



**FINTON HOUSE**  
SCHOOL

## IMAGES OF PUPILS POLICY

Member(s) of staff responsible: Guy Collins Down and Kate Hebblethwaite (Data Compliance Co-ordinator)

Date Revised: 9 April 2019

Governing committee/sub-committee responsible: Risk Management/Safeguarding

A hardcopy of this policy is available to all governors on request from the School Office. It is accessible to all staff electronically (in the Policy folder on the Staff Admin Drive) and a hardcopy held on file in the Head's Office.

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## 1. Policy Statement

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The policy has been created in light of the implementation of the General Data Protection Regulation (GDPR) in 2018.

Finton House School is obliged to comply with the General Data Protection Regulation (GDPR) and the Data Protection Act 2018 when it takes or publishes images of its pupils. 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.

The Data Protection Act gives children rights over their own data when they are considered to have adequate capacity to understand. Most children will reach this level of understanding at around age 12. For this reason, in the context of Finton House School's primary setting, it *will not* normally be up to the individual child to decide whether or not to be photographed. Thus, in most cases, where the School considers that the child *does not* have the capacity to make such a decision, the School will act as it considers to be in the best interests of the child, and in doing so will take account of any stated parental preference.

If parents wish to express a preference for the School to avoid taking or publishing images of their child/children in certain circumstances, they should please indicate their preferences using the attached form. If no preferences are expressed, then the School will act in accordance with the principles expressed in this policy.

For the purpose of this policy, the term "images" will be taken to mean any image, whether digital or printed, including still photographs and video.

Responsibility for this policy lies with Kate Hebblethwaite and Guy Collins-Down, the school's Data Compliance Co-ordinators. Any questions about the policy should be referred in the first instance to them.

## 2. Images for Internal Use

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Finton House School staff and volunteers are encouraged to take digital / video images to support educational aims. These will generally be for internal school use, but may also include images for publication, such as photos or videos for the website, social media or newsletter, or to show as slides at an event for parents. Unnamed photographs may also be used on display boards which can be seen by visitors to the school.

When creating images of pupils, Finton House School staff and volunteers will be governed by all relevant school policies:

- The School's Safeguarding Policy
  - The Acceptable Use Policy
  - The School's Terms and Conditions (Parent Contract)
  - The School's Data Protection Policy
  - The School's Retention of Records Policy
- When the image is produced, the pupils will be informed and told what it is for so that they can object if they wish (those producing the images will use their professional judgement in working with children of different ages across the school).
  - Staff are aware that they may only create images of children on a school device. Personal devices may not be used to create or store images of children.

## 3. Use of Images on School Social Media Accounts

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- The School regularly publishes images of pupils on its Facebook and Twitter pages. Posts are created by specific members of staff who have received training in the selection of images appropriate for this purpose.
- These will be unnamed images of groups, never of individual pupils. Images will show pupils who are appropriately dressed and are not participating in activities that might put any pupil at risk, or bring the school into disrepute.
- Staff at Finton House School will inform and educate pupils about the risks associated with the taking, use, sharing, publication and distribution of images online. In particular pupils will

be taught the risks attached to publishing their own images online e.g. on social networking sites.

#### **4. Images for External Use**

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- The School will give proper consideration to the interests of its pupils when deciding whether to allow external organisations to take photographs or to film.
- Where visiting organisations or the media are allowed to be present in school or at school events, they will be subject to the terms of this policy and also the Acceptable Use Policy for Visitors.
- Where the media are allowed to be present at a particular event, the School will make sure that pupils and their parents are informed of the media presence. If no objection is received, then the school will assume that unnamed photographs may be published.
- When the School wishes to send images to the media in support of a news story, images will be unnamed and only images of those pupils for which parental consent has been obtained will be used.
- If the media entity wants to publish named images, then they must obtain specific consent from the parents of those pupils concerned. The School will require the media entity to check with the school before publication so that the school can check that any objections have been taken into account.

#### **5. Family Photography at School Events**

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- Parents are welcome to take videos and digital images of their own children at school events for their own personal use. Such use is not covered by the Data Protection Act.
- The school records highlights of plays and concerts and shares them with parents on Frog (the school VLE). For the enjoyment of other audience members and the performers, we politely request that parents do not film these productions on their own devices.
- Family and other spectators are requested not to publish any photographs of children other than their own on the internet.
- Parents taking pictures of other parents or spectators at such school-based events are requested not to share them on the internet, and are asked to let adults know that their photograph has been taken at the event.

#### **6. Storage and Retention of Images**

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- Images created on school devices will be transferred onto the school network within one week, and then deleted from the device.
- Images of pupils who have left the school may be stored for historical purposes such as alumni events and school celebrations. Some of these images may be stored on encrypted hard drives which are stored securely on school premises.
- Details of how long images and other personal data are stored, and how it is disposed of, is available in our Records Retention Policy.