



**HURLINGHAM
SCHOOL**

Taking, Storing and Using Images of Children Policy

This policy is made available to all parents, prospective parents, staff and prospective employees of Hurlingham School on our website, and a hard copy can also be viewed at our School Office.

This policy applies to all activities of Hurlingham School, including the Early Years Foundation Stage (EYFS) Nursery and Reception pupils.

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1. Introduction

- At Hurlingham School, we are an open and inclusive community that is very proud of all of the achievements of all of our pupils in their academic, artistic and sporting endeavours. We celebrate our diversity and give all of our many visitors a warm welcome.
- We particularly welcome parents to our concerts, plays and sporting events, as well as to more formal occasions during the school year. The school walls are decorated with examples of pupils' work, team photographs and photographs of trips and expeditions in which our pupils have participated. Our web site is updated regularly, and all parents are sent our Newsletter at the end of each term in order to keep them fully abreast with the news of our active community.

2. This Policy

- This Policy is intended to provide information to pupils and their parents, carers or guardians (referred to in this policy as "parents") about how images of pupils are normally used by Hurlingham School ("the School"). It also covers the School's approach to the use of cameras and filming equipment at school events and on school premises by parents and pupils themselves, and the media.
- It applies in addition to the School's terms and conditions and parent contract, and any other information the School may provide about a particular use of pupil images, including e.g. signage about the use of CCTV (*see our CCTV Policy*); and more general information about use of pupils' personal data, e.g. the School's Privacy Notice. Images of pupils in a safeguarding context are dealt with under the school's relevant safeguarding policies.

3. General points to be aware of

- Certain uses of images are necessary for the ordinary running of the school; other uses are in the legitimate interests of the School and its community and unlikely to cause any negative impact on children. The School is entitled lawfully to process such images and take decisions about how to use them, subject to any reasonable objections raised.
- Parents who accept a place for their child at the school are invited to agree to the School using anonymous images of their child and information relating to his or her achievements for promotional purposes, which may be published in the prospectus or on the web site, as well as displayed within the premises, and in newsletters. Permission for this is requested on a form given to parents during the admissions process (*See 'Use of Images of Pupils by the School' consent form for parents and 'Use of Your Image by the School' consent form for Pupils*) and/or from time to time if a particular use of the pupil's image is requested. However, parents should be aware of the fact that certain uses of their child's images may be necessary or unavoidable (for example if they are included incidentally in CCTV or a photograph).
- We hope parents will feel able to support the School in using pupil images to celebrate the achievements of pupils, sporting and academic; to promote the work of the school; and for important administrative purposes such as identification and security.
- Any parent who wishes to limit the use of images of a pupil for whom they are responsible should contact the Admission's Registrar in writing. The School will respect the wishes of parents/carers (and indeed pupils themselves) wherever reasonably possible, and in accordance with this policy.

4. Use of Pupil Images in School Publications

- Unless the relevant pupil or his or her parent has requested otherwise, the school will use images of its pupils to keep the school community updated on the activities of the school, and for marketing and promotional purposes, including:
 - on internal displays on conventional notice boards within the school premises;
 - in communications with the school community (parents, pupils, staff and Advisors) and alumni) via password-protected sections of the school's web site;
 - on the school's website for marketing purposes; and
 - in online, press and other external advertisements for the school. Such external advertising would not normally include pupil's names and in some circumstances the school will seek the parent or pupil's specific consent, depending on the nature of the image or the use.
- The source of these images will predominantly be the school's staff (who are subject to policies and rules in how and when to take such images), or a professional photographer used for marketing and promotional purposes, or occasionally pupils. The school will only use images of pupils in suitable dress and the images will be stored securely and centrally.

5. Use of Images for Identification Purposes

- We request passport size photographs of all children joining us in Nursery and Reception. This image is retained in their Early Years Profile document and also for identification purposes on the children's coat hooks. All pupils are photographed individually in the autumn term and passport size images of each child are securely stored in the individual child's record in the password-protected area of our School database, where access is restricted to academic, pastoral and school office staff. Parents are able to purchase copies of his or her son or daughter's photograph.
- Hard copies of these images are printed on medical advice cards which we use to help identify those children designated 'code red' because of a potentially life-threatening medical condition. These cards are displayed in the Medical Rooms, Staff rooms, in some group teaching spaces and the child's classroom and copies are also placed in the sport and outing medical bags.
- CCTV is in use on school premises and will sometimes capture images of pupils. Images captured on the School's CCTV system are used in accordance with the *Privacy Notice* and the *CCTV Policy*.

6. Use of Pupil Images in the Media

- Where practicably possible, the school will always notify parents in advance when the media is expected to attend an event or school activity in which school pupils are participating, and will make every reasonable effort to ensure that any pupil whose parent or carer has refused permission for images of that pupil, or themselves, to be made in these circumstances are not photographed or filmed by the media, nor such images provided for media purposes.
- The media often asks for the names of the relevant pupils to go alongside the images, and these will only be provided where parents have been informed about the media's visit and either parent or pupil has consented as appropriate.
- We would complain to the Press Complaints Council (PCC) if the media failed to follow the appropriate code of practice for the protection of young people, including the children of celebrities.

7. Security, Storage and Review of Pupil Images

- As per the GDPR and the DPA 2018, images obtained by the school will not be kept for longer than necessary; retention periods for the different types of personal data are outlined in the school's Record Management Policy.
- Hard copies of photos and video recordings held by the school will be annotated with the date on which they were taken and will be stored securely . They will not be used other than for their original purpose, unless permission is sought from the Head and parents of the pupils involved and the DPO has been consulted.
- Paper documents will be shredded or pulped and electronic memories scrubbed clean or destroyed once the retention period has ended.
- The Head of Media and Computing will review stored images and videos on an annual basis to ensure that all unwanted material has been deleted.
- Where a parent or pupil has withdrawn their consent, any related imagery and videos involving their child/the pupil will be removed from the school drive immediately.
- When a parent withdraws consent, it will not affect the use of any images or videos for which consent had already been obtained. Withdrawal of consent will only affect further processing.
- Where a pupil's security risk has changed, the DSL will inform the Head immediately. If required, any related imagery and videos involving the pupil will be removed from the school drive immediately. Hard copies will be removed by returning them to the parent/pupil or by shredding, as appropriate.
- Official school photos are held on SIMS alongside other personal information and are retained for the length of the pupil's attendance at the school, or longer if necessary, e.g. due to a police investigation.
- Images taken on the camera must be downloaded as soon as possible on to a school computer/laptop, ideally once a week.
- Members of staff are responsible for ensuring that images are safely stored, particularly on memory sticks and hard drives. They must take reasonable measures to ensure that they do not come into the possession of unauthorised persons.
- No digital image will be altered or enhanced in any way by any member of staff, unless given prior permission by the Head to do so.
- The school may require images to be deleted or edited as appropriate and may choose to use images taken by members of staff or volunteers for other purposes, provided the processing conditions and consent requirements of this policy are met.
- Staff members are responsible for ensuring that edited images do not mislead or misrepresent. They must not edit images which result in their subject being vulnerable to embarrassment, teasing, bullying or abuse.
- If the memory card for individual school cameras needs to be replaced, then the replaced memory card will be destroyed to ensure that no images can be recovered.
- Members of staff must remember that, even when images are physically deleted from a camera or memory card, the camera or the memory card must be appropriately disposed of to ensure that no imprint remains.

8. General Use of Digital Cameras & Mobile Devices by Staff

- Members of staff may be provided with a camera to record and maintain pictorial evidence of the lessons, behaviour, activities and events related to their pupils.
- Photos may only be taken for educational purposes and in “school or educational provision settings” as mentioned above.
- The use of personal cameras, mobile phone cameras or other recording equipment is prohibited on school premises at all times.
- The school-owned cameras and Google Pixel mobile phones are stored in the office of the Head of Media and Computing Resources. Members of staff are responsible for making sure that any camera or mobile device is returned to the Head of Media and Computing Resources after use.
- Each camera will be clearly numbered/labelled.
- Members of staff are not allowed to bring in personal cameras without prior permission. If personal cameras are allowed to be brought in due to a specialist requirement or defective equipment, the memory card should be shown to be empty and images downloaded to the school's server.
- Members of staff are not allowed to take school cameras or memory cards home.
- Staff or other adults are not permitted to take photographs of pupils in vulnerable circumstances, such as when they are upset or inappropriately dressed.
- Members of staff and the school community are required to report inappropriate use of digital cameras and images to the Head. If it is found that any incidents raise child protection concerns, immediate action will be taken in consultation with the DSL.
- The school is not responsible for lost, stolen or damaged camera equipment. This remains the responsibility and obligation of the borrower/member of staff.

9. Use of Cameras and Filming Equipment (including mobile phones) by Parents

- Parents, guardians, carers or close family members (hereafter, parents) are welcome to take photographs of (and where appropriate, film) their own children taking part in school events, subject to the following guidelines, which the school expects all parents to follow:
 - When an event is held indoors, such as a play or a concert, parents should be mindful of the need to use their cameras and filming devices with consideration and courtesy for cast members or performers on stage and the comfort of others. Flash photography can disturb others in the audience, or even cause distress for those with medical conditions; the school therefore asks that it is not used at indoor events.
 - Parents are asked not to take photographs of other pupils, except incidentally as part of a group shot, without the prior agreement of that pupil's parents.
 - Parents are reminded that such images are for personal use only. Images which may, expressly or not, identify other pupils should not be made accessible to others via the internet (for example on Facebook), or published in any other way.
 - Parents are reminded that copyright issues may prevent the school from permitting the filming or recording of some plays and concerts. The school will always print a reminder in the programme of events where issues of copyright apply.

- Parents may not film or take photographs in changing rooms or offstage during school productions, nor in any other circumstances in which photography or filming may embarrass or upset pupils.
- The school reserves the right to refuse or withdraw permission to film or take photographs (at a specific event or more generally), from any parent who does not follow these guidelines, or is otherwise reasonably felt to be making inappropriate images.
- The school arranges for most plays and concerts to be recorded professionally, in which case CD, DVD or digital copies may be made available to parents for purchase. Parents of pupils taking part in such plays and concerts will be consulted if it is intended to make such recordings available more widely.

10. Use of Cameras and Filming Equipment by Pupils

- All pupils are encouraged to look after each other, and to report any concerns about the misuse of technology, or any worrying issues to a member of the pastoral staff.
- The use of cameras or filming equipment (including on mobile phones) is not allowed in toilets, washing or changing areas, nor should photography or filming equipment be used by pupils in a manner that may offend or cause upset.
- The misuse of images, cameras or filming equipment in a way that breaches this Policy, or the school's *Anti-Bullying Policy*, *Data Protection Policy for Pupils, Parents and Carers*, *E-Safety Policy*, *IT Acceptable Use Policy*, *Safeguarding and Child Protection Policy* or the *School Rules* is always taken seriously, and may be the subject of disciplinary procedures or dealt with under the relevant safeguarding policy as appropriate.

11. Staff Induction

- All new teaching and office staff are given guidance on our School policy on taking, using and storing images of children. All staff are made aware of the following points:
 - No functions within mobile telephones should ever be used in a room where EYFS children are present unless a specific emergency requires their application.
 - Children must never be photographed by cameras built into mobile phones.
 - Should a photograph of a child be taken using a digital camera, the image must be transferred onto the school network media drives at the first possible opportunity and the file on the camera must then be deleted. No images of children should ever be uploaded to photo or video sharing sites.

12. Additional Safeguarding Procedures

- The school understands that certain circumstances may put a pupil's security at greater risk and, thus, may mean extra precautions are required to protect their identity.
- The DLS will, in known cases of a pupil who is an LAC or who has been adopted, liaise with the pupil's social worker, carers or adoptive parents to assess the needs and risks associated with the pupil.
- Any measures required will be determined between the DSL, social worker, carers, DPO and adoptive parents with a view to minimising any impact on the pupil's day-to-day life. The measures implemented will be one of the following:
 - Photos and videos can be taken as per usual school procedures
 - Photos and videos can be taken within school for educational purposes and official school use, e.g. on registers, but cannot be published online or in external media

- No photos or videos can be taken at any time for any purposes
- Any outcomes will be communicated to all staff members via a staff meeting and the list outlining which pupils are not to be involved in any videos or photographs, held on SIMS, will be updated accordingly.

13. Treating Others with Respect

- Everyone has a right to feel secure and to be treated with respect, particularly the vulnerable. Harassment and bullying will not be tolerated. Our *Anti-bullying Policy* is set out on the School web site and a hard copy is also available upon request from the School office. Our school is strongly committed to promoting equal opportunities for all, regardless of race, gender, gender orientation or physical disability.
- All pupils are encouraged to look after each other and to report any concerns about the misuse of technology or worrying issue to a member of the pastoral staff. The use of cameras is strictly supervised and they are not allowed in washing and changing areas, nor should photography be used in a manner that may offend or cause upset. The misuse of cameras in a way that breaches our *Anti-bullying Policy* is always taken seriously and may be the subject of disciplinary procedures.

Date created: Spring 2010

Date of last review: June 2021

Date of next review: September 2022