



## Photography Policy

Lead Senior Leader: DSL, Karen Harper

Assistant DSLs - Headteacher, Deputy Headteacher.

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Next Review: October 2023

Governor Review: PDW Committee

However, this policy is under continuous review by the Senior Leadership Team and Governors



## 1. Introduction

Schools need and welcome publicity. Making use of photographs for publicity materials and to promote the school in the press can increase pupil motivation and staff morale and help parents and the local community identify and celebrate the school's achievements. Students' photographs add colour, life and interest to articles promoting school activities and initiatives.

We recognise that:

- The welfare of the children and young people taking part in our activities is paramount.
- Children, their parents and carers have a right to decide whether their images are taken and how these may be used, regardless of age, disability, gender reassignment, race, religion or belief, sex or sexual orientation.
- Consent to take images of children is only meaningful when children, their parents and carers understand how the images will be used and stored and are fully aware of the potential risks associated with the use and distribution of these images.
- There are potential risks associated with sharing images of children online.

This policy applies to the use of photographs in school publicity materials, on its website, social media and in the press.

At Sir William Borlase's Grammar School, we will only routinely use images of our pupils for the following purposes and it is these purposes that this policy applies to:

- Team photographs and photographs of trips and expeditions in which our pupils have participated.
- A photograph on a pupil file on our SIMS database
- Year group or whole school photographs
- Internal displays on conventional notice boards within the school premises.
- Communications with the school community (parents, pupils, staff, Governors and alumni) via sections of the school's website, newsletters and the school magazine and brochures.
- Marketing the school digitally by website, by prospectus and weekly newsletters
- Displays at educational fairs and other marketing functions, including posters on display in public areas, e.g., train stations and shops.
- Articles on the activities and successes of our pupils in newspapers and magazines, and via social media and Facebook, Instagram, Flickr and Twitter.

However, any photographs taken must be used in a responsible way. Schools need to respect children's and parents' rights of privacy and be aware of potential child protection issues.

At Sir William Borlase's Grammar School every reasonable effort will be made to minimise risk by following the guidelines detailed in this document and by securing parental and pupil consent for the use of photographs. Policy implementation is the responsibility of all staff. Parents and visitors will be made aware of this policy.



## 2. Child Protection

There may be a risk when individual pupils can be identified in photographs. For that reason, the governing body of Sir William Borlase's Grammar School have developed this policy to make every effort to minimise risk by :

- always asking for written consent from a child and their parents or carers to take and use photographs for the purposes listed in Section 1
- making it clear that if a child or their family withdraw consent for an image to be shared, it may not be possible to delete images that have already been shared or published.
- not using the full names (e.g. first name and surname) of children whose images are being used in our published material
- never publishing personal information about individual children
- reducing the risk of images being copied and used inappropriately by only using images of children in appropriate clothing (including safety wear if necessary) avoiding full face and body shots of children taking part in activities such as swimming where there may be a heightened risk of images being misused.
- using images that positively reflect young people's involvement in the activity. We will also develop a procedure for reporting the abuse or misuse of images of children as part of our child protection procedures. In the event of the inappropriate use of children's photographs, the Headteacher or Designated Safeguarding Lead will inform the local Child Protection Officer, Social Services and / or the Police. We will ensure everyone involved in our organisation knows the procedures to follow to keep children safe.

## 3. Data Protection

The School is also obliged to comply with the General Data Protection Regulation (GDPR) and the Data Protection Act 1998 when it takes or publishes photographs of its pupils. Photographs and video images of pupils and staff are classed as personal data under the terms of the Data Protection Act. Therefore, using such images for school publicity purposes requires consent. The Data Protection Act gives children rights over their own data and it will normally be up to the individual child to decide whether to be photographed. The school will always try to act in the best interest of the pupils and, as far as it legally can, it will take parental preferences into account.

Most of our parents have given us permission to use images of their children when they joined us in Year 7. If at any point during their child's time with us, they wish to change their preferences, they should contact the school via [parents@swbgs.com](mailto:parents@swbgs.com). If no preferences are expressed, then we will act in accordance with the principles expressed in this policy.

Sir William Borlase's Grammar School will not display images of pupils or staff on websites, in publications or in a public place without such consent. The definition of a public place includes areas where visitors to the school have access.



#### 4. Use of Images: Internal Identification

All pupils are photographed on entering the school for the purposes of internal identification and, thereafter, at intervals by professional photographers. Pupils are always properly supervised when professional photographers visit the school.

An order form is sent to parents of the annual photographs that are taken. The school receives an electronic copy of the passport-sized photograph of each pupil from the photography company. A copy is then attached to each students' personal record on the school's Management Information System (SIMS).

#### 5. Storage and Review

The staff and governors of Sir William Borlase's Grammar School will:

- Ensure that images are stored securely and used only by those authorised to do so; they are stored on a secure network to which members of the public have no access.
- Not hold negatives of photographs.
- Ensure that they are stored securely either in the form of electronic files or hard copy photographs.
- Hard copy photographs are retained securely in our archives. We reserve the right to display these at different events, but they will never be published on social media sites or in the press without specific permission.
- Not use an image of any child who is subject to a court order.
- Ensure that children are appropriately dressed when being photographed.

#### 6. School Website and Social Media

The advice for using photographs on a website is no different from their use in any other kind of publication or publicity material. However, the staff and governors of Sir William Borlase's Grammar School are aware of the potential risk of inappropriate use of images because of the lack of control over who might see the image and the wide extent of the misuse of the Internet by certain people.

The images that we use for communication purposes never identify individual pupils using full names. We only use images of school activities, such as plays, concerts, sporting fixtures, prize-giving, school trips etc. in their proper context. We never intentionally use any image that might embarrass or humiliate a pupil.

#### 7. The Press

The use of photographs in newspapers and magazines is already subject to strict guidelines. The Press Complaints Commission's Code of Practice states that:

Journalists must not interview or photograph a child under the age of 16 on subjects involving the welfare of the child in the absence of or without the consent of a parent or other adult who is responsible for the children. Pupils must not be approached or photographed while at school without the permission of the Headteacher/DSL/Member of the Senior Leadership Team.



There is no breach of the Data Protection Act 1998 in passing on a child's name to a journalist if parental consent has been secured in writing.

Sir William Borlase's Grammar School will provide names of children to accompany photographs published in newspapers and magazines only where the parent or guardian have provided their consent.

## 8. Commercial Filming of Events

On occasions, commercial video films may be made of children on educational visits and performing in school productions and events. The school will inform parents where arrangements have been made for a commercial photographer to film such an event.

## 9. Photographs by Other Authorised People/Agencies

No unauthorised filming or photography should take place at Sir William Borlase's Grammar School and express permission to photograph or film should be sought in writing using the form found in Appendix A from the Headteacher or from the Designated Safeguarding Lead.

The purpose of the pictures must be explained to the parents or the students themselves and written permission (through a consent Form) must have been obtained. Students must not be photographed for any purposes under any circumstances unless written permission has been obtained.

Parents should be made aware that, when class or group photographs are taken by a commercial agency, the photographer retains the copyright. They should be given contact details of the agency used.

In addition, where a commercial photographer is used, the school will follow the NSPCC guidelines which are as follows:

- Schools should provide a clear brief about what is considered appropriate in terms of content and behaviour.
- Schools should issue the photographer with identification which must be worn always; Schools should let parents and children know that a photographer will attend an event and ensure they have consented to both the taking and publication of films and photographs.
- Schools should not allow unsupervised access to children or one-to-one photo sessions at home.
- Schools should not approve / allow photo sessions outside the event or at a child's home.

If children or parents have any concerns about inappropriate or intrusive photography, they should report them to the Headteacher or Designated Safeguarding Lead who would report them in the same manner as any other child protection concern.

If schools or parents have concerns regarding the use of filmed images by television companies, they should contact the Office of Communication (Ofcom).



## 10. Camera Phones in Schools

Concerns have been expressed about the risks posed directly and indirectly to children through the use of camera phones on school premises.

Visitors will be advised of the ban on the use of camera phones/photography and filming in school and, wherever possible, all visitors will be accompanied by a member of staff during the duration of the visit.

## 11. Staff Induction and Training

All new teaching and support staff are given guidance on the school's policy on taking, using and storing images of children.

## 12. Use of Cameras and Recording Equipment by Parents and Guardians

The School does not allow the taking of photographs or the recording of digital media on its school site by visitors or parents. This includes musical evenings, sports day and drama productions except where written permission has been given by the Headteacher or the Designated Safeguarding Lead.

Where anyone is found recording or taking photographs on the school site without permission, they will be asked to delete all images taken immediately.

## 13. Use of Cameras and Recording Equipment by Staff

Photographs of pupils will only be taken when parents' permission has been given (provided in writing via consent form). While staff may take an image using their own phone to post on school social media, they must not store images on their own personal devices. All staff, volunteers and governors have been advised that personal mobile phones should not be used in any student areas within our school.

Our Staff Code of Conduct found on our school website, provides further detail.

## 14. Use of Cameras and Recording Equipment by Pupils at School

It is forbidden to use cameras/video facilities on a mobile phone to photograph other members of the school community without specific permission from the Headteacher or Designated Safeguarding Lead. If permission is given it will be subject to the stipulations in Appendix B. If a pupil uses their school device or mobile phone, to photograph legitimately or otherwise, in a manner which is inconsiderate to those around them or for any form of cyberbullying (as determined by the Headteacher or member of the School Leadership Team) then they will be punished in accordance with the Anti-Bullying and Behaviour policies.

## 15. Treating Others with Respect

All pupils are encouraged to look after each other, and to report any concerns about the misuse of technology or related worrying issues to a member of the pastoral staff. The use of cameras including on mobile phones are not allowed in washing and changing areas or at swimming galas and events at the pool, nor should photography be used in a manner that may offend or cause



upset. The misuse of cameras in a way that might embarrass or humiliate a student or that breaches our Anti-Bullying policy is always taken seriously and may be the subject of disciplinary procedures.

Similarly, the distribution of images or placing of images on the Internet which might bring the school into disrepute will be considered a serious breach of discipline and subject to the sanctions expressed in the Behaviour policy.

#### 16. Monitoring and Review and Related Policies

This policy is part of a suite of policies which relate to Child Safeguarding. The policy is reviewed every year by the Governing Body and the implementation of it is checked by the Governor for Child Protection. The person with that responsibility will demand that any deficiencies found or weaknesses in the policy exposed are remedied without delay.

#### Related Policies

- Child Protection (including Covid-19 addendum as applicable)
- Staff Code of Conduct
- Behaviour
- Anti-Bullying and Peer on Peer Abuse
- ICT and Online Safety (Staff and Students)

