



CAMPBELL
COLLEGE

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Photography Policy

Revised: August 2017

Next Revision: August 2018

At Campbell College Kindergarten & Junior School, we are keen to use photographs and videos to assess pupils' progress, capture their 'special moments' and celebrate their achievements.

However, we are acutely aware of the potential Safeguarding & Child Protection risks around the taking of photographs and films, and the sharing of images.

The Use & Storage of Digital Images

The Data Protection Act (DPA) and Human Rights Legislation require that the College safely manages the use of photographs, videos and web cams in the school environment.

All photos held on file (both electronic and paper) of the pupils exist in accordance with the DPA.

A parental permission form is used to obtain digital permissions across a variety of media at the start of each school year. If a parent or guardian does not give permission for their child to be photographed, all staff will be informed so that all reasonable steps can be taken to ensure that the child is not included in any photographs.

Examples of various platforms where photographs or videos may be used:

- Classrooms
- Corridor displays
- Junior Journal Newsletter
- College Website
- Junior School Facebook page
- School Twitter Feeds
- School Prospectus

An official Kindergarten/Junior School photograph is taken at the start of each school year and a copy is held on file electronically in accordance with the DPA. A copy is also available for parents to purchase.

Recording Images

- Photos and videos will only be taken using a Kindergarten camera or iPad. Staff will not be permitted to take photographs of children on their mobile phones or on any other camera.
- Images taken will portray the children appropriately attired, to reduce the risk of inappropriate use.
- Cameras will never be taken into the toilets/changing area.
- Photos or film footage taken by parents/guardians of their children at school events is permitted under the exemption in the DPA.
- Parents/carers who accompany children as volunteer helpers on Kindergarten outings are not permitted to take photographs. Any photos will be taken on a Kindergarten camera or iPad.
- Photos of school staff will only be used with consent of that staff member.
- Any incident of improper use of photographs/videos should be reported to a member of staff immediately.

Storing Images securely

Images of video recordings of children must be kept securely. Hard copies of images should be kept in a locked drawer, and electronic images should be in a protected folder with restricted access.

Images should not be stored on unencrypted portable equipment (eg: laptops, memory sticks and mobile phones).

Photographs and videos should only ever be stored on school computers – never on personal computers at home.

All computers in school are password-protected and can be inspected at any time, without notice, by the Manager and another witness.

If a child's image appears on the website or other publicity materials, their full name will not appear alongside the photograph. However, children's first names may be used and their full names may be given in group situations where they cannot be linked to individuals in the photograph.

By observing these points, we seek to ensure that visitors to the website cannot link images of pupils to names of pupils.

8 **WHOSE RIGHTS?**

The rights under the Data Protection Act are the individual's to whom the data relates. The School will however in most cases rely on parental consent to process data relating to students unless, given the nature of the processing in question, and the student's age and understanding, it is unreasonable in all the circumstances to rely on the parent's consent. Parents should be aware that in such situations they may not be consulted.

The School will only grant the student direct access to their personal data if in the School's reasonable belief the student understands the nature of the request.

Students must agree that the School may disclose their personal data to their parents or guardian.

Where a student seeks to raise concerns confidentially with a member of staff and expressly withholds their agreement to their personal data being disclosed to their parents or guardian, the School will maintain confidentiality unless it has reasonable grounds to believe that the student does not fully understand the consequences of withholding their consent, or where the School believes disclosure will be in the best interests of the student or other students.

9 **EXEMPTIONS**

Certain data is exempted from the provisions of the Data Protection Act which includes the following:

- The prevention or detection of crime;
- The assessment of any tax or duty;
- Where the processing is necessary to exercise a right or obligation conferred or imposed by law upon the School.

The above are examples only of some of the exemptions under the Act. Any further information on exemptions should be sought from the DPC.

10 **DISCLOSURE OF INFORMATION**

The School may receive requests from third parties to disclose personal data it holds about students, their parents or guardians. The School confirms that it will not generally disclose information unless the individual has given their consent or one of the specific exemptions under the Data Protection Act applies. However the School does intend to disclose such data as is necessary to third parties for the following purposes:

- To give a confidential reference relating to a student to any educational institution which it is proposed that the student may attend.
- To give information relating to outstanding fees or payment history to any educational institution which it is proposed that the student may attend.
- To publish the results of public examinations or other achievements of students of the School.
- To disclose details of a student's medical condition where it is in the student's interests to do so, for example for medical advice, insurance purposes or to organisers of school trips.

Where the School receives a disclosure request from a third party it will take reasonable steps to verify the identity of that third party before making any disclosure.

11. USE OF PERSONAL INFORMATION BY THE SCHOOL

The School will, from time to time, make use of personal data relating to students, their parents or guardians in the following ways. Should you wish to limit or object to any such use please notify the DPC in writing.

- To make use of photographic images of students in School publications and on the School website. However the School will not publish photographs of individual students with their names on the School website without the express agreement of the appropriate individual.
- For fundraising, marketing or promotional purposes and to maintain relationships with students of the School, including transferring information to any association society or club set up for the purpose of establishing or maintaining contact with students or for fundraising, marketing or promotional purposes.

12 ACCURACY

The School will endeavour to ensure that all personal data held in relation to an individual is accurate. Individuals must notify the DPC of any changes to information held about them. An individual has the right to request that inaccurate information about them is erased or corrected.

13 SECURITY

The School will take reasonable steps to ensure that members of staff will only have access to personal data relating to students, their parents or guardians where it is necessary for them to do so. All staff will be made aware of this policy and their duties under the Data Protection Act. The School will ensure that all personal information is held securely and is not accessible to unauthorised persons.

14 ENFORCEMENT

If an individual believes that the School has not complied with this Policy or acted otherwise than in accordance with the Data Protection Act, they should utilise the School complaints procedure.

15 REVIEW

This policy will be reviewed by the Board of Governors; however, the College may revise the policy at any time it considers necessary. The latest version will be available by contacting the College.