

Digital Images Guidelines

Contents

1. Introduction.....	1
2. Data Protection.....	1
3. General Points	1
4. Use of Pupil Digital Images: School Publications, Website, Social Media & Marketing	2
5. Media.....	2
6. Security of Pupil Images	3
7. Use of Cameras and Filming Equipment by Parents	3
8. Use of Cameras and Filming Equipment by Pupils	4

1. Introduction

These Guidelines are intended to provide information to pupils and their parents, carers or guardians (referred to in these guidelines as "parents") about how digital images (including video) of pupils are normally used by Twickenham Prep School. It also covers the School's approach to the use of cameras and filming equipment at School events, on trips and on School premises by parents and pupils themselves, and in the media.

They apply in addition to the School's Terms and Conditions (Parent Contract), and any other information the School may provide about a particular use of pupil images, including e.g. CCTV; and more general information about use of pupils' personal data, e.g. the School's Pupil Privacy Notice. Images of pupils in a safeguarding context are dealt with under the School's relevant safeguarding policies.

2. Data Protection

Digital images of pupils are classed as personal data under the terms of the Data Protection Act 2018.

Certain uses of digital images are necessary for the ordinary running of the School; other uses are in the legitimate interests of the School. The School is entitled lawfully to process such images and take decisions about how to use them, subject to any reasonable objections raised.

3. General Points

Parents who accept a place for their child at the School are invited to indicate their agreement to the School using images of their child by completing a Digital Images of Pupils Consent Form on My School Portal (MSP). The School will respect the wishes of

parents (and indeed pupils themselves) wherever reasonably possible, and in accordance with these guidelines. Parents may update their consent by resubmitting the consent form on MSP at any time.

Parents should be aware of the fact that certain uses of their child's images may be necessary or unavoidable, for example if they are included incidentally in CCTV.

We hope parents will feel able to support the School in using pupil digital images to celebrate and share the achievements of our pupils, to promote the work of the School; and for important administrative purposes such as identification and security.

Parents should be aware that, from around the age of 12 and upwards, (defined to be Year 8 at our School) the law recognises pupils' own rights to have a say in how their personal information is used – including digital images.

4. Use of Pupil Digital Images: School Publications, Website, Social Media & Marketing

Unless the relevant pupil or his or her parent has requested otherwise, the School will use images of its pupils to keep the School community updated on the activities of the School, and for marketing and promotional purposes, including:

- On internal displays (including video clips) on digital and conventional notice boards within the School premises;
- In communications with the School community (parents, pupils, staff, Governors and alumni) including by email, on My School Portal (MSP) and by post;
- On the School's website and, where appropriate, via the School's social media channels, e.g. Twitter, Instagram, Facebook and Youtube. (Such images would not normally be accompanied by the pupil's full name without permission); and
- In the School's prospectus, and in online, press and other external advertisements for the School. Such external advertising would not normally include pupils' names (and in some circumstances the School will seek the parent or pupil's specific consent, depending on the nature of the digital image or the use).

The source of these images will predominantly be the School's staff (who are subject to policies and rules in how and when to take such images) or a professional photographer/filming company used for marketing and promotional purposes, or occasionally pupils. The School will only use images of pupils in suitable dress and the images will be stored securely and centrally.

5. Media

Where practicably possible, the School will notify parents in advance when the media is expected to attend an event or School activity in which School pupils are participating. Every reasonable effort will be made to ensure that any pupil whose parent has refused permission for images of that pupil, or themselves, to be made in these circumstances are not photographed or filmed by the media, nor such images provided for media purposes.

The media often asks for the names of the relevant pupils to go alongside the images, and these will 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

Professional photographers and the media are accompanied at all times by a member of staff when on School premises. The School uses only reputable professional photographers and makes every effort to ensure that any images of pupils are held by them securely, responsibly and in accordance with the School's instructions.

Digital images taken by staff or pupils should only be taken using school electronic devices; on no account should personal electronic devices be used to capture digital images of pupils.

CCTV is in use on School premises as a security measure. Images captured on the School's CCTV system are used in accordance with the School's Privacy Notice and CCTV Policy. Cameras are only located in appropriate areas and clear signage indicates that they are in operation.

The School takes appropriate technical and organisational security measures to ensure that images of pupils held by the School are kept securely on School systems, and protected from loss or misuse. The School will take reasonable steps to ensure that members of staff only have access to images of pupils held by the School where it is necessary for them to do so.

All staff are given guidance on the School's Digital Images Guidelines, and on the importance of ensuring that images of pupils are made and used responsibly, only for School purposes, and in accordance with School policies and the law.

The use of inappropriate of images or the misuse of images, will be reported to the School's Designated Safeguarding Lead (DSL) and will be reported to the police, Social Services or the Local Authority, as appropriate.

7. Use of Cameras and Filming Equipment by Parents

Parents are permitted to take photographs of (and where permission is provided, film) their own children taking part in School events, subject to the following guidelines, which the School expects all parents to follow:

- The School will be recording all productions, concerts and performances using an in-house team and a professional quality video will be made available to parents. To enable a high-quality finished product for the enjoyment of our pupils and their families, the School kindly requests that no other filming or photography is conducted during the performances, unless express permission is provided at the time. However, photographic opportunities will be made available at the end of the performance.
- Parents are asked not to take photographs or film other pupils, except incidentally as part of a group shot, without the prior agreement of that pupil's parents.
- 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 (for example on Facebook, YouTube or other social media channels), or published in any other way.
- Live video streaming is strictly forbidden during all school events.

- Where photographic permission is permitted during an indoor event, flash photography must not be used.
- Parents may not film or take photographs in changing rooms or backstage during school productions, concerts and performances, nor in any other circumstances in which photography or filming may embarrass or upset pupils.
- The School reserves the right to refuse or withdraw permission to film or take photographs (at a specific event or more generally), from any parent who does not follow these guidelines.

8. Use of Cameras and Filming Equipment by Pupils

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 the pastoral staff.

The use of cameras or filming equipment is only permitted on school electronic devices and under the authorisation and supervision of a member of staff. On no account should photographic or filming equipment be used in toilets, changing areas or sports facilities, or used in a manner that may offend or cause upset.

The misuse of images, cameras or filming equipment in a way that breaches these Guidelines, or the School's Anti-Bullying Policy, Data Protection Policy, Online Safety Policy, Privacy Notices for Pupils, Behaviour & Discipline Policy, I.T. Acceptable Use Policy for Pupils, Safeguarding & Child Protection Policy or the School Rules is always taken seriously, and may be the subject of disciplinary procedures or dealt with under the relevant safeguarding policy as appropriate.