

Photographic Image and Video Policy

Emanuel School is an open and inclusive community that is very proud of the achievements of all pupils in their academic, artistic and sporting endeavours. We celebrate our diversity and give all our many visitors a warm welcome.

The school particularly welcomes parents to concerts, plays and sporting events as well as to more formal occasions during the school year. In some areas of the school, walls are decorated with examples of pupils' work, team photographs and photographs of trips in which our pupils have participated. The school website is updated regularly, news frequently added to the school's social media accounts and parents receive the fortnightly school newsletter in order to keep them fully abreast with the news of our active community.

This policy is intended to provide information about how images and recordings of pupils are normally used by the school and what our lawful basis for its use is.

Emanuel School is aware of potential child protection and safeguarding issues when taking photos or filming children and young people. Therefore, this policy also details the rules of governing photography and recording videos, the distribution of these photos and videos and their publication online.

The school has taken advice from the Information Commissioner's Office (ICO) '[Data Protection Advice for Schools](#)' on taking photographs, DfE '[Data Protection in Schools/Sharing Personal Data](#)' and NSPCC's '[Photography and Sharing Image Guidance](#)'.

1. Principles

The school understands that some children, parents or carers may not be comfortable with images being shared. This can have various reasons, but may include:

- if a child and/or their family have experienced abuse they may worry about the perpetrator tracing them online,
- children who choose not to have contact with some members of their family may decide to minimise their online presence,
- families may have religious or cultural reasons for choosing not to be photographed.

The policy is therefore founded on the following principles:

Safety: The overriding priority is to ensure that photography does not lead, either directly or indirectly, to anything that may potentially endanger the safety of the children at Emanuel School.

Privacy: The school believes that every child and parent/carer is entitled to their own privacy and can therefore choose not to feature in photographic images or videos recorded at the school.

Projecting the right image: Photographs taken should not do anything that may cause embarrassment to the school and members of the school community.

2. Consent

Certain uses of images are important for administrative purposes such as identification and security. Other uses are in the legitimate interests of the school and its community and unlikely to cause any negative impact on children. The school is entitled lawfully to process such images and take decisions about how to use them, subject to any reasonable objections raised.

The school hopes parents will feel able to support the school in using pupil images to celebrate the achievements of pupils, sporting and academic; to promote the work of the school; and for important administrative purposes such as identification and security.

The school must have a lawful basis for using personal data. To comply with data protection requirements, the school asks the parent/carer for written consent to take and use digital images of their child beyond the need of administrative purposes and security and which may not be considered within the legitimate interest of the school.

Consent is gained when a child joins Emanuel School. The school may decide to renew the *Photographic Image and Video Consent Form* as required and request parents/carers to review the consent given.

Emanuel School follows the [NSPCC guidance](#) on seeking consent to share images. The school will, as far as reasonably practicable, seek parental consent as well as pupil consent to use images of children in Year 7 and above. One of the reasons to follow this advice beyond the age of 16 is, that parents have in most circumstances still a legal responsibility for their children up to the age of 18.

The following rules apply:

- The school will not accept verbal consent under any circumstance. If it is not possible to obtain prior written consent, then images will not be taken involving the child concerned.
- Consent to using a child's image will last throughout their time at Emanuel School and will continue for a short time after they leave. This rule excludes images that are kept on record for historical reference purposes in support of the pupil's lifelong relationship with Emanuel School in line with the school's privacy notices.
- Consent can be withdrawn at any time. Withdrawal of consent must be given in writing to the deputy head: co-curricular, partnerships and admissions. Publications printed before the date of change will remain unaltered. It is also difficult to recall images that have been used online/on social media.
- If consent was given for an image to be used for a certain purpose, or for a set time, the school will not use the photo for other purposes or outside that time frame without first obtaining consent.
- If children, parents and/or carers do not consent to photographs being taken, the school will respect their wishes. A child will never be excluded from an activity because photo consent was not given. Teachers are aware of consent restrictions and will give their best in ensuring that photographer can identify pupils that should not be photographed in a way that does not single out the child or make them feel isolated.

The school keeps a record of the written consent that parents, carers and children have given for images being used.

3. The Taking of Images

3.1 Taking of Images by Staff

Only school equipment must be used when taking images of pupils e.g. during an educational visit or a sporting event and it is important that staff familiarise themselves with consent restrictions of pupils in their care.

It is not best practice for staff to take photos/videos of pupils on their personal camera, mobile phone or tablet and staff is strongly discouraged to do so without justifiable and professional reason. Staff sign the school's *Acceptable Use Agreement* which includes a clause on the use of mobile phones/personal devices for taking images of pupils.

When taking images, staff must be mindful:

- that pupils are appropriately dressed and not participating in activities that might bring the individuals and/or the school into disrepute.
- that images are not taken against the wish of the pupil; a child's right not to be photographed needs to be respected.
- of one-to-one situations.

- that it is not permitted to take photos/video in sensitive areas such as changing rooms, toilets, swimming areas.

3.2 Taking of Images by Parents/Carers

Parents, carers or close family members (*hereafter, parents*) are welcome to take photographs of their own children taking part in school events, subject to the following guidelines, which the school expects all parents to follow:

- 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. Flash photography can disturb others in the audience, or even cause distress for those with medical conditions; the school therefore asks that it is not used at indoor events.
- The school asks parents to respect the principles of privacy and safety and are reminded that images are for personal use only. Images which may, expressly or not, identify other pupils (*including pupils from other schools attending school events at Emanuel School*) should not be made accessible to others via social media platforms including WhatsApp, or published in any other way. It should be noted, however, that the school is unable to effectively 'police' this and cannot be held responsible for images appearing without parental consent.
- 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's parents.
- Parents may not film or take photographs in changing rooms or backstage during school productions, nor in any other circumstances in which photography or filming may embarrass or upset pupils.
- Parents are reminded that copyright issues may prevent the school from permitting the filming or recording of some plays and concerts. The school will take reasonable steps to print a reminder in the programme of events where issues of copyright apply.

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 is otherwise reasonably felt to be making inappropriate images.

The school may sometimes record plays and concerts professionally (or engage a professional photographer or film company to do so), in which case digital copies may be made available to parents. Parents of pupils taking part in such plays and concerts will be consulted if it is intended to make such recordings available more widely.

3.3 Taking of Images by a Third Party

3.3.1 Images taken by a contracted photographer

Emanuel School may contract professional photographers to take images or film footage during school events, for teaching purposes, school displays or for pupil's individual and/or class/form/whole school photos. Professional photographers are always accompanied by a member of staff when on school premises.

The school uses only reputable professional photographers and makes every effort to ensure that any images of pupils are held by them securely, responsibly and in accordance with the school's instructions.

Each academic year, parents are given the opportunity to buy individual or class/form/whole school photographs of their child. The school will let parents, carers and pupils know in advance when photographs will be taken and give them the option to 'opt out'. The school will keep a record of pupils who have opted out and make sure staff are aware.

3.3.2 Images taken by the local or national media

Where practicably possible, the school will always notify parents in advance when the media is expected to attend an event or school activity in which school pupils are participating, and will make every reasonable effort to ensure that any pupil whose parent or carer has refused permission for images of that pupil, or themselves, to be made in these circumstances are not photographed or filmed by the media, nor such images provided for media purposes.

3.4 Taking of Images by Pupils

Pupils must not use their personal mobile devices (camera, mobile phone or tablet/laptop) to take photographs or videos of other pupils or staff whilst in school. Pupils may use school equipment where they have been permitted by their subject teacher, form tutor or the club/society co-ordinator.

Everyone has the right to feel secure and to be treated with respect, particularly the vulnerable. Harassment and bullying will never be tolerated. All pupils are encouraged to look after each other, and to report any concerns about the misuse of technology, or any worrying issues to their form tutor or the deputy head: pastoral.

The misuse of images, cameras or filming equipment in a way that breaches this policy, or related policies like the school's Anti-Bullying Policy, Behaviour Policy, Pupil Acceptable Use Policy, Laptop and Mobile Device Policy, Safeguarding and Child Protection Policy or the School Rules is always taken seriously, and may be the subject of disciplinary procedures or dealt with under the relevant policy as appropriate.

3.5 CCTV

CCTV is in use on school premises and will sometimes capture images of pupils. Images captured on the school's CCTV system are used for the purposes of safeguarding and promoting the welfare of pupils, staff and visitors and for the protection of property, in accordance with the Information Commissioner's Office (ICO) Code of Practice.

Please also refer to the school's privacy notices that can be found on the school website. The school also has a standalone *CCTV Policy*.

4 The Use of Images

Certain uses of images are important for the day to day running of the school including for administrative purposes such as identification/security. Other uses are in the legitimate interests of the school and its community and unlikely to cause any negative impact on children. The school is entitled lawfully to process such images and take decisions about how to use them, subject to any reasonable objections raised. This may include the use of group photos which do not directly identify an individual to promote an event and the school's aims.

The school hopes parents will feel able to support the school in using pupil images to celebrate the achievements of pupils, to promote the work of the school and especially for important administrative purposes such as identification.

Parents should be aware that, from around the age of 12 and upwards, the law recognises pupils' own rights to have a say in how their personal information is used – including images.

4.1 Use of Images by the School

The school may use pupil images for various purposes which include:

- Identification
- Internal Displays, School Platforms and Educational Materials
- School Publications
- School Website

- Social Media
- Promotional Material

The conditions of image use apply at all times.

4.1.1 Conditions of Image Use for the School

- Only images that conform to the school's safeguarding principles will be used.
- If consent was given for an image to be used for a certain purpose, or for a set time, the school will not use the image for other promotions or outside the time frame without first obtaining consent.
- If consent was not given for images to be taken/used, staff will ensure that these pupils are sensitively removed from any situation in which other pupils' images are captured.
- The school will only use images of pupils who are suitably dressed, to reduce the risk of such images being used inappropriately. Photographs will not be taken of children when they are vulnerable – upset, hurt or in a state of undress. Should the school learn about any inappropriateness of image use involving a pupil, the school will immediately act and report it in line with the school's safeguarding/child protection procedures.
- When posting images or videos in public fora, the school will avoid identifying a child by name in any accompanying text or caption and only use a child's first name where appropriate and relevant. If it is necessary to use a full name, the school will obtain prior written permission from the parents/carers and/or pupil.
- The school may use group or class photos of footage with general labels such as 'a maths lesson' or 'trip to the museum'. Group photos may also be taken on large scale events where individuals cannot be directly identified and these photos would not be considered personal data.
- Photographs or video can never be used or passed on outside the school without explicit consent.

4.1.2 Use of Images for Identification Purposes

All pupils are individually photographed by a professional photographer on entering the school and, thereafter at the start of each academic year for the purposes of internal identification. These photographs are securely stored on the school's pupil databases and used to identify the pupil by name, year group, house and form/tutor group and on class/form registration sheets. Access to this database is password-protected and restricted to authorised staff only.

We consider this use to be in the legitimate interest of the school and do not rely on consent as a lawful basis under data protection law.

4.1.3 Use of Images for Internal Displays, School Platforms and in Educational Materials

The school may use pupil images on display boards/noticeboards, video screens and banners around the school site as well as platforms that the school uses (e.g. Firefly for parents and pupils). Pupil images may also be used for educational purposes in assembly presentations and other teaching material.

For display boards/noticeboards, profile photos may be used accompanied with the pupil's first name and year group/form, e.g. to promote school council membership.

We consider this use to be in the legitimate interest of the school and do not rely on consent as a lawful basis under data protection law. We ask parents, or pupils, to let the school know if images should not be used for internal displays, on school platforms and in educational materials. *Conditions of image use (see point 4.1.1) apply.*

4.1.4 Use of Pupil Images in School Publications

Good communication is vital to any successful and large organisation and Emanuel School is committed to keeping parents, pupils, staff, governors and alumni up to date with school events and news. As part of this commitment, we regularly take photographs to illustrate, communicate

and celebrate school and pupil success in our school publications some of which are also shared with prospective parents and/or can be found on the school website.

School publications include but are not limited to school newsletters (e.g. The Edit, alumni newsletter), the Portcullis magazine and the Rose & Portcullis alumni magazine. These publications are retained as part of the school archive which is available to members of the school community on request.

We consider this use to be in the legitimate interest of the school but obtain written permission as many publications can also be found on the school website. *Conditions of image use (see point 4.1.1) apply.*

4.1.5 Use of Images on School Website

The school website is the window into our school community/life at Emanuel School, highlighting the school's strengths and achievements and communicating our values, ethos and vision to current and prospective parents, pupils and beyond.

Images published on the school website, which include pupils, will always be carefully selected and will comply with the conditions of image use (point 3.1.1). These photos are usually group images and/or images that focus on group activities.

Written permission will be obtained for the use of images on the school website.

Please refer to paragraph 2 (Consent).

4.1.6 Use of Pupil Images on Social Media

The school uses social media to communicate news, promote activities and events. There are strict internal rules and procedures in place and staff receive regular guidance to ensure that these rules are always adhered to. A child's full name is never used on any social media channel unless prior consent has been obtained.

Written permission will be obtained for the use of images on the school's social media accounts.

Please refer to paragraph 2 (Consent).

4.1.7 Use of Pupil Images in Promotional Material

The school routinely advertises all entry points and open events; therefore, imagery of the school and school community is used for posters, school prospectus, banners, flyers and brochures. We may also advertise in local newspapers, national education magazines and school guides. Promotional material may also include pre-recorded virtual open days and school tours that will be uploaded to the school's YouTube channel and shared on the school website.

Written permission will be obtained for the use of images in promotional material. The school will, where possible, seek explicit permission from parents for large scale advertising such as on billboards at bus stops and on vehicles.

4.1.8 Use of Pupil Images in the Media

The media often asks for the names of the relevant pupils to go alongside the images. Where parents/pupils have been notified of media presence and photo/video permission has not been refused, names of pupils will only be revealed if written consent for this purpose has been given.

5. Storage and Retention of Images

The school takes appropriate technical and organisational security measures to ensure that images of pupils held by the school are kept securely on school systems (school server/cloud storage) and protected from loss or misuse. The school will take reasonable steps to ensure that members of staff only have access to images of pupils held by the school where it is necessary for them to do so.

Hard copies of images that are not part of a display or publication are kept in locked drawers.

Photographs must be destroyed or deleted from the school's network/database once they are no longer required for the purpose for which they were taken (e.g. a photograph for ID purposes should not be retained when replaced or when a child is no longer a pupil at the school). Please refer to the school's *Data Retention and Disposal Policy*.

6. Media and Filmmaking Club

The media and filmmaking club is an extra-curricular activity that involves pupils in various aspects of film making. Some of the videos produced (e.g. Emanuel News) will be shared on the school's YouTube channel, the school's website and other channels (including social media).

On occasion, films may be submitted into public competitions. When this occurs, the school will contact parents and pupils to ask for explicit written consent.

7. Veo Video Camera

The school's Veo camera is occasionally used on sporting events, such as 1st team fixtures or national tournament fixtures for all age groups. This is for sports analysis and feedback after match play.

Occasionally, the video camera may be used in training sessions to inform pupils more specifically on their performances or sports awards events may be filmed or live streamed.

Footage is usually kept for no longer than an academic year. It is only ever stored on secure shared drive on the school's network.

The use of the video camera is considered to be in the legitimate interest of the school. When Veo is used for fixtures with pupils from other schools the Director of Sport will ensure that the opposition school has been informed with due notice so that any objections can be raised.

8. Related Policies and Documents

- Anti-Bullying Policy
- CCTV Policy
- Data Protection Guidelines for Staff
- Data Protection Policy
- Data Retention and Disposal Policy
- DfE [Data Protection in Schools/Sharing Personal Data](#)
- ICO [Data Protection Advice for Schools](#)
- Laptop and Mobile Device Policy
- NSPCC [Photography and Sharing Image Guidance](#)
- Privacy Notice for Parents
- Privacy Notice for Staff
- Pupil Acceptable Use Policy
- Safeguarding and Child Protection Policy
- Staff Code of Conduct