

## **IMAGE USE POLICY**

### **1. Official use of Images/Videos of Children by the School**

#### **1.1 Scope and aims of the policy**

- This policy seeks to ensure that images and videos taken within and by Tunbridge Wells Girls' Grammar School (TWGGS) are taken and held legally and the required thought is given to safeguarding all members of the community.
- This policy applies to all staff including the governing body, teachers, support staff, external contractors, visitors, volunteers and other individuals who work for or provide services on behalf of the school (collectively referred to as 'staff' in this policy) as well as children and parents/carers.
- This policy must be read in conjunction with other relevant school policies including (but not limited to) safeguarding and child protection, anti-bullying, behaviour, data security, Acceptable Use Policies, confidentiality, screening, searching and confiscation, and relevant curriculum policies including Personal Social and Health Education (PSHE) and Sex and Relationships Education (SRE).
- This policy applies to all images (including still and video content) taken by the school.
- All images taken will be used in a manner respectful of the Data Protection Principles. This means that images will be processed:
  - fairly, lawfully and in a transparent manner
  - for specified, explicit and legitimate purposes
  - in a way that is adequate, relevant limited to what is necessary
  - to ensure it is accurate and up to date
  - for no longer than is necessary
  - in a manner that ensures appropriate security
- The Data Protection Officer (DPO) supported by the Designated Safeguarding Lead (DSL) and Senior Leadership Team (SLT) 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 TWGGS Image Use Policy.

#### **1.2 Parental Consent**

- Written permission from parents or carers will always be obtained before images/videos of children are taken, used or published by the school. This will be obtained from pupils aged 18 or over. See Appendix 1.
- Written parental consent will always be sought to take and use photographs offsite for professional, marketing and training purposes. This may be in addition to parental permission sought for onsite images.
- Written consent from parents will be kept by the school where children's images are used for publicity purposes (such as brochures or publications), until the image is no longer in use.
- Parental permission will be sought on admission to the school.
- A record of all consent details will be kept securely on the pupil's file. Should permission be withdrawn by parents/carers, or 18+ pupils, at any time, then all relevant images will be removed and disposed of and the record will be updated accordingly.

#### **1.3 Safety of Images and Videos**

- All images taken and processed by the school will take place using school provided equipment and devices.
- Staff will receive information regarding the safe and appropriate use of images as part of their data protection and 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.
- All images will remain on site at all times, unless prior explicit consent has been given by the parent or carer of any child or young person captured in any photograph.

- Any memory stick, CD or storage device containing images of children to be taken offsite for further work will be suitably protected.
- The DPO and/or DSL reserve the right to view any images taken and can withdraw or modify a member of staff's authorisation to take or make images at any time
- Any apps, websites or third party companies used to share, host or access children's images will be risk assessed prior to use.
- The school will ensure that images always are held in accordance with the General Data Protection Regulations (GDPR) and the Data Protection Act and suitable child protection requirements (if necessary) are in place.
- 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/carer.

#### **1.4 Publication and sharing of images and videos**

- Images or videos that include children will be selected carefully for use e.g. only using images of children who are suitably dressed.
- Children's full names will not be used on the website or other publication, for example, newsletters, social media channels, in association with photographs or videos.
- The school will not include any personal addresses, email addresses or telephone numbers on the website, in a prospectus or in other printed publications.

#### **1.5 Safe Practice when taking images and videos**

- The school will discuss the use of images with children and young people in an age appropriate way.
- A child or young person's right not to be photographed is to be respected. Images will not be taken of any child or young person against their wishes.
- Photography is not permitted in sensitive areas such as changing room, toilets, swimming areas etc

#### **1.6 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.
- 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.

### **2. Use of Images/Videos of Children by Others**

#### **2.1 . Use of Photos/Videos by Parents/Carers**

- Parents/carers are permitted to take photographs or video footage of events for private use only.
- Parents/carers who are using photographic equipment must be mindful of others (including health and safety concerns) when making and taking images.
- The opportunity for parents/carers to take photographs and make videos can be reserved by the school on health and safety grounds.
- Parents/carers are only permitted to take or make recording within designated areas of the school. Photography is not permitted in sensitive areas such as changing room, toilets, swimming areas etc.
- 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 school DPO/ DSL to discuss any concerns regarding the use of images.
- Photos and videos taken by the school and shared with parents should not be shared elsewhere for example, posted on social media sites. To do so may breach intellectual property rights, data protection legislation and importantly may place members of the community at risk of harm.

## **2.2. 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 use the camera (e.g. unsupervised areas, toilets etc.)
- The use of personal devices e.g. mobile phones, tablets, children's own digital cameras, is covered within the school online safety policy.
- 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 asking permission before they take any photos.
- Photos taken by children for official use will only be taken with parental consent and will be processed in accordance with the GDPR and the Data Protection Act.
- 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 carefully 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 setting.

## **2.3. 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 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 or where an acceptable request has been agreed by the school. 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 setting is to be considered to have acted in good faith.

## **2.4 Use of External Photographers (this may include volunteers such as staff or parents)**

- External photographers who are engaged to record any events will be prepared to work according to the terms of the school's online safety policy.
- Photographers will sign an agreement which ensures compliance with the GDPR and the Data Protection Act
- Images taken by external photographers will only be used for a specific purpose, subject to parental consent.
- Photographers will not have unsupervised access to children and young people

## **3. Useful School Contacts**

School Designated Safeguarding Lead: Jane Parkinson

School e-Safety Coordinator: Mike Tomlinson

Governor with lead responsibility: Susan Cooke

## Appendix 1: Parental Consent Form for Using Images of Children

**Pupil's Name:**

**Form:**

We need to ask for your consent before we are able to take photographs of your child during her time at Tunbridge Wells Girls' Grammar School (TWGGS). We may take photographs for a number of reasons whilst your child is with us, including:

- documenting and recording education activities; recording learning and development progress
- recording and celebrating special events and achievements
- for the school prospectus or in other printed publications that we produce, as well as on our website
- video or webcam recordings for school-to-school conferences, monitoring or other educational use
- from time to time, our school may be visited by the media who will take photographs or film footage of a visiting dignitary or other high profile event. Pupils will often appear in these images, which may appear in local or national newspapers, or on televised news programmes.

We do however recognise that with the increased use of technologies, particularly digitally and online, the potential for misuse has become greater and we understand that this can give rise to concern. We will therefore endeavour to put effective safeguards in place to protect children and young people by minimising risk. We are mindful of the fact that some families may have reasons why protecting a child's identity is a matter of particular anxiety. If you have special circumstances either now or at any time in the future which would affect your position regarding consent, please let the school know immediately in writing. We have a specific policy regarding the use of images and also include the safe use of mobile phones and personal devices as part of our online safety policy, which may be found on the school website.

To comply with the General Data Protection Regulation, we need your permission before we can photograph or make any recordings of your child. You are encouraged to consult with your child about categories of consent and to use this document to explore their feelings about being photographed at TWGGS. Please read and complete below; do not hesitate to contact the school should you have any queries.

### Parental Consent Form for Using Images Of Children

- This form is valid for the period of time your child is at TWGGS. The consent will automatically expire after this time. We will not re-use any photographs or recordings after your child leaves the school/setting without additional consent.
- We will not use the personal information or full names (which means first name and surname) of any child or adult in a photographic image or video on our website, online, in our prospectus or in any of our other printed publications.
- If we use photographs of individual children, then we will not use the full name of that child in the accompanying text or photo caption. If we name a child in any text, then we will not use a photograph of that child to accompany the article.
- We may include pictures of children and staff that have been drawn by the children. We may use group photographs or footage with general labels. We will only use images of children who are suitably dressed.
- We will discuss the use of images with children in an age appropriate way and to role model positive behaviour.
- This consent can be withdrawn by parent/carer at any time by informing the school in writing.

We would like to use your child's photograph/image in displays around the school.

We would like to record your child's image or use videos for assessments, monitoring or other educational uses within the school. These images or recordings will be used internally only.

We would like to use your child's photograph/image in our prospectus and other printed publications that we produce for educational and promotional purposes.

We would like to use your child's image on our website or other electronic communications.

We would like to record your child's image on webcam for appropriate curriculum purposes.

We would like your child to appear in the media e.g. if a newspaper photographer or television film crew attend an event organised by the setting.

We would like the school to be able print images of your child electronically

Please sign below to indicate your consent to the above, deleting any areas where consent is denied. You may withdraw your consent at any time.

- I have read and understood the conditions of use and I am also aware of the following:
  - Websites can be viewed worldwide and not just in the United Kingdom where UK law applies.
  - The press are exempt from the Data Protection Act and may want to include the names and personal details of children and adults in the media.
- I/we will discuss the use of images with our child/ren to obtain their views.
- As the child's parents/guardians, we/I agree that if we/I take photographs or video recordings of our child/ren which include other children, then we will only use these for our personal use and not post on social media.

Parent/Carer Name:

Parent/carer's signature:

Date:

Pupil's signature: