



Use of Images of Children

This policy is compliant with GDPR/Data Protection Act 2018

Approved by:	Governing Body	Date:	November 2024
Last reviewed on:	November 2024		
Next review due by:	November 2027		

This policy has been reviewed on the 06.11.24, and has been impact assessed in the light of all other school policies and the Equality Act 2010.

Name	Signed	Date reviewed	Minute Number
Mr N Boden Chair of Governors			

Our Aim

Through this Use of Images of Children Policy we aim to ensure that proper, legal and appropriate use is made of photographic and video images of the children at this school. The policy is in accordance with our Safeguarding and Child Protection Policy to ensure that it always preserves the safety and welfare of every child. It is also compliant with the General Data Protection Regulation (GDPR) and the Data Protection Act 2018 (DPA).

This policy covers the taking of images of children in school and during school events out of school.

Typical images taken

- Records of performing arts including dance and movement, concerts, drama performances, Nativity play, Harvest Festivals, Sports Days and sports fixtures etc
- Displays in school of children's work and activities
- Photographic evidence of children and their work to be included in files/folders/books
- Photographs for Facebook, Twitter and the school website
- Photographs for the school prospectus and/or other publications promoting our school
- Photographic records of visits out of school linked to topics/events in school
- Images taken during inter-school/cluster activities
- Publicity in newspapers surrounding events in school
- Class/individual photographs taken by professional photographers for purchase by parents and relatives

This list is not exhaustive, but is representative of the likely times/events when photographs might be taken.

Use/misuse of images

Digital images are easy to capture, reproduce and publish and therefore easy to misuse. The school is not permitted to take, use or store images of any member of the school community or public without first seeking consent and considering the appropriateness.

- With the written consent of parents (on behalf of children) and staff, the school permits the appropriate taking of images by staff and children with school equipment.
- Staff are not permitted to use personal digital equipment, such as mobile phones and cameras, to record images of children - this includes when on field trips or sports events. However, with the express permission of the Headteacher, images may be taken provided they are transferred immediately and solely to the school's secure network and deleted from the staff device. Staff will be required to declare in writing that they will immediately delete any images taken of children for school purposes, and that deletion will be carried out before they leave the school premises.
- Under any circumstances, volunteers in school or on school trips must not take photographs of children on their personal devices.

- Children are never permitted to use personal digital equipment, including mobile phones and cameras, to record images of others; this includes when on field trips.

Taking of photographs

- Still photographs and video clips taken by staff will always depict children in an appropriate way. They will not display images of children in inappropriate clothing, e.g. swimming costumes, so that levels of integrity and decency are maintained.
- Parents will only be authorised to take photographs/videos for personal use, e.g. to put in the family photo album. They will not be permitted to take images of children who do not have photograph permission. This may mean, for example, that should they want to take a photo of a whole class or group of children performing in which there is a child who does not have photograph permission, they will not be allowed to do so. This is made clear to parents at every event.
- Photographs or images likely to cause embarrassment will not be used.

Children photographing each other

- This practice, overseen by staff, can occur during off-site activities, particularly during residential visits, using school cameras. Children are not allowed to take personal cameras or mobile phones, or any other valuables, with them on school trips.
- Children may also take photographs or moving images using school iPads - which are linked to the school's secure system - as part of curriculum work in school. Images created will be used solely for evidence of children's learning.
- Staff should ensure that children only take photographs that are wholly appropriate and would not cause embarrassment.
- The use of mobile phones by children during the school day is **not allowed**. Children who bring phones into school are instructed to hand them to their teacher on arrival so that they can be locked away until the end of the day.

Publishing children's images and work

On a child's entry to the school, all parents/carers will be asked to give permission to use their child's work/images in the following ways:

- On the school website , Facebook page and Twitter feed
- In printed publications that the school may produce for promotional or information purposes
- Recorded/transmitted on a video or webcam
- In display material that may be used in the school's classrooms and communal areas
- In display material that may be used outside of school, e.g. a local exhibition promoting the school, a PEGS display in another school
- General media appearances, e.g. local/ national media/ press releases sent to the press highlighting an activity (sent using traditional methods or electronically)

This consent form is considered valid for the entire period that the child attends this school, unless the school is informed in writing that there has been a change in the child's circumstances and consent has been withdrawn, e.g. divorce of parents, custody issues, change of mind etc. Parents/carers may withdraw permission, in writing, at any time. Consent has to be given by adults who have parental responsibility in order for it to be deemed valid.

Should the school wish to use images of past pupils, stating the specific purpose, the school will need to gain, in writing, new consent from the parents - or from the pupils themselves if they are 13 or over.

Children's names will not be published alongside their images, and vice versa. E-mail or postal addresses or any personal details of children will not be published.

Before posting student work on the school website, Facebook or Twitter, a check needs to be made by staff to ensure that permission has been given for work to be displayed in this way. As part of the website coordinator's monitoring role, regular checks will be made to ensure that there are no images of children on the website where parental permission has not been given.

Website Coordinator: Angela Smith

Governor responsible for the website: Stuart Wilson

Storage of Images

- Images of children are stored securely on the school's computer network system.
- Staff are not permitted to use personal portable media for storage of images (e.g. USB sticks, mobile phones) without the express permission of the Headteacher. Where permission has been granted, images must be removed immediately after use. All USB sticks must be encrypted and all mobile phones password protected.
- Rights of access to this material on the school's computer network system are restricted to school staff.
- Our IT Technician has the responsibility of deleting the images when they are no longer required, or consent has expired/been withdrawn.

Parental consent to take photographs

- The school will obtain parental permission for staff to take and use photographic images of children using the form in Appendix 2. This will be done initially when a child joins the school, or any time the school makes a change to the policy.
- All staff are informed annually of those children who do not have photograph consent.
- If a child whose parent has refused permission for photography is involved in a group activity or event, photography of the group will not include the child.
- Photographs taken for use in a newspaper will not include children's names or personal details.
- Except in rare circumstances (e.g. the celebration of a child's success in the local newspaper where parental consent has been sought and granted in writing), names will never be put to photographs of children that are displayed either in or out of school.

Background Information to this Policy

Data Protection

When reviewing this policy we have ensured that it meets the requirements of the GDPR and DPA on taking, using and storing photographic material in school.

Recommended Good Practice

Advice from the Information Commissioner (see ICO website) states that data protection legislation is unlikely to apply in many cases where photographs are taken in school and other educational institutions, provided that this policy has been adhered to.

Where the Act does apply, a common sense approach suggest that if the photographer asks for permission to take a photograph, this will usually be enough to ensure compliance.

Photographs taken for official school use may be covered by the Act, and children should be advised why they are being taken.

Photos taken purely for personal use are exempt from the Act.

Examples from the Information Commissioner relating to the Data Protection Act and the taking of photographs are to be found in Appendix 1 of this policy.

Links with other policies

Safeguarding & Child Protection Policy

Data Protection Policy

Online-Safety Policy

Equalities for All Policy

Special Educational Needs Policy

Staff Code of Conduct Policy

This policy will be reviewed every three years by the Governing Body, or sooner if there is a change in the law or in the required use of images by the school.

APPENDIX 1

Please see ICO – ‘Taking photos in schools’

<http://www.ico.org.uk>

Examples from the Information Commissioner Relating to the Data Protection Act and the Taking of Photographs in School:

Personal Use

- A parent takes a photograph of their child and some friends taking part in the school Sports Day to be put in the family photo album. These images are for personal use and the Data Protection Act does not apply.
- Grandparents are invited to the school nativity play and wish to video it. These images are for personal use and the Data Protection Act does not apply.

Official School Use

A small group of children are photographed during a science lesson and the photo is to be used in the school prospectus. This will be personal data but will not breach the Act as long as the children and/or their guardians are aware this is happening and the context in which the photo will be used.

Media Use

A photograph is taken by a local newspaper of a school awards ceremony. As long as the school has agreed to this, and the children and/or their guardians are aware that photographs of those attending the ceremony may appear in the newspaper, this will not breach the Act.

APPENDIX 2

Dear Parents/Carers

Consent Form for Photography and Images of Children Consent for the Academic Year 2018-19

During your child's time at our school, we may wish to take photographs of activities that involve your child. The photographs may be used for displays, publications, the school website and social media pages, for inclusion in your child's school work or by local newspapers.

Photography or filming will only take place with the permission of the Headteacher and under appropriate supervision. When filming or photography is carried out by the news media or by other professional visitors, children will not be named and home addresses or other personal details will never be given out. Images that might cause embarrassment or distress will not be used.

Before taking any photographs of your child, we need your permission. Please **complete the attached consent form, sign and date it and return it to school.**

In accordance with our Subject Access Request (SAR) Procedures, you can ask to see images of your child held by our school at any time. You may also withdraw your consent in writing at any time.

Yours sincerely

Headteacher



Parental Consent Form
Child/Children's Details

Forenames:
Surname:
Date of birth:

Please give each statement your full consideration and complete the form as appropriate by ticking the corresponding answer. Parental consent to Data processing must be obtained for pupils under the age of 13 years.

Photo & Filming Permission

There are many activities and occasions in school where children are likely to be photographed/ filmed to record their achievements and successes and to complement the work they do. As a parent/carer you have the right to decide whether you wish to give consent your child's image being captured during such an activity.

We may use the photographs in our school publications or on display boards in school.

We may make film recordings for monitoring or other educational use.

I give my permission for my child to be photographed/filmed during an activity as described above.

YES..... NO.....

School website

The school may post images to the school website but will not use a child's name.

I give my permission for my child's photograph/film to be used on the school website.

YES..... NO.....

Outside Media

From time to time, our school may be visited by the media or other invited agents who may take photographs/film footage or carry out newspaper/radio/television interviews of the children.

I give permission for my child's photograph/film to be used by the media. We will not release names of any children in the media.

YES..... NO.....

School events

Whenever there are events to which we invite parents and other family members we will allow photographs/video footage to be taken but we ask everyone not to post any images they have captured to the internet.

I agree that any photograph or video I take at a school event will be for personal or family use only and will not be put on the internet.

YES..... NO.....

Classroom and internal school displays

We use your child's name on displays in school to identify their work and help your child to identify their name. We would like your permission to use your child's first name where appropriate on classroom displays.

I give my permission for my child's first name to be used on internal school displays.

YES..... NO.....

PG & U Classification films

At various times throughout the year we would like to be able to show films either to further enhance the curriculum or as a treat. The films are either suitable for all ages or PG. We would like your permission to allow your child to watch a PG film.

I give my permission for my child to watch a PG film in school.

YES..... NO.....

Local walks

The school offers opportunities during the school year for our pupils to take part in a variety of activities in the immediate locality. We are seeking a single permission to enable children to take part, there will be no cost to parents and they will take place during the normal school day. These could include fully supervised local environment walks, swimming lessons, visits to Church or Chapel and trips to other local schools to take part in a variety of activities including sports.

I give my permission for my child to undertake supervised walks within the local area.

YES..... NO.....

Forest School Activities

Each week the children will take part in Forest School activities usually off site.

I give my permission for my child to take part in Forest School activities.

YES..... NO.....

Use of hired transport and staff/parent cars

At various times of the year the school offers trips to the wider community for educational purposes. At times the school will use hired transport (mini bus/coach) and also staff or parent cars. The school has a policy to ask for copies of appropriate documents from staff and parents to ensure correct insurance and MOT checks are held. We would like your permission to allow your child to travel supervised on hired transport and to travel in staff or parent cars.

I give my permission for my child to use hired transport, supervised and to travel in staff and parent cars.

YES..... NO.....

Email

We would like to use your email address to send and receive information to and from school such as newsletters and information regarding your child. We will not share this information without your consent with any other parties and is for school use only.

I give permission for my email address to be used for contacting me.

YES..... NO.....

My email address is _____

Outside providers

We also pass on information to the following companies for the reasons listed. Please indicate your consent by ticking the relevant answer to enable us to share this information. For more information about the companies' GDPR compliance, please look at the company website or contact the school office.

Teachers2parents

(Eduspot Ltd) <https://eduspot.co.uk/security/>

To receive text messages from school regarding events, reminders and other information. We need to provide your child's name and class details, year group and your mobile phone number(s).

I give my permission for my child's personal information to be used for the purpose as described above.

YES..... NO.....

Your right to withdraw consent:

Please note you have the right to withdraw these consents at any time and you can do this by contacting us at the address below.

For more information on how Combs Infant School uses data we hold about you or your child, how long we keep it and your rights relating to it, e.g to have it corrected, erased, restricted, transferred or to see your records please contact the school office: Mrs Angela Smith on 01298 813120 or in writing to;

Combs Infant School

Lesser Lane

Combs

High Peak

SK23 9UZ

Your choices will be applied for the duration of your child's time in Combs Infant School unless you request otherwise.

Signed.....

Print name.....

Relationship to pupil.....

Date.....