

SWANBOURNE HOUSE



11e TAKING, STORING AND USING IMAGES OF PUPILS POLICY

Review Arrangements:

Date	May 2019
Reviewed (MP)	May 2020
Reviewed (RN)	September 2020

References:

- 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](#)

Amendments

Amendment	Date	Description
1	April 2018	New policy
2	May 2019	Review and update

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 Swanbourne House 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.

This Policy 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.

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 and via the media consent form attached to the school's terms and conditions. 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.

Any parent who wishes to limit the use of images of a pupil for whom they are responsible should contact the Head in writing. The School will always respect the wishes of parents/carers (and indeed pupils themselves) where reasonably possible, and in accordance with this policy.

From the age of 13 onwards, parents should be aware that the law recognises pupils' own rights to decide how their personal information – including images – is used.

2. **Use of Pupil Images in School Publications.**

a. 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 the school intranet and by post;
- on the school's website and, where appropriate, via the school's social media channels, e.g. Twitter, Instagram and Facebook. Such images would not normally be accompanied by the pupil's full name without permission;
- in the school's prospectus, and in online, press and other external advertisements for the school. Such external advertising would not normally include pupil's names.

b. The source of these images is predominantly the school's professional photographer 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.**
 - a. All pupils are photographed on entering the school and, thereafter, at intervals, for the purposes of internal identification. These photographs identify the pupil by name, year group, house and form/tutor group.
 - b. 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**
 - a. Where practicably possible, the school will always 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.
 - b. 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 either parent or pupil has consented as appropriate.
5. **Security of Pupil Images.**
 - a. 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.
 - b. 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.
 - c. 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.
6. **Use of Cameras and Filming Equipment (including mobile phones) by Parents.**
 - a. 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

- 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
- 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

b. **Parents are reminded that such images are for personal use only.** Images which may identify other pupils should not be made accessible to others via the internet (for example on Facebook), or published in any other way. *A reminder will be made on every school concert, play or event programme stating: "Safeguarding note: All at Swanbourne House School take their duty of care towards children very seriously. We would ask that any photos or videos which parents, guardians or friends may make are taken on the clear understanding that they are for personal use only. Under no circumstances should images of children other than your own be shared on any social media platform."*

c. 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.

d. 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.

e. 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.

f. 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 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.**

a. 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. *If they are using recording equipment of any kind, they will do so under close supervision (pupils are not allowed mobile phones in the course of normal school activities in any case).*

b. The use of cameras or filming equipment (including on mobile phones) 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.

c. The misuse of cameras or filming equipment in a way that breaches this Policy, or the school's Anti-Bullying Policy, Data Protection Policy for Pupils, Parents and Carers or IT

Acceptable Use Policy for Pupils is always taken seriously, and may be the subject of disciplinary procedures or dealt with under the relevant safeguarding policy as appropriate.