




CAGE GREEN PRIMARY SCHOOL

AND THE PHOENIX CENTRE FOR AUTISM

Image Use Policy

Date Agreed: September 2018

Date of Next Review: September 2021

Signed by: 

Graeme Garthwaite
Headteacher

Useful School Contacts

Designated Safeguarding Lead: Catherine Wickham

Additional Named Safeguarding Leads: Graeme Garthwaite, Jamie Gurr, Jo Wilson

Governor with Lead Responsibility for Safeguarding: Monica Pell

Data Controller: Lynda Boorman

Official use of Images/Videos of Children

- All images taken by Cage Green Primary School and the Phoenix Centre for Autism will be used in a manner respectful of the eight Data Protection Principles. This means that images will be:
 - fairly and lawfully processed
 - 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
- The Data Controller and DSLs are responsible for ensuring the acceptable, safe use and storage of all camera technology and images at Cage Green Primary School and the Phoenix Centre for Autism.
- Written permission from parents or carers will be obtained before images/videos of children are electronically published by the setting.
- Written parental consent will 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 us 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 Cage Green Primary School and the Phoenix Centre for Autism.
- A record of all consent details will be kept securely on file. Should permission be withdrawn by parents/carers at any time, then all relevant images will be removed and disposed of and the record will be updated accordingly.
- Images will not be kept for longer than is to be considered necessary. A designated member of staff (the Data Controller – Lynda Boorman) 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 at all times, unless prior explicit consent has been given by the DSLs and the parent or carer of any child or young person 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 and data will be kept securely (e.g. with appropriate encryption).
- The Data Controller and/or DSL reserve the right to view any images taken and/or to withdraw or modify a member of staffs' authorisation to take or make images at any time.
- Images or videos that include children will be selected carefully when used online and will not provide material that could be reused.
- Children's' full names will not be used on the website in association with photographs.
- Cage Green Primary School and the Phoenix Centre for Autism will not include any personal addresses, emails, telephone numbers, fax numbers on video, on the website, in a prospectus or in other printed publications.
- We will only use images of children who are suitably dressed.
- Children's work will only be published with their permission or their parent's consent.
- Staff will receive information regarding the safe and appropriate use of images as part of their 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.
- Only official setting owned equipment (e.g. work provided digital or video cameras) will be used by staff to capture images of children for official purposes. Use of personal cameras by staff is prohibited at all times.

- Any apps, websites or third party companies used to share, host or access children's images will be risk assessed prior to use. We will ensure that images are held in accordance with the Data Protection Act and suitable child protection requirements (if necessary) are in place.
- 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.
- We will discuss the use of images with children and young people in an age appropriate way.
- Images will not be taken of any child or young person against their wishes. A child or young person's right not to be photographed is to be respected.
- Photography is not permitted in sensitive areas such as changing rooms, toilets, swimming areas etc.
- 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 parent/carer.

Use of Photos/Videos by Parents/Carers

- Parents/carers are permitted to take photographs or DVD footage of events for private use only.
- Parents/Carers are only permitted to take or make recording within designated areas of Cage Green Primary School and the Phoenix Centre for Autism. Photography is not permitted in sensitive areas such as changing room, toilets, swimming areas etc.
- The opportunity for parents/carers to take photographs and make videos can be reserved by Cage Green Primary School and the Phoenix Centre for Autism on health and safety grounds.
- Parents and carers who are using photographic equipment must be mindful of others when making and taking images.
- 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 DSL to discuss any concerns regarding the use of images.

Use of Photos/Videos by Children

- We 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 (e.g. unsupervised areas, toilets etc).
- The use of non-setting provided devices is covered in the school's online 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 the Data Protection Act 1998.
- 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 setting 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 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 (e.g. first names only) can 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 school is to be considered to have acted in good faith.

Use of Professional Photographers

- Professional photographers who are engaged to record any events will be prepared to work according to the terms of our online safety policy.
- Photographers will sign an agreement which ensures compliance with the Data Protection Act and that images will only be used for a specific purpose, subject to parental consent
- Photographers will not have unsupervised access to children and young people

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 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.
- 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 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.

Photographing Children: Frequently Asked Questions for Parents/Carers

Why do we need a policy?

Schools, playgroups and youth groups have always used photographs as a way of celebrating achievement or seeking publicity for fundraising etc. Parents and families and the children themselves often derive great pleasure from 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 need to be aware that placing any identifying information in the public domain has risks. Parents need to understand these issues in order to give properly considered consent. It is important that parents and schools have the opportunity to 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 setting or youth group and the name of the child it could be quite easy to find out the child's address and even work out their likely route to school/the 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, no. 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 in order to make an informed decision.

What about school/setting websites?

The same concerns apply to school/setting controlled sites and there is an added concern that images of children may be copied directly from a site which can then be manipulated or changed by another person. Settings/Schools can copy protect images and use lower quality images which means they cannot be usefully enlarged but this can be bypassed so must not be relied upon to keep images safe.

I want to do my own recording of We play/event is this ok?

Taking pictures or recordings of *your own children for your own personal use* is ok. The difficulty arises with plays or other events in that other children may also be filmed. It is important that we are all aware that some members of the community (children or adults) 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 site without appropriate permission from Cage Green Primary School.

10 September 2018

Dear Parents and Carers,

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 Cage Green Primary 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.

Continued overleaf/

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 school.

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

Yours sincerely,

Mr G Garthwaite,
Headteacher



PHOTOGRAPH PERMISSION FORM

- This form is valid for the period of time your child attends Cage Green Primary School unless specifically stated otherwise. The consent will automatically expire after this time. We will not re-use any photographs or recordings after your child leaves Cage Green Primary School without additional consent, *unless they are currently being used for educational and/or promotional purposes.*
- 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 full 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 parent/carer at any time by informing Cage Green Primary School in writing.

	Please circle as appropriate
May we use your child's image in displays around Cage Green Primary School?	Yes / No
May we record your child's image or use videos for assessments, monitoring or other educational uses with the School? These images or recordings will be used internally only.	Yes / No
May we use your child's image in our prospectus and other printed publications that we produce for educational and/or promotional purposes?	Yes / No
May we use your child's image on our official school website?	Yes / No
May we record your child's image on video or webcam for appropriate curriculum purposes?	Yes / No
Are you happy for your child to appear in the media eg if a newspaper photographer or television film crew attend an event organised by the school?	Yes / No
Are you happy for the school to print images of your child electronically?	Yes / No

Continued overleaf/

1. 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 legislation and may want to include the names and personal details of children and adults in the media.

2. I/we will discuss the use of images with our child/ren to obtain their views, if appropriate.
3. As the child's parents/carers, 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:..... Class

Child's signature (if appropriate) Date:

Parent/Carer's signature: Date:

Parent/Carer's name:



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Cage Green Primary 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 children are at risk and **MUST NOT** have their image put online. Not all members of the community will know who they are.
- 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.
- Therefore in order to keep all members of the community safe we must all **'Think Before We Post'** Online

At Cage Green Primary 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:

- Be Safe Online: <http://tiny.cc/49eiu>
- Information Commissioner's Office: <http://tinyurl.com/yc7nmnv>
- Think U Know: www.thinkuknow.co.uk/parents/safeuse
- Get Safe Online: www.getsafeonline.org

Adapted from resources developed by the Hertfordshire Schools' e-Safety Team



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

We are happy for parents and carers to take photos and video for personal use but request that these images are not distributed or put online if they contain images of other children, adults or staff without consent. This will help protect all members of the community

Thank you for your support



Adapted from resources developed by the Hertfordshire Schools' e-Safety Team