



## Camera Use Policy v2.1

### Document Control:

| Version Number | Date modified | Description of modification   | Modified by         |
|----------------|---------------|---|---------------------|
| 2.0            | 17.5.2023     | Added reference to SmartWatches where mobile devices are referenced.<br>Amended skinton to sheap email address<br>Amended S Drive to OneDrive   | S Kurze-Kinton-Heap |
| 2.1            | 18.5.2023     | Removed duplicated word in point 3 (log)<br>Amended point 14 to reference prior checks before filming/photography in places where data is held<br>Removed adopted data from footer as amendment dates shown in document modification log  | S Kurze-Kinton-Heap |
| 2.2            | 5.9.2023      | Amened reference to my school portal and replaces with My school post.<br><br>Added Teaching, Learning and Official Photographs option as a number of people request this option<br><br>Broadened school own devices as may not only be ipads – may be a school camera or other device such as another brand of tablet computer.<br><br>Removed reference to camera and video courtesy code as I am unsure if this is provided to parents – is this part of the contract? | S Kurze-Kinton-Heap |

## **Introduction**

Photographs and video for school and family use are a source of innocent pleasure and pride, which can enhance the self-esteem of students and young people and their families.

Parents/carers are not required to comply with the Data Protection Act 1998 when taking photographs for their own private use of their students at an organised event.

Parents should not be stopped taking photographs for their own private use because of concerns of contravening the Data Protection Act. However, we must always be mindful of the need to safeguard the welfare of students in our school, and issues of child protection, data protection and parental consent will be given careful thought. Images may be used to harm students, for example as a preliminary to 'grooming' or by displaying them inappropriately on the Internet.

This policy will apply to all forms of publications: print, film, video, DVD, on websites and in the professional media.

Where another body provides services or activities separately, using the school premises, the Bursar will ensure that the body concerned has appropriate policies and procedures in place in regard to safeguarding students.

## ***Consent forms***

1. All parents of students in the school will be asked to sign an online consent form to gain permission to publish photographs in public places (including websites). This form will include clear references to where the image may be used. If this list is added to, new permission MUST be sought. Parents will have the option of
  - a. Full Consent (any purpose),
  - b. Teaching, Learning and Official School Photographs only Consent (to record or aid teaching and learning or in formal form/year or whole class photographs)
  - c. Teaching and Learning Consent (to record or aid teaching and learning)
  - d. No Consent (not for any purpose).

Even when No Consent is given, we have a legitimate interest to take photographs of the students for our internal use to enable staff to identify the student.

2. This consent will be sought when a child starts school; parents must be made aware that they can withdraw consent at any time and the mechanism to do this. Withdrawal of consent will be from the date the request is received by our administration team and will only apply to new publications after that date – it is not retrospective; i.e. we will attempt to identify and remove any photographs of the child already published, but in some cases this may not be possible.
3. A log is kept on School Post and on OneDrive of all parents/carers replies including the date and method by which consent was given. Where a parent proactively does not consent and failure to reply will both be treated as if consent has not been given and recorded on our log. If parents/ carers disagree over consent for their child, it will be treated as if consent has not been given.
4. All adults in the school will be asked to sign a consent form to gain permission to publish photographs and moving images in public places (including websites) – this is part of their employment contract and managed by the Bursar.

## ***Parents and carers***

5. We do not allow parents/carers or attendees to take photographs and videos at school events as other students may inadvertently be captured. This includes, but not is limited to, smart watches, cameras, mobile phones or tablets. This will be clearly stated in the letter/communications regarding events and a member of staff will announce this prior to events starting.
6. If general shots/ footage are to take place such as at a school event, visitors will be warned in the invitation/ communications. Tickets/ reply slips and/or entry signage will include a warning that school photography/ filming will take place at the event and ask visitors to select a lanyard on entering the event. If they choose no lanyard (proactive consent given to be in photographs) or yellow lanyard (do not consent to being in school photographs). The image(s)/ footage of the person will therefore show if the person has given consent and have a date of capture. Guests must be invited to make this choice when entering the event so they can make a pro-active opt-in choice under GDPR. Our school photographer will also wear a clear red high-vis vest that identifies their role and enables subjects to move away or request not to be photographed should they change their mind during the event.
7. People with no connection to our school will not be allowed to photograph – staff will question anyone they do not recognise who is using a camera and or video recorder at events and productions.

### ***Creation of images***

8. All photographs/ footage must be taken on school cameras or school-owned iPads/devices. NO member of staff is permitted to take photographs on their own device (including, but not limited to, smart watches, cameras, mobile phones or tablets) for any purpose.
9. School iPads should be secured with a passcode which activates after 2 minutes without use. Staff should read and comply with the school ICT policy which states that school devices and their passcodes should not be shared with others, nb this includes students in school or friends/ family members outside of school.
10. Only image/ footage of students suitably dressed will be allowed to reduce the risk of images being used inappropriately. Special consideration will be given to photographs taken during PE (sports day), Dance and swimming.
11. No photographs or videos may be taken when students are dressing or changing.
12. No photographs or videos may be taken when students are receiving medical attention.
13. No photographs or videos should be taken in areas of the school where student data is held (unless a member of staff has previously checked that no data could be captured); this includes, but is not limited to, the staff room, administration offices, SEN Office and SEN Teaching Room, Bursary and Safeguarding Lead's Office.
14. If a photograph is likely to be used again it will be stored securely on the school network or OneDrive and MUST be deleted from the device upon which it was created. Images should only accessed by those people authorised to do so.

### ***Students who should not be identified***

15. Every effort will be made by the school to prevent capturing the image of any child who should not be identified.
16. The Marketing team will check online and print publications before they are published to ensure no images of children who should not be identified are included within the publication. The consent log will be used for this purpose.

### ***Media photographing and filming***

17. The media operate under their own Code of Practice. Photographs taken by the media are usually exempt from the Data Protection Act.
18. If the media are invited into school for publicity purposes parents/ carers of those students likely to appear will be informed.

### ***Video Conferencing and Web Cameras***

19. Where parents have asked that their children's images should not be included in video conference or web camera every effort will be made to avoid this.

### ***Mobile phones (MMS MultiMedia messaging service, video phones), Tablets and Smart Watches***

20. Mobile phones, tablet devices and smart watches should not be used to capture or transmit images unless where it is linked to learning AND permission has been granted by the teacher (e.g. Capturing images/notes of board, videoing a practical). It is important that during such occurrences no other child is in the clip taken. Teacher will vet any photo where it is believed this has occurred. (SEE MOBILE PHONE POLICY)

### ***CCTV***

21. CCTV (*where installed*) will be operated in accordance with the principles of data protection.

See Information Commissioner Guidance which can be found at <http://www.ico.gov.uk/documentUploads/cctvcop1.pdf>. *Guidance for parents*

If at any time you wish to withdraw this consent, please contact [sheap@thorntoncollege.com](mailto:sheap@thorntoncollege.com)

## **A guide for parents who wish to use photography and/or video a school event**

Parents/carers and others, attend school events at the invitation of the Headteacher and Community. The Headteacher and Community have the responsibility to decide if photography and videoing of a particular event is permitted. We do not allow parents/ carers or attendees to take photographs or videos at school events as other students may inadvertently be captured.

Where we have consent, our school photographer will capture events and these images will be shared with parents and carers. Parents and carers can view these photographs and videos taken at a school event for their own personal use only. Such photographs and videos must not be downloaded, recorded or sold and must not be put on the web/ internet, other than on official Thornton College channels. To do so would likely break Data Protection legislation.

Recording or photographing would require a written record of the date and method of the express, proactive consent of all persons captured. NB where the person is under thirteen years old this permission would need to be obtained from all persons with parental responsibility for that individual.

Parents and carers must not photograph or video students changing for performances or events.

If you are accompanied or represented by people that school staff do not recognise they may need to check who they are, if they are using a camera or video recorder.

Mobile devices (including, but not limited to, mobile phones, smart watches, cameras, mobile phones or tablets) should not be used to capture or transmit images.