

# Taking, Storing and Use of Images Policy

Whole School Policy  
including EYFS and Boarding

**Person responsible for this policy:**

Alison Eckersley  
Designated Safeguarding Lead & Assistant Head Welfare

**Date of Policy Review:**

January 2022

**Next Review Date:**

January 2023



Dulwich Prep  
Cranbrook

## Scope and aims of the policy

This policy seeks to ensure that images and videos taken within and by Dulwich Prep Cranbrook are taken and held legally and the required thought is given to safeguarding all members of the community.

This policy applies to all staff including the governing body, teachers, support staff, external contractors, visitors, volunteers and other individuals who work for or provide services on behalf of the school (collectively referred to as staff, in this policy) as well as children and parents/carers.

This policy must be read in conjunction with other relevant school policies including (but not limited to) Safeguarding and Child Protection, Anti-Bullying, Behaviour, Data Security, Use of Images, Acceptable Use Policies, Personal Social and Health Education (PSCHEE), and Relationships and Sex Education (RSE).

This policy applies to all images (including still and video content) taken by the school.

All images taken by the school-will be used in a manner respectful of the Data Protection Act (2018) Key Principles. GDPR states that personal data must be:

- Processed lawfully, fairly and in a transparent manner in relation to the data subject.
- Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.
- Adequate, relevant and limited to what is necessary in relation to the purposes for which the data is processed.
- Accurate and up to date. Every reasonable step must be taken to ensure that personal data that is inaccurate is erased or rectified without delay.
- Kept on file for no longer than is necessary
- Processed in line with an individual's legal rights
- Kept securely - including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage.
- Adequately protected if transferred to other countries

The Data Protection Lead, DSL and Senior Management Team are responsible for ensuring the acceptable, safe use and storage of all camera technology and images within the school. This includes the management, implementation, monitoring and review of the Taking, Storing and Use of Images Policy.

## INTRODUCTION

Dulwich Prep Cranbrook (the School) is an open and inclusive community which takes pride in all its children and their varied achievements. In order to celebrate these, to share success and to demonstrate our diversity, the School uses images (printed and digital) and video (collectively referred to in this Policy as Images) of children in publications, displays

and electronic media. Images are also frequently taken by the many visitors to the school.

This Policy outlines the way in which images of children may be taken, stored and used and describes the School's procedures to ensure protection against inappropriate use of images and how individuals' preferences for privacy are maintained. It is designed to be read in conjunction with the Whole School Data Retention Policy.

It is important to remember that parents can ask the School for more information about how we use images by speaking to the School's Data Protection Lead using the contact details below. At the point a child joins the School, parents are asked to confirm on the Parent Consent Form, whether or not they consent to the School using photographs or video of their child in accordance with the School's Privacy Notice and the Taking and Storing of Images policy. Click [here](#) to update your consent on the Parent Consent Form at any time.

The Parent Consent Form also includes approvals for the sharing of parent contact details to other parents in a child's year group, receiving urgent messages from the School via Clarion Call and giving permission for a child to be registered on the School's Library Recognition Software

By telephone: 01580 713064

By Email: [dpl@dulwichprepcranbrook.org](mailto:dpl@dulwichprepcranbrook.org)

## **EXAMPLES OF USE OF IMAGES**

This section of the Policy outlines examples of the various purposes for which children's images may be used and, where relevant, explains whether use of a child's image for the purpose described is subject to parental consent.

### **School Administrative Purposes**

All children are photographed on joining the school and at the start of each academic year for internal formal identification purposes which do not include school publicity. Children's images are also used for internal teaching purposes, especially in the Early Years Foundation Stage (Nash House).

These images are stored securely in a password protected area of the school database and only available to staff authorised to access them although copies can be made available to parents on request.

## **Use of Images on Displays, in Communications and to Celebrate Children's Achievements and Activities**

The School particularly welcomes parents to concerts, plays and sporting events as well as to more formal occasions during the school year. There are many examples of children's work, team photographs and photographs of trips and outings in which our children have participated on display throughout the School. The School makes full use of electronic notice boards inside the building to enhance displays of the children's work and the range of activities that they have been engaged in. The School's website is updated regularly, and all parents are sent a weekly newsletter to keep them informed about the news of the School's active community.

The School magazine is produced annually, and this contains many photographs of the children at the school at work and play.

The School only uses images of school activities, such as plays, concerts, sporting fixtures, prize-giving, school trips etc. in their proper context. The School will never use any image that might embarrass or humiliate a child. The School will only use images of children who are suitably dressed.

The images that the school uses for displays and communications purposes never identify an individual child by their full name unless written permission has been given to do so by the child's parents.

From time-to-time professional photographers are invited into the School to take group photographs or pictures of noteworthy events. Any such photographers are subject to the school's standard vetting checks and safeguarding policy and are required to sign an undertaking to confirm their compliance with GDPR and the School's procedures. Children are always properly supervised when professional photographers visit the school. Parents are given the opportunity to purchase copies of these photographs.

The School will only use images of children for these purposes where parents have provided their consent.

Photographers will not have unsupervised access to children and young people.

## **Use of Images for School Promotional Purposes**

It is custom and practice of this school to include some images of children in the school's promotional material including but not limited to press advertisements, banner displays, brochures, exhibition display boards, the school website and the school's social media platforms (e.g. Facebook and Twitter) etc.

The School records some performances such as plays and concerts and makes recordings available to parents for purchase.

Where images are published on the school's social networking services such as Facebook or Twitter, the objective of publication is for the benefit of the school community. Such

services are risk assessed by the School prior to their use for such purposes. The School will ensure that images are held in accordance with the Data Protection Act and that suitable safeguarding and child protection measures (if necessary) are in place.

The School will only use children's images for school promotional purposes with parental consent. Further, where an image of a child is also accompanied by the child's name, the School will seek additional specific consent from the relevant person.

### **Use of Photos/Videos by Children**

The use of personal devices e.g. mobile phones, iPads, Laptops etc., is covered within the School's Online Safety policy.

- All staff will be made aware of the acceptable use rules regarding children's use of cameras and will ensure that children are appropriately supervised when taking images for official or curriculum use.
- Members of staff will role model positive behaviour to the children by encouraging them to ask permission before they take any photos.
- Photos taken by children for official use will only be taken with parental consent and will be processed in accordance with GDPR.
- Parents will be made aware that children might take photos/videos of other children and these images will not be shared online or via any website or social media tool.
- Photos taken by children for official use will be carefully controlled by the School and will be checked carefully before being shared online or via digital screens.
- Still and video cameras provided for use by children and the images themselves will not be removed from the setting.

### **Use of Images for Media Coverage**

From time to time the school may be asked to share children's images with the media or be visited by the media who may take photographs or film footage at a school event. Providing we have appropriate consent; children may appear in these images which may then appear in local or national media (press and/or TV). Further, where an image or recording of a child is to be published together with the child's name, the School will seek additional specific consent from the relevant person.

Every effort will be made to ensure that children whose parents have refused permission for images of their children to be used are not photographed or videoed by the media.

The School will always complain to the Press Complaints Council (PCC) if the media fails to follow the appropriate code of practice for the protection of young people, including the children of celebrities.

The identity of any press representative will be verified, and access will only be permitted where the event is planned, and where press is to be specifically invited to attend. No authorisation will be given to unscheduled visits by the press under any circumstances.

Every effort will be made to ensure the press abide by any specific guidelines should they be requested. No responsibility or liability however can be claimed for situations beyond reasonable control, and where the School is to be considered to have acted in good faith.

## **THE APPLICATION OF DATA PROTECTION LAWS TO USE OF CHILDREN'S IMAGES**

Where Dulwich Prep Cranbrook takes, uses and stores images of children it does so in accordance with its obligations under GDPR, the School's Whole School Data Retention Policy and this Taking, Storing and Use of Images policy.

### **~~Your~~ Consent to the Use of Images of Children**

On joining the school, parents are invited to consent or object to images of their child being used for the majority of the purposes set out in this Policy. After this, parents may amend their original instructions at any time by contacting the School's Data Protection Lead. Any changes to your initial preferences will take effect from the date the School issues ~~our~~ written acknowledgement. Where consent is withdrawn, the School will make reasonable efforts to ensure that the image is not used in future. However, it may not always be possible to remove images that have already been circulated or published.

### **Storage and Review of Images**

Photographic images are stored securely in a password-protected area of the school database and only available to staff authorised to access them. Images of children used for display purposes are destroyed securely.

Once a child has left, the School will endeavour to ensure that images of children will not be published in any new school material although existing publications, website and archived material may continue to contain these images.

## **USE OF CAMERAS AND RECORDING EQUIPMENT BY PARENTS, CARERS AND VISITORS**

This part of the Policy applies to the use of cameras, recording equipment and similar devices by parents, carers and visitors (collectively referred to as parents):

Other than in the Early Years Foundation Stage (Nash House), where different rules apply, parents are welcome to take photographs of their own children for personal domestic purposes only and subject to the following provisions:

Unless authorised by the School, parents should not photograph or video any child other than their own without the prior agreement of the other child's parents. This reflects the School's legal obligation under GDPR and is designed to protect the privacy and in some cases safety of all our children.

In any event, where parents have obtained permission to photograph or video children other than their own e.g. at a school performance or play, the School does not permit the further publication of the photograph or video unless all of the relevant parental and school consents have first been obtained.

Parents may photograph their own children taking part in sporting and outdoor events. However, in order to respect the privacy of other children, parents may only take photographs of their own child/children in and around the swimming pool. In addition, parents must not enter the changing rooms when they are or may be occupied by children. Photography and video are never permitted in the changing room areas under any circumstances.

When an event is held indoors, parents should be mindful of the need to use their cameras and recording devices with consideration and courtesy for the comfort of others. Flash photography can disturb others in the audience or even cause distress for those with medical conditions; we therefore ask that it is not used at indoor events. Parents are also reminded that copyright issues may prevent the school from permitting the filming or recording of some plays and concerts.

Photos and videos taken by the school and shared with parents should not be shared elsewhere (e.g. posted on social media site), to do so may breach intellectual property rights, data protection legislation and importantly may place members of the community at risk of harm.

#### **ADDITIONAL INFORMATION FOR USE OF CAMERAS, MOBILE PHONES AND SIMILAR DEVICES IN THE EARLY YEARS FOUNDATION STAGE (NASH HOUSE)**

In order to protect children and prevent misuse of images the School has imposed additional restrictions on the taking of images in The Early Years Foundation Stage, Nash House.

The School prohibits the use of parents' and visitors' personal mobile phones, cameras and similar devices to take or record images in Nash House other than when permission is notified (e.g. during assemblies, concerts and performances). Personal devices are not permitted to be used when working with children or accompanying them on school outings.

## CCTV

Externally mounted Closed Circuit Television Cameras (CCTV) are installed at the main entrances to the School premises for the purposes of security, surveillance and for the prevention and detection of crime. Signs notifying the use of CCTV are displayed in these areas.

CCTV images are not publicly displayed, streamed, recorded, retained or used for any improper purpose.

The School may disclose CCTV images to the Police or other law enforcement authorities if it is appropriate to do so or where legally required to do so in which case, any such disclosure of images will be strictly in accordance with GDPR.

This policy will be reviewed annually.