



*Saint* **GREGORY'S**  
*Bath*

## **Photograph, Video and CCTV Policy**

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### **Key Information**

<b>Title</b>	<b>Photograph Video and CCTV Policy</b>	
Prepared By	Karen Tyler, Data Manager	Date: 7 September 2018
Checked By	Ann Cusack, Headteacher	Date: 7 September 2018
Approved By	Lisa Slater, Lead Data Governor	Date: 12 September 2018
Version	V01.00	
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### **Version History**

<b>Version</b>	<b>Date</b>	<b>Amendments</b>
V01.00	12 September 2018	Approved by Lead Data Governor

*“In Christ we flourish”*

## **Introduction**

At St Gregory's we take and use photographs and videos for a variety of purposes related to the educational services we provide.

Every time we record or use images of individuals (i.e. of our students or staff), we are processing their personal information. Under the legal obligations imposed by the Data Protection Act 2018, the school has specific responsibilities in terms of how such photos and videos are taken and stored. Parents and carers may also wish to take photos or videos of their children participating in school events for their personal use. Therefore we have implemented a policy on the safe use of cameras and video recording equipment at or by the school.

Please also refer to the following policies:

- Acceptable Use Policy
- Behaviour for Excellence
- Safeguarding Policy

## **Photographs and Video recordings**

We will use photographs of students internally for identity management purposes. These will be taken by a professional photographer and kept securely on the school network. They will only be accessed by staff authorised to do so.

Students will normally have their photograph taken individually and in year groups by a professional photographer during their time at St Gregory's. We will ensure that the companies we use to do this are aware of their obligations under the Data Protection Act.

Photographs and videos of students may be taken by the school for its legitimate internal purposes when necessary and directly related to their studies. For example, a presentation given by a student may on occasion be recorded for assessment or learning purposes.

For some GCSE and A Level courses (for example PE, Dance and Drama), videos of the students demonstrating their skills may also need to be sent to the examining boards. In any such case, the footage will be taken on school equipment and sent securely to the exam board, either by recorded delivery that needs to be signed for or electronically via secure email.

Photographs and videos taken of students will not normally be used for any purposes other than those mentioned above, unless consent has been given by the parent/carer for Year 7 to 11 students or by the student themselves if they are in the Sixth Form. See the consent forms in the appendices to this policy. On each occasion when we ask for such additional consent, we will note any students for whom such consent has not been given and make sure that this information is made available to staff. If taking photographs or video images of any particular student would potentially pose a risk their safety, the Designated Safeguarding Lead and/or the Office Supervisor will also advise staff as appropriate.

When Parents and/or Sixth Form students provide such additional consent, (i.e. to images being taken for a particular event/occurrence), they may subsequently withdraw their consent at any time. If it is subsequently withdrawn any images held on the school drives will be deleted as soon as possible. In such cases the Data Manager will also arrange for any images held on school devices to be deleted and will inform staff that the particular

images/footage of the student are no longer to be used. However, this can only be guaranteed insofar as it is reasonably practicable, for example, if a parent consents to their child's image being taken and used by the school in its marketing literature and a photo of the child is taken and used in our prospectus, if the consent is subsequently withdrawn, the photo will be deleted and it will not be used in any future publications, but we will not be able to recall publications that are already in circulation.

Staff will only take photographs or record videos of students on school owned devices. The cameras or other devices should be kept at school and locked away when not in use. All images should be downloaded as soon as possible to a computer on the school network.

Photographs for marketing purposes and for publicity regarding school events are often taken by a professional photographer who will normally use their own equipment. We will have a data sharing agreement with the photographer and will ensure that they too are aware of their responsibilities under the data protection legislation.

All images/footage taken by members of staff or volunteers at school or during school activities remain the property of the school. Such images must not be shared with anyone outside the school or held for private use.

Where appropriate, staff will avoid identifying students when displaying or publishing images. If names are required, only first names will normally be used.

Hard copies of photographs and videos will normally be annotated with the date on which they were taken and will be stored in a locked filing cabinet when not in use. They will only be used for their original purpose. They can be kept for up to 10 years after the student has left the school and should then be shredded or pulped.

### **Photography and Videos of School Events**

The Headteacher (or their delegate) has the responsibility for deciding whether parents and carers are permitted to take photographs and/or videos during school events. If permission is granted then parents and carers must:

- Make their own children the focus of any photographs and/or videos.
- Ensure that all images obtained are used exclusively for their own personal use and not uploaded to the internet, posted on social networking sites or shared with any other person in any way.
- Refrain from taking further photos and/or videos if requested to do so by a member of staff.

When parents/carers take photographs and/or video recordings for their own personal use at school events, it is the parent/carer who is actually processing the personal data for legal purposes, not the school, and the images themselves will be exempt from data protection legislation.

### **Students taking Photographs**

Students are not permitted to take photographs of each other in school for their own use and are discouraged from taking such pictures on the way to or from school. However, if a student does take any such photographs of another individual, it is the student themselves

who is processing the personal data for legal purposes, not the school and the images themselves will, once again be exempt from data protection legislation.

### **CCTV**

We will notify students, staff and visitors of the purpose for collecting CCTV images by publishing our privacy notices on the school website.

Cameras will only be placed where they do not intrude unnecessarily on anyone's privacy and where they are necessary to fulfil their purpose.

All CCTV footage is routinely kept for 30 days for security purposes. The Site Team are responsible for ensuring that all footage is stored securely. The Director of Finance and Premises and the Site Team have access to it. The Director of Finance and Premises is responsible for allowing other people access to the footage as appropriate.

### **Disposal of equipment**

If a memory card needs to be replaced, then the replaced card will be destroyed to ensure that no images can be recovered.

Even when images have been deleted from a camera it must be disposed of securely. Staff should return all redundant cameras to the IT Manager for safe disposal.

### **Responsibilities of the Data Protection Officer**

- Monitoring the school's compliance with data protection legislation in relation to processing photographs and videos.
- Providing training to staff members as to how data protection legislation impacts photographs and videos.
- Publishing this policy so that all staff, parents and students are aware of it.

**Appendix 1**

**Student Photograph Consent Form**

Please tick the appropriate boxes below to indicate in which circumstances you give your consent for St Gregory's to use photographs and/or video clips of your child.

- In school – to be displayed on walls or notice boards around the school or on screens in the classroom, in the foyer or in the Hall. Please note these images may continue to be used for up to 10 years after the student has left the school.
  
- In school publications – to be printed in newsletters, the prospectus, the information booklet given to parents and carers of new students and/or programmes for school productions or to be displayed on the school website and on other social media pages. Please note that only first names will be used alongside the photos.
  
- In press releases (e.g. to celebrate exam success or participation in sporting or music and drama activities).
  
- To share with other organisations/partners with whom we work, so that they can use them for their own marketing purposes, (for example the University of Bath, if our students attend an event run by them on their campus).

Please note that you can withdraw your consent at any time by emailing [tylerk@st-gregorys.org.uk](mailto:tylerk@st-gregorys.org.uk).

Please also note that all students will normally have their photograph taken individually and in year groups by a professional photographer regularly during their time at St Gregory's. These will be available for you to purchase.

Student's name: \_\_\_\_\_

Name of parent / carer: \_\_\_\_\_

Signature of parent/carers: \_\_\_\_\_

Date: \_\_\_\_\_

**Appendix 2****Sixth Form Student Photograph Consent Form**

Please place a tick in some or all of the boxes below to show in which circumstances you give your consent for St Gregory's to use photographs and/or video clips of you.

- In school – to be displayed on walls or notice boards around the school or on screens in the classroom, in the foyer or in the Hall. Please note these images may continue to be used for up to 10 years after you have left the school.
- In school publications – to be printed in newsletters, the prospectus, the information booklet given to parents and carers of new students and/or programmes for school productions or to be displayed on the school website and on other social media pages. Please note that only first names will be used alongside the photos.
- In press releases (e.g. to celebrate exam success or participation in sporting or music and drama activities).
- To share with other organisations/partners with whom we work, so that they can use them for their own marketing purposes, (for example the University of Bath if our students attend an event run by them on their campus).

Please note that you can withdraw your consent at any time by emailing [tylerk@st-gregorys.org.uk](mailto:tylerk@st-gregorys.org.uk)

Please also note that all students will have their photograph taken individually and in year groups by a professional photographer regularly during their time at St Gregory's. These will be available for purchase.

Name: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_