NORWOOD GREEN JUNIOR SCHOOL

Camera and Image Use Policy (including CCTV)

Policy ratified by the GB: March 2025

Policy to be reviewed: March 2028

Key:

SBM-School Business Manager
SLT – Senior Leadership Team

Scope and aims of the policy

This policy seeks to ensure that images and videos (including CCTV) taken within and by *Norwood Green Junior School* are taken and held legally and the required thought is given to safeguarding all members of the community.

This policy applies to all staff including the governing body, teachers, support staff, external contractors, visitors, volunteers and other individuals who work for or provide services on behalf of the school (collectively referred to as 'staff' in this policy) as well as children and parents/carers.

This policy must be read in conjunction with other relevant school policies including, but not limited to:

- Child Protection and Safeguarding Policy,
- SEN Policy,
- Acceptable Use Policies,
- relevant curriculum policies including computing,
- GDPR Data Protection Policy

This policy applies to all images, including still and video content taken by *Norwood Green Junior School.*

Legislative Framework
This policy complies with the requirements of the Data Protection Act 2018, Freedom of Information Act 2000, Human Rights Act 1998.

All images taken will be used in a manner respectful of the Data Protection Principles.

This means that images will be processed:

- fairly, lawfully and in a transparent manner
- for specified, explicit and legitimate purposes
- in a way that is adequate, relevant and limited to what is necessary
- to ensure it is accurate and up to date
- for no longer than is necessary
- in a manner that ensures appropriate security

Implementation within school:

The Data Protection Officer (DPO) within the setting supported by the Headteacher/DSL, SLT and SBM are responsible for ensuring the acceptable, safe use and storage of all camera technology and images within the school. This includes the management, implementation, monitoring and review of the

Parental consent

Written permissions will be obtained from parents or carers upon entry to the school before images / videos of children are electronically published by the school. A record of all consent details will be kept securely on file and on the pupil's MIS record. Where permission has not been granted or permission is withdrawn by parents/carers at any time relevant staff will be notified e.g. class teachers, then all relevant images will be removed and disposed of and the record will be updated accordingly.

Permission will be sought for any specific children featured where children's photographs may be bought by parents to celebrate a school event e.g. Year 6 Graduation

Written consent from parents will be kept by the school where children's images are used for publicity purposes (such as brochures or publications), until the image is no longer in use.

Written parental consent will always be sought to take and use photographs offsite for professional, marketing and training purposes. This may be in addition to parental permission sought for onsite images.

Images will not be kept for longer than is to be considered necessary.

Safety of images and videos

All images will remain on site at all times, unless prior explicit consent has been given by both SLT / SBM and the parent or carer of any child or young person captured in any photograph. Should permission be given to take images off site, all relevant details are to be recorded, for example who, what, when and why and how data will be kept securely (e.g. with appropriate encryption).

SLT / SBM reserve the right to view any images taken and/or to withdraw or modify a member of staff's authorisation to take or make images at any time.

Any memory stick, CD or storage device containing images of children to be taken offsite for further work will be suitably encrypted and will be logged in and out by SLT / SBM and monitored to ensure it is returned within the expected time scale.

Children's full names will not be used on the website in association with photographs.

The school/setting will not include any personal addresses, emails, telephone numbers, on video, on the website, in a prospectus or in other printed publications.

The school/setting will only use images of children who are suitably dressed.

Staff will receive information regarding the safe and appropriate use of images as part of their safeguarding training and responsibilities.

All members of staff (including volunteers) will ensure that all images are available for scrutiny and will be able to justify any images in their possession.

Only official school owned equipment (e.g. work provided digital or video cameras) will be used by staff to capture images of children for official purposes. Use of personal cameras by staff is prohibited at all times.

Any apps, websites or third party companies used to share, host or access children's images will be risk assessed prior to use. The school will ensure that images are held in accordance with the General Data Protection Regulations (GDPR) and Data Protection Act and suitable child protection requirements (if necessary) are in place.

Safe Practice when taking images and videos

Careful consideration is given before involving very young or vulnerable children when taking photos or recordings, who may be unable to question why or how activities are taking place.

The school will discuss the use of images with children and young people in an age appropriate way.

Images will not be taken of any child or young person against their wishes. A child or young person's right not to be photographed is to be respected.

Photography is not permitted in sensitive areas such as changing room, toilets, swimming areas etc.

Photographs will be disposed of should they no longer be required. They will be returned to the parent or carer, deleted and wiped or shredded as appropriate. Copies will not to be taken of any images without relevant authority and consent from the Data Controller and/or DCPC and the parent/carer.

Use of Closed-Circuit Television (CCTV)

Norwood Green Junior School uses CCTV for the following purposes:

- To provide a safe environment for pupils, staff and visitors
- To prevent the loss of or damage to buildings and/or assets
- To assist in the prevention of crime and assist law enforcement agencies in apprehending offenders

Cameras are sited in prominent positions where they are clearly visible to staff, pupils and visitors. All areas which are covered by CCTV will be signposted to inform individuals that they are in an area within which CCTV is in operation. The school uses fixed cameras on site which are not equipped for sound recording. Cameras will not be sited in areas which individuals have an expectation of privacy, such as changing rooms or toilets.

Recordings will be retained for a limited time only as the system automatically overwrites the hard drive unless the school considers it reasonably necessary to retain recordings, or if lawfully required by an appropriate third party such as the police or local authority. Where such data is retained, it will be retained in accordance with the Data Protection Act and our Data Protection Policies. Information including the date, time and length of the recording, as well as the locations covered and groups or individuals recorded, will be noted by the Headteacher and kept securely with the recording.

The viewing of live and recorded CCTV images will be restricted to appropriate members of staff only (SLT/SBM).

The CCTV system is checked weekly by appropriate staff to ensure that it is operating effectively.

The school will ensure that appropriate security measures are in place to prevent the unlawful or inadvertent disclosure of any recorded images. The measures include:

- The CCTV recording systems being located in restricted access areas
- The CCTV system being password protected
- Restriction of the ability to make copies to specified members of staff.

Any individual recorded in any CCTV image is a data subject for the purposes of the Data Protection legislation, and has a right to request access to those images. Any individual who requests access to images of themselves will be considered to have made a subject access request. Such a request should be considered in the context of the school's Individual Rights Policy. If the footage contains only the individual making the request then the individual may be permitted to view the footage. This must be strictly limited to that footage which contains only images of the individual making the request.

If the footage contains images of other individuals then Norwood Green Junior School must consider whether:

- The request requires the disclosure of the images of individuals other than the requester, for example whether the images can be distorted so as not to identify other individuals;
- The other individuals in the footage have consented to the disclosure of the images, or their consent could be obtained; or
- If not, then whether it is otherwise reasonable in the circumstances to disclose those images to the individual making the request.
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A record must be kept, and held securely, of all disclosures which sets out:

- When the request was made;
- The process followed by the school in determining whether the images contained third parties;
- The considerations as to whether to allow access to those images;
- The individuals that were permitted to view the images and when; and
- Whether a copy of the images was provided, and if so to whom, when and in what format.

Norwood Green Junior School will only disclose recorded CCTV images to third parties where it is permitted to do so in accordance with the Data Protection Legislation.

CCTV images will only be disclosed to law enforcement agencies in line with the purposes for which the CCTV system is in place.
If a request is received from a law enforcement agency for disclosure of CCTV images the school must follow the same process as above in relation to subject access requests. Detail should be obtained from the law enforcement agency as to exactly what they want the CCTV images for, and any particular individuals of concern. This will then enable proper consideration to be given to what should be disclosed, and the potential disclosure of any third party images.

The information above must be recorded in relation to any disclosure.

If an order is granted by a Court for disclosure of CCTV images then this should be complied with. However very careful consideration must be given to exactly what the Court order requires. If there are any concerns as to disclosure, then the Data Protection Officer should be contacted in the first instance and appropriate legal advice may be required.

Use of images by parents / carers

Parents/carers are permitted to take photographs or DVD footage of events for private use only. They may not put events up on social media sites.

Parents/Carers are only permitted to take or make recording within designated areas of the school. Photography is not permitted in sensitive areas such as changing room, toilets, swimming areas etc.

The opportunity for parents/carers to take photographs and make videos is reserved by the school on health and safety grounds.

Parents and carers who are using photographic equipment must be mindful of others when making and taking images.

The right to withdraw consent will be maintained by the school and any photography or filming on site will be open to scrutiny at any time.

Parents may contact the school to discuss any concerns regarding the use of images.

Use of photos / videos by children

The school will discuss and agree age appropriate acceptable use rules with children regarding the appropriate use of cameras, such as places children cannot take the camera (e.g. unsupervised areas, toilets etc).

Children are not allowed personal devices in school with which to take images / video. These include: mobile phones, smart watches or any other devices which take images or videos.

Children may be allowed to take digital cameras on trips upon request to the relevant class teacher. These are for personal use only and no photo should subsequently be placed on social media sites. The camera is the responsibility of the children and the school is not responsible for its safe care.

All staff will be made aware of the acceptable use rules regarding children's use of cameras and will ensure that children are appropriately supervised when taking images for official or curriculum use.

Members of staff will role model positive behaviour to the children by encouraging them to ask permission before they take any photos.

Photos taken by children for official use will only be taken with parental consent and will be processed in accordance with GDPR and the Data Protection Act.

Parents/carers will be made aware that children will be taking photos/images of other children and will be informed how these images will be managed. For example, they will be for internal use only and will not be shared online or via any website or social media tool.

Still and video cameras provided for use by children in class and the images themselves will not be removed from the setting and must be processed / removed off the device before any device is taken off site.

Use of images of children in the media:

Where a press photographer is to be invited to celebrate an event, every effort will be made to ensure that the newspaper's (or other relevant media) requirements can be met. A written agreement will be sought between parents and carers and the press which will request that a pre-agreed and accepted amount of personal information (e.g. first names only) can be published along with images and videos.

The identity of any press representative will be verified and access will only be permitted where the event is 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.

Every effort will be made to ensure the press abide by any specific guidelines should they be requested. No responsibility or liability however can be claimed for situations beyond reasonable control, and where the setting is to be considered to have acted in good faith

Use of professional photographers:

Professional photographers who are engaged to record any events will be prepared to work according to the terms of the settings e-Safety policy.

Photographers will sign an agreement which ensures compliance with GDPR and the Data Protection Act and that images will only be used for a specific purpose, subject to parental consent

Photographers will not have unsupervised access to children and young people.