Taking, storing and using images of children

Document Control	
Document Title:	Taking, storing and using images of children
Version:	2
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Name of Originator/Author (including job title):	Hannah Hamilton Director of Marketing
Target Audience:	All United Learning staff who may capture or process images of pupils
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We take and store images for a number of purposes:

- For identification purposes
- To take images of pupils, individually or in groups, as part of the school's record and as a service for parents
- For security via CCTV recordings
- For teaching and learning purposes
- For use in celebration and promotion of activities in school

For the purposes of identification, record, security and teaching and learning, our legal basis for processing is public task, because we need to process these images as part of running North Oxfordshire Academy.

Photographs taken in school as a service for parents (such as class photos) are processed on the basis of legitimate interest, because this is an activity that people might reasonably expect us to perform.

We will ask for consent to use images in promotional material.

How we use Your Data

The data controller for personal information held by North Oxfordshire Academy is United Learning Trust (ULT). ULT is registered with the Information Commissioner's Office (ICO). The registration number is Z7415170. The Company Secretary, Alison Hussain, is responsible for ensuring that ULT complies with the Data Protection Law. She can be contacted on company.secretary@unitedlearning.org.uk or 01832 864538.

All images will be used in a manner respectful of the eight Data Protection Principles. This means that images will be:

- 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.

Darren Jeffs IT Network Manager and Adam Leyburn DPL are responsible for ensuring the acceptable, safe use and storage of all images within the school. This includes the management, implementation, monitoring and review of this policy.

How we seek your consent for images used for promotion

- Written parental permission will be sought on entry to the school, except in the case of Sixth Form students, who will be asked to sign their own consent forms. A record of all consent details will be kept securely on file.
- Should permission later be withdrawn by parents/carers, records will be updated and the relevant staff informed, and no further images of the pupil concerned will be captured for use in publicity. *(Please note that images already in circulation cannot be withdrawn.)*
- We will always make individuals aware if photography is taking place, and will talk about how and why we are taking the images in an age-appropriate way.
- We will always respect the individual, and will never take images of anyone against their wishes.
- When taking images, careful consideration will be given before involving very young or vulnerable children who may be unable to question why or how activities are taking place.
- Photography is not permitted in sensitive areas such as changing rooms, toilets, etc.

There are always some risks associated with the distribution of images. These measures help to mitigate those risks, but you should make sure you are comfortable with your child being featured in images before you give consent.

How we use images for promotion

Images are a way for us to celebrate achievement, keep parents and communities informed about our activities, and raise our profile. Parents and families and the children themselves often derive great pleasure from seeing their loved ones in print or on a website.

- Images may be included in print or digital media. Examples might include: printed publications; websites; adverts; in communications channels such as newsletters or social media; as part of wall displays; or to accompany stories in the media.
- Children's full names will not be associated with photographs except where directly relevant. For example: where the child has won a major competition.

Capture of images by Parents/Carers

- Parents/Carers are permitted to take photographs or video footage of events for private use only.
- Parents/Carers must not share images of any other pupil on social media.
- Parents/Carers are not permitted to take photographs in sensitive areas such as changing rooms, toilets, swimming areas etc.
- Parents/Carers who are using photographic equipment must be mindful of others when capturing images.
- Parents/Carers may contact the school's DSL to discuss any concerns regarding the use of images.

Capture of images by children

- We will discuss and agree age-appropriate acceptable use rules with children regarding the use of cameras, such as places children must not capture images (eg unsupervised areas, toilets etc).
- All staff will be made aware of the acceptable use rules regarding children's use of cameras and will ensure that children are appropriately supervised when taking images for official or curriculum use.
- Members of staff will role model positive behaviour to the children by encouraging them to ask permission before they take any photos.
- Images taken by children which are used for school purposes will be processed and stored in accordance with this policy.

Use of Closed-Circuit Television (CCTV)

For information on how we capture and process images through CCTV, please refer to our CCTV policy.

Annex 1 - Template image consent form (parents)

Parental consent to use pupil photos and videos (images) for promotion

Images are a way for us to celebrate achievement, keep parents and communities informed about our activities, and raise our profile. Parents and families and the children themselves often derive great pleasure from seeing their loved ones in print or on a website.

- Images may be included in print or digital media. Examples might include: printed publications; websites; adverts; in communications channels such as newsletters or social media; as part of wall displays; or to accompany stories in the media.
- Children's full names will not be associated with photographs except where directly relevant. For example: where the child has won a major competition.
- Images will only be used for promotional purposes with the consent of parents / carers.

I [parent/carer name] grant permission for you to capture images of my child for use in publicity and communications by [school name] and United Learning. I confirm that I have read the privacy notice, and I understand that it may not always be possible to recall existing images of my child from circulation if I withdraw consent at a later date.

Pupil name _____

Parent/Carer name _____

Relationship to child _____

Signed _____

Date _____

You have the right to withdraw your consent at any time. You can do so by contacting [insert details]. Should you withdraw your consent, no further images of the pupil concerned will be captured for use in publicity.

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Please note that [school name] and United Learning take images (including photographs and video) for a number of other purposes. These purposes and the lawful basis for processing those images are identified in our Image use policy.

Annex 2 - Template image consent form (Sixth Form)

Sixth Form: consent to use pupil photos and videos (images) for promotion

Images are a way for us to celebrate achievement, keep parents and communities informed about our activities, and raise our profile. Parents, families and pupils often derive great pleasure from seeing their loved ones in print or on a website.

- Images may be included in print or digital media. Examples might include: printed publications; websites; adverts; in communications channels such as newsletters or social media; as part of wall displays; or to accompany stories in the media.
- Full names will not be associated with photographs except where directly relevant. For example: where the pupil has won a major competition.
- Images will only be used for promotional purposes with the consent of parents / carers, or of the individual pupil once they enter Sixth Form.

I [pupil name] grant permission for you to capture my image for use in publicity and communications by [school name] and United Learning. I confirm that I have read the privacy notice, and I understand that it may not always be possible to recall existing images of me from circulation if I withdraw consent at a later date.

Pupil name _____

Signed _____

Date _____

You have the right to withdraw your consent at any time. You can do so by contacting [insert details]. Should you withdraw your consent, no further images of you will be captured for use in publicity.

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Please note that [school name] and United Learning take images (including photographs and video) for a number of other purposes. These purposes and the lawful basis for processing those images are identified in our Image use policy.