



**Mission Statement**  
 "A Caring Christian Family Where We Grow Together"

## SCHOOL PHOTO USE PROCEDURE

**Effective Date:** 15/10/2020

**Review Date:** March 2026 annual

Review Date	Signed Executive Headteacher	Signed Director RCSAT
15/10/2020	<i>Dr M Badger</i>	<i>P. Bantock</i>
09/02/2022	<i>Dr M Badger</i>	<i>P. Bantock</i>
01/03/2023	<i>Dr M Badger</i>	<i>P. Bantock</i>
26/01/2024	<i>Dr M Badger</i>	<i>P. Bantock</i>
10/02/2025	<i>Dr M Badger</i>	<i>P. Bantock</i>

Persons Responsible for Policy:	Executive Headteacher RCSAT
Approval Date	15/10/2020
Signed:	Director RCSAT
Signed:	Executive Headteacher RCSAT



## 1. Introduction

- 1.1. This Procedure is intended to provide information to pupils and their parents, carers or guardians (referred to in this procedure as “parents”) about how images of pupils may be used by Rural Church Schools Academy Trust (RCSAT) schools.
- 1.2. The procedure defines the school’s approach to the use of cameras and filming equipment at school events and on the premises by parents, pupils and the media.
- 1.3. The Procedure reflects the school’s legal obligation to protect the privacy, and in some cases, personal safety of all pupils, in recognition that not all pupils and their parents wish to have the pupil’s image published.

## 2. General Information

- 2.1. Photographic and video images of pupils and staff are classed as ‘personal data’ under the terms of the General Data Protection Regulations (UKGDPR).
- 2.2. Certain uses of images are necessary for the ordinary running of the school.
- 2.3. Other uses are in the legitimate interests of the School and its community and are unlikely to have a negative impact on pupils. The school is entitled to process such images lawfully and take decisions about how to use them, subject to any reasonable objections being raised.
- 2.4. On joining the school, (i.e. by accepting a place), parents and pupils are invited to indicate whether they consent or object to the use of images by the school for various different purposes via a written consent form.
- 2.5. School will maintain a list of children for whom consent has not been provided which will be checked by school staff before approving any images for publication.
- 2.6. Parents should be aware that certain uses of their child’s image may be necessary, such as for identification and security purposes, or unavoidable if, for example, if the pupil included incidentally in a photograph or film.
- 2.7. Parents are expected to support the school in using pupil images to celebrate the achievements of pupils, promote the work of the school and pupils, as well as for important administrative purposes such as identification and security.
- 2.8. The school will always respect the wishes of parents (and indeed pupils themselves), where reasonably possible, and in accordance with this procedure.
- 2.9. Where class photographs are taken these are made available to all parents of pupils in that class. We will only include your child in a class photo that may be purchased by other families if we have your consent to do so
- 2.10. Any parent who wishes to limit or amend their consent preferences for the use of images of a pupil for whom they are responsible should contact the School Administrator, who retains a record of their consent, or update your preferences via SIMS Parent App at any time.

## 3. Use of Pupil Images in School Publications

- 3.1. Unless the relevant pupil or parents have requested otherwise, the school shall use images of its pupils to keep the school community updated on the activities of the school and for marketing and promotional purposes including:
  - 3.1.1. On internal displays (including clips of moving images) on digital and conventional notice boards within the school premises;
  - 3.1.2. In communications with the School community (parents, pupils, staff and Governors) including by email, on the school intranet and by post;
  - 3.1.3. On the school’s website and, where appropriate, via the school’s social media channels, e.g. Twitter and Facebook. In external media posts, such images shall not be accompanied by



the pupil's full name to prevent identification of the pupil;

- 3.1.4. In any school Prospectus and in online, press and other external advertisements for the school. Such external advertising shall not include pupils' names.
- 3.2. The source of these images is predominantly the staff in relation to school events, sports and trips, or a professional photographer contracted for marketing or promotional purposes. Occasionally, pupils will take images of other pupils under the direction of staff.
- 3.3. The School shall only use images of pupils in suitable dress and images shall be stored securely and centrally.
- 3.4. Pupils' full names shall not be included with their image in school Publications or on the school Website or other publicity connected with the school without the prior written consent of the parent and/or pupil.

#### 4. Use of Pupil Images for Identification and Security

- 4.1. All pupils shall be photographed on joining the school and at necessary intervals thereafter for the purposes of identification. These photographs shall identify the pupil by name and year group.
- 4.2. The images will be stored on the child's educational record in the schools MIS system which is held securely on the school server, and is only accessible by appropriate school staff.

#### 5. Use of Pupil Images in the Media

- 5.1. The school shall notify parents in advance when the media is expected to attend an event or school activity in which pupils are participating, in order to obtain their consent to take part, if this is necessary.
- 5.2. The School shall make every reasonable effort to ensure that any pupil whose parent has refused permission, or where the pupil has refused permission, is not photographed or filmed by the media, nor such images provided for media purposes.
- 5.3. The media often asks for the names of the relevant pupils to go alongside the images and these will only be provided where the parent and/or pupil has consented to their name being used.

#### 6. Security of Pupil Images

- 6.1. Professional photographers and the media shall be accompanied at all times by a member of staff when on school premises.
- 6.2. The school shall use only reputable professional photographers and shall make every effort to ensure that any images of pupils are held by them securely, responsibly and in accordance with the school's instructions.
- 6.3. The school shall take appropriate technical and organisational security measures to ensure that images of pupils are retained securely by the school and protected from loss or misuse. In particular, the school shall take reasonable steps to ensure that members of staff who take images and/or have access to images of pupils held by the school only do so where it is necessary.

#### 7. Use of Cameras and Filming Equipment (including mobile phones and body devices) by Parents - including visiting parents from other schools

- 7.1. Parents (including guardians or close family members) 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:
  - 7.1.1. 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. In particular, flash photography can disturb others in the audience or even cause distress for those who have medical conditions. 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 or their parents.



- 7.1.2. Parents are reminded that such images are for personal use only. Images which may, expressly or not, identify other pupils should not be accessible to others via the internet (for example Facebook), or published in any other way.
- 7.1.3. Parents may not film or take photographs in changing rooms, private areas, nor in any other circumstances in which photography or filming may embarrass or upset pupils.
- 7.1.4. 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 otherwise is reasonably felt to be taking inappropriate images.

## **8. Use of Cameras and Filming Equipment (including mobile phones and body devices) by Staff (Teaching and Support)**

- 8.1. Photographs or video shall only be taken by staff member(s) to give evidence of pupils' progress, or to record a trip or sporting event. Such images shall only be taken on school-owned equipment.
- 8.2. Staff shall not use their own camera, mobile phone or tablet or any other such device capable of taking images unless in exceptional circumstances, subject to approval by the Principal.
- 8.3. Photographs or video shall not be used or passed on outside the school.
- 8.4. When taking photographs or filming in school, staff shall:
  - 8.4.1. Note that a list of pupils/parents who have not given consent for their child's image to be used is kept by the School Administrator. It is each member of staff's responsibility to check this list before they intend to take any images of pupils;
  - 8.4.2. Check the above list of children before they publish any images of pupils;
  - 8.4.3. Be clear about the purpose of the activity and what will happen to the photographs when the lesson/activity is concluded. It is not generally acceptable to use a photograph to illustrate sensitive or negative issues;
  - 8.4.4. Ensure that photographs are taken for valid educational purposes;
  - 8.4.5. Ensure that all images are available for scrutiny in order to screen for acceptability;
  - 8.4.6. Be able to justify any images of pupils and other children in their possession;
  - 8.4.7. Avoid making images in one-to-one situations;
  - 8.4.8. Not to take/film or store images of pupils on personal cameras, devices or home computers;
  - 8.4.9. Not make images of pupils available on the internet, other than through official School network/website.
  - 8.4.10. Report any concerns relating to any inappropriate or intrusive photography to the Designated Safeguarding Lead.
  - 8.4.11. Not use images of a pupil who is considered vulnerable or subject to a relevant court order, unless parents have given specific consent;
  - 8.4.12. Regularly review stored images and ensure that unwanted images are permanently deleted or securely destroyed when no longer needed in accordance with the School's Records Management Policy.
- 8.5. Copyright and the use of photographs shall be carefully controlled by and retained by the school.

## **9. Use of Cameras and Filming Equipment by Pupils**

- 9.1. All pupils shall be encouraged to look after each other and to report any concerns about the misuse of technology or any worrying issues to their teacher or a member of the pastoral staff.
- 9.2. The use of cameras or filming equipment (including on mobile phones) shall not be 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.
- 9.3. Pupils shall not film or take photographs of other members of the school community (pupils and staff), other than where there is a justifiable or educational reason.
- 9.4. Using photographic or film material of any kind to bully, harass or intimidate others shall not be



tolerated and will constitute a serious breach of discipline.

- 9.5. Where there is an allegation about a pupil taking inappropriate images, the Designated Safeguarding Lead or Deputy Safeguarding Lead may request access to the image(s) stored and ask the pupil to delete the images in question, if they are deemed to be inappropriate in the circumstances.
- 9.6. Images of any member of the school community shall not be displayed publicly around the school unless in accordance with this Procedure.
- 9.7. The misuse of images, cameras or filming equipment by pupils in a way that breaches this Procedure shall be taken seriously and may be the subject of disciplinary procedures or dealt with under the Safeguarding Policy and Child Protection Procedures as appropriate.

## **10. Inter-School Fixtures and other Events**

- 10.1. This Policy shall be applied to inter-school events.
- 10.2. From time to time other schools may wish to photograph or film inter-school sports fixtures or other events in which images of participating pupils will be captured as a record of the event.
- 10.3. If a Pupil, for whom consent has not been given or has subsequently been withdrawn, is involved in one of these events, staff shall inform the other school to ensure, as far as reasonably practicable, that the particular pupil is not photographed or filmed.
- 10.4. Where the other school (or third party on behalf of the other school) wishes to use the image(s) for a purpose other than as a record of the event, and which is not covered by the parents/pupils' original consent, then further specific consent shall be sought ahead of the event.

## **11. Filming and Photography by External Suppliers to the School**

- 11.1. Where a commercial photographer is contracted by the school, the contractor shall be considered to be a "data processor" under the General Data Protection Regulations and the School shall enter into a Data Processing Agreement with them, which shall confirm both parties' compliance with the requirements of the General Data Protection Regulations (UKGDPR).
- 11.2. Where class photographs are taken these are made available to all parents of pupils in that class. We will only include your child in a class photo that may be purchased by other families if we have your consent to do so.

## **12. Filming and photography by visitors to the school**

- 12.1. Visitors to the school, (who are not staff or parents) shall not be permitted to take images of pupils on the school site without the necessary permissions and consent.

## **13. Naming of Pupils in Images for the School's Use**

- 13.1. Pupils shall not be identified by full name in photographs unless either parent or pupil has consented to this, except where it is required for internal identification purposes.
- 13.2. The School may refer to the pupil by first name only or alternatively first name and the first initial of the surname.
- 13.3. Group images, for example team sports, may be referred to collectively by year or team.
- 13.4. The misuse of cameras or filming equipment in a way that breaches this Procedure or any of the School's other Policies and Procedures shall always be taken seriously and may be the subject of disciplinary procedures.

## **14. Related Policies and Procedures**

- 14.1. Data Protection Policy and Procedure;
- 14.2. Privacy Notice(s);
- 14.3. Staff Handbook;
- 14.4. Safeguarding Policy and Child Protection Procedures.



**15. Queries and Complaints**

- 15.1.** If a parent/carer, pupil or member of staff believes that the school has not complied with this procedure, the Grievance Procedure, RCSAT-PR-018-02, or Complaints Procedure, RCSAT-PR-012-01, shall be followed.

**16. Review and Amendment**

- 16.1.** This procedure shall be reviewed annually to ensure its validity.
- 16.2.** In the event that a situation occurs which necessitates any amendment of the procedure, the Executive Headteacher shall implement those amendments.

