



THE BLUE SCHOOL

CHURCH OF ENGLAND

*Whatever you do in word or deed,
do everything in the name of the Lord Jesus,
giving thanks to God the Father through him.*

Colossians 3:17

Policy:	Images Policy
Co-ordinator:	Headteacher
Date ratified:	October 2021
Date for next review:	September 2023

The Blue School

▪ **Policy on the Use of Children's Images**

Rationale

All schools benefit from and welcome positive publicity. Photographs of pupils at work and at play can help demonstrate the best aspects of any school, adding colour, life and interest to any activity taking place at the school. Making use of photographs in school publicity materials can increase pupil motivation and staff morale, and help parents and the local community to identify and celebrate the school's achievements. A photographic record of school events also serves as a useful historical record of the school's work and achievements over time.

However, photographs must be used in a responsible and appropriate manner. Schools need to respect children's and parents' rights of privacy and be aware of potential child protection issues.

At The Blue School every reasonable effort will be made to minimise risk by following the guidelines set out in this policy and by securing formal parental/carer consent for the use of photographs and other images of their children.

This policy applies to the use of photographs in school publicity materials, on its website and in the local/national press. The implementation of, and adherence to the guidelines and requirements contained within this policy are the responsibility of all Blue School staff and volunteers. Parents and other visitors to the school, and all other participants in school organised activities will be made aware of this policy.

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● **The Blue School's policy on photographing children**

1. The Blue School's policy on the taking, handling and using photographs of pupils are as follows:

- The school will ensure that all images are stored securely and accessed/used only by those authorised to do so;
- The school will ensure that electronic images are stored on a secure network to which members of the public have no access;
- The school will not use or publish any images of any child who is subject to a court order;
- The school will secure parental consent for the use of children's photographs;
- The school will not use photographs of children or staff who have left the school without their prior consent;
- The school will ensure that images/photographs of children are only taken when they are appropriately dressed;

- The school will ensure that, if a child's photograph is to be used in a publication or placed on public display, the child's name should not be used in connection with the photograph **unless** previously agreed by parents.

The most important consideration re: the taking and use of photographs or other images of children, is ensuring that parents and carers have given their consent for images of their children to be taken and used. (Please see Consent Form at **Annex A**).

Re-using photographs

2. Sometimes it is necessary to retain photographs of pupils for future use; perhaps in a school brochure or on the website or indeed simply as a historical document about the school. All such images will be stored securely.

Child protection and risk assessment

3. There may be a risk when individual pupils can be identified in photographs. For that reason, the governing body of The Blue School have developed this policy for use by all those employed, and involved in the activities/events organised by the school to help minimise risk.

4. The Headteacher, after consulting with parents and carers, will make a professional judgement on the photographing of pupils participating in certain activities which might present the possibility of greater risk (e.g. swimming, gymnastics, athletics, and other sports activities including timetabled Physical Education sessions/lessons etc).

5. In activities which present possible risk (as listed above), any photography must focus on the event, not on a particular child. In line with NSPCC guidance, **full face and body shots should be avoided in such circumstances** (e.g. if a photograph is taken of a pupil swimming it should be from the shoulders or waist upwards) Photographs of children actually *in* the water are acceptable.

6. Where it is suspected or reported that images of children have been used inappropriately, the Headteacher (or Assistant Headteacher in her absence) will inform the relevant child protection/safeguarding officers at the London Borough of Hounslow and / or the Police.

Data Protection Act 2018

7. Photographs and video images of individuals are classed as personal data under the terms of the Data Protection Act 2018.

8. The, for the school has chosen to use the consent lawful basis when processing the images of pupils. Therefore, will seek the express consent of either the individual concerned or in the case of pupils, their legal guardians.

9. For the school workforce and governors, the school has chosen the Public task lawful basis to process their images are used as part of the efficient and effective running the school. These individuals can apply to opt out of their photo being used in any circumstance and this will be assessed on a case by case basis.

10. The school will not display images of pupils or staff on any school managed websites, in publications or in a public place without such consent. The definition of a

public place includes areas where visitors to the school have access i.e. internal display boards.

Using images of our pupils on the school's website

11. Using photographs on the school's website should follow the same code of practice as set out above. However, we are fully aware that placing images of children onto the school's website, and therefore the Internet, can present a clear risk of misuse by certain people outside the school's control.

12. Watermarking images *may* prevent the inappropriate downloading of images but this method is not foolproof. The fact is that anyone determined enough can break through any security system.

13. The Blue School's policy is to ensure that **all parents and carers are fully aware that the school may occasionally use images of children on the school's website** and that their consent is explicitly requested for the use of images on the Internet - this is in line with the Blue School's Internet Use Policy. (Please refer to **annexes A and B**).

14. Children's names will not be included in photographs of children published on the school's website.

Use of photographs in local/national newspapers and other non-school publications

15. All schools welcome positive publicity in local or national newspapers and magazines and most parents and carers are delighted to see a photograph of their child in the local press. Newspapers do have their own code of conduct, with strict guidelines, regarding the photographing and use of images of children.

16. The Press Complaints Commission Code of Practice states that:

- Journalists must not interview or photograph a child under the age of 16 on any subject involving the welfare of the child or any other child in the absence or without the consent of a parent or other adult responsible for the child
- Pupils must not be approached or photographed while at school without the permission of the school authorities

17. The issue over using a pupil's photograph in a newspaper with that child's name is of some concern. However, it is obvious that a photograph without a name or indeed without the name of the school is of little use to the newspaper and most parents and carers would much prefer the child's name to be included. Schools obviously benefit by having the name of the school linked to the pupil.

18. The Blue School will provide names of children to accompany photographs published in newspapers and magazines **only where the parent or guardian have provided their consent** (using the consent form at **Annex A**).

19. There is no breach of the Data Protection Act 2018 in passing on a child's name to a recognised journalist as long as an appropriate lawful basis is used.

Photographing or filming school events

Parents/carers

20. The Blue School's policy is to allow parents and carers to take still photographs but **not videos of school events.**

21. To assist parents/carers this policy includes some simple guidelines for those who wish to photograph school visits, activities and events (see **Annex B**)

22. Advice for parents/carers, regarding taking photographs during school visits, activities and events, from the NSPCC underpins the school's own policy – i.e.:

- Unsupervised, one-to-one photographs of pupils are not to be permitted

Use of commercial photographers or film company

23. Where the school uses a commercial photographer or film company, the school will follow the NSPCC guidelines re: photographing children – i.e.:

- Schools should provide a clear brief about what is considered appropriate in terms of content and behaviour when attending the school/event;
- Schools should issue the photographer with identification which must be worn at all times whilst on the school's premises or attending an off-site school organised event;
- Schools should let parents and children know that a commercial photographer will be in attendance at the school or a school-organised event and ensure they consent to both the taking and publication of any films and photographs of their children;
- Schools should not allow unsupervised access to children or one-to-one photo sessions at home;
- Schools should not approve / allow photo sessions outside the event or at a child's home.

Safeguards

24. (As per paragraph 6.) if parents/carers have any concerns about suspected or actual inappropriate or intrusive photography, or use of photographs or other images, of children, in connection with the school, they should report the matter to the Headteacher (or his nominated deputy), who will make a note of the incident in the same manner as when recording any issue of child protection.

25. Should photographs taken at a school event be used by film companies or on television without consent, parents and carers can make a complaint direct to the Office of Communications (Ofcom).

Consent

Parental/carer

26. The school will seek the formal consent of parents/carers regarding the use of photographs of children using the consent form attached at **Annex A** to this policy. The consent will include agreement on:

- how and where the images will be used
- the types of images to be taken and used
- the period of consent (see below)
- the storage and deletion/destroying of photographs or other images

27. We request that parents and carers agree, in the consent form, to the school taking and using images of pupils throughout their time at the school.

28. Staff, working with the parents and carers concerned, will be responsible for ensuring that any photographs accidentally or otherwise taken of children and members of the school's staff, where consent has been withheld, or such is not in place, are not used.

29. Completed consent forms will be retained on file in the school office until the individual, concerned leaves the school.

Equal Opportunities

30. Assuming consent has been given, we will ensure that any images displayed or published by the school will represent the broad range of pupils in our school.

31. Girls, boys, pupils from ethnic minority communities and young people with disabilities will be included in any photographs or other images of life at The Blue School.

Responsibilities and review

32. The Governing Body, working with the Headteacher, have the responsibility for ensuring that this policy is kept under regular review (at least annually) and communicated.

[Appendix A & B](#)