Digital Image and Mobile Phone Policy

<table>
<thead>
<tr>
<th>Document title</th>
<th>Digital Image and Mobile Phone Policy</th>
</tr>
</thead>
<tbody>
<tr>
<td>Version number</td>
<td>1</td>
</tr>
<tr>
<td>Policy status</td>
<td>Approved</td>
</tr>
<tr>
<td>Date of issue</td>
<td>September 2020</td>
</tr>
<tr>
<td>Date to be revised</td>
<td>August 2021</td>
</tr>
<tr>
<td>Owner</td>
<td>Justine Mountford</td>
</tr>
<tr>
<td>Author</td>
<td>Based on a policy by Plymouth County Council</td>
</tr>
</tbody>
</table>

Revision log (last 5 changes)

<table>
<thead>
<tr>
<th>Date</th>
<th>Version No</th>
<th>Brief detail of change</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
# Contents

<table>
<thead>
<tr>
<th>Section</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>Introduction</td>
<td>4</td>
</tr>
<tr>
<td>Aim</td>
<td>4</td>
</tr>
<tr>
<td>Scope</td>
<td>4</td>
</tr>
<tr>
<td>Responsibilities</td>
<td>4</td>
</tr>
<tr>
<td>Legislative framework</td>
<td>5</td>
</tr>
<tr>
<td>Code of conduct</td>
<td>5</td>
</tr>
<tr>
<td>Consent</td>
<td>6</td>
</tr>
<tr>
<td>Statement of intent</td>
<td>6</td>
</tr>
<tr>
<td>Procedures</td>
<td>6</td>
</tr>
<tr>
<td>Images</td>
<td>6</td>
</tr>
<tr>
<td>Statement of intent</td>
<td>6</td>
</tr>
<tr>
<td>Procedures</td>
<td>6</td>
</tr>
<tr>
<td>Use of images of children by the media</td>
<td>7</td>
</tr>
<tr>
<td>Statement of intent</td>
<td>7</td>
</tr>
<tr>
<td>Procedures</td>
<td>7</td>
</tr>
<tr>
<td>Use of a professional photographer</td>
<td>8</td>
</tr>
<tr>
<td>Statement of intent</td>
<td>8</td>
</tr>
<tr>
<td>Procedures</td>
<td>8</td>
</tr>
<tr>
<td>Children photographing each other</td>
<td>9</td>
</tr>
<tr>
<td>Statement of intent</td>
<td>9</td>
</tr>
<tr>
<td>Procedures</td>
<td>9</td>
</tr>
<tr>
<td>Parents photographing their children</td>
<td>9</td>
</tr>
<tr>
<td>Statement of intent</td>
<td>9</td>
</tr>
<tr>
<td>Procedures</td>
<td>9</td>
</tr>
<tr>
<td>Closed circuit television (CCTV)</td>
<td>9</td>
</tr>
<tr>
<td>Statement of intent</td>
<td>9</td>
</tr>
<tr>
<td>Procedures</td>
<td>9</td>
</tr>
<tr>
<td>Webcams</td>
<td>10</td>
</tr>
<tr>
<td>Statement of intent</td>
<td>10</td>
</tr>
<tr>
<td>Procedures</td>
<td>10</td>
</tr>
<tr>
<td>Mobile Phones</td>
<td>10</td>
</tr>
<tr>
<td>Statement of Intent</td>
<td>10</td>
</tr>
<tr>
<td>Procedures</td>
<td>10</td>
</tr>
<tr>
<td>Work Mobile</td>
<td>11</td>
</tr>
<tr>
<td>Driving</td>
<td>11</td>
</tr>
<tr>
<td>Website</td>
<td>12</td>
</tr>
</tbody>
</table>
Learning journeys ............................................................................................................................ 12
Statement of intent .......................................................................................................................... 12
Procedures ...................................................................................................................................... 12
Practitioners training portfolios ..................................................................................................... 13
Statement of intent .......................................................................................................................... 13
Displaying images .......................................................................................................................... 13
Statement of intent .......................................................................................................................... 13
Procedures ...................................................................................................................................... 13
Storage and disposal ....................................................................................................................... 13
Statement of intent .......................................................................................................................... 13
Procedure ........................................................................................................................................ 13
Security .......................................................................................................................................... 14
Statement of intent .......................................................................................................................... 14
Procedures ...................................................................................................................................... 14
Image and Photography Consent Letter and Form. Acceptable Use Agreement Template. 15
Introduction

- The use of cameras and devices with cameras are an essential and integral part of everyday life. Children, practitioners, and their managers are encouraged to use such technology in a positive and responsible way.
- It is important that children and young people feel happy with their achievements and have photographs and films of their special moments. Family and friends also want to be able to share the successes of their children when they have been part of a special event or activity.
- Digital technology has increased the potential for cameras and images to be misused and this increased risk will be reflected in this policy.
- At UCC the use of cameras and images is managed sensitively and respectfully. We have a proactive and protective ethos which will promote effective safeguarding practice.
- Technology itself does not present the greatest risks, but the behaviours of individuals using such equipment.

Aim

- The Digital Image and Mobile Phone Policy aims to ensure safer and appropriate use of cameras and images through agreed acceptable use procedures. This is in line with legislative requirements and aims to respect the rights of all individuals.

Scope

- The Digital Image and Mobile Phone Policy will apply to all individuals who have access to and / or are users of work-related photographic and video equipment. This will include children, parents and carers, early years practitioners and their managers, volunteers, students, committee members, visitors, contractors, and community users. This list is not exhaustive.
- The Digital Image and Mobile Phone Policy applies to the use of any device with a camera. This includes mobile phones and portable gaming devices with inbuilt cameras as well as other forms of digital technology and resources for storing and printing images.

Responsibilities

- The Designated Safeguarding Lead (DSL) is responsible for ensuring the acceptable, safe use and storage of all camera technology and images. This includes the management, implementation, monitoring and review of the Digital Image and Mobile Phone Policy.
- Further details on the responsibilities of the Designated Safeguarding Lead, registered person, practitioners and their managers, parents and carers, and children are to be found in the Acceptable Use Policy.
Legislative framework

- This policy complies with the requirements of the Data Protection Act 2018, General Data Protection Regulations (GDPR), Freedom of Information Act 2000, Human Rights Act 1998 and other relevant acts, regarding the taking and use of photographic images of children.
- All images will be used in a manner that meets the requirements of the six Data Protection Principles:
  - Fairly and lawfully processed
  - Processed for limited, specifically stated purposes only
  - Used in a way that is adequate, relevant, and not excessive
  - Accurate and up to date
  - Kept on file for no longer than is necessary
  - Processed in line with an individual’s legal rights
  - Kept securely
  - Adequately protected if transferred to other countries
- Most organisations that process personal data must register under the Data Protection Act with the Information Commissioners Office. Some settings may be exempt and further details (including details of the new GDPR legislation) can be found at www.ico.gov.uk

Code of conduct

- All early year’s practitioners and their managers must ensure that the policy and procedures included herein are adhered to at all times. The Digital Image and Mobile Phone Policy will be considered in conjunction with the Acceptable Use Policy and the Misuse of Information Communication Technology Policy.
- The use of cameras and other photographic equipment should be authorised by the Designated Safeguarding Lead. It must be recognised that individuals may be given different levels of responsibility in terms of authorised use.
- Wherever practical, cameras and other photographic equipment should be designed for work-related purposes only. It is acknowledged that at Uplands Community College it may sometimes be necessary for staff members to use their personal photographic equipment. If personal photographic equipment is being used to record school events such as sports day, school productions, school celebration events, etc. and pictures of students are involved then the files should be transferred to the school files as soon as is practicable and then deleted from the personal device. No picture should be taken of a child that contravenes UK law, or commonly understood levels of decency. Pictures should not denigrate or humiliate any child and consent from the student, and/or the parents and/or the DSL or Principal should be sought.
- The transferring of images via unprotected USB sticks, unfiltered web mail or unprotected mobile media should be avoided. Any personal data stored on servers outside of the UK must comply with standards designated by UK Data Protection Law.
- The Designated Safeguarding Lead reserves the right to view any images taken and/or to withdraw or modify an individual’s authorisation to take or make images at any time. Practitioners and their managers must ensure that all images are available for scrutiny and be able to justify any images in their possession.
- The Designated Safeguarding Lead is responsible for ensuring the safe storage of all images, in accordance with the Digital Image and Mobile Phone Policy and the advice given by the UK Information Commissioners Office concerning the secure storage of personal data.
- Early years practitioners and their managers have a duty to report any concerns relating to potential misuse. The whistle-blowing procedures should be used.
Consent

Statement of intent
- General signed consent to take photographs or record images of children is requested from the parent or carer on enrolment of their child. The purpose for taking any images is clearly explained and agreed. The length of time that photographs will be stored for is clear. If photographs are being taken for a specific purpose, such as for the school prospectus or a production programme, then specific consent will be sought.

Procedures
- Consent can only be given by persons who have parental responsibility. Consent from one person with parental responsibility will be sufficient. If another parent with parental responsibility objects, the images will not be used.
- The parent or carer will reserve the right to refuse or withdraw their consent at any time. Partial or restricted consent may also be given where deemed necessary by the parent or carer.
- Specific consent for the use of images for purposes other than those previously stated and agreed will be requested, for example, should images be required for publicity materials or to support the training needs of practitioners and their managers. Such consent will detail how the photographs are to be used and for what period of time such permissions will cover.
- Images of children who no longer attend the setting will not be used unless specific consent has been obtained to cover this extended period. Generally, consent to use images will lapse should a child leave the setting.

Images

Statement of intent
- It is recognised that children could be exposed to potential risk should images be misused, including:
  - the making, taking and distribution of inappropriate and indecent images
  - grooming (the process by which child sex offenders and paedophiles will befriend victims through direct or indirect contact, often preceded by efforts to gain personal information about the child or young person)
- It should be remembered that such incidents fortunately remain very rare; but it should also be understood that detailing such concerns will often raise further anxieties and will make many individuals feel uncomfortable. It must be acknowledged however, that the first step towards minimising any danger is to have a fuller understanding of what constitutes a risk and what behaviours may compound it.
- Protective and precautionary measures should therefore be considered when taking, making or using images of children; and therefore, practitioners and managers should be expected to agree and sign up to an Acceptable Use Agreement (in line with the Acceptable Use Policy).

Procedures
- The purpose and context for any proposed image should always be considered.
- Sensitivity must be shown to any child or young person who appears uncomfortable; and the potential for misinterpretation must be recognised. Images should therefore not be taken of any child or young person against their wishes.
- The taking or making of images of a child in a one to one situation with an adult must be avoided whenever possible; unless there is an agreed, specified reason for doing so. It is recognised that the context of such situations could be perceived as sensitive and the use of cameras may be seen as intrusive and open to misinterpretation. One-to-one photography should only take place with the prior knowledge and consent of the Principal, DSL, student, and parent.
Photographs will not usually be taken of any child or young person if they suffer an injury, whether it is accidental or non-accidental. Where necessary, medical help will be sought, and in the case of a suspected non-accidental injury, the Safeguarding Policy should be implemented with immediate effect. On rare occasions, when a member of the safeguarding team considers that it may be necessary to take a photograph to document an injury, consultations will take place with the Principal, DSL, and external agencies as appropriate. No photographs will be taken unless the student is able to, and has consented.

Images which may cause distress, upset or embarrassment must not be used.

Images of children must only be taken when they are in full and suitable dress. In no circumstances are images to be taken of children in any state of undress. Should children be participating in sport activities, careful consideration must be given to the appropriateness of taking such images, in particular the angle at which shots are taken.

The taking or making of images in sensitive areas of the setting, for example toilet cubicles and changing areas, are not permitted.

Uplands Community College will not publish a child’s full name alongside any photograph. First names may be used, but careful consideration will be given before publication as to the possible impact of such publication.

Consideration should always be given where images are published. This will also include where parents are encouraged to be involved with online learning journeys. These systems must be designed to enable parents and carers to access their own child’s photographs and work safely. Where parents take photographs of their child at a group event, they will be made aware of expectations of how that image may be used. Images and videos should be used for their own or family’s personal use only and parents / carers should be encouraged to:

- think about privacy and who has the right to see their images, not only of their own child but of others
- think about the implications of sharing the images online. If the images are shared online, then they must make sure they are limited to immediate family only and not made public

Use of images of children by the media

**Statement of intent**

- There may be occasions where the press is invited to a planned event to take photographs of the children who take part. It should be noted that the press enjoys special rights under the Data Protection Act, which permit them to publish material for journalistic purposes.
- Generally, parents and carers will take pride in ‘press-cuttings’. For the majority, this pride will often outweigh any fears about the image and / or information being subject to misuse. However, some parents may object to information about, and images of, their own children being published. As a result, it should be ensured that parental / carer consent has been sought before the press is given any access to children. If a parent or carer chooses not to give permission for their child to be photographed in such circumstances, this right must be observed at all times.

**Procedures**

- The manner in which the press will use images is controlled through relevant industry codes of practice as well as the law. In this way a check is put on the potential improper use of images of children by the press. Additional checks should however also be carried out by the Designated Safeguarding Lead. This ensures that broadcasters and press photographers are made aware of the sensitivity in respect of detailed captioning, one to one interview, and close-up sports photography.
- Where a press photographer is invited to celebrate an event, every effort should be made in advance to ensure that the newspaper’s (or other relevant media) requirements are able to be met. Where, for example, a newspaper is invited to take photographs of children, it is...
usual practice for names to be provided. Newspapers will be very unlikely to print anonymous photographs. You may request that only first names are used however responsibility and liability cannot be held for the actions of a third party organisation, should they choose not to abide by any of those requests

- The identity of any press representative must always be verified. Access will only be permitted where the event is planned, and where the press is specifically invited to attend. No authorisation will be given to unscheduled visits by the press under any circumstances. In the event that the press should turn up uninvited for reasons beyond the control of the setting, every reasonable effort will be made to ensure that children and parents and carers are protected from any press intrusion

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

**Use of a professional photographer**

**Statement of intent**

- It should be ensured that any professional photographer engaged to record any events is prepared to work according to the terms of this policy document and the following guidelines:
  - In the context of data protection legislation, the photographer will be considered a ‘data processor’ and any agreement with them will be in accordance with the Data Protection Act 2018, General Data Protection Regulations (GDPR)
  - Photographers will only be used where they guarantee to act appropriately to prevent unauthorised or unlawful processing of images; and will insure against accidental loss or destruction of, or damage to, personal data

**Procedures**

- Photographers should be expected to demonstrate that they have agreed to ensure:
  - compliance with the Data Protection Act 2018 and General Data Protection Regulations (GDPR)
  - images are only used for a specified purpose and will not be used in any other context
  - images are not disclosed to any third party unless it is a specific requirement to do so in order to fulfil the requirements of the agreement. Such use will also be subject to parental/ carer permission

- Care will be taken when choosing photography agencies and/or professional photographers.
- Details of any checks regarding suitability, which may include evidence of Disclosure and Barring Service checks, will be requested. Photographic identity should be checked on arrival. If there are any concerns in respect of the authenticity of any photographer, entry will be refused. Such concerns should be reported
- Photographers should be treated as any other visitor. As such, appropriate levels of supervision should be in place at all times. This will ensure that no unsupervised access to children is given
Children photographing each other

Statement of intent

- Children may on occasion be given the opportunity to photograph each other and their surroundings. This practice will often occur during off-site activities and for most children it will be normal practice to take photographs to record a trip or event. Children may also be given access to cameras within the setting environment to support their learning and development needs. These activities should be encouraged in a safe and enabling environment.

Procedures

- Teachers will tell the students that they must follow the school policies and procedures with regard to photographing their peers
- They must obtain consent to photograph, posing for a photograph will be taken as consent. Photographs must not be taken secretly, or while the other person is unaware, for example, if they are sleeping
- Images must not be tagged on social media
- Any image which is humiliating, distressing, or unacceptable to the person or people in the image should be deleted

Parents photographing their children

Statement of intent

- Parents and carers are not covered by the Data Protection Act 2018 and General Data Protection Regulations (GDPR) if they take photographs or make a video recording for their own private use. The Act does not prevent parents and carers taking photographs or making video recordings of their own children within the setting environment, for example during school productions and events
- The right to refuse parents and carers the opportunity to take photographs and make videos is however reserved

Procedures

- Parents and carers should complete a Photography Acceptable Use Agreement if they wish to take or make any recordings within the setting environment of any child other than their own child. Authorised use will only be permitted on agreed dates and times, and within designated areas of the setting
- Parents and carers will only be permitted to make recordings or take photographs of any event for their own personal use. The use of such images and recordings for any other purpose and without express permission should not be allowed
- Parents or carers who are authorised to use photographic equipment should be encouraged to be mindful of others when making and taking such images. This ensures minimum disruption to other parents and carers during any event or production. The right to withdraw consent will be maintained and any images or filming must be open to scrutiny at any time

Closed circuit television (CCTV)

Statement of intent

- CCTV may be used for the following purposes:
  - to control access
  - to monitor security
For site management, for example monitoring incorrect parking, maneuvering vehicles, and delivery arrivals

- For monitoring purposes, particularly within the building, in corridors and areas out of sight or not frequently trafficked by early years practitioners, for example in the vicinity of toilets (but not in toilet cubicles)
- For general and focused observations of children, practitioners, and their managers
- To act as an effective deterrent to prevent crime and to discourage trespass

**Procedures**

- All areas which are covered by CCTV must be well signposted, and notifications should be displayed so that individuals are advised before entering such vicinity
- If CCTV is used within the setting, the manufacturer’s instructions, data protection and information sharing guidelines should be followed at all times. This should include the appropriate storage and disposal of all recordings
- Recordings should be retained for a limited time period only and for no longer than their intended purpose. This will generally be a maximum of no more than 30-days. All recordings should be erased before disposal
- Regular auditing of any stored images should be undertaken by the Designated Safeguarding Lead
- Every effort will be made to avoid inadvertently taking inappropriate images and therefore cameras will be placed and positioned sensitively. No cameras should be pointed directly at toilet cubicles or any other sensitive areas within the setting environment
- Images taken outside of operational hours should be erased in accordance with the procedures previously identified

**Webcams**

**Statement of intent**

- Parental consent must be obtained before webcams are used within the setting environment. Before seeking such consent, full details of why a webcam is to be used should be provided. This should also include information on the use of images, who is to be given authority to view them, and the security measures which will be implemented to prevent unauthorised access.

**Procedures**

- The regulations which apply to webcams regarding signage should be the same as for CCTV.
- If filming takes place, children, parents and carers, practitioners and their managers should be consulted. Written consent should be obtained from all parents and carers
- The details for the storage and disposal of recordings should be the same as for CCTV

**Mobile Phones**

**Statement of Intent**

- The aim of the Digital Image and Mobile Phone Policy is to protect children from harm, by ensuring the appropriate management and use of images captured on mobile phones by all individuals who come into contact with the setting
- Children should also be empowered with the skills to manage the changes in technology in a safe and appropriate way; and to be alert to the potential risks of such use
- This should be achieved through balancing protection and potential misuse. Alongside the potential risks, mobile phones continue to be effective communication tools. This in turn contributes to safeguarding practice and protection
Procedures
- Clearly defined policies and procedures help to ensure effective safeguarding practices which protect children from harm and exposure to behaviours associated with misuse. Care should be taken to ensure that mobile phones do not cause unnecessary and/or unsafe disruptions and distractions in the workplace.
- Students in Years 7 to 11 will be required to keep their mobile phones switched off while they are on the school site. This is to minimise lesson disruption, the inappropriate use of mobile phones, and cyber bullying. In addition, it promotes face-to-face, direct communication and makes a positive contribution to mental wellbeing. The consequences of not following this requirement are outlined in the Good Behaviour Policy.
- The recording, taking, and sharing of images, video and audio on mobile phones must confirm to the guidance specified within the Digital Image and Mobile Phone Policy. Such authorised use should be monitored and recorded. All mobile phone will be open to scrutiny by members of the pastoral team and the Designated Safeguarding Lead may withdraw or restrict authorisation for use at any time if it is necessary.
- Practitioners and their managers should not use their own personal mobile phones for contacting children, parents and carers, unless it is an emergency.
- All users, including parents, carers, visitors and contractors should be advised that if it is necessary for mobile phone calls and/or texts to be taken or made, any unnecessary disturbance or disruption to children must be avoided. Images, video, or audio recordings should only be made in accordance with this policy. Members of staff should not have their mobile phone on display during lessons.
- Parents and carers are encouraged to film their child at special events, but are expected to support the setting in keeping children safe by considering the following, in line with the guidance within the Digital Image and Mobile Phone Policy:
  - images and video should be for their own or family’s personal use only
  - if images are shared online, access should be limited to immediate family only and not public
- All individuals who bring personal devices into the school setting must ensure that they hold no inappropriate or illegal content.

Work Mobile
- The use of a designated work mobile should be promoted as:
  - an effective communication tool, enabling text, email messages and calls to be made and received
  - an essential part of the emergency toolkit which is to be taken on short trips and outings
  - a back-up facility should landline facilities be unavailable – or where contact needs to be made outside of operational hours
- Effective security procedures should be put in place to safeguard against potential misuse.
- Only authorised individuals should have access to the work mobile, which should be password protected, and stored securely when not in use.
- Personal calls should not be made on the work mobile phone, other than in circumstances to be agreed. Personal contact may be permitted via the work mobile in the event of an emergency. All such communications should be logged.
- The work mobile phone is to be clearly labelled as such.

Driving
- Practitioners and their managers who are required to drive on behalf of the setting must ensure any work and / or personal mobile phones are switched off whilst driving. When driving on behalf of the setting, practitioners and their manager should not make or take a phone call, text, or use the enhanced functions of a mobile phone. This also applies to the
use of hands-free and wireless connections, which can be a distraction rather than a safer alternative

**Website**

- For students under the age of 16 consent from the parent or carer is required to use a child’s image on the website. For students of 16 years and over we will ask the student and parent for consent. We will not use the image of any child on our website if the child is not happy for us to do so, regardless of whether we have consent. If a child becomes unhappy about the use of their image at a later date, we will take the image down as quickly as we are able to do so
- Images may be used on the school Facebook and Twitter pages. We will always obtain consent to do this. We may anonymise the student’s image before uploading the photograph. Uploading of images to these sites will be covered by the Photography Acceptable Use Agreement.

**Learning journeys**

**Statement of intent**

- Under the Early Years Foundation Stage, practitioners and their managers are encouraged ‘to track children’s progress and have a system for channeling the wealth of information gathered about individual children into a manageable summary. Detailed individual activity in a particular context, photos and special moments contained in a child’s portfolio all document the child’s unique learning journey’. Such portfolios are known as learning journeys and these are used to document and monitor the individual learning and development progress of each child in the early years age group (birth to five years)

**Procedures**

- The information contained within each learning journey relates to an individual, identifiable child; therefore, it should be treated as personal data. This means that such information should be stored securely when not in use. The aim is to avoid unauthorised access to potentially sensitive data
- A code of practice trust statement should be advocated to protect and promote the welfare and individual rights of children. Details of this code of practice will therefore be included in a Learning Journey Trust Statement. It must be displayed on the front cover of all individual learning journeys
- Consent must be obtained from parents and carers if their child is photographed amongst a group of children; and where the image is included in a learning journey belonging to another child
- Where possible, therefore, ‘blanket’ consent should be requested from parents and carers for group images to be included in the learning journeys of other children. Parents and carers should also be permitted to restrict their consent. This may mean that group images can only be included in specified learning journeys, for example, those which belong to close friends. If it is not possible to obtain consent, the relevant image should not be shared across the learning journeys of other children
- Individual learning journeys, constructed by practitioners and their managers, are provided for the benefits of the individual child and their parents or carers. Parents and carers should therefore be given the responsibility for choosing what to do with any personal data contained in the learning journey, once it is in their possession. However, parents must be made aware that they are not permitted to ‘publicise’ another child or young person without the express agreement of the parent or carer concerned. Parents and carers must therefore
be reminded that they must not share, distribute, or display those images without relevant authorisation and consent from the parent and carers of all children captured in any of the photographs.

**Practitioners training portfolios**

**Statement of intent**
- During training, practitioners may be required to compile portfolios which will be used to document and evidence their own learning. Part of this documentation is likely to include images of the practitioner working alongside children participating in various activities.
- The Designated Safeguarding Lead has a duty of care to ensure that practitioners act responsibly in compiling the images included in training portfolios. Practitioners should therefore be monitored in their taking, making and use of such images. All images should be subject to scrutiny and regular audits should be carried out to ensure all relevant policies and procedures are adhered to.

**Procedures**
- The Designated Safeguarding Lead should oversee the compilation of images and videos which are used by practitioners when completing training portfolios. Any images which are deemed unsuitable for any reason should not be included.
- If images are considered inappropriate, the Designated Safeguarding Lead should ensure the Misuse of Information Communication Technology Policy is applied.

**Displaying images**

**Statement of intent**
- It should be ensured that still images (including those which are displayed in digital photo frames) and video clips depict children in an appropriate way. The identity of individual children should also be protected. Particular caution should be taken where images are displayed in a public place. (The definition of a public place includes any areas where parents and carers, members of the public and visitors are given access.)

**Procedures**
- Increased sensitivity and security procedures should be observed when digital photo frames are used. The positioning of such frames should be considered, as they are often displayed in the most public areas of the setting, such as the reception.

**Storage and disposal**

**Statement of intent**
- Images should be stored and disposed of securely. The aim is to prevent unauthorised access, ensure confidentiality and protect identity. All images should be stored and disposed of in line with the Data Protection Act 2018 and General Data Protection Regulations (GDPR).

**Procedure**
- Images should not be kept for longer than necessary. The Designated Safeguarding Lead should ensure that all photographs are permanently wiped from memory cards, computer hard drives, portable drives or other relevant devices once the images are no longer of use.
• If images need to be kept for a short period of time, they must be protectively stored, and password protected on the computer hard drive or other appropriate storage device. Such equipment should be stored securely and access restricted
• Photographs should not be stored on portable storage devices for any longer than is necessary
• Security measures should be the same that apply to any personal data
• All images, including those held within learning journeys should remain on site at all times, unless prior explicit consent has been given by the Designated Safeguarding Lead
• Photographs should be disposed of when no longer required. They should be returned to the parent or carer, deleted and wiped or shredded as appropriate. Copies should not be taken of any images without relevant authority and consent from the Designated Safeguarding Lead and the parent or carer
• A record of all consent details should be kept on file. If permission is withdrawn at any time, all relevant images should be removed and disposed of. The record should be updated accordingly

Security

Statement of intent
• All images should be handled as personal data and deemed to be of a sensitive and confidential nature. It should be recognised that damage or distress could be caused if security is breached
• The Designated Safeguarding Lead is responsible for ensuring that all information is handled appropriately and securely. If there are any concerns over breaches of security, the Designated Safeguarding Lead and / or the registered person are required to take action as appropriate. All such incidents should be recorded, reported, and acted upon

Procedures
• Security procedures should be monitored and reviewed regularly
• Under the Data Protection Act 2018 and the General Data Protection Regulations, reasonable steps must be taken to ensure the reliability and suitability of any individual who has access to personal data
• To this effect, effective safer recruitment procedures should be applied. Rigorous and regular checks should also be undertaken to ensure the on-going suitability of all new and existing practitioners and their managers. All relevant checks must be completed before any new employee, volunteer or student is given access to children and / or their personal data
• All practitioners are required to follow confidentiality and information sharing procedures, which must be agreed to at the time of induction
• The following aspects of security are to be managed accordingly
  o Physical security – effective measures should be put in place to ensure physical security and to protect against theft, including that of laptops, computers, cameras, and any personal data, including images and videos
  o Digital security – stringent measures should be implemented to ensure digital security. Awareness should be raised in respect of technological advancements which could put online systems at risk. Security should be updated as and when required
• Security procedures should be proportionate to the potential risks involved and must be subject to constant monitoring and review
Image and Photography Consent Letter and Form. Acceptable Use Agreement Template

To comply with the General Data Protection Regulations that came into effect on 25th May 2018, we need your permission before we can photograph or make recordings of your child.

We would like your consent in order to do this and use the information in the ways described above. If you’re not happy for us to do this, that’s no problem – we will accommodate your preferences.

Please tick the relevant box(es) below and return this form to school.

Occasionally, we take photographs of our students. We may use these images in our school prospectus or in other printed publications that we produce, in displays and on our website. We may also make video or webcam recordings for school, monitoring or other educational use.

We may also send images to the news media, or our school may be visited by the media who will take their own photographs or film footage (for example, of a visiting dignitary or other high-profile event). Students often appear in these images. The news media may use the images in printed publications (including local or national newspapers), on televised news programmes or on their website. They then store them in their archive. They may also syndicate the photos to other media for possible use, either in printed publications, on websites, or both. When we submit photographs and information to the media, we have no control on when, where, if or how they will be used.

We would like your consent to take photographs of your child and use them in the ways described above.

Please tick the relevant box(es) below and return this form to school.

- I am happy for the school to take photographs of my child
- I am happy for photographs of my child to be used on the school website
- I am happy for photographs of my child to be used for marketing purposes and the school prospectus
- I am happy for photos of my child to be used in internal displays
- I am NOT happy for the school to take or use photos of my child
Conditions of use:

1. This form is valid for the period of time your child attends this school. Images of your child will not be used after this time. Please write to the school if you wish to withdraw consent at any time.

2. The images we take will be of activities that show the school and students in a positive light; we will not publish an image of your child with their first name and surname.

3. Embarrassing or distressing images will not be used. The images will not be associated with negative or sensitive issues.

4. We may use group or class photographs or footage with very general labels e.g. 'science lesson'.

5. We will only use images of students who are suitably dressed.

6. We will make every effort to ensure that we do not allow images to be taken of any students for whom we do not have permission or who are ‘at risk’ or disallowed from having their photographs taken for legal or social reasons.

7. We will take all reasonable measures to ensure the images are used solely for the purposes for which they are intended; however we cannot guarantee this and take no responsibility for the way images are used by other websites or publishers or for any consequences arising from publication.

If you have any other questions, please get in touch.

Why are we asking for your consent again?

You may be aware that there were new data protection rules coming in from May 2018. To ensure we are meeting the new requirements, we need to re-seek your consent to take or use photos of your child. We really value being able to take or use photos of your child, so we would appreciate you taking the time to give consent again.

Name of Child: ___________________________  Form Group:________________________

Parent/Carers signature:_______________________________________________________

Name: _________________________________     Date: ____________________________

If you require help completing this form, please contact the school.