



Felsted

TAKING, STORING AND USING IMAGES POLICY

**COVERING BOTH SCHOOLS
INCLUDING EYFS AND BOARDING**

Governors' Committee normally reviewing:	Governance Committee
Date last formally approved by the Governors:	Summer 2022
Date policy became effective:	Summer 2018

Period of Review:	2 Yearly
Next Review Date:	Summer 2024

Person responsible for implementation and monitoring:	Director of Digital Strategy
Other relevant policies:	Data Protection Policy Privacy Notice for Pupils Privacy Notice for Parents Safeguarding (Child Protection and Staff Behaviour) Policy Online Safety and ICT Acceptable Use Policy Social Media Policy

The following Policy encompasses the Aims and Ethos of the Preparatory School and the Senior School

[Aims and Ethos](#)

SAFEGUARDING STATEMENT

Felsted is committed to maintaining a safe and secure environment for all pupils and a 'culture of vigilance' to safeguard and protect all in its care, and to all aspects of its 'Safeguarding (Child Protection and Staff Behaviour) Policy'.

EQUAL OPPORTUNITIES STATEMENT

The aims of the School and the principles of excellent pastoral care will be applied to all children irrespective of their race, sex, disability, religion or belief, sexual orientation, gender reassignment or pregnancy or maternity; equally these characteristics will be recognised and respected, and the School will aim to provide a positive culture of tolerance, equality and mutual respect.

1. This Policy

- This Policy is intended to provide information to pupils and their parents, carers or guardians (referred to in this policy as "parents") about how images of pupils are normally used by Felsted School ("the School"). It also covers the School's approach to the use of cameras and filming equipment at School events and on School premises by parents and pupils themselves, and the media.
- Additional arrangements are in place for Stewart House (EYFS), see Appendix 1.
- It applies in addition to the Felsted Parent Agreement and any other information the School may provide about a particular use of pupil images, including signage about the use of CCTV; and more general information about use of pupils' personal data in the School's Privacy Notices. Images of pupils in a safeguarding context are dealt with under the School's Safeguarding (Child Protection and Staff Behaviour) Policy.

2. General points to be aware of

- Certain uses of images are necessary for the ordinary running of the School; other uses are in the legitimate interests of the School and its community and unlikely to cause any negative impact on children. The School is entitled lawfully to process such images and take decisions about how to use them, subject to any reasonable objections raised.
- Where images are used for the benefit and enhancement of the pupils' education this will fall within the category of legitimate interest. For example, the analysis of pupils' sporting performance.
- Parents who accept a place for their child at the Prep School and pupils who join the Senior School are invited to agree to the School using images as set out in this policy and from time to time if a particular use of the pupil's image or more personal information to accompany the image is requested. Parents and Senior School pupils should be aware of the fact that certain uses of images may be necessary or unavoidable for example if they are included incidentally in CCTV or a photograph.
- We hope parents and pupils will feel able to support the School in using pupil images to celebrate the achievements of pupils, including academic and co-curricular activity; to promote the work of the School; and for important purposes such as safeguarding and promoting the welfare of pupils, identification and security.
- Any parent (Prep) or pupil (Senior) who wishes to limit the use of images of a pupil for the purposes of publicity and promotion, should contact:
Marketing Department
Felsted School
Felsted
Essex
CM6 3LL
Email: marketing@felsted.org
- The School will respect the wishes of parents/carers and pupils themselves wherever reasonably possible, and in accordance with this policy.
- Parents should be aware that, from around the age of 13 and upwards, the law recognises pupils' own rights to have a say in how their personal information is used, including images.

3. Use of Pupil Images

Legitimate Interest

Unless the relevant pupil or his or her parent has requested otherwise, the School will use images of its pupils to keep the School community updated on the activities of the School, and for some marketing and promotional purposes, including:

- on internal displays, including clips of moving images on digital and conventional notice boards within the School premises;
- in communications within the School community (parents, pupils, staff, Governors and alumni) including the School Newsletter, Felsted Magazine, Social Media and communications by email and by post;

Consent

Parents of pupils or pupils themselves, dependent on the pupils' age, will be asked to consent to the use of pupil images, still and film, for the purposes of promotion and publicity, including website, social media and press by Felsted School and associations the School is a member of, including the Independent Association of Prep Schools (IAPS), the Headmasters' and Headmistresses' Conference (HMC) and the Independent Schools Council (ISC).

The use of pupils' images may be still and film, and used for the purposes of online publicity, including on the School's website, via the School's social media channels such as Twitter, Instagram, YouTube, LinkedIn and Facebook, in the School's prospectus, online, press and other external advertisements for the School:

- For pupils in the Prep School permission will be sought from the pupils' parents for the duration of the pupils' time in the Prep School and for a period of time after leaving the School, with the opportunity to withdraw the consent at any time.
- For Pupils in the Senior School, these pupils are deemed of the age appropriate to provide their own consent and will be asked to do so for the duration of their time at the Senior School and for a period of time after leaving the School, with the opportunity to withdraw the consent at any time. In the event a Senior School pupil is not deemed to have the maturity to provide their own consent, this will be sought from their parents.
- For pupils attending the Summer School and/or Holidays Courses, permission will be sought from the attendees or their parents, dependent on the age of those attending.

The source of images will predominantly be the School's staff or a professional contracted photographer used for marketing and promotional purposes who are subject to policies and rules in how and when to take such images, or occasionally pupils.

The School will only use images of pupils in suitable dress.

Standard practice is only to publish the first name and initial of surname, unless permission has been given by parents or the pupil (dependent on their age) for the full name to be used. Additional pupil or parent permission is sought to publish, if requested by the press, the age of the pupil and/or their home town/area or any other information that we deem to be more privacy intrusive.

Parents are able to access photographs taken by the School for personal use. The photos are made available via a Google photo gallery, available in the parent area of the Management Information System (MIS). Parents are advised the following:

Parents are reminded that these images are for personal use only. Images which may identify other pupils should not be made accessible to others via the internet (for example on Facebook), or published in any other way.

4. Use of Pupil Images for Identification and Security

All pupils are photographed on entering the School and, thereafter, at appropriate intervals, for the purposes of internal identification. These photographs identify the pupil by name, year group, house and form/tutor group.

CCTV is in use on School premises, and will sometimes capture images of pupils. Images captured on the School's CCTV system are used for the purposes of safeguarding and promoting the welfare of pupils, staff and visitors and for the protection of property, in accordance with the Information Commissioner's Office (ICO) Code of Practice. See Appendix 3.

5. Use of Pupil Images in the Media

Where practicably possible, the School will always notify parents / pupils in advance when the media is expected to attend an event or School activity in which School pupils are participating, and will make every reasonable effort to ensure that any pupil, for whom permission to be photographed has not been given is not photographed or filmed by the media, nor are such images provided for media purposes.

The media often asks for the names of the relevant pupils to go alongside the images, and these will be provided where parents / pupils have been informed about the media's visit and either parent or pupil has consented as appropriate.

6. Security of Pupil Images

The media are accompanied at all times by a member of staff when on School premises. The School has contract agreements in place with named professional photographers and the relevant recruitment checks have been carried out.

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.

Staff are given guidance on this policy and in the School's Safeguarding (Child Protection and Staff Behaviour) 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.

7. Use of Cameras and Filming Equipment (including mobile phones) by Parents (excluding Stewart House)

Parents, guardians or close family members (hereafter, parents) may be offered the opportunity to take photographs of (and where appropriate, film) their own children taking part in School events, subject to the following guidelines, which the School expects all parents to follow:

- For events such as a play or a concert, parents may be asked not to take photographs or film the performance due to a number of reasons including:

- where copyright issues prevent the school from permitting filming photography;
- for the purposes of safeguarding and protecting the privacy of pupils;
- where photography and / or filming may disturb performers, others in the audience, or cause distress for those with medical conditions

The School will make an announcement at the start of a performance or print a message in the programme if photography or filming is not permitted during a performance.

If photography or filming is permitted:

- Parents are asked to make every effort to not take photographs or film of other pupils unless they have the relevant permission (from the individual, parents or school) to do so.
- .
- 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 via the internet (for example on Facebook), or published in any other way.
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- Parents may not film or take photographs in changing rooms or backstage during School productions, nor in any other circumstances in which photography or filming may embarrass or upset pupils.
- The School reserves the right to refuse or withdraw permission to film or take photographs (at a specific event or more generally), from any parent who does not follow these guidelines, or is otherwise reasonably felt to be taking inappropriate images.
- The School sometimes records plays and concerts professionally (or engages a professional photographer or film company to do so), in which case DVD or access to digital copies may be made available to parents for purchase and bite size clips are available on the School website. Parents of pupils taking part in such plays and concerts will be consulted if it is intended to make such recordings available more widely.

8. 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 the pastoral staff.
- The use of cameras or filming equipment (including on mobile phones) 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 Safeguarding (Child Protection and Staff Behaviour) Policy, Online Safety and ICT Acceptable Use Policy, Social Media Policy, Privacy Notices, Pastoral Care Plan including Anti-Bullying and the Behaviour and Discipline Policy (Prep), Behaviour and Discipline Policy (Senior) or Anti-Bullying Policy (Senior), is always taken seriously, and may be the subject of disciplinary procedures or dealt with under the relevant safeguarding policy as appropriate.

Appendix 1

Stewart House Mobile Phone and Camera Policy

This policy should be read in conjunction with the School's Safeguarding (Child Protection and Staff Behaviour) Policy, Pastoral Care Plan including the Anti-bullying policy and the Behaviour and Discipline Policy and the Online Safety and ICT Acceptable Use Policy.

Personal Mobile Phones

- Staff, Volunteers and Visitors must not use a personal mobile phone or use its camera facility (for any purpose) in Stewart House, the swimming pool or changing areas, when walking around the School site outside the Stewart House area or on School trips, **at any time when children are present** as this department includes EYFS children.
- Personal mobile phones, cameras or video recorders must not be used to record classroom activities - only School equipment should be used.
- Stewart House staff should share the direct line to the Stewart House office with immediate family and people who may need to contact them in an emergency.
- In the event of an emergency, the office phone or personal phones may be used in the designated staffroom or staff areas.
- If an adult (staff, volunteers or visitor) is seen to be using their personal mobile phone when children are present, they will be asked to stop and reported to the Head of Stewart House.
- Staff are permitted to use their mobile phone to make appointments or private calls in the staff designated areas where no children are present. Once children have left the classroom areas after clubs' finish at 4:30pm, staff may use their personal mobile in their classroom.
- When leaving the School site to walk to swimming, Forest School sessions or on an outing, staff must take a School mobile phone with them and not use their personal phone. These will be stored securely in the Stewart House office. Phones must be returned to the Stewart House office on return to School to ensure they are safely stored and charged.
- PE department staff have access to a School phone in Roed Hall.

Cameras and Videos

- Camera and video use is monitored by the Head of Stewart House and EYFS Lead.
- Members of staff must not bring their personal camera or video recorders into the setting.
- Photographs or recordings of children should be taken on devices belonging to Felsted School. All devices must stay in School at all times.
- Photographs and recordings of the children are only taken if there is written consent from parents/carers as recorded on the admission consent form. This includes permission for photographs being used for promotional material.
- Photographs and recordings of the children are only taken to evidence learning, development, for displays or performances within the setting.
- In the case of School productions including sports day, parents/carers are not permitted to take photographs/video footage of their own child. Most Pre-Prep events will be videoed / photographed by School staff or a designated photographer and then made available to parents. We strongly advise against the publication of any such photographs on social networking sites and parent photos/ videos including children other than their own must not be added to social media.
- Anyone using a personal mobile phone to take photographs at any time, will be asked to delete the images, refrain from taking further photographs and will be reported to the Head of Stewart House.
- Images and recordings used for School social media must be taken using a School device and names of individuals will not be used alongside an image.

Storage of personal devices on School premises

During contact time with children, all mobile phones must be stored securely out of reach within the setting, either in staff storage or designated areas.

Visitors, parents and volunteers will be given information regarding this policy and asked not to use their phone or camera and to store it away out of sight.

Appendix 2

Photography & Video Procedures for Staff and Contractors (formerly the Photography Policy)

Felsted's aims to capture key photography and video footage across the School year as a record for both the School and for Felsted families.

The responsibility for capturing key photography and video at specific planned events will be shared between Felsted Marketing and the Felsted School Media Team, these events have been agreed by the Heads and parties involved and are noted below.

For those events or activities that fall outside of those noted in this policy, photography and video becomes the responsibility of the person running that particular event or activity. Recording Felsted activities is a shared responsibility by all those who work at Felsted and all staff are encouraged to share photos and videos of events they run with the wider community via channels such as the weekly newsletter. If the event requires a more professional approach please advise the Marketing Department who may be able to support you.

Photos and videos can be taken via the following routes:

1. **Phones and other devices:**

Stewart House (including EYFS and KS1)

Staff should use a School device to take any images of pupils. Staff, volunteers and visitors are not permitted to use a personal mobile or other personal device to take photographs or videos at any time.

Year 3 and above

Staff should use a School device to take any images of pupils. School provided digital cameras or devices are available and must only be used for a particular purpose, such as to display a pupil's work, where it is necessary to record pupil progress or as part of this policy or the School's Social Media Policy.

If a member of staff is unable to access a School device, the member of staff should seek permission from their line manager to take any images of pupils on their personal device.

Images must be downloaded to a School google account as soon as reasonably possible (as soon as the member of staff can access their School google account) and must then be permanently deleted from the School or personal (in exceptional circumstances) device.

2. **Cameras:** School cameras and video recorders are available and can be borrowed from The Marketing Dept or the Hunt Theatre. If a personal/professional device is used, footage must be deleted as soon as possible, once downloaded to the School network according to social media policy.

3. **Book a professional photographer/videographer:** Please advise the Marketing Department who have a list of professionals who might be available to record your event. These professionals have all signed contracts with the School and have been security checked. The School will endeavour to own the copyright of the images taken. The costs will be charged to your event budget so should only be used for events where budget allows.

4. **Permissions:** Photographs/video of pupils must only be taken, stored and/or published where there is written consent of parents / carers or pupils to do so. The Marketing Department can advise on the details of any pupils for whom this permission has not been

granted. This information is also stored on pupil records within the School's MIS (Management Information System).

Photo/Video Sharing:

- All footage should be shared with the Marketing Department via Google Drive (marketing@felsted.org) as soon as possible post an event. Please note that any high res photographs should be saved because photos uploaded to Twitter are not generally of high enough resolution for print.
- Photos/videos will be shared with parents and pupils for free via Google, with links to it from the weekly newsletter.

Please note that the copyright in any photos/videos taken at Felsted events of Felsted staff and pupils remain the property of Felsted School.

Events normally filmed or photographed by the School

Autumn Term

New Staff photos

Whole School Charity Event

Autumn Prospectus Shoot

House Singing Comp - Part Song

House Singing Comp - Unison Song

Prep League Music

CCF Remembrance Sunday

Prep & Senior Autumn Sport

Senior School

Prep Christmas Cracker Concert

Prep Phase Productions

Pre-Prep Nativity

Prep Feast

International Dinner

Swing into Spring Concert

MUN

Prep & Senior Spring Sport

House Feasts

Prep Summer Sport

Senior Summer Sport

Prep Speech Day

Senior Summer Concert

Senior Sports Day

Senior Speech Day

Prep Sports Day

Pre-Prep Sports Day

Dance Show

Marketing videos throughout the year, commissioned by marketing and taken either by pupils, marketing or professional companies.

Appendix 3

CCTV Policy

1. Introduction

The purpose of this policy is to regulate the management and operation of the Closed Circuit Television (CCTV) System at Felsted School (the School). It also serves as a notice and a guide to data subjects (including pupils, parents, staff, volunteers, visitors to the School and members of the public) regarding their rights in relation to personal data recorded via the CCTV system (the System).

The System is administered and managed by the School, who act as the Data Controller. This policy will be subject to review every two years or as required, and should be read with reference to the School's Data Protection Policy and Privacy Notices:
<https://www.felsted.org/parents/policies-school-information>.

All fixed cameras are in plain sight on the School premises and the School does not use CCTV for covert monitoring or monitoring of private property outside the School grounds.

The School's purposes of using the CCTV system are set out below and, having fully considered the privacy rights of individuals, the School believes these purposes are all in its legitimate interests. Data captured for the purposes below will not be used for any commercial purpose.

2. Objectives of the System

The School's use of CCTV is for the purposes of safeguarding and promoting the welfare of pupils, staff and visitors as well as for the protection of property:

- To protect pupils, staff, volunteers, visitors and members of the public with regard to their personal safety.
- To protect the School buildings and equipment, and the personal property of pupils, staff, volunteers, visitors and members of the public.
- To support the police and community in preventing and detecting crime, and assist in the identification and apprehension of offenders.
- To monitor the security and integrity of the School site and deliveries and arrivals, including car parking.
- To monitor and uphold discipline among pupils in line with the School Rules, which are available to parents and pupils on request.

3. Positioning

Locations have been selected, both inside and out, that the School reasonably believes require monitoring to address the stated objectives.

The system will be set to not record sound / audio unless there is an assessment undertaken to establish a necessity to do so.

Adequate signage has been placed in prominent positions to inform pupils, staff, volunteers and visitors that they are entering a monitored area, identifying the School as the Data Controller and giving contact details for further information regarding the system.

No images will be captured from areas in which individuals would have a heightened expectation of privacy, including changing and washroom facilities.

No images of public spaces will be captured except to a limited extent at site entrances.

4. Maintenance

The CCTV System will be operational 24 hours a day, every day of the year.

The System Manager (Estates Manager) will check and confirm that the System is properly recording and that cameras are functioning correctly, on a regular basis.

The System will be checked and (to the extent necessary) serviced no less than annually.

5. Supervision of the System

Staff authorised by the School to conduct routine supervision of the System are the Estates Manager, the Deputy Heads, the Bursar and security staff. Access will also be available to ICT staff and engineers in order to install and maintain the system.

Images will be viewed and/or monitored in a suitably secure and private area to minimise the likelihood of or opportunity for access to unauthorised persons.

6. Storage of Data

The day-to-day management of images will be the responsibility of the Estates Manager who will act as the System Manager, or such suitable person as the System Manager shall appoint in their absence.

Images will be stored for 28 days, and automatically overwritten unless the School considers it reasonably necessary for the pursuit of the objectives outlined above, 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 2018 and our Data Protection Policy. Information including the date, time and length of the recording, as well as the locations covered and groups or individuals recorded, will be recorded.

7. Access to Images

Access to stored CCTV images will only be given to authorised persons as listed in section 5 above, or under the supervision of the System Manager, in pursuance of the above objectives (or if there is some other overriding and lawful reason to grant such access).

Individuals also have the right to access personal data the School holds on them (please see the School's Privacy Notice and Data Protection Policy, including information held on the System), if it has been kept. The School will require specific details including at least time, date and camera location before it can properly respond to any such requests. This right is subject to certain exemptions from access, including in some circumstances where others are identifiable.

The System Manager must satisfy themselves of the identity of any person wishing to view stored images or access the system and the legitimacy of the request. The following are examples when the System Manager may authorise access to CCTV images:

- Where required to do so by the Head, the Police or some relevant statutory authority;

- To make a report regarding suspected criminal behaviour;
- To enable the Designated Safeguarding Lead or his/her appointed deputy to examine behaviour which may give rise to any reasonable safeguarding concern;
- To assist the School in establishing facts in cases of unacceptable pupil behaviour, in which case, the parents/guardian may be informed as part of the School's management of a particular incident;
- To data subjects (or their legal representatives) pursuant to an access request under the Act and on the basis set out above;
- To the School's insurance company where required in order to pursue a claim for damage done to insured property; or
- In any other circumstances required under law or regulation.

Where images are disclosed a record will be made including the person viewing the images, the time of access, the reason for viewing the images, the details of images viewed and a crime incident number (if applicable).

8. Other CCTV systems

The School does not own or manage third party CCTV systems, but may be provided by third parties with images of incidents where this is in line with the objectives of the School's own CCTV policy and/or its School Rules.

9. Complaints and queries

Any complaints or queries in relation to the School's CCTV system, or its use of CCTV, or requests for copies, should be referred to compliance@felsted.org

For any other queries concerning the use of your personal data by the School, please see the School's applicable Privacy Notice.