
Policy: Taking, Storing and Using Images of Children

1. This Policy

- 1.1. This Policy is intended to provide information to pupils and their parents, carers or guardians (referred to in this policy as "parents") about how images of pupils are normally used by West Buckland School ("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 parents and pupils themselves, and the media.
- 1.2. 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 Data Protection Policy]. [Images of pupils in a safeguarding context are dealt with under the school's relevant safeguarding policies.
- 1.3. 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.
- 1.4. Parents who accept a place for their child at the school are invited to agree to the school using images of him/her as set out in this policy, via the consent form issued by the Deputy Head or Prep School Headmaster. We hope parents will feel able to support the school in using pupil images to celebrate the achievements of pupils, promote the work of the school, and for important administrative purposes such as identification and security.
- 1.5. Any parent who wishes to limit the use of images of a pupil for whom they are responsible should inform the Deputy Head or Prep School Headmaster in writing via the consent form. The school will always respect the wishes of parents/carers (and indeed pupils themselves) where reasonably possible, and in accordance with this policy. [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).]
- 1.6. A list of students who do not give consent for their images to be used by the school will be distributed to all staff by the Deputy Head or Prep School Headmaster.

2. Use of Pupil Images in School Publications

- 2.1. 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:
 - a) on internal displays (including clips of moving images) on digital and conventional notice boards within the school premises;
 - b) in communications with the school community (parents, pupils, staff, Governors and alumni) including by email, on the school intranet and by post;
 - c) on the school's website and, where appropriate, via the school's social media channels, e.g, Twitter and Facebook. Such images would not normally be accompanied by the pupil's full name without permission from the parents; and
 - d) in the school's prospectus, and in online, press and other external advertisements for the school. Such external advertising would not include pupil's names.

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- 2.2. The source of these images is predominantly the school's Marketing Department for marketing and promotional purposes, or staff/pupils in relation to school events, sports or trips. The school will only use images of pupils in suitable dress.

3. Use of Pupil Images for Identification and Security

- 3.1. All pupils are photographed on entering the school and, thereafter, at periodic intervals, for the purposes of internal identification. These photographs identify the pupil by name, year group, house and form/tutor group as appropriate.
- 3.2. 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 Data Protection Policy for Pupils and Parents/Carers, and any other information or policies concerning CCTV which may be published by the school from time to time.]

4. Use of Pupil Images in the Media

- 4.1. Where practicably possible, the school will endeavour to notify parents in advance when the media is expected to attend an event or school activity in which school pupils are participating, and will make every effort to ensure that any pupil whose parent or carer has refused permission for images of that pupil to be made in these circumstances are not photographed or filmed by the media.
- 4.2. The media normally 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 no objection from the parents has been received.

5. Use of Cameras and Filming Equipment (including mobile phones) by Staff

- 5.1. As part of the school's Safeguarding Policy, the school does not permit images of pupils or staff to be captured on privately-owned devices. The school provides cameras which are owned by the school and are to be used for the recording of images at either formal or informal events which may be on or off-site. Staff can sign-out these cameras, which are held in various accessible and secure locations around the school, at any time for use at any school event.
- 5.2. Any images taken using these cameras should be downloaded, at the earliest opportunity, to the school's Network (users' personal Z-drive in first instance). The images that remain on the camera should then be deleted.
- 5.3. The use of the cameras should be supervised by a member of staff at all times. Any problems concerning the cameras including abuse, loss or damage should be reported to the appropriate member of staff as soon as is practicable.
- 5.4. Staff that are also parents may take images of their own children in accordance to the guidance given in Section 7 - 'Use of Cameras and Filming Equipment (including mobile phones) by Parents'. However, staff must be clear when their roles as 'a member of staff' or 'a parent' change. For example, a member of staff taking a school trip in which their son or daughter are present is 'a member of staff' and should therefore follow guidance as 'a member of staff'. A member of staff who is watching their son or daughter playing in a sports match is 'a parent' and should follow the guidance in Section 7.

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6. Security of Pupil Images

- 6.1. 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.
- 6.2. The school takes appropriate technical and organisational security measures to ensure that images of pupils held by the school are kept securely, and protected from loss or misuse, and in particular 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.
- 6.3. 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 the school's policies and the law.

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

- 7.1. When an event is held indoors, such as a play or a concert or sporting event parents should be mindful of the need to use their cameras and filming devices with consideration and courtesy for cast members or performers and the comfort of others.
- 7.2. In particular, 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.
- 7.3. Photographs or videos must not be taken during events in the swimming pool.
- 7.4. 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.
- 7.5. 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), or published in any other way.
- 7.6. 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.
- 7.7. 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.
- 7.8. 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.
- 7.9. The school sometimes records plays and concerts professionally (or engages a professional photographer or film company to do so), in which case copies of the DVDs and CDs may be

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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.

- 8. Use of Cameras and Filming Equipment by Pupils (including students who are aged 18 or over)**
- 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 the pastoral staff.
 - 8.2. The use of cameras or filming equipment (including on mobile phones) is not allowed in toilets, bedrooms of boarding house, 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 cameras or filming equipment in a way that breaches this Policy, or the school's Mobile Phone, Anti-Bullying Policy, Data Protection Policy, E-Safety & IT Policy, Acceptable Use Policy for Staff & Pupils, 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.

The main legislation in this area is the Data Protection Act 1998 and the Education (Independent School Standards) Regulations 2014. Relevant guidance which has informed this Policy includes:

- a) [The ICO Code of Practice on Privacy Notices](#)
- b) [The ICO sector-specific guidance for schools, universities and colleges](#)
- c) [The ICO Code of Practice on CCTV](#)
- d) [The ICO's Guide to Data Protection](#)
- e) [The NSPCC's Using photographs of children for publication](#)
- f) West Buckland School Acceptable User Agreement Policy
- g) West Buckland School Safeguarding & Child Protection Policy
- h) West Buckland School Mobile Phone Policy
- i) West Buckland School Anti-Bullying Policy
- j) West Buckland School E-Safety & IT Policy
- k) West Buckland School Acceptable User Agreement (Staff)
- l) West Buckland School Acceptable User Agreement (Pupil)

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