



Use of Digital Images Policy

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Document Owner: Clare Whitlock (Marketing Manager)

Description: This policy outlines the Whole School's approach to taking, storing and using digital images of pupils and covers all photography taken in School, on School trips or at events.

OUR SCHOOL AIMS

- ❖ *To be a safe and trusted foundation for our pupils to achieve their individual academic, social and creative potential.*
- ❖ *To cultivate the skills, knowledge, self-awareness and academic credentials our pupils will need to confidently meet the challenges of our rapidly changing world.*
- ❖ *To instil and nurture a strong sense of social responsibility, integrity and environmental awareness so our pupils positively contribute to a sustainable and just society.*
- ❖ *To guide each pupil in the discovery, delight and development of their individual gifts, talents and character.*
- ❖ *To create and sustain an inclusive contemporary school culture, where diversity, difference and individuality are recognised and celebrated.*
- ❖ *To prioritise physical and emotional wellbeing across every facet of our school community.*

1.0 INTRODUCTION

- 1.1 There are many occasions where digital images are taken and used as part of School life. Such circumstances include everything from assessment and observation purposes in the classroom to award ceremonies, pupil achievements, productions and sporting events as part of the broader life of the School. This policy sets to provide a clear set of guidelines which will balance the School's commitment to record events in the School year whilst protecting the rights of individuals and minimising any risk that may result from the misuse of images.
- 1.2 It also covers the School's approach to using cameras and filming equipment at School events and on School premises by staff, parents and the pupils themselves.

2.0 POLICY AIMS

- 2.1 The digital imagery policy sets out to ensure that:
- Digital images are used solely for the purposes for which they are intended.
 - Personal family photography and videos are allowed where possible.



- We operate in line with the law when creating, using and sharing images of pupils
- Individual rights are respected, and child protection ensured
- Parents and pupils are given the opportunity to opt-out.

3.0 FOR THE PURPOSE OF THIS POLICY

- 3.1 Throughout this policy, the term ‘images or imagery’ refers to digital images, videos, audio recordings and photographic prints. ‘In School’ refers to all occasions whenever or wherever pupils are the responsibility of Education, Pastoral and Sports Staff. ‘Parent’ refers to anyone with parental rights and responsibility in relation to a child.
- 3.2 “Personal use” of photography and videos is defined as the use of cameras to take images and recordings of children by relatives, friends or known individuals, e.g. a parent taking a group photo of their child and their friends at a school event. These photos and videos are only for personal use by the individual taking the photo and are not intended to be passed on to unknown sources. The principles of the Data Protection Act 1998 do not apply to images and videos taken for personal use.
- 3.3 Certain uses of images are deemed “essential” and are necessary for the ordinary operation of the School. Other uses are in the legitimate interests of the School and its community and are unlikely to cause any negative impact on children. The School is entitled lawfully to process such images and take decisions on how to use them, subject to any reasonable objections raised.
- 3.4 Where images are used for the benefit and enhancement of the pupils’ education this will fall within the category of legitimate interest. For example, for learning and lesson observation.
- 3.5 Lingfield College recognises that every member of the school community has a right to privacy under both human rights and data protection legislation and that this right must be respected at all times. The primary legislation considered is the GDPR (General Data Protection Regulation (EU) 2016/679), which requires us to ensure all individuals have personal information treated properly and appropriately. We have also considered child protection issues and the need to be mindful of copyright restrictions. See Data Protection Policy.

4.0 USE OF IMAGES

- 4.1 The School uses digital images for a number of purposes:
- **Essential uses**
 - Learning, observation, demonstration, evidence & assessment including internal displays in classrooms, noticeboards, and video screens around the School site.
 - Identification, administration & security
- 4.2 Unless the relevant pupil or their parent has requested otherwise, the School will also use images of its pupils for the following purposes:
- **Recording events in the life of the School, including:**
 - We take images/videos of children during productions, concerts, awards ceremonies, class activities, events, trips and sporting matches and use them:
 - On our digital learning platforms, Firefly



- In School newsletters
- In yearbooks, sports team photography and whole school photographs
- **Marketing and promotion of the School**, including:
 - We take images/videos of children during productions, concerts, awards ceremonies, class activities, events, trips and sporting matches and use them:
 - On the School website (www.lingfieldcollege.co.uk)
 - For our School social media channels. This includes Twitter, LinkedIn, Instagram, Facebook, Flickr, YouTube and podcasting platforms
 - In promotional materials, including the prospectus, banners, flyers, brochures and posters
 - In advertisements in agreed third-party publications, billboard displays, digital display ads or local/national media.
 - For alumni purposes

5.0 CONSENT

- 5.1 A 'Use of Digital Images Permission Form' is issued to new starters (see Appendix I: Use of Digital Imagery Permission Form). A record of all consent details will be kept securely on file.
- 5.2 Permission can be withdrawn at any time by emailing The Head of Finance & Resources. Please be aware that this withdrawal of your consent will not affect the rights of the School to process images of your child that are necessary for the school's administration or where the School requires it and is otherwise lawfully entitled to do so. It may not be possible to change printed publications, such as the School newsletter, prospectus, or third-party publications (for example, where we have placed an advert or provided an image to a newspaper.)
- 5.3 For School productions, special events, and large-scale photography shoots, we may contact the pupil(s) parent/guardians to reconsider their consent on the basis that they may wish to approve specific uses.
- 5.4 The data protection laws give children rights over their own data (including images) where they are considered to have the capacity to understand their data rights. In the UK, it is agreed that most children will reach this level of understanding from the age of 13. In the Senior School, where appropriate, we may seek the verbal consent of a pupil before taking an image for the purposes of promotion or publicity where that pupil is a specific focus of the shot or identified by name, but not when included as part of a larger group or team photo.
- 5.5 For external children attending events organised by the School, including Summer Holiday Courses, separate permission will be sought from the attendees or their parents, dependent on the age of those attending.
- 5.6 Images will not be taken of any child against their wishes - a child's right not to be photographed is to be respected.
- 5.7 Whilst we will always try to avoid using images of children which feature children for whom we do not have parental consent, inevitably at times, this may be unavoidable.
- 5.8 We may still publish images where the child in question is in the frame but is unrecognisable, for example, has their back turned or is blurred in the background.



6.0 PUBLISHING IMAGES

- 6.1 The source of images will predominantly be the School's staff or a professional contracted photographer used for marketing and promotional purposes who are subject to policies and rules in how and when to take such images, or occasionally pupils.
- 6.2 The images we use are carefully selected and will always show the School and pupils in a positive light. Any images the School uses must conform to appropriate standards of integrity and decency and avoid the possibility of embarrassment by the subject of the image.
- 6.3 Standard practice is only to publish the first name unless permission has been given by the pupil's parents (dependent upon their age) for the full name to be used.
- 6.4 If showcasing digital video work to an external audience, we ensure that pupils are not referred to by name on the video or on the credits at the end.
- 6.5 Careful consideration will be in place before taking photos or recordings of very young children.
- 6.6 Photography is not permitted in sensitive areas such as changing rooms or toilets.
- 6.7 Parents are able to access some photographs taken by the School for personal use. The photos are available by a Flickr album or our secure learning platform FireFly or Family APP. Parents are advised that these images are for personal use only.

7.0 STORING & SECURITY OF IMAGES

- 7.1 Photographs used for identification, administration and security purposes (i.e. ISAMS and FIREFLY) will not be held on databases once the photographs have been replaced or expired or the pupil has left the School.
- 7.2 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 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.
- 7.3 Staff are given guidance on this policy and in the School's Safeguarding (Child Protection and Staff Behaviour) Policy 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.
- 7.4 If you have given appropriate consent, images of your child may be actively used for up to 5 years after leaving the School. Images may be archived and published in the future for an indefinite period for historical/alumni purposes.
- 7.5 Some photos are uploaded to online FLICKR albums to represent key events at the School. Parents can access these albums and download them for personal use only. These photos are only for personal use and are not intended to be passed on to unknown sources. Flickr albums will be routinely deleted after 24 months.
- 7.6 Images taken on School devices such as IPADS will be uploaded to a secure computer network. Devices will be cleared of images at regular intervals.
- 7.7 Parent Representatives, students and the LCPA may at times request access to images of pupils for Yearbooks etc. Where practically possible, we will contact parents to request additional permission.



8.0 USE OF IMAGES FOR IDENTIFICATION & SECURITY

- 8.1 All pupils are photographed at regular intervals for internal identification purposes, as part of the Schools contract with them, including ISAMS and Firefly.
- 8.2 CCTV is used on school premises and can capture pupils' images. Images captured on the School's CCTV system are used in accordance with the school's CCTV Policy. Such images are retained securely and only viewed by designated members of staff if a need arises.

9.0 USE OF IMAGES IN THE MEDIA

- 9.1 From time to time, the media are asked to cover School events or to highlight pupil successes. It is an essential part of publicising school achievement and informing the public about educational initiatives.
- 9.2 Where practicably possible, the School will always notify parents/pupils 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 for whom permission to be photographed has not been given is not photographed or filmed by the media, nor are such images provided for media purposes.
- 9.3 The media may ask for the full names of the relevant pupils to go alongside the images. Full names will only be provided where parents/pupils have been informed about the media's visit, and either parent or pupil has consented to this as appropriate.

10.0 USE OF MOBILE PHONES BY PUPILS

- 10.1 Pupils are encouraged to look after one another and to report any concerns about the misuse of technology or any worrying issues to a member of the pastoral staff.
- 10.2 Prep School pupils are not permitted mobile phones unless, in exceptional circumstances, and with prior permission from the Head of Prep, such as using public transport or school transport. In these exceptional cases, pupils must bring their phones to the School Office, where they will be stored securely until the end of the School day.
- 10.3 Mobile phones must not be used between 8.30 am and 3.50 pm for students in Years 7-11. They must be switched off and stored securely e.g. in their bag, locker or blazer. (See Mobile Phone Policy for more detail)
- 10.4 Use of mobile phones during the School day is permitted for Sixth Form students in the Sixth Form Centre only.

11.0 USE OF MOBILE PHONES, CAMERAS AND FILMING EQUIPMENT BY STAFF

- 11.1 The responsibility for capturing key photography and video around the School is shared between the Lingfield College Marketing Department and Teaching Staff. All staff are encouraged to share images and videos of activities and events they run with the wider community via channels such as newsletters.
- 11.2 Staff are given guidance on this policy and in the School's Safeguarding Policy and the Staff Code of Conduct, 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.



- 11.3** Staff will receive information regarding the safe and appropriate use of images as part of their safeguarding training and responsibilities.
- 11.4** All members of staff will ensure that all images are available for scrutiny and will be able to justify any images in their possession.
- 11.5** The school will ensure that images are held in accordance with the Data Protection Act and that suitable child protection requirements are in place.

12.0 PREP SCHOOL

- 12.1** Staff, volunteers and visitors are advised that personal mobile devices or camera facilities or video recorders are not permitted in the Foundation Stage area of Prep School. All devices must be stored away in secure boxes in the EYFS kitchen while they are on site.
- 12.2** Staff, volunteers and visitors are asked to restrict their use of personal mobile phones during the school day when they are around Prep pupils, and reference is made to this in both the Staff Code of Conduct and the Safe Working Practice forms.
- 12.3** Photographs or recordings of children must only be taken on devices belonging to Lingfield College. All devices must stay in School at all times. Each year group is provided with a School IPAD on which photographs and recordings of the children are taken to evidence learning, and development, for displays or performances within the setting and for newsletters and marketing purposes.
- 12.4** Anyone using a personal mobile phone to take photographs or videos at any time will be asked to delete the images, refrain from taking further images and will be reported to the Head of Prep.
- 12.5** The PE Department, Prep Marketing Co-ordinator and School Marketing Department also have access to School Cameras and School Mobile Phones, which may be used when taking photos/videos of the children.
- 12.6** When leaving the School site for a trip or on an outing, staff must take a School mobile phone or IPAD with them and not use their personal mobile phone to take photographs or videos.
- 12.7** Images or video footage taken on School devices such as IPADS will be downloaded to a secure computer network. Devices will be cleared of images at regular intervals.

13.0 SENIOR SCHOOL

- 13.1** Taking digital images with devices such as mobile phones, tablets or cameras without the express permission of the person being photographed/video is strictly forbidden in School or on school transport.
- 13.2** Wherever possible, Staff should not take digital images of students using their own devices but should use School Cameras, IPADS or phones. If a personal device is used, footage must be deleted once downloaded to the School network as soon as possible.

14.0 PARENTAL PHOTOGRAPHY/VIDEOS

- 14.1** In many cases, parents' digital images taken at events form an important part of family albums. Everything possible will be done to ensure this tradition is allowed to continue.



- 14.2 Parents can take digital images of their children at award ceremonies, sporting events, concerts and productions; however, they are reminded that such images are for personal use only. Images which may, expressly or not, identify other pupils should not be made accessible to others via the internet or social media channels without the prior agreement of that pupil's parents, or published in any other way.
- 14.3 Parents are asked expressly not to interfere with the smooth running of the event or to compromise health and safety to take images.
- 14.4 Commercial copyright in shows or productions may prevent parents from filming or recording pupil performances. If that is the case, the audience will be told there must be no copyright infringement.
- 14.5 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 taking inappropriate images.

15.0 USE OF PROFESSIONAL PHOTOGRAPHERS

- 15.1 The School may engage the services of a number of external photographers to take event photography, whole school photographs, award ceremonies and for marketing purposes. The School will endeavour to own the copyright of the images.
- 15.2 Photographers will not have unsupervised access to the pupils during their time at the School.

16.0 EVENT SPECIFIC FILMING OR PHOTOGRAPHY

- 16.1 Photographs, audio and/or video recording may occur at external events organised by the School, including productions, open days, performances etc.
- 16.2 Where practically possible we will provide advance notice of this, depending on the size of the event. This will be done in a number of ways including email, newsletter and/or the School website.
- 16.3 At all times we will provide clear instructions on how to opt out of any photography or filming. There will be signage at the events in key areas outlining our uses and how to opt-out. Requests to opt-out can be made to the photographer, a member of the marketing team or any other staff members present.

17.0 THIRD-PARTY PERMISSION

- 17.1 From time to time the School engage in the services of third-party organisations/companies for external events, talks, events, assemblies or run activities. They may request to use images of our pupils for their own marketing purposes.
- 17.2 We will ensure the organisation understands what they can use them for as set out in our Use of Digital Images Policy.
- 17.3 Photos and/or videos will not be taken without prior permission, and photos/video will be approved for use by the School prior to publication.



18.0 RELATED POLICIES

This policy should be read in conjunction with other relevant School policies, including:

- Anti-bullying & Cyberbullying Policy
- Behaviour Management Policy (including the Pupil Code of Conduct) – Prep and Senior School versions
- Child Protection and Safeguarding Policy
- Educational Visits Policy
- E-Safety Policy – Prep and Senior School versions
- Internet & Social Networking Policy
- Staff Code of Conduct
- Use of ICT Policy
- Data Protection Policy
- CCTV Policy
- Computer Usage Policy
- Mobile Phone Policy
- Use of Cameras and Mobile Phones (EYFS) Policy

Policy created August 2022

Next review due August 2023



APPENDIX I



USE OF DIGITAL IMAGES – PERMISSION

! ALL PARENTS NEED TO PROVIDE CONSENT FOR PHOTOGRAPHY AND FILM TO BE TAKEN OF THEIR CHILD IN ACCORDANCE WITH OUR USE OF DIGITAL IMAGES POLICY!

Introduction

The School has a duty of care to provide a safe environment for our pupils. Some uses of images are deemed essential for the successful operation of the School or where the School requires it and is otherwise lawfully entitled to do so, and as such, do not require parental consent. These purposes include but are not limited to,

- Identification, administration and security
- Learning, observation, demonstration, evidence & assessment - including internal displays in classrooms, noticeboards, and video screens around the School site.

We also recognise the positive value of the responsible use of professional, high-quality images/videos of pupils in celebrating and promoting the School as a successful, enjoyable and vibrant place to learn. We also believe that keeping parents, staff, pupils and the wider community up to date with school activities, events, news and our achievements can make a valuable contribution to the life and morale of the School, aid pupil motivation and help enhance our reputation.

The Use of Digital Image Policy

Full details of the School's policy on the use of photographs and video/audio recordings within the School are details in our Use of Digital Images Policy. This policy is intended to minimise the risks of image misuse and the right to consent and privacy. It takes into account data protection and child protection issues and covers procedures for taking, storing and publicising images of pupils.

How We Use Images

To Record Events in the life of the School

We take images/videos of children during productions, concerts, awards ceremonies, class activities, events, trips and sporting matches and use them:

- On our digital learning platforms, Firefly*
- In School newsletters
- In yearbooks, sports team photographs and whole school photographs

Please note:

*Access to Firefly is restricted to current parents via secure login.



Marketing and Promotion of the School

We take images/videos of children during productions, concerts, awards ceremonies, class activities, events, trips and sporting matches and use them:

- On the School website (www.lingfieldcollege.co.uk)
- For our School social media channels. This includes Twitter, LinkedIn, Instagram, Facebook, Flickr, YouTube and podcasting platforms
- In promotional materials, including the prospectus, banners, flyers, brochures and posters
- In advertisements in agreed third-party publications, billboard displays, digital display ads or local/national media.
- For alumni purposes.

Please note:

We never publish the full names of pupils. (Occasionally express and direct permission may be sought in respect of significant news items).

GDPR & Consent

In 2018, UK Data Protection Legislation changed to include General Data Protection Regulation, which Lingfield College follows, and the guidance set by the Information Commissioner's Office on image consent.

To ensure that parental consent is evident and clear we require the completion of our consent form below for every pupil in the School.

This form is subject to the provisions of GDPR which includes rules on giving privacy information to those whose data is held by an organisation. These requirements ensure that privacy information is clear and understandable. Our [Privacy Policy](#) is detailed on the school's website and details the overall privacy responsibilities of the school.

Please note: The data protection laws give children the right to their own data (including images) where they are considered to have a capacity to understand their own data. In the UK, it is agreed that most children reach this level of understanding at the age of 13. In the Senior School, where appropriate, we may seek the verbal consent of a pupil before taking a photograph/video.

Where Consent Has Not Been Given

For those parents who feel unable to give consent for images of their children to be used in a particular way, we would like to outline the process so that parents are aware of how we will manage this.

- If you have indicated that you do not wish your child to be photographed or filmed they may be either asked **to stand aside during photo and filming opportunities**, or we will doctor the image to ensure that the pupil is not recognisable using **pixelation** prior to publishing. This would include general classroom and playground images as well as school events, productions, school trips etc.
- Whilst we will always try to avoid using images of children which feature children for whom we do not have parental consent, inevitably at times, this may be unavoidable.
- We may still publish images where the child in question is in the frame but is unrecognisable, for example, has their back turned or is blurred in the background.



Guidance for Parents Taking Photographs/Videos at School Events

- Images/videos taken by parents of their own children at School events such as award ceremonies, sporting events, concerts and productions, are reminded that such images should be used for **personal use only**.
- A parent/carer publicly sharing images of other pupils with no controls on privacy may be in breach of data protection rules. Parents are therefore asked that images that may, expressly or not, identify other pupils should not be made accessible to others via online or social media channels without the prior agreement of that pupils' parents or shared/published in any other way.
- Parents are asked expressly not to interfere with the smooth running of the event or compromise health and safety to take images.
- The School reserves the right to refuse or withdraw permission to film or take photographs from any parent who does not follow these guidelines or is otherwise reasonably felt to be taking inappropriate images.



APPENDIX 2



USE OF DIGITAL IMAGES – CONSENT FORM

By submitting this form you:

- Give consent to the use of images of your children in accordance with your responses detailed above/below.
- Understand that If you would like to withdraw or update your consent at any time, you can do this by emailing brassetta@lingfieldcollege.co.uk
- Are aware that if you do not provide consent below the School may continue to process images of your child that are necessary for the successful operation of the School or where the School required it and is otherwise lawfully entitled to do so.
- Understand that the consent above applies from the date of completion onwards. It may not be possible to change retrospectively printed publications, third-party advertisements, or social media posts. These images will originally have been used in accordance with our previous policy.
- You agree that the below information is correct, has been completed by you and that you wish the School to administer your instructions in accordance with the information you have given and the Schools' Use of Digital Imagery policy.

1. Name of the person completing this form:
2. Relationship to child:
3. Names (s) of the pupil
4. Year Group of the Pupil
5. I/We give consent for the School to take digital images of our child for **Recording events in the life of the School**
Yes/No
6. I/We give consent for the School to take digital images of our child for **Marketing and Promotion of the School**
Yes/No
7. Date Signed