

Use of Images Policy

This policy seeks to ensure that images taken within and by Heritage (the “School”) are taken and held legally and the required thought is given to safeguarding all members of the Community. For the purpose of this policy the word ‘image’ refers to a photograph or video. Parents or legal guardians must read this policy and agree to adhere to it.

1. Scope

This policy applies to all staff including teachers, support staff, trustees, 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.

2. Data Protection

All images taken by the School will be used in a manner respectful of the Data Protection Principles. This means that images will be processed:

- fairly, lawfully and in a transparent manner
- for specified, explicit and legitimate purposes
- in a way that is adequate, relevant limited to what is necessary
- to ensure it is accurate and up to date
- for no longer than is necessary
- in a manner that ensures appropriate security

The Headmaster has overall responsibility for data protection and cyber security policy implementation and strategy.

The School has appointed the Compliance Officer as the Data Protection Lead (DPO) who alongside the management team is responsible for ensuring the acceptable, safe use and storage of all camera technology and images within the setting. This includes the management, implementation, monitoring and review of the Use of Images Policy.

3. Use of images of children

At Heritage School, we often use photographs and video to celebrate our pupils’ accomplishments and demonstrate features of our curriculum and culture to prospective parents, current parents or guardians, pupils and the public.

Certain uses of pupil images are considered to be legitimate interests for the ordinary running of the School. Legitimate interests will be relied upon for any uses which are essential (e.g. for administration, identification, educational and curricular purposes and safety/security), unavoidable (e.g. if a pupil is included incidentally as part of a photograph) or fall within a scope of reasonably expected uses including: use of images on internal displays and notice boards; school publications, on the school website and (where appropriate) on the school's social media channel. Any parent who wishes to limit the use of images of a pupil for whom they are responsible should indicate this via the general consent form before their child starts at the School.

3.1 Parental Consent

Parents are invited before their child/ren starts at the school to provide consent for the school to use images of their child as set out in this policy. Parents must declare that they have read this policy and agree to adhere to it. Please note that when agreement and consent is given by one parent, it is understood by us to have been given from both parents. Parents are asked the following questions:

- Parental rights: we understand the rights of parents over images of their children, and we will not upload any image which includes any part of the face of a child who is not our own into an online environment
- We give our consent for images of our child(ren) to be shared internally
- We give our consent for images of our child(ren) to be used externally on printed materials, in the school newsletter, on the school website, social media platforms

A record of all consent details will be kept securely on file. The school will take reasonable steps following any objection or withdrawal of consent to dispose of images, but may not be able to recall or destroy printed materials. Any particular concerns or vulnerabilities relating to a student or their family should be drawn to the School's attention in advance. The safeguarding and best interests of pupils will remain the School's priority at all times.

3.2 Safety of images

All images taken and processed by or on behalf of the School will take place using school provided equipment and devices. Exceptions to this rule will be agreed for designated staff who use their own cameras to photograph or video school activities for marketing purposes. The following staff members are designated for this purpose: Meg Lowe, Catherine Kang, Jason Fletcher.

All staff are given guidance on the School's policy on taking, using and storing images of children, and on the importance of ensuring that images of pupils are made and used responsibly, only for school purposes and in accordance with school policies and the law.

- Staff will:
 - only take images where the child is happy for them to do so.
 - ensure that a senior member of staff is aware that the equipment is being used and for what purpose.
 - avoid making images in a one-to-one situation.
- Staff will not:
 - take images of pupils for their personal use.
 - display images of pupils on internal displays or noticeboards unless they are sure that they have parental consent to do so
 - take images of pupils using personal equipment (unless they have received designation to do so)
 - take images of pupils in sensitive areas such as changing rooms, toilets, swimming areas etc.
 - take images of a child's injury, bruising or similar.

Use of images on printed marketing materials, in the school newsletter, on the school website and social media platforms will be managed by the Marketing Officer. Parental consents for internal/external use of images will be checked in advance prior to images being used.

All members of staff will ensure that all images are available for scrutiny and will be able to justify any images in their possession.

The School reserves the right to view any images taken and can withdraw or modify a member of staffs' authorisation to take or make images at any time.

A child or young person's right not to be photographed or videoed is to be respected. Images will not be taken of any child or young person against their wishes.

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, are protected from loss or misuse and held in accordance with the General Data Protection Regulations (GDPR) and Data Protection Act.

3.4 Publication and sharing of images

Children's full names will not be used on the School website or other publication, for example newsletters, social media channels, in association with photographs or videos.

The majority of photographs used will be anonymous. However, if, for example, congratulations are due for a specific achievement or appointment, it may be that a first name is appropriate. They will only be used if specific parental permission, for that instance, has been granted.

The School will not include any personal addresses, emails, telephone numbers on video, on the website, in a prospectus or in other printed publications.

3.5 Use of images by parents / carers

Heritage School asks that any image which includes any part of the face of a child who is not your own, if taken by yourself or another parent or shared internally by the school, must be for personal use only and stored in a solely private digital collection. Such images must never be uploaded into an online environment (e.g. social media such as WhatsApp, Facebook or Instagram). To do so may breach intellectual property rights, data protection legislation and importantly may place members of the community at risk of harm.

Parents/carers who are using photographic equipment must be mindful of others when making and taking images.

The opportunity for parents/carers to take photographs and/or make videos may be reserved by the school on health and safety grounds.

Parents/carers are only permitted to take or make recordings within designated areas of the school. Photography or filming is not permitted in sensitive areas such as changing rooms, toilets, swimming areas etc.

The right to withdraw consent will be maintained and any photography or filming on site will be open to scrutiny at any time.

3.6 Use of stand-alone cameras by children

The school will discuss and agree age-appropriate acceptable use rules with pupils regarding the appropriate use of stand-alone cameras. This will include:

- places pupils cannot take stand-alone cameras, e.g. unsupervised areas, toilets, changing rooms
- to ask permission before taking a photograph or video
- stand-alone cameras must only be used by pupils where permission has been granted by a member of staff for curriculum use e.g. art lessons

All staff will be made aware of the acceptable use rules regarding pupil's use of stand-alone cameras and will ensure that pupils are appropriately supervised at all times when taking images.

3.7 Use of images by external media

The School will notify parents in advance when it expects the media to attend an event or school activity in which pupils are participating. We will assume that the parental consent you have provided to Heritage for the external use of images of your child/ren should apply to these events/activities, unless you advise otherwise.

The media may ask for the names of relevant pupils to go alongside the images, and these will only be provided where parents have been informed about the media's visit and either parent or pupil has specifically consented to the publication of their name for an appropriate and necessary purpose.

Any external processors of pupil images are engaged only for lawful purposes consistent with those set out in this policy, and subject to proper due diligence and contractual protections.

Professional photographers and the media are accompanied at all times by a member of staff when on school premises.

4. Related Policies and Procedures

This policy should be read alongside our organisational policies and procedures, including:

- Acceptable Use of Screens Policy
- Code of Conduct for staff
- Data Protection Policy
- Online Safety
- Parents, Pupils, Alumni and Friends Data Privacy Notice
- Safeguarding Policy

Authorised by	Jason Fletcher
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