

# Photograph, Media and CCTV Permission Policy

## Clarity Independent School

Bridge Barn Farm  
Woodhill Road  
Sandon  
CM2 7SG

### Clarity Independent School is committed to safeguarding...

*"Our school is committed to our whole-school approach to safeguarding, which ensures that keeping children safe is at the heart of everything we do, and underpins all systems, processes and policies...We promote an environment where children and young people feel empowered to raise concerns and report incidents and we work hard in partnership with pupils, parents and caregivers to keep children safe."*

Clarity Safeguarding Policy September 2024

Written by Debbie Hanson

**This is version [5]**

**Written:** 4.9.19

**Update Date:** October 2024

**Updated by Name:** Debbie Hanson

**Our policy complies with the following regulations:**

ICO regulations:

<https://ico.org.uk/for-organisations/guide-to-data-protection/key-dp-themes/guidance-on-video-surveillance-including-cctv/>

The Surveillance Camera Code of Practice (PoFA 2012):

<https://assets.publishing.service.gov.uk/media/5a759177e5274a545822c871/code-of-practice.pdf>

**CCTV Checklist**

This CCTV system and the images produced by it are controlled by:

Clarity Independent School, represented by Mrs Debbie Hanson, who is responsible for how the system is used under the UK GDPR and Data Protection Act 2018.

We, Clarity Independent School, have considered the need for using CCTV and have decided it is necessary for the prevention and detection of crime and for protecting the safety of individuals, or the security of premises. We will not use the system for any incompatible purposes and we conduct regular reviews of our use of CCTV to ensure that it is still necessary and proportionate.

	Checked (Date)	By	Date of next review
If our system is processing footage of identifiable individuals and is processing personal data, we have registered as a controller and <a href="#">submitted a relevant data protection fee</a> to the Information Commissioner’s Office (ICO). We have also recorded the next renewal date.	17 <sup>th</sup> October 2024  Expires 26 <sup>th</sup> May 2025	D. Hanson	16 <sup>th</sup> October 2025
There is a named individual who is responsible for the operation of the system.	17 <sup>th</sup> October 2024	D. Hanson	16 <sup>th</sup> October 2025
Prior to processing we have clearly defined the problem we are trying to address. We regularly review our decision to use a surveillance system.	17 <sup>th</sup> October 2024	D. Hanson	16 <sup>th</sup> October 2025
We have identified and documented an appropriate <a href="#">lawful basis</a> for using the system, taking into consideration Article(s) 6, 9 and 10	17 <sup>th</sup> October 2024	D. Hanson	16 <sup>th</sup> October 2025

of the UK GDPR and relevant Schedules of the DPA 2018.			
Our system produces clear images which we can easily disclose to authorised third parties. For example, when law enforcement bodies (usually the police) require access to investigate a crime.	17 <sup>th</sup> October 2024	D. Hanson	16 <sup>th</sup> October 2025
We have positioned cameras in a way to avoid any unintentional capture of private land or individuals not visiting the premises.	17 <sup>th</sup> October 2024	D. Hanson	16 <sup>th</sup> October 2025
There are visible signs showing that CCTV is in operation on all entry / exit points. Contact details are displayed on the sign(s) if it is not obvious who is responsible for the system.	17 <sup>th</sup> October 2024	D. Hanson	16 <sup>th</sup> October 2025
We securely store images from this system for a defined period (30 days) and only a limited number of authorised individuals may have access to them, for the minimum required amount of time.	17 <sup>th</sup> October 2024	D. Hanson	16 <sup>th</sup> October 2025
Our organisation knows how to respond to individuals making requests for copies of their own images, or for images to be erased or restricted. If unsure the controller knows to seek advice and <a href="#">guidance</a> from the Information Commissioner's Office (ICO) as soon as a request is made.	17 <sup>th</sup> October 2024	D. Hanson	16 <sup>th</sup> October 2025

**This checklist is kept in a safe place until the date of the next review.**

Overall responsibility for Photo, Media and CCTV usage in **Clarity Independent School** rests with the Head Teacher:

Debbie Hanson, Head Teacher

## **Recording, Usage and Retention Consent Form (for completion by parents)**

Name of child: \_\_\_\_\_

Our school CCTV video and sound is continuously operational and captures the events and procedures occurring at the school. This also may include capturing parents and visitors to the school. There are visual signs at each access point alerting visitors to this.

We may use the visual and voice recordings captured, for learning observations of the children, for timeline analysis of events, and staff training and monitoring purposes.

We may also review recordings of meetings and phone calls for the purposes of making accurate, confidential meeting minutes or make written notes from phone calls for our school data communication records. Minutes from formal meetings will automatically be shared with all parties but if you require a brief copy of the written notes of a phone call, please request this via the member of staff with whom the call was made.

We may also voice record your child completing activities such as reading, fluency practice exercises or during assessment, to record progress. This may be in order to share steps of progress with you, or simply to aid the marking process.

All recordings are automatically deleted after 30 days or kept for the shortest additional time possible until all matters are resolved.

The CCTV system is managed through the Ring app, which is password protected and accessible through dual factor authentication. It is controlled via a single school mobile device which the Head Teacher keeps securely, and is accessible through fingerprint and password security.

Recordings are not shared outside the School, except for statutory requirements such as during an inspection or under safeguarding protocols where necessary.

Occasionally, we may take photographs of the children at our school. We use these images as part of our wall displays and sometimes in other printed publications. We will also use them on our school website, and may use them on a Facebook page and Twitter account owned by the school.

If we use photographs of individual pupils, we will not use the name of that child in the accompanying text or photo caption. If we name a pupil in the text, we will not use a photograph of that child to accompany the article. If a child has won an award and the



parent would like the name of their child to accompany their picture, we will obtain permission from the parent before using the image.

From time to time, our school may be visited by the media who will take photographs or film footage of a high-profile event. Children may appear in these images, which will sometimes be published in local or national newspapers, or on approved websites.

### **Parental Permission Form**

To comply with the Data Protection Act 2018, we need your permission before we can photograph or make any recordings of your child. Please circle your responses to the questions below, then sign and date the form where shown and return the completed form to the school.

- I give permission for my child's photograph to be used within school for display purposes. Yes / No
- I give permission for my child's photograph to be used (anonymously) in other printed publications. Yes / No
- I give permission for my child's image to be used (anonymously) on our website. Yes / No
- I give permission for my child's image to be used on the school's social media sites (e.g. Facebook & Twitter) (anonymously). Yes / No
- I give permission for my child to appear (anonymously) in the media. Yes / No
- I give permission for my child to be captured on CCTV for the purposes above. Yes / No\*
- I give permission for my child to have a school photograph taken and I understand this printed/digital group photograph can be purchased by parents. Yes / No

### **Conditions of use for this form (all parents / care-givers):**

This form is valid indefinitely from the date you sign it until you let us know otherwise.

\*You have the right to retract or change your permission at any time; however, if you prefer your child not to be captured on the School's CCTV system, the School will be unable to offer a placement to a child intending to attend the school site, but prevent them from being captured on the school's CCTV system. This is because it is not possible to prevent them from being captured on the CCTV system whilst they move round the school building, conducting activities throughout the day. Whole school capture on the school CCTV system



is necessary for school security and insurance purposes. If you would like to discuss this further, please contact the Head Teacher who will offer further reassurance as to its storage and uses.

We will not re-use any photographs or recordings a year after your child leaves this school. Historic photographs will remain on our school website and social media feeds.

We will not use the personal details or full names (which means first name and surname) of any child or adult (apart from staff members) in a photographic image or video, on our website, on our social media platforms in our school prospectus or in any of our other printed publications.

If we use photographs of individual pupils, we will not use the name of that child in the accompanying text or photo caption.

If we name a pupil in the text, we will not use an individual photograph of that child to accompany the article.

We may include pictures of pupils and teachers that have been drawn by the pupils.

We may use group or class photographs or footage with very general labels, such as 'a science lesson' or 'making Christmas decorations'.

We will only use images of pupils who are suitably dressed, to reduce the risk of such images being used inappropriately.

Websites and social media platforms can be viewed throughout the world and not just in the United Kingdom where UK law applies.

All visual/voice recording data will be kept securely, electronically, in password protected files and stored for the minimum amount of time required, in accordance with the Data Protection Act 2018 and the School's Data Protection Policy.

**Parents / carers:**

I have read and understood the conditions of use of this form.

Parent/guardian signature \_\_\_\_\_

Please print name \_\_\_\_\_

Date \_\_\_\_\_



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