



Taking, Storing and Using Images of Pupils

1. Introduction

- 1.1 This policy provides information to older pupils and their parents, carers or guardians (referred to in this policy as "parents") about how images of pupils are used by the College. It also covers our approach to the use of cameras and filming equipment at events and on our premises by parents, pupils and the media. It also takes account of data protection legislation and guidance from the Information Commissioners Office.
- 1.2 It applies in addition to our parent contract, and any other information we may provide about use of images, including signage about the use of CCTV, more general information about the use of pupils' personal data and Pupil and Parents Privacy Notices. Images of pupils in a safeguarding context are dealt with under our relevant staff safeguarding policies.
- 1.3 There are additional regulations that apply to the Pre-Prep in addition to this policy, which are detailed below.
- 1.4 Parents will be aware that from the age of 13 and upwards, the law recognises pupils' own rights to have a say in how their personal information is used and this includes their images. (In this policy, these pupils are referred to as "older pupils")

2. General points

- 2.1 Certain uses of images are necessary to run the College which we can legitimately use e.g. to ensure safety and security or to market the College but in a way that is not detrimental to those pictured or likely to cause any negative impact. We are entitled to process such images and take decisions about how to use them, subject to any reasonable objections raised, normally at the point of reading the Privacy Notices or when any specific consent for use is sought.
- 2.2 The Privacy Notices describe how we may take photographs or videos of pupils at events to use on social media, on our website or in other marketing communications. This helps us show prospective parents and pupils what we provide and to promote the College. We will seek specific consent from parents and older pupils before using a photograph or video recording of pupils, where we consider that the use is more privacy intrusive e.g. a photograph of a single pupil, particularly if it is focused just on the head and shoulders. We may continue to use these photographs and videos after your child has left the College.

- 2.3 However, parents and older pupils should be aware that certain uses of their images may be necessary or unavoidable, for example if they are included accidentally in CCTV footage or a photograph.
- 2.4 We trust parents and older pupils will feel able to support us in using pupil images to celebrate achievements, sporting and/or academic, to promote the work of the three schools and for important administrative purposes such as identification and security.
- 2.5 Any parent or older pupil who wish to limit the use of images should contact the their school office. The contact details are at the end of this document. We will respect such wishes wherever reasonably possible, and in accordance with this policy.
- 2.6 Unless specifically informed, the College will deem consent is in place and deemed valid until:
 - a. the pupil leaves the College;
 - b. the pupil reaches the age of 13 when additional pupil consent is required; and
 - c. either the parent or pupil withdraws consent at any time. Please be aware that it is only possible to remove online images and the College cannot change printed materials once published.

3. Use of Pupil Images in College Publications

- 3.1 Unless the pupil or their parent has requested otherwise, we will use images of pupils to keep the College community (parents, pupils, staff, Governors and alumni) updated on our activities and for marketing and promotional purposes, including:
 - a) on internal displays (including clips of moving images) on digital and conventional noticeboards within our premises;
 - b) in communications with the College community including by email, intranet and by post;
 - c) on our website and, where appropriate, via the College social media channels e.g. Twitter, Instagram and Facebook. Such images would not normally be accompanied by the pupil's full name without permission; and
 - d) in our prospectus and in online, press and other external advertisements for the College. Such external advertising would not normally include pupil's names and in some circumstances, we will seek the parent or pupil's specific consent, depending on the nature of the image or the use.
- 3.2 The source of these images will predominantly be our staff (all staff must use technology safely and responsibly in accordance with the College's Acceptable Use Policy and Data Protection Policy), or a professional photographer used for marketing and promotional purposes, or occasionally pupils. We will only use images of pupils in suitable dress and the images will be stored securely. All areas of the College will upload images directly to approved and secure areas on the College system.

4. Use of Pupil Images for Identification and Security

- 4.1 All pupils are photographed at the start of the academic year, for the purposes of internal identification. These photographs identify the pupil by name, year group, house and form/tutor group.
- 4.2 CCTV is in use on our premises and will capture images of pupils. Images captured on the CCTV system are used in accordance with the Privacy Notices and any other information or policies concerning CCTV which we may be publish.

5. Use of Pupil Images in the Media.

- 5.1 We use approved photographers for taking pupil images and occasionally supply images to the local media in certain situations e.g. exam results, sports events. In the rare event that the media are on campus and wish to take their own images, where practicably possible we will notify parents and older pupils in advance. We will make every reasonable effort to ensure that where permission has been refused for images, no such images will be provided for media purposes.
- 5.2 The media often ask for the names of the pupils to go alongside the images, and these will only be provided where parents have been informed about the media's visit and either parent or pupil has consented as appropriate.

6. Security of Pupil Images

- 6.1 Professional photographers (with the exception of those classed as contractors) and the media are accompanied at all times by a member of staff when on our premises. We make every effort to ensure that any images of pupils are held securely by contractors and in accordance with our instructions.
- 6.2 We take appropriate technical and organisational security measures to ensure images of pupils held by us are kept securely on our systems and protected from loss or misuse. We will take reasonable steps to ensure that members of staff only have access to images of pupils held by us where it is necessary for them to do so.
- 6.3 All staff are given guidance on this policy and on the importance of ensuring that images of pupils are made and used responsibly, only for College purposes and in accordance with our policies and the law.

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

- 7.1 Parents or close family members are welcome to take photographs of (and where appropriate, film) their own children taking part in our events, subject to the following guidelines, which we expect all parents to follow:
 - a) When an event is held indoors e.g. a play or a concert, parents should be mindful of the need to use their devices with consideration and courtesy for cast members or performers on stage. Flash photography can be disruptive, or even cause distress for those with medical conditions; we therefore ask that photographs are **not** taken with a flash at indoor events.
 - b) Photography is not allowed under any circumstances in the swimming pool.

- c) Parents are asked not to take photographs of other pupils, except incidentally as part of a group shot, without the prior agreement of that pupil's parents or where appropriate the pupil.
- d) 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 e.g. Facebook or published in any other way.
- e) Parents are reminded that copyright issues may prevent us from permitting the filming or recording of some plays and concerts. We will always print a reminder in the programme of events where issues of copyright apply.
- f) Parents may not film or take photographs in changing rooms or backstage during productions, nor in any other circumstances in which photography or filming may embarrass or upset pupils.
- g) We reserve the right to refuse or withdraw permission to film or take photographs (at a specific event or more generally), from anyone who does not follow these guidelines, or is otherwise reasonably felt to be making inappropriate images.
- h) Staff will question anyone they do not recognise who is using a camera or recording device at events and College productions.
- i) We sometimes record plays and concerts professionally (or engage a professional photographer or film company to do so), in which case CD, DVD or digital copies may be made available to parents for purchase. Parents of pupils taking part in such plays and concerts will be consulted if it is intended to make such recordings available more widely.
- j) Whilst unreasonable requests will never be made, the College reserves the right to not permit the taking of photographs or allow filming at College events.

8. Use of Cameras and Filming Equipment by Pupils

- 8.1 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 staff.
- 8.2 The use of cameras or filming equipment (including 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.
- 8.3 The misuse of images, cameras or filming equipment in a way that breaches this policy, or the College's Anti-Bullying Policy, Data Protection Policy, E-Safety Policy, IT Acceptable Use Policy for Pupils, Safeguarding Policy or the College procedures is always taken very seriously. These may be the subject of disciplinary procedures or dealt with under the Safeguarding Policy as appropriate.

9. Additional regulations for the Pre-Prep

- 9.1 There are additional requirements for the Early Years Foundation Stage and Key Stage 1 pupils and parents.
- 9.2 College staff are not allowed to take images on their personal devices of any age group. In addition, Pre-Prep staff keep their mobile phones in their locker in the Staff Common Room whilst teaching in classrooms. College devices are supplied when working in the Forest School site, Dining Hall and Swimming Pool as an emergency means of communications.
- 9.3 All College staff, visitors, Senior School helpers and volunteers working in the Pre-Prep buildings or grounds, must hand in any mobile phones or devices they have in their possession to the Pre-Prep Office.
- 9.4 Pre-Prep pupils do not bring in or wear watches that have the capacity to take pictures or video images. Appropriate watches for this age child are simple analogue or digital watches (Fitbit watches are acceptable).

If you would like to contact us about any aspect of this policy, please email the Data Manager via tahira.hanif@bishopsstortfordcollege.org