



BORDEN GRAMMAR SCHOOL

School Image Use Policy

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Devised/revised by	Michelle Brooker (using the KCC model policy)
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Designated Safeguarding Lead (DSL)	Michelle Brooker (Rebecca Powell & Chris Brinn are Deputy DSLs)
Linked Trustee	Mark Bailey (Online Safety)

All staff will have access to this policy and will be asked to sign to the effect that they have read and understood its content.



Borden Grammar School

School Image Use Policy

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

1.1 Scope and aims of the policy

- This policy seeks to ensure that images and videos taken within and by Borden Grammar 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 and Personal Social and Health Education (PSHE) and Relationships and Sex Education policy.
- This policy applies to all images (including still and video content) taken by the school.
- All images taken by the school will be used in a manner respectful of the eight Data Protection Principles. This means that images will be processed:
 - fairly and 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), Network Manager, DSL and Leadership Group 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 School 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 (except in the case of routine school business for examination purposes e.g. English GCSE speaking assessments, PE practical coursework).
- 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 an agreed basis on admission to the school.
- 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.

1.3 Safety of Images and Videos

- All images taken and processed by or on behalf of 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.
- Images will not be kept for longer than is to be considered necessary. A designated member of staff (DPO, DSL, Network Manager) 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 (e.g. **with appropriate encryption**).
- Any memory stick, CD or storage device containing images of children to be taken offsite for further work will be **suitably encrypted** and will be logged in and out by the Network Manager and DPO and this will be monitored to ensure that it is returned within the expected time scale.
- The DPO and/or Network Manager 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 (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.
- The school/setting will ensure that images always are held in accordance with the General Data Protection Regulation (GDPR) and Data Protection Act 2018, 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 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.
- 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 (e.g. 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.

1.5 Usage of Apps/ systems to share images with parents

- Borden Grammar School uses Edulink to upload and share images of children with parents.
 - The use of the system has been appropriately risk assessed and the DPO has taken steps to ensure all data stored is held in accordance with GDPR and the Data Protection Act 2018.

- Images uploaded to Edulink will only be taken on school/setting devices.
- All users of Edulink 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.

1.6 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 etc.

1.7 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 14 days. All recordings are to be erased before disposal.
- Regular auditing of any stored images will be undertaken by the Network Manager or DSL or other member of staff as designated by the leadership group.
- 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.

1.8 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 14 days. All recordings are to be erased before disposal.

2. Use of photos and videos of children by others

2.1 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 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 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.

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 take 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's 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 2018.
- 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 children will not be sharing these images online or via any website or social media tool.
- Photos taken by children for official use will be carefully controlled by the school and school staff will check 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 school.

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.
- 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 school is to be considered to have acted in good faith.

2.4 Use of External Photographers

- External photographers who are engaged to record any events will be prepared to work according to the terms of the settings in the Online Safety Policy.
- Photographers will sign an agreement which ensures compliance with GDPR and the Data Protection Act 2018.
- 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. Photography and Video Consent

Occasionally, we may take photographs and video of our pupils at our school. We may use these images in our prospectus or in other printed publications that we produce, as well as our own website and school Facebook and Twitter site. We may also make video or webcam records 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. The media often wish to use the names of students to accompany these images.

To comply with the General Data Protection Regulation (GDPR) and Data Protection Act 2018, we need your permission before we can photograph your child or make any video records of your child (except for photographs and video used for examination and administration purposes, not shared outside the school settings). Your child also needs to give us their permission to be photographed, videoed and consent for publication. Please see conditions of school use below and also refer to our school Privacy Notice.

Conditions of school use :

1. We, the school, will not use the personal details 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.
2. If we use photographs of individual children, we will not use the full name of that child in the accompanying text or photo caption.
3. If we name a child in any text, we will not use a photograph of that child to accompany the article.
4. We will not include personal e-mail or postal addresses, or telephone or fax numbers on video, on our website, in our prospectus or in other printed publications.
5. We may include pictures of pupils and teachers that have been drawn by the pupils.
6. We may use group or class photographs or footage with general labels, such as "a science lesson" or "sporting fixture".
7. We will only use images of pupils who are suitably dressed, to reduce the risk of such images being used inappropriately.
8. We will discuss the use of images with children in an age appropriate way and to role model positive behaviour.
9. This consent can be withdrawn by parent/carer at any time by informing Borden Grammar School in writing

3.1 Parental Consent Form for Images

This form is valid for the period of time your child attends 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.

	<i>Please Circle as Appropriate</i>
May we use your child's image in displays around the school?	<i>Yes / No</i>
May we 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.	<i>Yes / No</i>
May we use your child's image in our prospectus and other printed publications that we produce for educational and promotional purposes?	<i>Yes / No</i>
May we use your child's image on our official school/setting website?	<i>Yes / No</i>
May we use your child's image on our official social media channels? (Facebook, Twitter)	<i>Yes / No</i>
May we record your child's image on webcam for appropriate curriculum purposes?	<i>Yes / No</i>
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?	<i>Yes / No</i>
Are you happy for the school to print images of your child electronically?	<i>Yes / No</i>

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 UK and the Data Protection Act 2018 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.

I have retained a copy of this consent for reference.

Name of Child: _____

Parent/ Carer Name _____

Parent/ Carer signature: _____

Student Signature _____

Date: _____

Appendix 1a) Group Activity Letter and Consent Forms

Dear Parent/Carer

We are staging a production/special event of on xxxxxx. We are sure some parents/carers would like to take photographs/videos of the production. As you know we have a policy in place with regards to the taking, making and use of images and you will have previously signed a consent form stating whether or not your child could be photographed. In circumstances, such as productions or special events, we request specific consent before photographs can be taken by a third party. If you wish to take photos at the production there is a strong possibility that other children will also be included within the picture. We therefore need to ensure all parents/carers who have children in the production are happy for photographs to be taken, and hence need to request their permission.

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. 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.

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

At Borden Grammar School we are happy for parents and carers to take photos and video of events for personal use but we request that these images are not distributed or put online. This is to protect all members of the community. Please be aware that parents are not permitted to take photographs or to make a video recording for anything other than their own personal use (e.g. with a view to selling videos of an event).

Should any parent/carers not agree with their child being photographed, we will consider alternative options including:

- restricting who is involved in the production/special event
- staging specific photograph opportunities

Photographs of setting productions are ones which parent/carers tend to treasure. We will therefore only prohibit the use of cameras and videos as a last resort. We hope you will support us in this.

We would, therefore, be very grateful if you would complete the slip at the bottom of this letter and return it to me by (date).

Yours faithfully

Ashley Tomlin, Headteacher

Appendix 1b) Parental Consent for Images as part of a Group Activity

Child's name: _____

Date: _____

I *am / am not** happy for photographs to be taken of the production/special event in which my child is due to appear on xxxxxx (date)

*(*Please delete as appropriate)*

Parent/Carer: _____

Parent/carer's signature: _____

Child's Signature: _____

APPENDIX 2) Borden Grammar School's 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 Borden Grammar 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

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

Ashley Tomlin, Headteacher

Appendix 4 - Consent form for using photographs of Staff

The school would like to use your photograph for staff recognition purposes. These images will appear on our internal intranet and/or website. To comply with General Data Protection Regulation UK (GDPR UK) and the Data Protection Act 2018, we need your permission to use photographs of you. Please answer the question below, then sign and date the form where shown. We will not use the images taken, or any other information you provide, for any other purpose.

Please return the completed form, even if you have chosen not to give your consent.

Please circle your
answer

May we use your image on our:

- Website/Intranet, accessible by the setting only?
- Display/notice boards, accessible by the setting only?
- Website, viewable by anyone in the world?
- Official social media channels, viewable by anyone in the world?
i.e. Facebook, Twitter

Yes / No
Yes / No
Yes / No
Yes / No

- I have read and understood the conditions of use.

Yes / No

Complete the next 2 questions only if you answered 'Yes' to any of the above options:

- I confirm that I understand publication of my picture will mean that my picture will be viewable by those with access, alongside my job title and work contact details and I consent to such processing of my personal data.

Yes / No

- I understand that if my picture and details are placed on the website and/or social media channels potentially this will be accessible by anyone in the world with internet access.

Yes / No

Name: _____

Signed: _____

Date: _____

Conditions of use

1. This form is valid for **the duration of your employment at Borden Grammar School** .
Your consent will automatically not apply to any other usage of the photos.
2. Images must only be used in circumstances where consent has been given. Signed consent must be given for images to appear on the intranet and/or website (which is viewable by potentially anyone), or they cannot be published in this way.
3. Under the GDPR UK and the Data Protection Act 2018 your rights include:
 - a) Your consent (to the publication of your photo) can be withdrawn at any time (principle 1 of the Act)
 - b) Your photo will **not** be used for any other purpose without your further consent (principle 2 of the Act)
 - c) Your personal data will be accurately maintained and kept up to date (principle 4 of the Act)
 - d) Publication of your photo will cease and all electronic copies will be deleted when you leave the setting (principle 5 of the Act)

Appendix 5 - Useful Contacts

Kent County Council's Online Safety Guidance and Information for Education Settings: www.kelsi.org.uk/child-protection-and-safeguarding/e-safety

Kent County Council's Access to Information Content
www.kelsi.org.uk/school-management/data-and-reporting/access-to-information

Kent County Council Education Safeguards Team Content: www.kelsi.org.uk/child-protection-and-safeguarding

ATL Help and Advice on CCTV and other surveillance: www.atl.org.uk/help-and-advice/school-and-college/CCTV.asp

ICO Code of Practise for CCTV:
<https://ico.org.uk/media/for-organisations/documents/1542/cctv-code-of-practice.pdf>

ICO Sector Guide for Education:
www.ico.gov.uk/for_organisations/sector_guides/education.aspx

ICO Information on Data Protection Act for Organisations:
www.ico.gov.uk/for_organisations/data_protection.aspx

United Kingdom's Copyright Licensing Agency: <http://www.cla.co.uk/>

International Federation of Reproduction Rights Organisation: <http://www.ifrro.org/>