



**Southern
Education
Trust**

CCTV (and other image use) Policy

Next Review: June 2026

Principles

In accordance with the Information Commissioner's Office (ICO) guidance [Taking Photographs in Schools](#), all images taken by (or in) The Trust will be used in a manner respectful of the *General Data Protection Regulation 2016*.

This means that images will be:

- Fairly and lawfully processed;
- Processed for limited, specifically stated purposes only;
- Used in a way that is adequate, relevant and not excessive;
- Accurate and up to date;
- Kept on file for no longer than is necessary;
- Processed in line with an individual's legal rights;
- Utilised with consent of subject;
- Kept securely; and
- Adequately protected if transferred to other countries.

The Status of Photographs under GDPR

GDPR stipulates that data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs is sensitive personal data. The Trust acknowledges that these attributes can be relayed through photographs and digital images. If an image is deemed to be sensitive data The Trust/ School will seek explicit consent to utilise it.

Consent

The Trust/ School will ensure that requests for consent are intelligible, easily accessible, in plain language and with the purpose for the data processing stated and evident. It will be as simple to withdraw consent as it was to give it. The Trust/ School acknowledges that consent is not indefinite and will form a system of review which allows it to remain current. Consent will be stored in a secure and auditable manner.

Procedures

The Trust/ School will ensure that:

- Children should always be consulted on the use of their image and this consent logged. The Trust/ School will re-consult children if they believe any suggested further processing is not reasonable based on initial consent;
- Written permission from parents or carers will be obtained before images/videos of children are electronically published by The Trust/ School;
- Written parental consent will be sought to take and use photographs offsite for professional, marketing and training purposes. This is in addition to parental permission sought for onsite images;
- Written consent from parents will be kept by The Trust/ School where children's images are used for publicity purposes (such as brochures or publications), until the image is no longer in use;
- Parental permission will be sought on an agreed basis;

- Any apps, websites or third party companies used to share, host or access children's images will be risk assessed prior to use and a transfer agreement formulated. The Trust/ School will ensure that images are held in accordance with the *General Data Protection Regulation 2016* and suitable child protection requirements (if necessary) are in place;
- 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 Trust/ School will arrange to 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; and
- Photography is not permitted in sensitive areas such as changing rooms, toilets, swimming areas etc.

Records

The Trust/ School will ensure that:

- A record of all consent details will be kept securely on file. Should permission be withdrawn by parents/carers at any time, then all relevant images will be removed and disposed of and the record will be updated accordingly;
- Images will not be kept for longer than is to be considered necessary. The Trust/ School retention period for images is one year. The Data Protection Officer will ensure that all photographs are permanently wiped from memory cards, computer hard drives and portable drives or other relevant devices once the images will no longer be of use;
- All images will remain on site at all times, unless prior explicit consent has been given by both the Data Protection Officer 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 any data will be kept securely (e.g. with appropriate encryption);
- The Trust/ School reserves 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;
- 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 be taken of any images without relevant authority and consent from the Data Protection Officer and the parent/carers;
- 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 the Data Protection Officer and monitored to ensure it is returned within the expected time scale;
- Images or videos that include children will be selected carefully when used online and will not provide material that could be reused;
- Children's full names will not be used on the website in association with photographs;
- The Trust/School will not include any personal addresses, emails, telephone numbers or fax numbers on video, on the website, in a prospectus or in other printed publications;
- The Trust/School will only use images of children who are suitably dressed; and
- Children's work will only be published with their permission or their parents' consent.

Records of CCTV recordings

- An on-site log will be kept of when CCTV images are viewed. This will include the date, camera location and reason for checking the CCTV. The log will also record if/when access is refused to footage.
- If any CCTV footage is kept longer than 30 days e.g. because its part of a police investigation, this must be recorded in the log.

Use of Photos/Videos by Parents/Carers

- Parents/carers are permitted to take photographs or DVD footage of events for private use only;
- Parents/carers are only permitted to take or make recording within designated areas of The Trust/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 can be withheld by The Trust/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 and any photography or filming on site will be open to scrutiny at any time; and
- Parents may contact The Trust/School Data Protection Officer to discuss any concerns regarding the use of images.

Use of Photos/Videos by Students

- The Trust/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.);
- The use of non-school provided devices, e.g. mobile phones and children's own digital cameras, will be controlled by the Headteacher;
- All staff will be made aware of the acceptable use rules regarding students' use of cameras and will ensure that students are appropriately supervised when taking images for official or curriculum use;
- Members of staff will remind students to ask permission before they take any photos;
- Photos taken by students for official use will only be taken with parental consent and pupil consent and will be processed in accordance with The Trust/School's Data Protection Policy;
- Parents/carers will be made aware that students will be taking photos/videos of other students and will be informed how these images will be managed by The Trust/School, e.g. will be for internal use by The Trust/School only (not shared online or via any website or social media tool);
- Photos taken by students for official use will be carefully controlled by The Trust/School and will be checked carefully before sharing online or via digital screens; and
- Still and video cameras provided for use by students and the images themselves will not be removed from The Trust/School.

Use of Images of Students by the Media

- All photographers and other visitors from the press must be DBS checked;
- A transfer agreement will be composed with the media company detailing how data will be handled, secured and utilised to ensure compliance with GDPR;
- Parents and pupils will be made fully aware of how their data will be used so that they can give consent with a full awareness of processing and potential further processing;
- 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; and
- 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 Trust/School has taken all reasonable steps in accordance with data and child protection legislation.

Use of Professional Photographers

- Professional photographers who are engaged to record any events must be DBS checked and prepared to work according to the terms of The Trust/School's requirements;
- A transfer agreement will be composed with the media company detailing how data will be handled, secured and utilised; and
- Photographers will not have unsupervised access to children and young people. The Headteacher will be responsible for the arrangements.

Use of Closed-Circuit Television (CCTV)

- All areas which are covered by CCTV will be well signposted and notifications are displayed so that individuals are advised before entering such vicinity;
- Recordings will be retained for a limited time period only and for no longer than their intended purpose. This will generally be a maximum of 30 days. All recordings are to be erased before disposal;
- Regular auditing of any stored images will be undertaken by the Data Protection Officer or other member of staff as designated by the Headteacher;
- If cameras record activities taking place on the premises which are of a criminal nature or give any cause for concern, then information will be referred to the appropriate agency by the Headteacher.

Use of Webcams

- Parental consent will be obtained before webcams will be used within The Trust/School environment for curriculum or educational purposes;
- All areas which are covered by webcams for security or safeguarding purposes will be well signposted and notifications are displayed so that individuals are advised before entering such vicinity; and
- Recordings will be retained for a limited time period only and for no longer than their intended purpose. This will generally be a maximum of 30 days. All recordings are to be erased before disposal.

Use of Bodycams

- Where it is not possible to use CCTV cameras for the safeguarding of staff and pupils it may be necessary to use a bodycam.
- Where pupils can become dysregulated and this results in physical and verbal threats or damage to property then a member of staff may be required to wear a bodycam. This will ensure that any incidents are accurately recorded and thus avoid lengthy investigations into the incident and the best course of action more easily put into place.
- Information recorded will only be reviewed in the case of an incident.
- The bodycam is password protected and any data will be stored in a secure file on an encrypted computer and will be deleted after 30 days unless it is required to support a pupil or member of staff.
- Parents and Carers have the right to request to view stored information and this can be accessed by a request to the Designated Safeguarding Lead or the Headteacher.

Breach

In the unlikely event of photographs or images of children being compromised through a data breach deemed to be a risk to the rights and freedoms of data subjects, the Data Protection Officer will notify the supervisory authority within 72 hours. Affected individuals will also be notified without undue delay.

Equal Opportunities

In making and implementing this policy The Trust/School will have regard to the Equal Opportunities Policies.

Responsibilities

Governing Body

The Governing Body is responsible for ensuring that suitable arrangements are in place and will review annually the implementation of the policy with reports from the Headteacher

Headteacher

The Headteacher is responsible for ensuring the acceptable, safe use and storage of all camera technology and images within The Trust/School. This includes the management, implementation, monitoring and review of this policy and procedures.

DATA PROTECTION OFFICER

The Data Protection Officer is responsible for the implementation of the policy and procedures and reporting as required to the Headteacher.

The Data Protection Officer is responsible for informing staff, students and parents of the policy and procedures and ensuring that staff have the opportunity to discuss and be consulted about the arrangements.

Staff

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

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.