

Guidelines for Taking, Storing and Using Images of Pupils

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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 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, 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. signage about the use of 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. General Points to be Aware of

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

Parents who accept a place for their child at the School are invited to indicate that they agree to the School using images of him/her as set out in these guidelines, by signing a Consent Form and from time to time, if a particular use of the pupil's image is requested. However, 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, a photograph or film.

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

If a parent wishes to limit the use of images of a pupil for whom they are responsible they should indicate their preference on the Consent Form. Additional information will be requested in these circumstances, to ensure the School complies fully with the parents instructions. The School will respect the wishes of parents/carers (and indeed pupils themselves) wherever reasonably possible, and in accordance with these guidelines.

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 images.

3. Use of Pupil Images

3.1. School Publications

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 clips of moving images) 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. Instagram, Facebook, X and YouTube. (Such images would not normally be accompanied by the pupil's full name without permission); and
- In the School's marketing materials, 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 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 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.

3.2. Identification and Security

All pupils are photographed once a year for the purposes of internal identification. These photographs identify the pupil by name, year group, house and form/tutor group.

CCTV is in use on School premises, and will sometimes capture images of pupils. Images captured on the School's CCTV system are used in accordance with the School's Privacy Notice, and CCTV Policy / any other information or policies concerning CCTV which may be published by the School from time to time.

3.3. 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. The School will make every reasonable effort to ensure that any pupil who does not have permission for their image to be used will not be 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.

4. 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.

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 Guidelines for Taking, Storing and Using Images of Pupils, 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.

5. Use of Cameras and Filming Equipment (including mobile phones and other mobile devices) by Parents

Parents, guardians or close family members (hereafter, parents) are welcome to take photographs of (and where appropriate, film) their own children taking part in School events, subject to the following guidelines, which the School expects all parents to follow:

- 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 filming devices with consideration and
 courtesy for cast members or performers on stage and the comfort of others.
- Flash photography can disturb others in the audience, or even cause distress for those with medical conditions; the School therefore asks that it is not used at indoor events.
- 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.
- 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 Instagram, Facebook, YouTube or other social media channels), or published in any other way.
- Parents are reminded that copyright issues may prevent the School from permitting the filming or recording of some plays and concerts. The School will always print a reminder in the programme of events where issues of copyright apply.

 Parents may not film or take photographs in changing rooms or backstage during School productions, 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, or is otherwise reasonably felt to be making inappropriate images.

The School sometimes records productions professionally (or engages a professional photographer or film company to do so), in which case digital copies are 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.

6. 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 (including on mobile phones and other mobile devices) is not permitted without the authority of a senior teacher and only under supervision and 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.

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.