

# CHADWELL HEATH ACADEMY



## Taking and Using Images of Children

### 1 Introduction

Chadwell Heath Academy (The School) is committed to protecting and promoting the privacy and welfare of our pupils. This policy is intended to provide information to employees, pupils and parents (to include carers and guardians) about how images of pupils are used by our School. This use is regulated by the General Data Protection Regulation (GDPR) and the Data Protection Act 2018 (DPA).

This policy also addresses the use of cameras and other filming equipment by parents, pupils and the media on the School's premises and at School events.

### 2 General rules regarding the School's use of pupil images

The School uses images of pupils for four broad purposes:

- educational;
- marketing and promotional;
- to communicate with parents and pupils; and
- for identification and security.

More information about the purposes for which we process images and the lawful basis for the processing required under the GDPR can be found in the School's privacy notices for parents, pupil and for employees. This is available on The School's website.

Images of pupils may be used in the following formats: printed and digital still photographs, videos and streaming media (such as CCTV and webcams) using devices such as cameras, video cameras, mobile phones and tablets). These images may be used internally, in our school prospectus, on our website, in paper or electronic communications with parents, on School social media accounts and in the local or national press and media.

In relation to all such processing by the School, we apply the following guidelines.

- Employees may take images of pupils using School equipment that is securely locked away; they must not use their own equipment to take images of any pupils. Employees may seek permission from the Headteacher to use personal equipment in special circumstances, if permission is given, parents will be asked to give specific consent. In this event images will be uploaded to school equipment and must be deleted from the personal equipment at the end of the activity.
- Images must be stored only on secure, password-protected equipment belonging to the School.

- Employees must be clear about the purpose for which images are being taken and used, who they may be shared with, where they must be stored and for how long. They must ensure that they process images accordingly.
- Employees must ensure that pupils appearing in any image are appropriately dressed.
- Images must not be taken of pupils participating in activities that may bring the individuals or the School into disrepute.
- Employees must not take images of pupils unless a third party is present.
- Employees must not use any images likely to cause distress, upset or embarrassment.
- Before taking or using photographs of children from other schools, employees must establish from those schools whether their policies permit this.
- Employees must report any concerns about inappropriate photography to our Designated Safeguarding Lead.

### **3 Consent**

We will not take or use pupil's images without written parental consent for promotional purposes or in the following circumstances:

- Where the image is published outside the School (other than to a parent).
- Where the image is accompanied by the pupil's full name
- Where pictures are taken of pupils by commercial photographers.

### **4 Individual's rights**

Parents who have given consent to the School's processing of pupil's images have the right to withdraw that consent at any time in which case we will stop the processing. Where the School processes pupil's images in circumstances where consent is not required, parents have the right to object to the processing in which case we will stop the processing unless we can demonstrate a compelling reason to continue.

### **5 Use of pupil's images for educational purposes**

Images may need to be used for the assessment of performance on a course, or the completion of assignments. Further information will be included in the course descriptions booklets (Key stage 4 & 5)

### **6 Use of pupil's images for marketing and promotional purposes**

The School may include the use of images of pupils on the school website, prospectus, press and other media advertisements.

### **7 Use of pupil's images to communicate with the School community**

We send information about the School to parents, pupils, employees, governors and alumni by post and email. Sometimes pupil's images appear in this information.

### **8 Use of pupil images for identification and security purposes**

The School uses CCTV to help ensure the safety of pupils, employees and other visitors to the School's premises and for the prevention and detection of crime. This use is carried out in

compliance with the GDPR. There may be a need to produce images of pupils for the purposes of evidence to the police, in the event there is a risk to The School. Further information is contained in our privacy notices.

## **9 Employees**

Photographs of employees may be used internally, on our website and in promotional material for the School.

## **10 The media**

We will ensure that professional photographers and the media are accompanied by a member of staff at all times when taking photographs of our pupils on School premises.

## **11 Parents taking images**

The GDPR and DPA do not regulate the taking of photographs or videos by parents of their own children on our School premises or at School events for purely personal or household purposes. However, we ask that they abide by the following rules.

- The photography must not interfere with the smooth running of the event or affect the health and safety or enjoyment of pupils, parents or employees.
- The images must not be inappropriate or embarrass or distress pupils.
- Images must be of the parent's own child. Images of other children may not be included (except incidentally) without the consent of a parent of the other child.
- The image must be for personal use only (it can be shared by email with family and friends) but if it identifies other pupils then it must not be published on any social media sites.

If parents and/or other family members fail to adhere to these conditions then we may withdraw permission to use a camera at future school events.

## **12 Pupils**

Pupils must not take, use, share or publish images of other pupils or members of staff without their permission. This restriction includes images taken on the School premises and on educational visits.

The use of cameras and mobile phones are prohibited in all circumstances in the toilet and changing areas at School.

We have high expectations of pupil behaviour when photographing peers and other individuals. Pupils must not take inappropriate images (including showing themselves or other pupils being inappropriately dressed). The School expects pupils to comply with the rules set out in our Behaviour policy and we will take seriously any incidents of bullying. We will apply appropriate disciplinary sanctions that may include exclusion. The School may also act where a pupil's behaviour outside of School may affect the reputation of our School.

If there are any allegations or concerns of abuse, pupils are encouraged to speak to a member of staff and we will provide pastoral support. Employees must report any safeguarding concerns to the Designated Safeguarding Lead.

### **13 Security**

The School will implement measures to protect the security of personal data. Employees must not use personal devices to take photographs of pupils (except in special circumstances, see note 2 above). Images will be securely and centrally stored to maintain confidentiality. Images of pupils will be accessible only to authorised employees. If an employee needs to send photographs of pupils via email to a recipient who cannot guarantee security, we will ensure that the emails are encrypted and password protected

We will seek contractual assurances required by the GDPR that any commercial photographers processing images of pupils on the School's behalf will store any images securely.

### **14 Use of CCTV**

The School adheres to the following guiding principles in order to ensure students, staff and property are safe from harm:

1. The use of a surveillance camera system will always be for a specified purpose which is in pursuit of a legitimate aim and necessary to meet an identified pressing need.
2. The use of a surveillance camera system in the School will take into account its effect on individuals and their privacy, with regular reviews to ensure its use remains justified.
3. Clear rules, policies and procedures are in place before a surveillance camera system is used.
4. Access to retained images and information is restricted and there are clearly defined rules on who can gain access and for what purpose such access is granted; the disclosure of images and information only takes place when it is necessary for such a purpose or for law enforcement purposes.

### **15 Retention**

The School will only retain images of pupils for as long as necessary for the purposes for which the images are processed, in accordance with the School's data retention policy. Images held by the School must be annotated with the date on which they were taken.

# CHADWELL HEATH ACADEMY



## Parental Consent to the Taking and Use of Images of Pupils

**Name of pupil:**

**Form:**

Chadwell Heath Academy (the School) uses images of our pupils as set out in our Taking and Using Images of Children policy which is available on our website or can be sent to you on request from the School Reception.

Please indicate below whether you consent to your child's image being used for promotional purposes in the following ways:

*Please circle your answer*

In the School's printed publications	Yes / No
On our website*	Yes / No
On the School's social media	Yes / No
In the media	Yes /No
Internal displays	Yes /No
When the full name is attached to the photo	Yes /No

If you give consent, you may withdraw it at any time. If you decide to do so, please contact our Data Protection Officer- Mr S. Islam Deputy Head Teacher.

If you do not withdraw consent, it will remain valid for the entire period of your child's attendance at the School and in addition may be used for alumni purposes.

\*Please note that websites can be viewed throughout the world and not just in the United Kingdom where UK law applies.

**Parent or guardian name:**

**Signature:**

**Date:**