Guidelines for Taking, Storing and Using Images of Pupils

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1. Introduction

These Guidelines are intended to provide guidance to staff and 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, video and filming equipment at School events, trips and on School premises by parents and pupils themselves, and in the media.

They apply alongside any parent consent form provided, and the School's Terms and Conditions (Parent Contract), where this includes terms around image use and marketing, and should be understood in the context of any other information the School may provide from time to time 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 in the School's Pupil Privacy Notice.

Safeguarding and online safety issues are more specifically dealt with under the School's relevant safeguarding policies.

Staff are additionally subject to their own training (in accordance with their role) and School policies in this area.

2. General Principles of Image Use

Certain uses of images, including pupil images, are necessary for the ordinary running of the School (for example, for administration, identification, educational and curricular purposes, and security). It may not be possible to object to such uses, although any concerns in this regard will be duly considered by the School.

Other uses are considered to be 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, although objectives may be raised and the School will seek to accommodate any reasonable concerns.

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 continue to be necessary (for example, administration, education or security) or will be unavoidable, for example if they are included incidentally in CCTV or as part of a whole-school 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, (applicable to pupils in Year 7 and 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 and Publication of Pupil Images

3.1. School Publications

In accordance with any consents, notices or objections as may be applicable from time to time, 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;
- As part of the School's email system and internal network, and in appropriate communications by whatever means with the School community (parents, pupils, staff, Governors and alumni) including by email, on My School Portal (MSP), website and by post;
- As part of the School curricular activities (for example, for physical education or drama);
- In printed material, such as the School's marketing materials and including the School's magazine, banners and posters;
- On the School's website, external search websites such as the Good School's Guide and via the School's social media channels, e.g. Instagram, Facebook and YouTube;

- External advertisements, posters and banners for the School and in the press.

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. The School commits that where digital images are used the full names of pupils will not appear on any external websites (including the school's website) and social media channels unless permission has been provided.

The School's guidelines in respect of the above uses is as follows:

- **Legitimate interests** will be relied upon for any uses which are either essential (for example, security, administration and education) or which fall within a scope of reasonably expected uses. Reasonably expected uses include via internal School or parent communications, on the school's internal network, in printed material such as a School magazine or brochures, or any uses whereby an individual child cannot reasonably be identified by someone outside the School community: for example, where their face cannot clearly be seen.

- The key effect of the School relying on legitimate interests is that parents and pupils may be entitled to object to such uses, although their specific consent will not be sought beforehand. Any objections will be duly considered by the School, but objections can be overridden by other factors: for example, uses which the School considers essential; or uses which create little or no risk of harm (including where children are not at risk of outside identification).

- **Consent** will be sought for all other external uses of pupil images online. In particular, where any intended use is more intrusive or exceptional, the School will discuss the use with the parents (as appropriate) in advance.

The School will take reasonable steps following any objection or withdrawal of consent but may not be able to recall or destroy printed materials. Any particular concerns or vulnerabilities relating to a pupil or their family should be drawn to the School's attention in advance. The safeguarding and best interests of pupils will remain the School's priorities at all times.

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 (for certain notified purposes, including security), and in certain cases is likely to 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 and the location of cameras will be clearly notified, including by signage.

3.3. External 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 may ask for the names of the relevant pupils to go alongside the images. It is not the School's policy to provide full or first names in this scenario, and these will only be provided where parents have been informed about the media's visit and either parent or pupil has specifically consented to the sharing of their name, for an appropriate and necessary purpose.

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 in suitable dress and held by such persons 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.

Any external processors of pupil images are engaged only for lawful purposes consistent with those set out in these guidelines, and subject to proper due diligence and contractual protections.

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.

Pupils are also given mandatory and age appropriate training on their own privacy online and with their peers, including image use and social media safety.

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 online (for example on Instagram, Facebook, YouTube, WhatsApp, by text 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.
- 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, by reference to their dress or activity or any other factor.

The School reserves the right to refuse or withdraw permission to film or take photographs, at a specific event or more generally, either for all attendees / parents (e.g. where a safeguarding risk to an individual child has been identified) or from any individual 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.

Should remote video provision at home (by Zoom, Teams or otherwise) be required or facilitated by the School in any context, specific guidelines and instructions will be provided to ensure privacy and safety, including around dress and recording of video.

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.