

# TORMEAD

## **PHOTOGRAPHY POLICY**

***This whole school policy also applies to the Early Years Foundation Stage.***

### **Introduction**

Schools need and welcome publicity. Children's photographs add colour, life and interest to articles promoting school activities and initiatives. Making use of photographs for publicity materials and to promote the school in the press can increase girls' motivation and staff morale, and help parents and the local community identify and celebrate the school's achievements. However, photographs must be used in a responsible way to ensure the safety and welfare of the girls of whom they are taken.

### **Scope**

The policy applies to all staff, governors and volunteers working at the school as well as visitors.

### **Definition**

'Photography' includes photographic prints as well as transparencies, video, film and digital imaging.

### **Other Policies**

This policy should be read in conjunction with Tormead's:

- Anti-Bullying Policy
- CCTV System Policy
- Data Protection Policy (Employment Manual)
- Girls' E-Safety and Acceptable Use of IT Policy (Junior School)
- Girls' E-Safety and Acceptable Use of IT Policy (Senior School)
- Privacy Notice
- Remote Working Policy
- Staff Code of Conduct (Employment Manual)
- Staff E-Safety and Acceptable Use of IT Policy (Employment Manual)
- Safeguarding Policy and its Addendum

### **Uses of Photography**

#### *Within School*

The School may use photographs and video recordings routinely in many ways including: administration tasks, record keeping, publications, publicity, displays, teachers' lessons and the girls' own work. In addition, a photograph of each girl is held on the school database and also used on items such as lunch, printing and coach passes for senior girls.

#### *CCTV*

The School uses CCTV recordings for the purposes of crime prevention and investigation and also in connection with its obligation to safeguard the welfare of pupils, staff and visitors to the School site. CCTV recordings may be disclosed to third parties such as the police but only where such disclosure is in accordance with the Act. Further information about the use of CCTV can be found in the School's CCTV System Policy.

#### *Professional Photography*

Parents will be informed that in every year of the Junior School, and at the starts of Year 7, Year 10 and the Lower Sixth in the Senior School, an individual photograph will be taken of their daughter by a professional company. This photograph will be made available to the parents. Whenever a whole School photograph is taken it will be displayed in school and also made available to the parent body. Occasionally, professional photographers are invited to document particular events eg. dramatic productions or to take photographs for marketing

purposes. Professional photographers are not allowed unsupervised access to the girls.

#### *External Publications*

The School may use photographs and video recordings for marketing and promotion purposes including in social media and on the website. The School may also allow external publication of media where appropriate (for example, in a local newspaper) and may agree to share media with interested parties on an ad hoc basis and on agreed terms that the data will not be shared further (for example, a recording of a play might be shared with its author or photographs of an event with those attending)

#### **Data Protection and Consent**

In accordance with the Data Protection Act 1988 and the General Data Protection Regulations from 25 May 2018 the image of a pupil may amount to personal data. To take and use images for publicity purposes, therefore, the School requires the age-appropriate consent.

Children are usually considered mature enough to exercise their own data protection rights when they are aged 12 years or older. Whether consent should be obtained from the parents, the girl or both will depend on the age of the girl. The School's policy is that when consent is required it should be obtained as follows:

- where the girl is in Year 7 or below, consent should be sought from a parent, guardian or carer;
- where the girl is in Year 8, 9 10 or 11 then consent should be sought from both the girl and her parent, guardian or carer;
- where the girl is in Year 12 or 13, then only the girl's consent will need to be obtained.

Pupil consent *does not apply to:*

- images where the focus is not upon the girls as individuals. Tornead defines this as instances where more than six girls are shown.
- images taken in the following contexts, for individuals or groups of any number
  - whole school or house events;
  - public events such as concerts and performances;
  - sporting fixtures.

Pupil consent *does apply for:*

- images taken of girls in groups of six or fewer.

Girls who withhold their consent must take responsibility for removing themselves from photographs or videos in those circumstances where consent applies. Where it does not, they must decide whether they wish to participate in the event in question; if they choose to, they must recognise and accept that their image might be used subsequently.

Parents/ guardians are asked to sign consent for the School to use images of their daughters before they join the school; girls are asked to sign consent in Year 8 or when joining in later years.

Parents/ guardians whose daughters re in year 8, 9, 10, 11 are asked annually to indicate whether there are any changes to their consent.

#### **Storage**

Images are stored on the school's secure drive, access to which is password-protected and access is restricted to staff with a Tornead email address. Staff should upload images as soon as they are able and then delete them from their own devices.

In addition, a photograph of each girl is held on the school database.

## **Safeguarding**

Staff should remain aware of the potential for images of pupils/students to be misused to create indecent images of children and/or for grooming purposes. Therefore, careful consideration should be given to how activities which are being filmed or photographed are organised and undertaken. Particular care should be given when filming or photographing young or vulnerable pupils who may be unable to question how or why the activities are taking place. Staff should also be mindful that pupils who have been abused through the use of video or photography may feel threatened by its use in a teaching environment. If staff have any concerns regarding the use of photography, they should refer these to a Designated Safeguarding Lead immediately.

Staff must ensure girls are not exposed to inappropriate or indecent images. Girls must not be exposed to unsuitable material on the internet and staff should ensure that any film or material shown is age appropriate.

Furthermore, the school will only take and use images that are appropriate and which are not considered to be open to misuse: activities such as swimming and drama present a much greater risk of potential misuse.

## **Youth-Produced Sexual Imagery**

The practice of children sharing images and videos via text message, email, social media or mobile messaging apps has become commonplace. However, this online technology has also given children the opportunity to produce and distribute sexual imagery in the form of photos and videos. Such imagery involving anyone under the age of 18 is illegal. All incidents of this nature should be treated as a safeguarding concern and reported to a DSL who will take appropriate action.

## **Remote Working**

In the event of school closure due to COVID-19, the school uses Zoom as a platform for remote working. All zoom calls are automatically recorded for the purpose of safeguarding reasons, and will be viewed if such a concern arise. Recordings are securely kept for 120 days before being deleted. The Junior School uses Google Meet as a platform for remote working. All Google Meet calls are recorded by the teacher at the start of the lesson for the purpose of safeguarding reasons and will be viewed if such a concern arises.

## **Guidelines for School Staff**

- Photographs or videos may be taken on personal or school cameras or mobile devices (mobile phones or iPads). If taken on personal devices, they should be uploaded to social media and/ or the school secure drive at the earliest opportunity and then deleted from the device itself once they have been used for school purposes.
- All photographs or videos should be stored securely and only accessed by those authorised to do so.
- Ensure that the girls are appropriately dressed. No photographs or videos should be taken when the girls are changing clothes for an activity.
- Only take and use images which are appropriate and not open to misuse.
- Images of girls should not be used to illustrate controversial subjects.

- No photographs or videos should be taken in one-to-one situations
- Ensure that the girls understand why the images are being taken and have agreed to the activity. This is essential for groups involving six or fewer girls, and strongly advised in all other circumstances, where possible. Images should not be taken secretly.
- Ensure that the girls understand what will happen to the images when the activity is concluded.
- If a photograph or video is to be displayed in a place to which the public have access (e.g. on the School's website) the accompanying caption should display only the girl's first name.
- Image filenames will avoid using children's names.
- No images of girls should be attached and sent to any external email address for non-School business without the permission of a member of the Executive Group.
- Photographs taken in school by school staff will not be made available to parents.
- When starting school at Tormead and joining the Reception class, parents are given a consent form to sign if they give permission for their daughter to be photographed. Girls in EYFS must only be photographed one of two Early Years iPads when on school premises. When teaching EYFS in their setting, staff must leave their mobile devices outside the setting (wherever that may be). External companies may occasionally be used to take photographs/ video footage of girls in EYFS; in these cases, the company in question should provide documentation making clear the date on which these images will be permanently deleted from their files.

### **Guidelines for Girls**

Girls should follow the guidelines stipulated in the appropriate (Junior or Senior) Girls' E-Safety and Acceptable Use of IT Policy, which every girl must sign at the start of each academic year.

If it is found that inappropriate images have been taken or sent by girls, the school will take action accordingly, following the procedures outlined in the Anti-Bullying, Behaviour and Safeguarding Policies as appropriate.

### **Guidelines for Parents**

Tormead recognises that photographs or video recordings taken by parents, relatives, and carers are a source of innocent pleasure and pride. However, a balance needs to be struck between providing parents with the chance to record memories of their daughter's school career and safeguarding the wider school community.

In accordance with data protection legislation, any photograph taken by a parent at a school event should be for **personal use only**. In other words, such images cannot be sold and should not be shared on the internet, including social media.

#### *KS1*

Photographs may not be taken during any events which include girls in Reception. At major events and performances a professional photographer will be in attendance; these images will be available for purchase via the parent portal. As before, if purchased, these images should be for personal use only.

#### *KS2 & Above*

At school sporting events, photographs may be taken, as long as these are for personal use only. It is, of course, inappropriate and distracting to use a camera during dramatic or musical performances; therefore, we provide opportunities for photography at the end of concerts and plays. At major events and performances a professional photographer will be in attendance; these images will be available for purchase via the parent portal. As before, if purchased, these images should be for personal use only.

An exception to these rules is made for designated parent photographers who provide content for the Year 6 yearbook and observe the same policy for upload and deletion as Tormead staff members.

All members of the community should challenge anyone taking photographs who either does not abide by these rules or appears to have no connection with Tormead.

**Date of Last Review:** 23 April 2021

