

## **T1. TAKING, STORING AND USING IMAGES OF CHILDREN POLICY**

Our mission is to develop happy, confident and successful children who are well prepared for their future.

ISSR no.	N/A
Policy Owner	Head of Prep
Reviewed by Head of Prep	21.05.24
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## INTRODUCTION

This Policy is intended to provide information to all staff employed at Westbrook Hay, pupils and their parents, carers or guardians (referred to in this policy as "parents") about how images of pupils are normally used by Westbrook Hay School (referred to in this policy as "the school"). It also covers the school's approach to the use of cameras and filming equipment at school events and on school premises by staff, parents and pupils themselves, and the media.

References to "**Staff**" throughout this policy relate to all members of employed staff, including teaching and support; governors; volunteers; peripatetic and contract; temporary; supply and agency; student placement, including those undertaking initial teacher training and apprentices.

It applies in addition to the school's terms and conditions, 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 Privacy Notices. Images of pupils in a safeguarding context are dealt with under the school's:

- Child Protection and Safeguarding policy
- Staff Behaviour Policy

This policy should also be read in conjunction with the:

- Anti Bullying Policy
- E-Safety Policy
- ICT Acceptable Use Policy
- Privacy Notices
- Bringing Your Own Device Policy

## GENERAL POINTS TO BE AWARE OF

1. 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.

2. Parents who accept a place for their child at the school are invited to consent to the school using images of him/her as set out in this policy, via the Parent Portal 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 or a photograph).
3. We hope parents will feel able to support the school in using pupil images to celebrate the achievements of pupils, sporting and academic; to promote the work of the school; and for important administrative purposes such as identification and security.
4. Any parent who wishes to limit the use of images of a pupil for whom they are responsible should contact the Marketing and Admissions Department in writing. The School will respect the wishes of parents/carers (and indeed pupils themselves) wherever reasonably possible, and in accordance with this policy.
5. Parents should be aware that, from around the age of 13 and upwards, the law recognises pupils' own rights to have a say in how their personal information is used – including images.

#### **USE OF PUPIL IMAGES IN 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 and on our Parent Portal;
- on the school's website and, where appropriate, via the school's social media channels, e.g. Twitter, Instagram, Vimeo, Flickr, YouTube, Tik Tok, Linked In and Facebook. Such images would not normally be accompanied by the pupil's full name without permission; and
- in the school's prospectus, and in online, digital display, press and other external advertisements for the school e.g. train station adverts. Such external advertising would not normally include pupil's 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,

pupils or occasionally parents. The school will only use images of pupils in suitable dress and the images will be stored securely and centrally.

- Where parents have not given consent for marketing purposes, the staff may ask that child to stand aside when the photo is being taken so as not to accidentally include them.

#### **USE OF PUPIL IMAGES FOR IDENTIFICATION AND SECURITY**

- At registration, parents are asked to submit a photograph of their child with the Registration Form.
- All pupils are photographed on entering the school and, thereafter, at appropriate intervals, to ensure an easily identifiable image is on file for the purposes of internal identification. These photographs are attached to pupils' MIS (Schoolbase) record.
- 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 Privacy Notice and CCTV Policy / any other information or policies concerning CCTV which may be published by the school from time to time.

#### **USE OF PUPIL IMAGES FOR MEDICAL PURPOSES**

- Occasionally, it may be necessary to track a medical condition using a photo or video. The ONLY way this is acceptable is if all of the following apply:
  - o A) The need for a photo or video is written as a part of the Pupil's Care Plan
  - o B) The photo or video is taken on a school-owned device, such as an iPad.
  - o C) the photo or video is removed as soon as it is no longer needed.
- At no other time should photos be taken of any medical condition. If a request is made by a parent or carer to document medical conditions in this way, the staff member must decline the request and suggest that the parent visit the school if they need to keep track of a condition.

#### **USE OF PUPIL IMAGES IN THE MEDIA**

- Where practicably possible, the school will make every reasonable effort to ensure that any pupil whose parent or carer 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 consented as appropriate.

### **USE OF PUPIL IMAGES BY OTHER SCHOOLS**

During the pupils' time at the school, children will often attend events at other Schools. These may be tournaments, sports fixtures, music concerts for example. These other schools will often ask for permission to take photographs of the pupils at the event for their marketing purposes. An understanding of how the photographs will be used will be sought, and permission will be given in line with the consent that parents have given for Westbrook Hay. No names will be used.

### **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 Policy on 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.
  - With the advent of AI, it is possible for photographs to be downloaded and manipulated for malicious purposes. Although the school cannot take any responsibility for this, steps are taken to minimise the possibility of this –
  - photographs cannot be downloaded from the website or flickr.
  - Lower resolution photos are upload to social media
  - More group shots are used over individual shots.

### **USE OF CAMERAS AND FILMING EQUIPMENT (INCLUDING MOBILE PHONES AND WEARABLE DEVICES) BY PARENTS**

- In the Pre-Prep building and Pre-Prep (Rosebud) Dining Room, parents and visitors may not use their mobile phone or camera.

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 Facebook, Instagram or X (formerly Twitter), 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, the swimming pool 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 may withdraw permission from all parents to film or take photographs at any time.
- The school sometimes records plays and concerts professionally (or engages 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.

#### **USE OF WESTBROOK HAY CAMERAS AND FILMING EQUIPMENT BY STAFF**

- Only equipment owned and monitored by Westbrook Hay may be used to take children's pictures. Staff should **never** use their own personal equipment (including mobile phones) to take pictures or record children.
- All staff members are encouraged to look after each other, and to report any concerns about the misuse of technology, or any worrying issues to the appropriate

place: MyConcern for issues concerning children and the Head Teacher for issues concerning staff.

- The use of cameras or filming equipment is not allowed in toilets, washing or changing areas, nor should photography or filming equipment be used by staff in a manner that may offend or cause upset.
- The misuse of images, cameras or filming equipment in a way that breaches this Policy, or the school's Child Protection and Safeguarding Policy, E-Safety Policy, IT Acceptable Use Policy, Bring Your Own Device Policy, Social Media Policy and GDPR Privacy Policies is always taken seriously, and may be the subject of disciplinary procedures or dealt with under the relevant safeguarding policy as appropriate.

#### **USE OF WESTBROOK HAY 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 staff.
- The use of cameras or filming equipment 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 this Policy, or the school's Anti-Bullying Policy, School Privacy Notices, E-Safety Policy, IT Acceptable Use Policy for Pupils, Child Protection and Safeguarding 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.