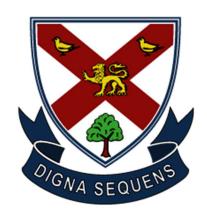
# Widford Lodge

PREPARATORY SCHOOL



# Policy on the use of Cameras, Mobile Phones, Smart Watches and Recording Devices, including the taking, storing and using of images of children

This policy applies to all staff, volunteers and pupils in the school, including in the EYFS

Reviewed and approved by Proprietor September 2025 Next Review September 2026

# Policy on the use of Cameras, Mobile Phones and Smart Devices

Please note, when referred to, the school's Designated Safeguarding Lead is Sam Pawsey and the Deputy Designated Safeguarding Lead is Michelle Cole. Louise Gear is the Proprietor responsible for Child Protection.

#### Use of Cameras and the manipulation and storage of images

# **Definitions**

In this policy terms such as 'photography', 'pictures', images', 'camera', 'device' and 'digital technology' include both still and video media. The term 'camera' includes mobile phones, ipads, smart watches and other equipment which has the capacity to take photographs.

#### Introduction

Widford Lodge School ("the school") is an open and inclusive community that is very proud of the achievements of all our pupils in their academic, artistic and sporting endeavours. We celebrate our diversity and give all of our many visitors a warm welcome.

We particularly welcome parents to our concerts, plays and sporting events, as well as to more formal occasions during the school year. The school walls are decorated with examples of pupils' work, team photographs and photographs of trips in which our pupils have participated. Our website is updated regularly, and all parents are sent a regular newsletter by email in order to keep them fully abreast with the news of our active community.

We recognise that the appropriate use of photography enhances many aspects of school life and the pupils' education. Mobile phone technology has become more sophisticated over recent years and will continue to evolve. Wireless connections in particular extend the capabilities of mobile devices further; which allow access to new content and services, such as the internet, social networking sites and instant messaging. Many mobile devices, alongside other technologies, aim to change the way we communicate. This speed of communication often provides security and reassurance; however, as with any other form of technology, there are associated risks.

The requirements of the General Data Protection Regulation have been considered when reviewing this policy.

# <u>Aim</u>

This policy is intended to provide guidance to staff and information to parents about how images of pupils are normally used by the school. It also covers the school's approach to the use of cameras, video and filming equipment at school events and on school premises by parents and the media. It applies alongside parent consent forms provided (the template is an Appendix to this policy) and should be understood in the context of any other information the school may provide from time to time about a particular use of pupil images eg signage about the use of CCTV, as well as more general information about use of pupils' personal data in the school's privacy notice.

# General Principles of Image Use

Certain uses of images, including pupil images, are necessary for the ordinary running of the school. It may not be possible to object to such uses, although any concerns in this regard will be duly considered by the school. Other uses are considered to be in the legitimate interests of the school and its community and unlikely to cause any negative impact on pupils. The school is entitled lawfully to process such images and take decisions about how to use them, although objections may be raised and the school will seek to accommodate any reasonable concerns. Examples are given in this policy.

We hope parents will feel able to support the school in using pupil images to celebrate the achievements of pupils, to promote the work of the school and for important administrative purposes such as identification and security. Parents who accept a place for their child at the school are invited to indicate that they agree to the school using

images of that child as set out in this policy via the form attached as an appendix to this policy and from time to time if a particular use of the pupil's image is requested. However, parents should be aware that certain uses of their child's images may continue to be necessary or will be unavoidable (for example as part of a whole school photograph or included incidentally in CCTV).

Any parent who wishes to limit the use of images of their child other than via the form attached as an appendix should contact the school office via email; the school will respect these wishes wherever possible and in accordance with this policy.

Parents are asked to reconsider the permissions granted/withheld via completion of the form attached as Appendix A at the start of the autumn term each year.

### Use and Publication of Certain Pupil Images

In accordance with any consents, notices or objections as may be applicable from time to time, the school will use images of its pupils to keep the school community updated on the activities of the school and for marketing and promotional purposes, including:

On internal displays and notice boards within the school premises;

As part of the school's email system and in appropriate communications with the school community (parents, staff and Proprietor);

As part of school curricular activities, as a teaching aid or as part of activities using school devices and applications;

In printed and emailed material including the school's prospectus and newsletter;

On the school's website and where appropriate and in line with relevant policies, via the school's social media channels eg Instagram;

In the press and for external advertisements for the school.

The school's policy in respect of the above uses is as follows:

- Legitimate interests will be relied upon for any uses which are either essential (eg security, administration and education) or which fall within a scope of reasonably expected uses, including via internal school or parent communications, in the newsletter or prospectus or any uses whereby an individual child cannot reasonably be identified by someone outside the school community.
- The key effect of the school relying on legitimate interests is that parents may be entitled to object to such uses, although their specific consent will not be sought beforehand. Any objections will be duly considered by the school but objections can be overridden by other factors, for example uses which the school considers essential or which create little or no risk of harm (including where children are not at risk of outside identification).
- Consent will be sought via the form attached as Appendix A for other ad hoc external uses of pupil images
  online, and via specific consent for other examples in particular where any intended use is more intrusive or
  unexpected.

The school will take reasonable steps following any objection or withdrawal of consent but may not be able to recall or destroy printed materials. Any particular concerns or vulnerabilities relating to a pupil or their family should be drawn to the school's attention in advance. The safeguarding and best interests of pupils will remain the school's priorities at all times.

For images of pupils to be used online, care will be taken where possible to limit the scope for any individual child to be a prominent, face on or central focus of an image.

#### Use of Pupil Images for Identification and Security

Pupils are photographed each November for the purposes of making photographs available for parents to buy and these photographs are added to the school's management information system, identifying the pupil by name, year group, class and house.

CCTV is in use on school premises for certain notified purposes, including security and in certain cases is likely to capture images of pupils. Such images are used in accordance with the privacy notice and CCTV policy and the location of cameras will be clearly notified, including by signage. Further information is available in the school's CCTV policy.

#### Use of Pupil Images by External Media

Where practically possible, the school will notify parents in advance when the media is expected to attend an event or school activity in which pupils are participating, and will make every reasonable effort to ensure that any pupil whose parent has refused permission for images of that pupil or themselves to be made in these circumstances are not photographed or filmed by the media, nor such images provided for media purposes.

It is the school's policy not to provide pupil names to the media; these will only be provided where parents have specifically consented to the sharing of the pupil's name for an appropriate and necessary purpose.

#### Security of Pupil Images

Professional photographers and the media are accompanied at all times by a member of staff when on school premises. The school uses only reputable professional photographers and makes every effort to ensure that any images of pupils are in suitable dress and held by such persons securely, responsibly and in accordance with the school's instructions.

The school takes appropriate technical and organisational security measures to ensure that images of pupils held by the school are kept securely on school systems and protected from loss or misuse. The school will take reasonable steps to ensure that members of staff only have access to images of pupils held by the school where it is necessary for them to do so.

Any external processors of pupil images are engaged only for lawful purposes consistent with those set out in this policy and subject to proper due diligence and contractual protections.

All staff are given guidance on this policy and on the importance of ensuring that images of pupils are made and used responsibly, only for school purposes and in accordance with school policies and the law. Pupils are also given age appropriate guidance on their own privacy online and with their peers, including image use and social media safety.

#### Use of Cameras and Filming Equipment (including mobile phones and devices) by Parents

Parents or other close family members (hereafter, parents) are welcome to take photographs and film their own children taking part in school events, subject to the following guidelines, which the school expects all parents to follow:

When an event is held indoors, parents should be mindful of the need to use their cameras and devices with consideration and courtesy for performers and the comfort of others. Flash photography can disturb others in the audience or cause distress for those with medical conditions; the school therefore asks that it is not used at indoor events.

Parents are asked not to take photographs of other pupils, except incidentally as part of a group shot, without the prior agreement of that pupil's parents.

Parents are reminded that such images are for personal use only. Images which may, expressly or not, identify other pupils should not be made accessible to others online (for example on facebook, Instagram or by text or WhatsApp) or published in any way.

Parents are reminded that copyright issues may prevent the school from permitting the filming or recording of some plays and concerts. Similarly, adults accompanying pupils' performances may not consent to recording or filming. The school will remind parents of this in the programme.

Parents may not film or take photographs in changing rooms or backstage, nor in any other circumstances in which photography or filming may embarrass or upset pupils, by reference to their dress, activity or any other factor.

The school reserves the right to refuse or withdraw permission to film or take photographs at a specific event or more generally either for all attendees/parents (eg where a safeguarding risk to an individual child has been identified) or from any individual parent who does not follow these guidelines or is otherwise reasonably felt to be making inappropriate images.

The school sometimes engages a professional photographer or film company to record plays/concerts, in which case physical or digital copies may be made available for parents to purchase. Parents of pupils taking part in such plays and concerts will be consulted if it is intended to make such recordings available more widely.

#### Use of Cameras and Filming Equipment by Pupils

All pupils are encouraged to look after each other and to report any concerns about the misuse of technology, or any worrying issues to a member of staff. The use of cameras or filming equipment is not allowed in toilets, washing or changing areas, nor should photography or filming equipment be used by pupils in a manner that may offend or cause upset. The misuse of images, cameras or filming equipment in a way that breaches this policy or the school's anti-bullying policy, data protection policy, esafety policy, safeguarding policy or behaviour policy is always taken seriously and may be the subject of disciplinary procedures or dealt with under the relevant safeguarding policy as appropriate.

Pupils are not permitted to bring personal cameras, mobile phones, smart watches or recording devices to school.

#### Other Photographs

From time to time a teacher or learning support assistant may undertake a case study of a child, for example, as part of a training course to gain a qualification. In such situations, parental consent with regard to photography must be respected. Case studies will only be undertaken following prior written consent from the parent or carer and, except by prior arrangement between the Headteacher and the parent/carer, the child's name will be changed in the case study to protect his or her identity.

Occasionally a photograph may be taken which inadvertently catches a pupil in an unfortunate, embarrassing or compromising position. If this is the case, the image and any copies of it must be destroyed immediately.

#### Photography by parents

If members of staff have concerns about the suitability of photography by parents, they should consult the Headteacher, Michelle Cole or Sam Pawsey, who is the school's Designated Safeguarding Lead. They will consider the situation with reference to this policy and the school's safeguarding procedures and take appropriate action. Concerns will be taken seriously, logged and investigated appropriately.

Any parent who works at the school, for example as a volunteer, must abide by this policy. The teacher responsible (for example the trip leader for an educational outing which uses parent volunteers) must ensure that parents involved are aware of this policy and abide by it.

Sometimes parents wish to video certain school events. When this is the case, staff are encouraged to ensure that the videoing is appropriate. Since it may be difficult to ensure that parental consent is respected in these situations, and it is not appropriate to share the details of consent given for particular children with other parents, the Headteacher may have to intervene and refuse permission for a video recording of the event to be made.

#### Use of equipment by Staff

Except as detailed below for Instagram, staff may not use their own cameras, phones or other equipment to take pictures in school or at events. School iPads are available for this purpose including within the EYFS. In order to post photographs onto the school's private Instagram account staff may take photographs of a group of non EYFS children using their mobile phone provided that: none of the children's parents have refused permission for their child's image to be used in this way; the teacher explains to the children what they are doing; and images are deleted promptly after being saved to the school's secure photos file.

Users bringing personal devices in to the school must ensure there is no inappropriate or illegal content on the device. Staff must ensure that this policy is observed when using other equipment in connection with photographs (photocopier, scanner, printer, ipads etc.). Disposable cameras should not be used. Cameras, phones, smart watches and other devices should never be used in changing rooms or toilets.

Staff who are also parents at the school, may have relatives or friends who take photographs of their child at school fixtures and events. Such photographs may therefore be stored on cameras and devices belonging to the staff member. These may include photographs of other pupils, depending upon the nature of the event. Staff members will agree to a review by the Senior Leadership Team of images stored on their devices.

# Use of Cameras within the EYFS

We use photo evidence to show children's development and achievements in their Profiles and Learning Journeys. These are stored online using Evidence Me software. Paper copies of special events may be kept in children's work folders for parents. We display the children having fun and enjoying their day.

- Each child has a digital Learning Journey and 'special book' (work book) with their photo on the front
- Photo observations are used in the children's Learning Journeys
- There are displays of children with photos for parents to see
- Photo/picture rules displayed on the walls
- Photo keyrings/picture boards to support the individual child.

# How we ensure photos are used/disposed of appropriately in the EYFS

- When children join the school parents sign a consent form (see attached) to confirm they are happy for us to take their child's photo
- ipads are not allowed in the toilet cubicle or nappy changing areas
- smart watches are not used in EYFS areas. Staff with smart watches are required to disable functionality when with EYFS children and this is checked by the EYFS leaders
- The Pre-school supervisor/class teacher checks the ipads are in the drawer at the end of each day
- Any unwanted photos are shredded
- Photo key rings are kept in a safe place and not readily available for others to see.
- If children take photos home, the image is of them only.
- Any photos that come down from a display are:
  - o Group photos put in the children's photo album
  - o Individual images sent home for parents to have
  - o If not needed, shredded

#### Note

- Disposable cameras are not used in the EYFS
- Thank-you cards with photos are not given to people outside of the school i.e. club leaders

# Editing and storage of photographs

All images taken by members of staff or volunteers at school or on school activities remain the property of the school. The school may require images to be deleted or edited as appropriate and may also select images taken by members of staff or volunteers for other purposes, with due attention paid to the requirements of this policy.

When editing images, staff must take due care and ensure that images do not mislead or misrepresent. Care must also be taken to ensure that images do not result in their subject being vulnerable to embarrassment, teasing, bullying or abuse.

Close attention must be paid to the storage of images, which are not permitted to be kept on portable media such as flash cards and memory sticks. Images must not be stored permanently on personal devices or storage media. Members of staff may transfer images to personal equipment for the purposes of sorting and editing but they must be transferred to the school's secure photograph archive and deleted from personal equipment at the earliest opportunity.

All images must be stored permanently only in the school's photograph archive on the staff shared area (except where they form part of other approved school documentation, such as a record of achievement, display, brochure or official website). Once sorted and edited, images must be transferred to the archive and deleted from other personal and school equipment and temporary storage media.

To maintain security and enable subsequent users to work effectively, where cameras have the capacity to save images without the need for a removable card, these must be deleted after use.

Unless specific prior consent has been obtained, members of staff and volunteers must not post images of children on personal pages of social networking sites or other websites. The age limit for having a Facebook account is 13 and other social networks have similar restrictions. However, parents do not always enforce these restrictions and regular reminders are issued to parents. Staff must be vigilant in respect of any inappropriate use by pupils of school images or their own photographs of school events on social networks and must report any concerns to the Designated Safeguarding Lead.

The Headteacher is responsible for liaising with the Proprietor to ensure familiarity with this policy and that images used in newsletters and other literature abide by this policy and respect the level of consent given by parents in respect of photography.

Final responsibility for the appropriate use of photography at school and in connection with school events rests with the Headteacher and Designated Safeguarding Lead. They will monitor school images and may require an image to be deleted, edited or removed from a particular document, website etc. in accordance with the requirements of this policy. Staff will be mindful of child protection issues and will raise concerns with the Designated Safeguarding Lead if they become aware of anyone appearing not to comply with this policy.

The school has a procedure for regularly checking and updating our website when expired material is deleted. We follow government guidance on e-safety. The school would always complain to the Press Complaints Council if the media failed to follow the appropriate code of practice for the protection of young people.

The school assesses the risk of access to archived images by inappropriate individuals to be very low. Staff and volunteers must ensure that their use and storage of images maintains a similarly acceptable level of risk.

Use of mobile phones and smart watches by members of staff, volunteers and visitors in school

Mobile phones and smart watches provide many benefits to school life, notably in improving health and safety through better communication with staff in more remote parts of the school, the school field and on off-site visits. However, these devices, particularly those capable of taking pictures, also present a challenge to the school community to ensure that pupils and staff are safeguarded in relation to the potential for improper use and also that pupils' education is not impeded by the use of mobile phones at inappropriate times. Between 8am and 5.30pm staff are asked to use their mobile devices only in the staff room or other locations to which children do not have access. This does not apply when offsite, where discretion is needed regarding making and receiving important school-related calls. The Fire Officer (the Headteacher unless she is offsite) is required to have their mobile phone with them and not silenced at all times for emergency purposes.

Staff should encourage family and friends to contact them via the Office in the event of an emergency.

Staff must be vigilant to ensure that the use of mobile devices, including their use by volunteers, visitors and pupils is always appropriate and that the safeguarding needs of the pupils are met. Any concerns should be discussed with the Designated Safeguarding Lead. Concerns will be taken seriously, logged and investigated appropriately.

Where a member of staff, visitor, volunteer or pupil has a mobile device with the facility to take pictures, its use is subject to the policy on the use of cameras and the manipulation and storage of images above. Visitors are reminded of the school's policy regarding using mobile devices to take photographs and videos when signing in at the office.

#### Mobile Devices in the EYFS

#### <u>Aim</u>

The EYFS main aim is to keep our children safe.

Staff, visitors, volunteers and students are not permitted to use their own mobile devices to take or record any images of children for their own records.

Many mobile devices have inbuilt cameras so staff mobile phones must not be carried around in pockets and should be left with personal belongings in the staff kitchen. Staff with smart watches must ensure that they turn off wifi and Bluetooth while they are in the EYFS setting.

Visitors may only use their phones outside the building.

In cases of a personal emergency all personal calls should be directed through the School phone. If the school lines are in use and there is a serious emergency, a mobile phone may be used to call the relevant emergency contact number, if deemed necessary by the Pre-school supervisor/class teacher.

Staff do not use personal mobiles to contact parents.

Staff are asked not to make personal calls during their working hours, other than during breaks.

If staff want to check their mobile phones, they must be taken to the school staff room in their bags.

#### Appendix 1

# CONSENT FORM: PHOTOGRAPHY AND USE OF IMAGES OR RECORDINGS OF CHILDREN

Nama at child :	

Pupils will not usually be named in photographs without your specific consent in each case. For images of pupils to be used online, care will be taken where possible to limit the scope for any individual child to be a prominent, face on or central focus of an image.

Consent to using your child's images will last throughout your child's time at the school and will continue to apply for a short time after they leave (except for images published for historical purposes which may be kept for an extended period of time to show the history of the school).

You can withdraw your consent at any time by emailing the Headteacher, at which point they will not be used in future publications but may continue to appear in publications already in circulation.

We/I have read the school's policy on taking, using and storing of images of children, and we/I agree that:

The school may use our child's image/recording on internal display boards (both digital and conventional) within the school, to illustrate life around the school including recent trips and events.	Yes/No (please indicate)
The school may use our child's image in material that is sent both electronically and by paper to the school community (parents, pupils, staff, alumni), for example photos of recent events or achievements in From the Study.	Yes/No (please indicate)
The school may use our child's image in printed material such as prospectuses that is sent to prospective parents, for example to show life at our school (no names will be detailed).	Yes/No (please indicate)
The school may use our child's image/recording on its website and on marketing material such as banners and signs (no names will be detailed). These promote the school to current and prospective parents as well as providing updates on current events.	Yes/No (please indicate)
We consent to the recording of our child during school productions/special assemblies by other parents within the school community.	Yes/No (please indicate)
The school may use our child's image on its private Instagram account; privacy settings are such to limit viewing of photos to followers approved by the school and photos provide updates on events and news within the school (no names will be detailed).	Yes/No (please indicate)
The school may use our child's image on its public Instagram page. This provides updates on events and news within the school (no names will be detailed)	Yes/No (please indicate)
The school may use our child's image in local newspapers to publicise school events such as charity fundraising. No names will be detailed and the school will endeavour to let parents know of upcoming visits by the media.	Yes/No (please indicate)

We/I agree to adhere to the school's guidelines for the private use of cameras and recording equipment.

**We/I** understand that we may not publish photographs or video of staff or pupils, other than our own children, on Facebook or via other social media including WhatsApp, without specific consent from that pupil's parents or the staff member.

Signature of Parent or Guardian	
Print Name	Date