Image Use Policy

Ringmer Primary and Nursery School

Created By:	Kelly Cheesley	**Date:** September 2024
Approved by:	Headteacher	**Date:** 23rd Oct 2024
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Amendments		
Review Date:	What was amended.	
July 2022	New section added on P6 regarding the use of staff images and how staff members give and remove permissions. Appendix 2 updated with the most current letter to parents and the new parental consent form with granular style permissions for images Appendix 5 Google Image Survey for staff added.	
July 2024	Designated governor changed. Details regarding the storage of permissions in Arbor added.	

School/Setting Data Controller: Anna Crompton
School/Setting Designated Safeguarding Lead (DSL): Anna Crompton
Governor with lead responsibility: Adam Baldwin

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Official use of Images/Videos of Children

Scope and aims of the policy

- This policy seeks to ensure that images and videos taken within and by Ringmer Primary and Nursery School 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, image use, Acceptable Use Policies, confidentiality, screening, searching and confiscation and

relevant curriculum policies including computing, Personal Social and Health Education (PSHE).

- This policy applies to all images, including still and video content taken by Ringmer Primary and Nursery School.
- All images taken by Ringmer Primary and Nursery School 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) within the setting Anna Crompton, DP Governor – Mike Fletcher supported by the DSL and management team are responsible for ensuring the acceptable, safe use and storage of all camera technology and images within the setting. This includes the management, implementation, monitoring and review of the Image Use Policy.

Parental consent

- Written or electronic permission (via Arbor) from parents or carers will always be obtained before images and/or videos of children are taken, used or published.
- 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 setting 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 child's record on Arbor.
- If a parent wishes to withdraw permission they must do so in writing. 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 written request must be stored with the child's record.

Safety of images and videos

- All images taken and processed by or on behalf of the Ringmer Primary and Nursery 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.
- 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.
- Images will not be kept for longer than is to be considered necessary. A designated member of staff (DPO or DSL) will ensure that all photographs are permanently wiped from memory cards, computer hard and portable drives or other relevant devices once the images will no longer be of use.
- All images will remain on site, unless prior explicit consent has been given by both DPO and DSL and the parent or carer of any child or young person captured in any photograph.

    - Should permission be given to take any images off site then all relevant details will to be recorded, for example who, what, when and why and data will be kept securely for example with appropriate protection.
- Any memory stick, CD or storage device containing images of children to be taken offsite for further work will be suitably protected and will be logged in and out by the DPO and/or DSL; this will be monitored to ensure that it is returned within the expected time scale.
- The DPO and/or DSL reserve the right to view any images taken and can withdraw or modify a member of staffs' authorisation to take or make images at any time.
- Only official setting owned equipment and cameras will be used by staff to capture images of children for official purposes. Use of personal equipment and cameras by staff is prohibited.
- Any apps, websites or third-party companies used to share, host or access children's images will be risk assessed prior to use.
- Ringmer Primary and Nursery School will ensure that images always are held in accordance with the General Data Protection Regulations (GDPR) and 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 to be taken of any images without relevant authority and consent from the DPO and/or DSL and the parent/carer.

Publication and sharing of images and videos

- Images or videos that include children will be selected carefully for use, for example only using images of children who are suitably dressed.
- Images or videos that include children will not provide material which could be reused.
- 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, emails, telephone numbers, fax numbers on video, on the website, in a prospectus or in other printed publications.

Usage of apps/systems to share images with parents

- The school uses Evidence Me to upload and share images of children with parents.
- The use of the system has been appropriately risk assessed and the governing body/headteacher have taken steps to ensure all data stored is held in accordance with GDPR and the Data Protection Act.
- Images uploaded to Two Simple will only be taken on school devices.
- All users of Evidence Me are advised on safety measures to protect all members of the community e.g. using strong passwords, logging out of systems after use etc.
- Parents/carers will be informed of the expectations regarding safe and appropriate use (e.g. not sharing passwords or copying and sharing images) prior to being given access. Failure to comply with this may result in access being removed.

Safe Practice when taking images and videos

- 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.
- 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

Use of Closed-Circuit Television (CCTV)

- 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 only and for no longer than their intended purpose; this will be a for a maximum of 14 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 management 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 setting.

Use of webcams

- Parental consent will be obtained before webcams will be used within the setting environment for 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.

<u>Use of photos and videos of children by others</u>

Use of photos and 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 onto social networking sites. To do so may breach intellectual

property rights, data protection legislation and importantly may place members of the community at risk of harm.

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, for example unsupervised areas, toilets etc.
- The use of personal devices e.g. mobile phones, tablets, children's own digital cameras, is covered within the school mobile phone and/or 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 encouraging them to ask 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 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. For example, they will be for internal use by the setting only and will not be 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.

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.
- A written agreement will be sought between parents and carers and the press which will request that a pre-agreed and accepted amount of personal information (such as first names only) will be published along with images and videos.
- 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 setting is to be considered to have acted in good faith.

Use of external photographers (to 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 settings online safety policy.
- Photographers will sign an agreement which ensures compliance with 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

Staff consent

- Written permission from members of staff will always be obtained before images and/or videos of children are taken, used or published.
- Written 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 staff will be kept by the setting where staff members images are used for publicity purposes, such as brochures or publications, until the image is no longer in use.
- Staff permission will be sought on starting a role at the school setting.
- A record of all consent details will be kept securely on file.
- If a staff member wishes to withdraw or change their permissions they should do so in writing to the school office. Should permission be withdrawn by a staff member at any time, then all relevant images will be removed and disposed of and the record will be updated accordingly.

Appendix 1 - Children's Images: Frequently Asked Questions for Parents/Carers

Why do we need a policy?

Schools, playgroups, nurseries and youth groups have always used photographs as a way of celebrating achievement or seeking publicity for fundraising etc. Families and children often enjoy seeing their loved ones in print or on a website. We want to ensure that everyone can continue to enjoy these activities safely. However, parents/carers need to be aware that placing any identifying information in the public domain has risks and will need to understand these issues to give properly considered consent. It is important that parents/carers and educational settings can fully consider the issues before any problems can arise.

So, what are the risks?

The most highly publicised and worrying risk is that a child who appears in the paper or on a web site may become of interest to a predatory sex offender. Locating people through the internet has become extremely easy, using widely available software, so if there is a picture and the name of a school/setting together with the name of the child then it could be quite easy to find out the child's address and even work out their likely route to school/setting. There are also other specific groups of children and families whose safety could be put at risk if identified e.g. families fleeing domestic abuse. To limit these potential risks, we will take appropriate steps, as outlined in the attached consent form, to safeguard children and the wider community.

Isn't this just scaremongering?

Sadly not. We have had cases in Kent of families receiving unwelcome phone calls following appearances in the press. However, this is rare, so it is important to have a sense of proportion in these matters. Remember we want to celebrate success and achievement but parents must be aware of risks to make an informed decision.

What about school/setting websites?

The same concerns apply to school/setting controlled online sites; there is an added concern that images of children can be copied, manipulated or changed by another person. We can try to copy protect images and will use lower quality images, but this can be bypassed so cannot not be relied upon to keep images safe.

I want to do my own recording of the school/setting play/event is this okay?

Taking pictures or recordings of your own children for your own personal use is okay. The difficulty arises when other children are also be filmed. It is important that we are all aware that some members of the community may be vulnerable and must not have their image shared online as they could be put at risk from harm. You may not always know who these people and we need everyone's support to protect the whole community. It's also important for us all to role model positive behaviour for children, so it might be a sensible idea to check first before posting any images online which contain other children than your own. Parents/carers should not copy images from the school website without appropriate permission from the school.

Appendix 2 - Letter Template and Consent Form - Parental Consent for Images

Dear Parent/carer,

This letter explains why we will need to ask for your consent before we are able to take photographs of your child during their time at Ringmer Primary and Nursery School

Generally, photographs are a source of pleasure and pride. We believe that the taking and use of photographs can enhance the self-esteem of children and their families and therefore is something to be welcomed and appreciated.

We may take photographs for a number of reasons whilst your child is with us, including:

- documenting and recording education activities
- recording their learning and development progress
- recording and celebrating special events and achievements

We will also encourage children to be active learners, and to become involved in using cameras themselves by taking photos of their surroundings, activities and of each other.

We do however recognise that with the increase 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 us 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 you are welcome to view or take a copy of at any time.

To comply with the General Data Protection Regulations (GDPR) and the Data Protection Act, we need your permission before we can photograph or make any recordings of your child. If your child is old enough to express their own view, you may want to consult with them about categories of consent, and we invite you to use this letter to explore their feelings about being photographed at the setting.

Please read and complete the attached forms and do not hesitate to contact me should you have any queries.

Yours sincerely,

Anna Crompton - Headteacher

Parental Consent Form for Images

- This form is valid for the period of time your child attends Ringmer Primary and Nursery School. The consent will automatically expire after this time.
- We will not re-use any photographs or recordings after your child leaves the school without additional consent.
- We will not use the personal information or full names (first name and surname) of any child 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, 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, we will not use a photograph of that child to accompany the article.
- 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 a parent / carer at any time by informing the school in writing.

	Please Circle as Appropriate
May we use your child's image in displays around the school?	Yes / No
May we use your child's image in our prospectus and other printed publications that we produce for educational and promotional purposes?	Yes / No
May we use your child's image on our official school/setting website?	Yes / No
May we use your child's image on our official social media channels? (Twitter)	Yes / No
Are you happy for your child to appear in the media e.g. if a newspaper photographer or television film crew attend an event organised by the setting?	Yes / No

- I have read and understood the conditions of use and I am also aware of the following:
    - Websites and social media sites can be viewed worldwide, not just in the United Kingdom where UK law applies.
    - The press are exempt from GDPR and 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, if appropriate.
- 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.

Name of Child: Date:

Parent/Carer Name:

Parent/carer's signature:

Appendix 3 - Ringmer Primary and Nursery School Guide to the Use of Images Online

Ringmer Primary and Nursery School Guide to the Use of Images Online

Using Images Safely and Responsibly

We all enjoy and treasure images of our family and friends; family events, holidays and events are moments we all like to capture in photos or on video. We now have the exciting dimension of adding our images and videos to our online social networks, such as Facebook, YouTube and many other websites. This means that we can easily share our photos and video with family and friends.

Whilst this can be very useful to all of us, we must ensure we protect and safeguard all children and staff, including those who do not want to have their images stored online.

What should we all think about before posting any images or video online and are there any risks?

- Once posted and shared online any image or video can be copied and will stay online forever.
- Some people do not want their images online for personal or religious reasons.
- Some children and staff may have a complex family background which means that sharing their image online can have unforeseen consequences.
- Some children are at risk and **MUST NOT** have their image put online; not all members of the community will know who they are.

Therefore in order to keep all members of the community safe we must all **'Think Before We Post'** Online

At Ringmer Primary and Nursery School we are happy for parents and carers to take photos and video of events for personal use but request that these images are not distributed or put online. This is to protect all members of the community.

We thank you for your support

Further Information on the Use of Images and video:

- Information Commissioner's Office: https://ico.org.uk/for-organisations/education/
- Think U Know: www.thinkuknow.co.uk/parents
- Get Safe Online: www.getsafeonline.org

Appendix 4 - Poster for display during school events

Respect and Care for the Whole Community when taking Photos and Videos

We are happy for parents and carers to take photos and video of their child for personal use but we request that these images are not distributed or shared online if they contain images of other children, adults or staff without consent. Sharing images of others online may put our community at risk.

Thank you for your support

Appendix 5 - Staff Consent Form for Images Google Survey

This form is sent to all new staff members and they are required to complete it. All responses are collated on a google spreadsheet and referred to when an image may be used.

- This form is valid for the period of time you are employed at Ringmer Primary and Nursery School. The consent will automatically expire after this time. We will not re-use any photographs or recordings after you leave the school without additional consent.

- This consent can be withdrawn by a member of staff at any time by informing the school in writing.

*Required

First Name*

Surname*

May we use your image in displays around the school?*

Yes / No

May we use your image in our prospectus and other printed publications that we produce for educational and promotional purposes?*

Yes / No

May we use your image on our official school/setting website?*

Yes / No

May we use your image on our official social media channels? (Private Instagram Account)*

Yes / No

Are you happy to appear in the media e.g. if a newspaper photographer or television film crew attend an event organised by the setting?*

Yes / No