

STOCKPORT GRAMMAR SCHOOL

WHOLE SCHOOL POLICY ON TAKING USING AND STORING IMAGES

(Reviewed by Governors 18.10.22)

1. Introduction & Background

- 1.1. Stockport Grammar School (the School) is an open and inclusive community that is very proud of all of the achievements of all of its pupils in their academic, artistic and sporting endeavours. The School celebrates its diversity and gives all of its many visitors a warm welcome.
- 1.2. The School particularly welcomes parents to its concerts, plays and sporting events as well as to more formal occasions during the School year.
- 1.3. The School walls are decorated with examples of pupils' work, team photographs and photographs of trips and expeditions in which our pupils have participated. We make full use of electronic notice boards inside the School to enhance our displays. The School's website is updated regularly and all parents are sent regular e-newsletters in order to keep them fully abreast with the news of the School's active community.
- 1.4. The School frequently sends press releases with photographs to the media to secure coverage of pupil and School achievements. From time to time the School may also be visited by the media who may take photographs or film footage at a School event. Pupils will often appear in these images which may then appear in local or national media (press, online and/or TV).

2. Scope

- 2.1. This policy is designed to cover the activities of staff, pupils, parents and visitors to the School and relates to the taking, using and storing of images of children:
 - 2.1.1. on School premises;
 - 2.1.2. in connection with School activities;
 - 2.1.3. for other legitimate purposes of the School.
- 2.2. The expression 'images' in relation to pupils includes:
 - 2.2.1. photographs and digital photographs;
 - 2.2.2. video or film clips, including CCTV;
 - 2.2.3. images captured by mobile phones, drones or other mobile devices with a "camera" facility.

3. Aims

- 3.1. The aims of this policy are:
 - 3.1.1. to promote safety, welfare and respect for others;
 - 3.1.2. to ensure a sensible balance between privacy, creative self-expression and routine collating of information;

- 3.1.3. to comply with the law and good practice without adhering to unnecessary bureaucratic procedures.

4. Privacy

- 4.1. No person is authorised to take images of children that:
- 4.1.1. might cause embarrassment or distress;
 - 4.1.2. are associated with distressing or sensitive issues;
 - 4.1.3. are unnecessarily intrusive.
- 4.2. If there is any doubt about these matters, the person wishing to take the image must obtain the written consent of the child's parent(s) and, where the child is of sufficient maturity and understanding, the written consent of the child.
- 4.3. Staff are not permitted to take photographs or recordings of a child on their own cameras, mobile phones, tablets or other personal devices.

5. The application of Data Protection laws to taking, using and storing images of children.

- 5.1. It is a term of the contract for educational services which exists between the School and the parents of a pupil that photographs of the pupil may be taken and used by the School in accordance with normal custom and practice, such as inclusion in the Prospectus, other School publications or on the website as well as displays within the premises and in bulletins sent to the School community.
- 5.2. The School will not use photographs of a pupil in conjunction with names or an address without first obtaining parental consent (by telephone or email). The general consent form that is given to parents when their child joins the School is attached at Appendix A. Full details of the School's Data Protection Policy and Privacy Notices are available from the school website and Bursar on request.
- 5.3. Pupils generally like to be photographed and to see their work displayed and we hope that parents will feel able to support the School by consenting to the School using images in the ways described herewith.

Use of images; Displays etc

- 5.4. Stockport Grammar School will use photographic images of its pupils for the following purposes:
- Internal displays (including clips of moving images) on digital and conventional notice boards within the School premises;
 - Communications with the School community (parents, prospective parents, pupils, staff, Governors and alumni) via sections of the School's website and in publications such as Taking Stock or The Stopfordian;
 - Marketing the School digitally through the website and through the School's prospectus (which may include a DVD), and by other means including the School's social media sites.

- 5.5. When pupils visit other schools for sporting or other events staff from Stockport Grammar School will take reasonable steps to ensure that those schools would only take photographs if permission has been requested and approval given in advance.

6. Use of images: internal identification

- 6.1. All pupils are photographed on entering the School and, thereafter, at regular intervals normally 1st,4th and 6th Form, for the purposes of internal identification.
- 6.2. These passport-sized photographs identify the pupil by:
- Name
 - Year Group
 - Age
 - House
- 6.3. These images are subject to the General Data Protection Regulations and will therefore be:
- 6.3.1. securely stored on the School's servers to which access for designated staff is gained by log-in and password controls;
- 6.3.2. not be used for any other purpose without the consent of the pupil or his or her parent(s);
- 6.3.3. These images may also be used on pupil cards (lunch, access or exeat) for the purposes of identification;
- 6.3.4. not be shown, copied or given to any unauthorised person.
- 6.4. Any parent who so requests will be sent a copy of their son or daughter's photograph. In accordance with the School's Data Protection duties, identification photographs are kept only as long as is necessary and are destroyed securely once they are no longer needed.

7. Images that the School uses in displays and on its website

- 7.1. The images that the School uses for displays and communications purposes may identify an individual pupil by their full name.
- 7.2. The School will not release named images to the media unless written consent has been received from one or both parents in advance but unnamed images may be released without seeking additional permission. The School only uses images of School activities, such as plays, concerts, sporting fixtures, prize-givings, trips etc in their proper context. The School will never use any image that might embarrass or humiliate a pupil. It will also only use images of pupils who are suitably dressed. Pupils are always properly supervised when professional photographers visit the School.
- 7.3. Parents are able to request copies of these photographs used by the School (although it reserves the right to make an administration charge for the supply of the material).

8. Storage and Review

- 8.1. Photographic images are stored securely either in locked filing cabinets or in a password-protected section of the School's database. A report is available in iSAMS of those children whose parents have declined permission for their children to be photographed.
- 8.2. When a pupil leaves the School, the images may be held in the School archive for specific purposes and may be used in alumni magazines, social media, the school's website and alumni community website.
- 8.3. Parents are advised that the School may still use images of their children in School material once they have left the School. Please note that the School's existing publications, website and archived material may contain these images. Procedures are in place for when an individual withdraws their permission for the storage of images.
- 8.4. The School has a procedure in place for regularly checking and updating its website.

Media Coverage

- 8.5. The School will notify parents in advance where practical when it expects the press to attend an event in which its pupils are participating and it will make every effort to ensure that children whose parents or guardians have refused permission for images of their children to be used are not photographed by the press.
- 8.6. The School always requests additional permission from parents before a named photograph of a child is given to the media and makes parents aware that it may then appear in printed and electronic forms, and be reproduced by further media outlets.
- 8.7. The School will always make a formal complaint if the media fails to follow the appropriate code of practice for the protection of young people including the children of celebrities.

Staff Induction

- 8.8. All new teaching and support staff are given guidance in the Staff Handbook on the School's policy on taking, using and storing images of children.

9. Use of cameras and recording equipment by parents and guardians

- 9.1. Parents and friends often wish to take images of their children at School plays and concerts or sporting activities. Parents are welcome to take photographs of their own children taking part in sporting and outdoor events. When an event is held indoors, such as a play or a concert, parents should be mindful of the need to use their cameras and recording devices with consideration and courtesy for the comfort of others.

- 9.2. Parents and other visitors are reminded that whilst it is permissible under the General Data Protection Regulations to take photographs for personal use, publication of such images may be unlawful.
- 9.3. The School asks that parents:
 - 9.3.1. do not to take photographs of other pupils on their own without the prior agreement of that child's parents;
 - 9.3.2. do not take photographs or recordings of a child on their own cameras, mobile phones, tablets or other personal devices in the Nursery or Reception classrooms.
 - 9.3.3. do not take photographs of their child or his/her fellow pupils in the changing rooms;
 - 9.3.4. do not use flash photography at indoor events where it can disturb others in the audience at an event or even cause distress for those with medical conditions;
 - 9.3.5. be aware that copyright and performing rights issues may prevent the School from permitting the filming or recording of some plays and concerts. Official photographs or videos may be available for sale, however. The School will print a reminder in the programme of events where issues of copyright or performing right restrictions apply.
- 9.4. The School may record plays and concerts and events either professionally or for its own publicity or archive use.
- 9.5. Parents are welcome to send photographs of School related events or of their children's achievements for use either in publicity or communication materials. No fee will be payable and the images will be deemed to be the property of the School on receipt.

10.CCTV

- 10.1. The School is registered with the Information Commissioner's Office (ICO) as a Data Controller and user of CCTV and has appointed the Bursar as its nominated representative. The Bursar oversees all aspects of the use of CCTV within the School.
- 10.2. The School has some Closed Circuit Television Cameras (CCTV) installed on its premises to collect and monitor visual images for the purpose of maintaining the security of the premises, for pastoral use, for preventing crime and for investigating crime. The School believes that CCTV offers improved security protection for both pupils and staff in certain areas although it is by no means considered to be the School's only means of security surveillance. In August 2022, the School conducted a documented impact assessment to ascertain the CCTV system's impact on privacy and it determined that its installation and use was justified. This was validated most recently by a 3rd party assessment of the School's site security requirements in October 2021.
- 10.3. The School has CCTV cameras which are located at several exterior locations, computer rooms and common public access areas. Cameras are NOT installed

in classrooms, changing rooms or toilets. Notices are clearly displayed in the entrances to areas where CCTV is used. These notices also indicate where information on the use of CCTV within our School can be obtained.

- 10.4. Parents are assured that the School does not stream images collected via CCTV to any third parties or outside agencies. Please note, however, that the School may be legally required to provide CCTV footage to the Police or other law enforcement agencies if requested.

11. Treating others with respect

- 11.1. Everyone has a right to feel secure and to be treated with respect. The School is strongly committed to promoting equal opportunities for all regardless of race, gender, gender orientation or physical disability. Harassment and bullying will not be tolerated. The School's anti-bullying policy is set out on the website.
- 11.2. All pupils are encouraged to look after each other and to report any concerns about the misuse of technology or a worrying issue to a member of the pastoral staff.
- 11.3. Pupils in the Junior, Lower and Middle School are not allowed to operate mobile phones at all during School hours. They may only use cameras with the express permission of the member of staff in charge and with the permission of those appearing in the image.
- 11.4. Pupils in the Sixth Form may not make use of cameras on mobile phones in washing and changing areas, nor should photography be used by anyone in a manner that may offend or cause upset. The misuse of cameras in a way that breaches our anti-bullying policy or School Rules is always taken seriously and may be the subject of disciplinary procedures. All pupils must allow staff access to images stored on mobile phones and / or cameras and must delete images if requested to do so.
- 11.5. As technology changes rapidly with improvements to image recognition and the use of social media websites, images of pupils may appear and be identifiable on other websites and social media sites that have no connection with the School. The School will take all reasonable steps to prevent this but cannot accept responsibility for the unauthorised use of images in this way.

Authorised by Chair of Governors	
Date	18.10.22
Circulation	Governors / teaching staff / all staff / parents / website
Status	Regulatory

CCTV IMPACT ASSESSMENT September 2022

- The School is registered as a Data Controller with the Information Commissioner to process personal information for a number of purposes, including the use of CCTV on the School site. The registration Z99975353 is due for renewal in October 2022.
- The Bursar is named as the nominated representative of the School in its capacity as a Data Controller and is responsible for the oversight of CCTV in the School.
- The School currently operates a number of CCTV cameras at locations around the school site. These are located on a number of exterior locations to provide appropriate coverage and currently in a number of designated public corridor, computer room and communal areas of the School site. The school may on occasions have a number of "dummy" cameras located around the site. Cameras may be re-located to meet the operational needs of the School.
- The School operates CCTV to collect and monitor visual images for the purpose of maintaining the security of the premises, for preventing and investigating crime and investigating any incidents that may involve pupils at the school. Cameras have been sited so that they provide clear images but avoid capturing the images of persons not visiting the premises.
- The personal data processed is of video and still image content only.
- There are visible signs at the entrances to the School showing that CCTV is in operation.
- Images from the CCTV system are stored securely. Access to images is restricted to designated staff. Access by other staff will only be permitted on the authorisation of the Head or Bursar.
- CCTV data is collected through the use of fixed IP cameras on the school network, managed directly through an on-premise CCTV recording and management server. No image data is held on the cameras themselves. Access to cameras via the server is secured through restriction to specific users only. Native direct access to the cameras is secured through use of a complex password held only by IT Support.
- CCTV recordings will be held for no longer than 28 days as standard. Exceptions to this will only be for specific incidents where the retention of exported footage is specifically required for the duration of the processing of the incident. Unless footage is specifically exported, the CCTV server's retention policy will automatically delete recordings that age past 28 days.
- Exported footage is held securely on a separate storage drive within the same CCTV server and is deleted by IT Support Staff as soon as it is no longer needed for the purposes of the specific incident it pertains to.
- Except for law enforcement bodies, images will not be provided to third parties without the consent of the relevant data subject.
- The School knows how to respond to individual requests for personal information, including copies of CCTV footage and still images. If unsure the School knows to seek advice from the Information Commissioner's Office as soon as such a request is made.
- Regular checks are carried out to ensure that the system is working properly and produces adequate quality images. The location of cameras will be kept under regular review.

- There are currently 53 cameras installed in various locations around the school site.

Bursary Roof	1	Parent Car Park	2
Dining Hall	3	Pavilion Corridor	1
Dining Hall Roof	1	Pavilion Field	1
EY Building Rear	1	Pavilion Quad	4
EY Classroom	1	Pavilion Terrace	1
EY Football Pitches	1	Playground Library	1
Gatehouse	1	Playground Technology	1
Hallam 6th Form Café	1	RC Lost Property	1
Hallam Corridor	1	School Gates Royal Close	1
Hallam Girls Corridor	1	School Gates Technology	1
Hallam Maths Corridor	1	Sports Hall Boys Foyer	1
Hallam Terrace	1	Sports Hall Foyer	1
JS Main Entrance	1	Sports Hall Girls Foyer	1
JS Vehicle Gate	1	Sports Hall Mezzanine	2
Kitchen Roof	1	Tech Corridor	1
Layby Gatehouse	1	Tech Upstairs	1
Layby Technology	1	Woodsmoor Astro	1
Library Bag Racks	2	Woodsmoor Lockers	1
Library CR3	1	Woodsmoor Rear	1
Library Ramp	1		
<i>Commissioned Summer 2022</i>			
Hallam Terrace Corridor	1	Hallam Entrance Steps	1
Headmasters Corridor	1	Hallam Drive	1
6th Form Common Room	2		

Internal (School) Entities with access to the CCTV System:

Staff Group	Access	Purpose
IT Support Staff Head of Estates	All cameras; Live view; 28 days of recordings.	Facilitate investigation of incidents and exporting of recordings – only accessed/exported upon specific request from approved staff (Senior Management, Senior Pastoral).
Breakfast Club Staff	All cameras; Live view only. Single camera – Breakfast Club entrance; Live view only.	Monitoring of Site Security. Monitor access to safeguard pupils under their care.

Junior School Admin Staff	Limited cameras - JS Entrance and front of school only; 2 day window for playback of recordings.	Access/playback required to enable staff to respond quickly to safeguarding incidents, i.e. disappearance of a child at end of school.
Senior School Admin Staff	Limited cameras – School Entrance and route to Main Office. Live view only.	Monitoring specific visitors to site to ensure they progress safely from School Gate to Main Office only without detour.
Senior Management; Senior Pastoral;	Specific exported footage only.	Access to exported recordings pertaining to specific incidents under their jurisdiction only.
NW Security Systems Ltd	Remote access to recording server upon request only.	Instances of maintenance and support as per support contract.

Potential Data Subjects:

The potential data subjects involved are all visitors to the school site.

This includes, but is not limited to:

- School pupils;
- School staff;
- Parents;
- Entities/visitors from other schools (pupils/staff/parents);
- Contractors;
- Visiting members of the public.

Appendix A

Stockport Grammar School

Publicity Consent Form

- I/we consent
 do not consent

to my child's photograph and/or image being used to celebrate his/her achievements and to promote the work of the School.

- My child is fully aware of my/our decision.
- Images may be used in publications, on the website and in other publicity and children may be identified by name.
- Where any photographs or images are referred to the media the name of my/our child will not be disclosed without School contacting me to obtain my/our specific consent.
- This consent will remain valid throughout my/our child's School life. If I/we wish to change this decision, I/we understand that this must be put in writing to the Head.

Signed: _____

Parents Name(s): _____

Child's name: _____

Further details about the School's Data Protection policy and privacy policy are contained in the School's Terms and Conditions, are published on the School's website www.stockportgrammar.co.uk or are available from the Bursar at the School.