**
  - Permission must be sought from the other parents before images of their child/children can be used via **Appendix D - CONSENT FORM: SCHOOL ALBUM;**
  - School owned images will be shared with the designated parent via a password protected account on Google Drive;

- The images are used for the intended purpose only and not to be distributed/shared with anyone or any company other than the chosen printing company;
- The images must be kept securely on a password protected device/cloud service;
- Images must be immediately destroyed after using them for intended purpose;
- Check that the printing company is GDPR compliant;
- Report to school if any images are lost or shared with someone by mistake.

**Linked guidance, policies and procedures:**

[Keeping Children Safe in Education \(KCSIE\) statutory guidance](#)

[Working together to safeguard children](#)

“Editor’s Code of Practice” PCC codes of Practice - [www.ipso.co.uk/IPSO/](http://www.ipso.co.uk/IPSO/)

“Data Protection Good Practice Note: Taking Photographs in Schools” ICO Guidance

<https://ico.org.uk/for-the-public/schools/photos/>

ICO advice for Schools on GDPR and Personal Data - <https://ico.org.uk/for-organisations/education/>

“Advice to schools on the use of images on school websites.” ISC

<http://iscdigital.co.uk/advice-on-the-use-of-images/>



## CONSENT FORM: MEDIA USAGE OF CHILDREN BY SCHOOL STAFF

The School makes various uses of images of pupils during their time at the School. Some of these are necessary for administration and the safety of pupils, such as CCTV and iSAMS identification.

- Occasionally, we may take photographs of the children for our school displays, the School Portal and in other printed/electronic publications for the school community.
- If we use photographs of individual pupils, we will not use the name of that child in the accompanying text or photo caption. If we name a pupil in the text, we will not use a photograph of that child to accompany the article. *If a child has won an award and the parent would like the name of their child to accompany their picture, the school must be notified via email by the parent.*
- Learning Journals are used in across the school to record and celebrate children’s progress. Photographs of individuals, groups or classes of children may appear in these records.
- Our school may occasionally be visited by the media or external educators who will take photographs or film footage of a high-profile event for newspapers or websites. Children may appear in these images. **Additional permission from parents will be sought before using the image.**
- To comply with Data Protection Legislation, including the EU General Data Protection Regulation (GDPR), we need your permission before we can photograph or make any recordings of your child.

Name of child ..... Class .....

**EDUCATIONAL/SCHOOL COMMUNITY USE:**

(tick below)

Yes, I consent to my child’s image being used in school media in the manner described above.	
No, I object to all non-essential uses of my child’s image without specific consent. Please give reasons [optional]: ..... .....	

**MARKETING USE:**

(tick below)

Yes, I consent to my child’s image being used on the school’s marketing website, magazine and on marketing material.	
No, I object to my child’s image being used on the school’s marketing website, magazine and on marketing material.	

Signature of parent or guardian .....  Print Name ..... Date .....
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## ***Conditions of use***

- **You may withdraw consent at any time in the future. In ensuring we can give effect to your wishes, it will also assist us if you are able to give reasons.**
- Once signed, this form is valid for the duration of the child's time at the school and for one year after.
- We will not re-use any photographs or recordings a year after your child leaves this school.
- Historic photographs will remain on our school website.
- We will not use the personal details or full names (which means first name and surname) of any child or adult in a photographic image or video, on our website or intranet, in our school prospectus or in any of our other printed publications.
- We may include pictures of pupils and teachers that have been drawn by the pupils.
- We may use group or class photographs or footage with very general labels, such as 'a science lesson'.
- We will only use images of pupils who are suitably dressed, to reduce the risk of such images being used inappropriately.
- Websites and social media platforms can be viewed throughout the world and not just in the United Kingdom where UK law applies.

**Please be aware** that objecting to above will not necessarily mean that the School will not continue to process images of your child that are either necessary for administration of the School or where the School requires it and is otherwise lawfully entitled to do so. It may not be possible to change printed publications, such as the school magazine, or third party publications (for example where we have placed an advert or provided an image to a newspaper). **Please see our Privacy Notice for further details, or enquire with the Bursar.**



## CONSENT FORM: MEDIA USAGE OF CHILDREN BY EXTERNAL PHOTOGRAPHERS AND ORGANISATIONS

*(To be filled in by a member of staff)*

The external organisation named .....

may use your child’s image on their website and/or their promotional material for the reason of

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Name of child .....	Class .....
This organisation may use my child’s image on their website and/or their promotional material for the reason stated above.	<i>(please indicate)</i> Yes/No
Signature of parent or guardian .....	
Print Name ..... Date .....	



## AGREEMENT FORM FOR PARENT TO USE SCHOOL PHOTOS

### USE OF SCHOOL PHOTOGRAPHS AND IMAGES BY PARENTS

- Permission must be sought from relevant parents before images/names of their child/children can be used;
- School owned images will be shared with the designated parent via a password protected account on Google Drive;
- The images are used for the intended purpose only and not to be distributed/shared with anyone or any company other than the chosen printing company;
- The images must be kept securely on a password protected device/cloud service;
- Images must be immediately destroyed after using them for intended purpose;
- Check that the printing company is GDPR compliant;
- Report to school if any images are lost or shared with someone by mistake.

Name: .....	Date: .....
Signature: .....	
Reason for using the images: .....	
.....	
.....	



## CONSENT FORM: SCHOOL ALBUM

Name of child .....	Class .....
I give consent for my child's image/name to be used in a school leavers' photo album.	<i>(please indicate)</i> Yes/No
Signature of parent or guardian .....  Print Name ..... Date .....	