CAMERA AND IMAGE POLICY

The school where everyone is valued and all succeed.

Twin Oaks Primary School

Governing Body with Responsibility	Resources
Agreed by Governors on	November 2025
Chair's Signature	Mr Gavin Kennedy
Staff Member Responsible for Review	SBM
Date for Review	November 2027

Twin Oaks Primary School

We, Twin Oaks Primary School, Scawen Road, London, SE8 5AE, Tel: 020 8692 432 are the 'data controller' for the purposes of data protection law.

Our Data Protection Officer is SchoolPro TLC LTD at DPO@schoolpro.uk

1. Introduction

The use of cameras, iPods and iPads should be considered an essential and integral part of everyday life. As such, children, teachers, EYS practitioners and all staff are encouraged to use such technology in a positive and responsible way.

It has to be recognised however, that digital technology has increased the potential for 'cameras' and images to be misused and inevitably there will be concerns about the risks to which children and young people may be exposed.

Practical steps must be taken to ensure that the use of cameras and images will be managed sensitively and respectfully. A proactive and protective ethos is to be reflected which will aim to promote effective safeguarding practice.

It must however be acknowledged that technology itself will not present the greatest risks, but the behaviours of individuals using such equipment will.

2. Aim

The Camera and Image Policy will aim to ensure safer and appropriate use of cameras and images through agreed acceptable use procedures.

This will aim to be in line with legislative requirements and will aim to respect the rights of all individuals.

3. Scope

The Camera and Image Policy will apply to all individuals who have access to and /or be users of work-related photographic equipment.

The Camera and Image Policy will apply to the use of any photographic equipment. This will include mobile phones, ipods, ipads and portable gaming devices or any device with inbuilt cameras as well as other forms of digital technology and resources for storing and printing images.

4. Responsibilities

The Head Teacher is to be responsible for ensuring the acceptable, safe use and storage of all camera technology and images. This will include the management, implementation, monitoring and review of the Camera and Image Policy.

5. Legislative framework

This policy complies with the requirements of the General Data Protection Regulation 2016, 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 respectful of the seven Data Protection Principles.

- Lawfulness, fairness and transparency
- Purpose Limitation
- Data Minimisation
- Accuracy
- Storage Limitation
- Integrity and Confidentiality
- Accountability

6. Code of conduct

All School staff must ensure that the policy and procedures included herein are to be adhered to at all times.

The use of cameras and other photographic equipment is only authorised by the Head Teacher. Staff should only use such equipment for purposes as allowed by the Head Teacher. It must be recognised that individuals may be given different levels of responsibility in terms of authorised use.

School cameras, ipods, ipads and other photographic equipment is authorised for work-related purposes only. All items are signed for by individual staff members.

The transferring of images is not to be done without prior approval from the Head Teacher. Should remote access be given to servers or systems where images are to be stored, access will only be given as authorised by the Head Teacher.

The Head Teacher 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. All staff must ensure that all images are available for scrutiny and be able to justify any images in their possession.

The Head Teacher will be responsible for ensuring the safe storage of all images, in accordance with the Camera and Image Policy.
All staff have a duty to report any concerns relating to potential misuse.

7. Consent

General signed consent to take photographs or record images of children is requested from the parent or carer on enrolment of their child. These records are kept by the school office. The purpose for taking images is to be clearly explained and agreed.

The consent will cover the taking of images for general purposes, such as taking photographs which will be used to document children's learning.

Consent must be requested because an image of a child or young person is considered to be personal data under the General Data Protection Regulation 2016, Freedom of Information Act 2000, Human Rights Act 1998 and consent must be obtained as a requirement of the Act.

The requirement for consent will be applied to all children and young people under the age of 18 years. The child's view is however to be considered at all times, regardless of age.

It is recognised that some children and young people will be more vulnerable than others, for example disabled children, children in care, those with a child protection or child in need plan, children with English as an additional language, black, minority and ethnic children and those who have been subject to domestic abuse. For a range of reasons, such children's security may be compromised more than others, and therefore extra precautions more than others must be considered in such circumstances.

Procedures:

- Prior consent will always be obtained in writing before any images will be taken. Verbal consent will not be accepted under any circumstances. If it is not possible to obtain prior written consent, no images will be taken involving the individual child.

- Individuals who do not have parental responsibility, such as child minders, friends or other relatives will not be able to give such consent. Only consent provided by a parent or carer with parental responsibility is to be accepted.

- The parent / carer will reserve the right to refuse or withdraw their consent at anytime. Partial or restricted consent may also be given where deemed necessary by the parent / 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 (e.g. school website) or to support the training needs of staff. 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 are no longer at the school will not be used, unless specific consent has been obtained to cover this extended period.

- Images of children if held for which consent has never been given are not to be used, unless specific consent of the parent / carer is to be obtained. Should it not be possible to obtain such consent, such images are to be returned to the individual concerned or destroyed.

8. 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).

It must 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 will be 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.

Procedures

- The purpose and context for any proposed image should always be considered. It must be determined whether taking a photograph or video will be the most effective option or whether alternative methods of capturing the information are to be judged more appropriate in the given circumstances.
- Careful consideration must be given before involving young or vulnerable children who may be unable to question why or how activities are to take place.
- Sensitivity must be shown to any child who appears uncomfortable: and the potential for misinterpretation is to be recognised. Images will therefore not be taken of any child against their wishes. Coercion will not be used to encourage a child to participate when it has been indicated that they clearly do not want to be involved. A child's right not to be photographed is to be respected.
- The taking or making of images of a child in a one to one situation with an adult is to be avoided whenever possible: unless there is an agreed specified reason for doing so. It must be recognised that the context of such situations are likely to be perceived as sensitive and the use of cameras will be seen as intrusive and open to misinterpretation. It is to be recognised that this may

leave both the adult and the child in a vulnerable position and is therefore not to be considered accepted practice.

- It is recognised that an individual close up picture of a child often provides little context or purpose, and most often, an image of a group of children will show an activity or situation to better effect. Unnecessary close up pictures of an individual child with no surrounding context or purpose are therefore to be avoided.
- Where group photographs of children are to be planned, permission must be obtained from all parents/carers. If any parent / carer has indicated that their child is not to have a photograph taken then a group photograph will not be considered appropriate. In the EYFS pictures are used for coat pegs and registration boards.
- Photographs are not to be taken of any child should they suffer an injury: whether it is to be considered accidental or non-accidental. This will be deemed a misuse of power which will potentially cause the child to become distressed or to feel humiliated.
- All images to be taken should represent the diversity of the children in the school. No child is to be favoured in photographs.
- Images which could be considered to 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. If children are participating in sport activities, careful consideration must be given to the appropriateness of taking such images, in particular the angle of which shots may be taken.
- The taking or making of images in sensitive areas of the school, e.g. toilet cubicles and changing areas are not permitted.
- It should be ensured that a child's name and other identifying information does not appear in any caption or accompanying text alongside their photograph, e.g. on displays, documentation panels and name cards. Particular care is to be taken where such images are likely to be viewed by others, including the general public. It would be standard practice in the EYFS classroom to have captions documenting learning including children's full name.
- It is to be ensured that if, on occasion, a child is to be named (for an agreed reason) in any published text a photograph of the child will not appear.
- The minimum amount of information possible is to be provided to preserve the identity of children at all times. No personal details, such as home telephone numbers, email or home addresses are to be disclosed in any written or verbal communications.
- Consideration will always be given to where images are to be published. This will also include where parents are to be involved with learning platforms which are designed to enable parents / carers to access their own child's photographs and work safely.

9. Use of images of children by the media

There may be occasions where the press are invited to planned event to take photographs of the children who take part.

Parental / carer consent will be sought before the press are given any access to children. Should a parent or carer choose not to give permission for their child to be photographed in such circumstances, this right will be reserved at all times.

Procedures:

- The manner in which the press will use images is to be controlled through relevant industry code of practice as well as the law. Checks will be carried out by the Head Teacher – this will ensure that broadcasters and press photographers are to be made aware of the sensitivity which must be considered in respect of detailed captioning, one to one interviews and close up sports photography.
- The identity of any press representative will only be permitted where the event is to be planned, and where press are to be 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 school, every reasonable effort will be made to ensure that children and parents/ carers are protected from any press intrusion.
- Every effort will be made to ensure the press abide by the specific guidelines as set out by the school.

10. Use of a professional photographer

Statement of intent

It will be ensured that any professional photographer who is engaged to record any events will be 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 General Data Protection Regulation 2016, Freedom of Information Act 2000, Human Rights Act 1998
- Photographers will only be used where they will 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 will be asked to sign an agreement which will aim to ensure:

- Compliance with the General Data Protection Regulation 2016, Freedom of Information Act 2000, Human Rights Act 1998 Images only to be used for a specific purpose and will not be used in any other context.

- Images will not be disclosed to any third party unless it is to be 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.
- Only reputable photography agencies and/or professional photographers will be used. Evidence of such authenticity will be required.
- Details of any checks regarding suitability, which includes evidence of a DBS check, will be requested. Photographic identity will be checked on arrival. Should there be any concerns in respect of the authenticity of any photographer, entry will be refused.
- Photographers are to be treated as any other visitor. As such, appropriate levels of supervision will be in place at all times. This will ensure that no unsupervised access to children will be given.

11. Children photographing each other

Statement of intent

Children may on occasion be given the opportunity to photograph each other and their surroundings, e.g. recording trips, activities, to support learning.

Procedures

- Staff will be required to discuss and agree some age appropriate acceptable use rules with children regarding the appropriate use of cameras.
- Nevertheless, there may be occasions where children will take inappropriate images. This practice will be discouraged, and parents will also be advised to monitor their child's use of cameras within the home and social environment.

12. The right of parents / carers to take photographs and videos.

Statement of intent

Parents / carers will not be covered by the General Data Protection Regulation 2016, Freedom of Information Act 2000, Human Rights Act 1998 if they are to take photographs or make a video recording for their own private use. The Act will therefore not prevent parents/carers from taking photographs or making video recordings of their own children within school, e.g. during nativity plays.

The right to refuse parents/carers the opportunity to take photographs and make videos is however to be reserved on health & safety grounds. This right will be implemented should it be deemed appropriate.

Procedures:

- Parents/carers will only be permitted to make recordings of any event for their own personal use. The use of such images and recordings or taking photographs of any purpose, without express permission, will be a breach of the General Data Protection Regulation 2016, Freedom of Information Act 2000, Human Rights Act 1998 Parents/carers must be encouraged to be

mindful of others when making and taking such images. This will be to ensure minimum disruption to other parents /carers during any event or production. Care must be taken to ensure the view of others will not be obscured and intrusive photography or filming must be avoided at all times.

- Every effort will be made to ensure that individuals with no connection to the school are not given any opportunity to film covertly.

13. Closed-circuit television (CCTV)

Statement of intent:

CCTV is to be used for the following purposes:

- To control access
- To monitor security
- For site management
- To act as an effective deterrent to prevent crime and discourage trespass

Procedures:

- All areas covered by CCTV must be well signposted and notices displayed.
- Recordings are retained for one month only, and then erased.
- Cameras are placed to view the school site – no cameras are pointed directly at toilet cubicles or any other sensitive areas.
- During operational and out of hours periods, cameras may record inappropriate activities taking place on the premises. If such images are of a criminal nature or give cause for concern, the information will be referred to the appropriate agency.

14. Web-cams

Statement of intent

Parental consent must be obtained before web-cams will be used to record within the school environment. Before seeking consent, full details of why a web-cam is to be used will be provided. This will 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 details for the storage and disposal of recordings will be the same as for CCTV.

15. Learning Journeys – Scrapbooks documenting learning in the EYFS

Statement of intent

Under the Early Years Foundation Stage, early years practitioners and their managers are to be encouraged 'to track children's progress, (and have)…a system for challenging the wealth of information gathered about individual children into a

manageable summary. Detailed individual observations of self-initiated activity in a particular context, photos and special moments contained in a child's portfolio all document the child's unique learning journey. (Progress Matters, National Strategies). Such portfolios will often be known as 'Learning Journeys' and these are to be 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 is to relate to an individual identifiable child; therefore it is to be treated as personal data. This means that such information is to be stored securely when not in use. The aim will be to avoid unauthorised access to potentially sensitive data.
- Where possible, therefore, 'blanket' consent will be requested from parents /carers for group images to be included in the learning journeys of other children. Parents/carers must be given the opportunity to view any images before they are to be included in any learning journey, should they request to do so. Parents/carers will also be permitted to restrict their consent. This may mean that group images can only be included in specific learning journeys, e.g. those which belong to close friends. Should it not be possible to obtain consent, the relevant image must not be shared across learning journeys of other children.
- Individual learning journeys, although constructed by the EYFS practitioners, are to be provided for the benefits of the individual child and their parents/carers. Parents/carers are therefore to be given the responsibility for choosing what to do with any personal data contained in the learning journey, once it is to be 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/carers must therefore be reminded that they must not share, distribute or display said images without relevant authorisation and consent from the parents/carers of all the children in any of the photographs.

16. Storage and disposal

Statement of intent:

Images are to be stored and disposed of securely. The aim will be to prevent unauthorised access, ensure confidentiality and protect identity. All images are to be stored and disposed of in line with the General Data Protection Regulation 2016, Freedom of Information Act 2000, Human Rights Act 1998.

Procedures:

- Images will not be kept for longer than is necessary. The Head Teacher is to ensure all photographs are to be permanently wiped from memory cards, computer hard and portable drives or other relevant devices once the images will no longer be of use.
- Photographs will only be stored on portable storage devices for a temporary period. Express permission must be obtained from the Head Teacher and effective security measures must be in place.

- Security measures are to be the same that apply to any personal data and means that such data:
    1. must be classified as protected, restricted or confidential
    2. must be marked for relevant disposal
    3. will not be removed from the site physically or electronically without suitable encryption (password protection is not enough by law).

- All images, including those held within learning journeys will remain onsite at all times unless prior explicit consent has been given by both the Head Teacher and the parent/carer.
- Photographs must be disposed of should they no longer be required. It must be ensured that they will be returned to the parent/carer, deleted and wiped or shredded as appropriate.
- A record of all consent details are to be kept on file. Should permission be withdrawn at anytime, all relevant images will be removed and disposed of. The record will be updated accordingly.

17. Security

Statement of intent:

All images are to be handled as personal data and deemed to be of a sensitive and confidential nature. It is to be recognised that damage or distress could be caused if security is to be breached. The responsibility of being in a position of trust in handling data must therefore be taken seriously.

The Head Teacher is to be responsible for ensuring all information is handled appropriately and securely. Should there be any concerns over breaches of security, the Head Teacher will be required to undertake an investigation as is deemed appropriate. All such incidents are to be recorded and where necessary reported to the relevant authorities. Any actions which are identified as a result of any investigations must be implemented with immediate effect.

Procedures

- Security procedures are to be monitored and reviewed each term.
- Under the General Data Protection Regulation 2016, Freedom of Information Act 2000, Human Rights Act 1998, reasonable steps must be taken to ensure the reliability and suitability of any individual who is to have access to personal data. All school and children centre staff are therefore considered to be in a position of trust.
- To this effect, effective safer recruitment procedures are to be applied. Rigorous and regular checks are also to be undertaken to ensure the on-going suitability of all new and existing staff and their managers. All relevant checks must be completed before any new employee, volunteer or student is to be given access to children and/or their personal data.
- All staff are required to follow confidentiality and information sharing procedures, which are agreed at the time of induction.
- The following aspects of security are to be managed accordingly

1. **Physical security** – effective measures to ensure physical security to protect against theft which include: iPods kept on person or locked away when not in use, class computers locked in class rooms laptops locked away when not in use, cameras locked away when not in use.
2. **Computer security** – password protected / access to servers by individual staff password only / visitors deigned access to school servers.