

Holy Trinity Primary School, A Church of England Academy

Camera & Image Policy

Rationale

The use of cameras should be considered an essential and integral part of everyday life. As such, children and young people and early year's practitioners and their managers are to be encouraged to use such technology in a positive and responsible way.

It has to be recognised however, that digital technology has increased the potential for cameras and images to be misused and inevitably there will be concerns about the risks to which children and young people may be exposed.

Practical steps must be taken to ensure that the use of cameras and images will be managed sensitively and respectfully. A proactive and protective ethos is to be reflected which will aim to promote effective safeguarding practice.

It must however be acknowledged that technology itself will not present the greatest risks, but the behaviours of individuals using such equipment will.

Aims

To ensure safer and appropriate use of cameras and images through agreed acceptable use procedures. This is to be in line with legislative requirements and will aim to respect the rights of all individuals.

Implementation

The Camera and Image Policy will apply to the use of any photographic equipment. This will include mobile phones and portable gaming devices with inbuilt cameras as well as other forms of digital technology and resources for storing and printing images.

- Cameras and other photographic equipment will be designated for work-related purposes only.
- The use of personal photographic equipment is prohibited.
- The use of personal USB sticks, the transferring of images via free unfiltered web mail or via mobile media is prohibited

Senior Leadership reserve the right to view any images taken and/or to withdraw or modify an individual's authorisation to take or make images at any time. Staff must ensure that all images are available for scrutiny and be able to justify any images in their possession.

ICT Network Manager will be responsible for ensuring the safe storage of all images, in accordance with the Camera and Image Policy.

General signed consent to take photographs or record images of children will be requested from the parent or carer on enrolment of their child at Holy Trinity Primary School (or extended school provision). The purpose for taking any images is to be clearly explained and agreed. This is reviewed each year.

The parent or carer will reserve the right to refuse or withdraw their consent at any time.

A list of children with and without photo consent is stored in the Pink File in each classroom

Protective and precautionary measures should therefore be considered when taking, making or using images of children. It is to be ensured that all staff are aware of the potential for images to be subject to misuse.

- The taking or making of images of a child or young person in a one to one situation with an adult is to be avoided whenever possible; unless there is an agreed, specified reason for doing so. It must be recognised that the context of such situations are likely to be perceived as sensitive and the use of cameras will be seen as intrusive and open to misinterpretation. It is to be recognised that this may leave both the adult and child in a vulnerable position and is therefore not to be considered accepted practice.
- It is to be recognised that individual close up pictures of a child or young person often provides little context or purpose, and most often, an image of a group of children will show an activity or situation to better effect. Unnecessary close up pictures of an individual child or young person with no surrounding context or purpose are therefore to be avoided.
- Where group photographs of children and young people are to be planned, permission must be obtained from all parents. If any parent has indicated that their child is not to have a photograph taken then a group photograph will not be considered appropriate.
- Images of children and young people must only be taken when they are in full and suitable dress. In no circumstances, are images to be taken of children or young people in any state of undress.
- The taking or making of images in sensitive areas of the school, for example, toilet cubicles and changing areas are not to be permitted.
- It should be ensured that a child or young person's name or any other identifying information does not appear in any caption or accompanying text alongside their photograph, unless prior consent has been received from parents.

Press Photographers

Where a press photographer is to be invited to celebrate an event, every effort will be made in advance to ensure that the newspaper's (or other relevant media) requirements are able to be met. Where, for example, a newspaper is to be invited to take photographs of children and young people, it is unacceptable for their names to be completely withheld. Newspapers will be very unlikely to print anonymous photographs. An agreement will therefore be sought between parents and carers and the press. Responsibility and liability however cannot be held

for the actions of a third party organisation, should they choose not to abide by any such agreement once in place.

The identity of any press representative will be verified. Access will only be permitted where the event is to be planned, and where press are to be specifically invited to attend

Use of a professional photographer

It will be ensured that any professional photographer who is to be engaged to record any events will be prepared to work according to the terms of this policy document and the following guidelines:

- In the context of data protection legislation, the photographer will be considered a 'data processor' and any agreement with them will be in accordance with the Data Protection Act 1998.
- Photographers will only be used where they will guarantee to act appropriately to prevent unauthorised or unlawful processing of images; and will insure against accidental loss or destruction of, or damage to, personal data.

Only reputable photography agencies and/or professional photographers will be used. Evidence of such authenticity will be required.

Details of any checks regarding suitability, which are to include evidence of DBS, will be requested. Photographic identity will be checked on arrival.

The right of parents and carers to take photographs and videos

Parents and carers will not be covered by the Data Protection Act 1998 if they are to take photographs or make a video recording for their own private use. The Act will therefore not prevent parents and carers from taking photographs or making video recordings of their own children within the setting environment, for example, during nativity plays.

Closed-circuit televisions (CCTV)

CCTV is to be used for the following purposes:

- To control access.
- To monitor security.
- For site management, for example monitoring incorrect parking, manoeuvring vehicles and delivery arrivals.
- For monitoring purposes
- For general and focused observations of children
- To act as an effective deterrent to prevent crime and to discourage trespass.

All areas which are to be covered by CCTV must be well signposted, and notifications are to be displayed so that individuals will be 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 no more than 30 days. All recordings are to be erased before disposal.

During operational and out of hours periods, cameras may record inappropriate activities taking place on the premises. If such images are of a criminal nature or give any cause for concern, the information will be referred to the appropriate agency.

Website

Displaying distinguishable images of children on the school's external website is to be avoided, wherever possible where they are specific permission has been received from parents.

Children's Books & Learning journeys

Photos and special moments contained in a child's book or portfolio all document the child's unique learning journey

The information contained within each learning journey is to relate to an individual, identifiable child; therefore it is to be treated as personal data. This means that such information is to be stored securely when not in use. The aim will be to avoid unauthorised access to potentially sensitive data.

Staff Training portfolios

During training, staff may be required to compile portfolios which will be used to document and evidence their own learning. Part of this documentation is likely to include images of the children participating in various activities.

The Senior Leadership team have a duty of care to ensure staff are to act responsibly in compiling the images to be included in training portfolios. All images will be subject to scrutiny and regular audits will be carried out to ensure all relevant policies and procedures are to be adhered to.

Storage and disposal

Images are to be stored and disposed of securely. The aim will be to prevent unauthorised access, ensure confidentiality and protect identity. All images are to be stored and disposed of in line with the Data Protection Act 1998.

Security

All images are to be handled as personal data and deemed to be of a sensitive and confidential nature. It is to be recognised that damage or distress could be caused if security is to be breached. The responsibility of being in a position of trust in handling such data must therefore be taken seriously.

Should there be any concerns over breaches of security, the Headteacher will undertake an investigation as is to be deemed appropriate. All such incidents are to be recorded and where necessary reported to the relevant authorities. Any actions which are to be identified as a result of any investigations must be implemented with immediate effect

Equality

This policy complies with the requirements of the Data Protection Act 1998, Freedom of Information Act 2000, Human Rights Act 1998 and other relevant Acts regarding the taking and use of photographic images of children.

All images 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

All images to be taken should represent the diversity of the children. No child is to be favoured in photographs.

This policy has been assessed for equality impact: Low

Monitoring

The effectiveness of this policy will be monitored by the Senior Leadership team & Safeguarding Governor.

Policy Written: February 2012

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To be reviewed: Nov 2019

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