Taking, Storing and Using Images of Children Policy

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1. This Policy

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 Tower House School ("the school"). It also covers the school's approach to the use of cameras, video and filming equipment at school events and on school premises by parents and pupils themselves, and the media.

It applies alongside any individual parent or pupil consent forms provided, and in addition to the school's terms and conditions, where this includes terms around image use and marketing 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 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, including under the Staff Handbook.

2. General points to be aware of

Certain uses of images, including pupil images, are necessary for the ordinary running of the school. 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 objections 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 agree to the school using images of him as set out in this policy, by signing the form attached to the school's terms and conditions and/or from time to time if a particular use of the pupil's image is requested. However, parents should be aware that certain uses of their child's images may continue to be necessary or will be unavoidable (for example if they are included incidentally in CCTV or as part of a whole school photograph).

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. For any uses of images which might be considered more intrusive or unexpected, we will seek specific consent from parents and, as appropriate, pupils.

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.

Parents should be aware that, from around 12/secondary school age, the law recognises pupils' own rights to decide how their personal information is used – including images.

3. Use and Publication of Certain Pupil Images

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 and notice boards within the school premises;
- as part of the school's email system and intranet, and in appropriate communications by whatever means with the school community (parents, pupils, staff, Governors and alumni)
- in printed material, such as school magazines and printed marketing material, including the school's prospectus
- on the school's and FOTH's website and, where appropriate, and in line with relevant policies via the school's social media channels, e.g. X (formerly Twitter), Instagram and Facebook including in the form of live streamed video of school events
- use by The Old Vicarage School on their website, social media channels, and marketing materials.
- Exceptionally, in the press and other external advertisements for the school.

The school's policy 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 intranet [or in other closed community groups], in printed material such as a school magazine or prospectus, or any uses whereby an individual child cannot reasonably be identified by someone outside the school community.

• 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 unexpected – for example, if a child is the focus of the image– the school will discuss the use with the pupil or 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.

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.

4. Use of Pupil Images for Identification and Security

All pupils are photographed on entering the school and, thereafter, at three-yearly intervals, 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 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 and the location of cameras will be clearly notified, including by signage. Please see our separate CCTV policy.

5. Use of Pupil Images by External Media

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.

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.

6. 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, 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.

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

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. Images of pupils in a safeguarding context are dealt with under the school's relevant safeguarding policies and the law.

The school is careful in our use of images and digital media but there is always a risk that content shared online may be copied, altered or shared by others outside the school's control. This includes the online misuse and manipulation of digital content for potentially unlawful purposes. The school has robust procedures in place to mitigate the risk of this happening but it cannot be completely eliminated.

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.

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

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 identify other pupils should not be made accessible to others online (for example on Facebook, Instagram, or by text or WhatsApp), or published in any other way.
- Surreptitious filming using personal devices of any sort is never permissible.

- 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, 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 plays and concerts professionally (or engages a professional photographer or film company to do so), in which case physical 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.

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.

By Staff

Staff are not permitted under any circumstances to use their personal devices when taking images, videos or other recording of any pupil nor to have any images, videos or other recording of any pupil on their personal devices. Please read this in conjunction with the Safeguarding Policy, Acceptable Use, Online, Staff Code of Conduct and School Trips Policies. Staff who wish to use their personal mobile devices or cameras in school must read and abide by the School's Bring Your Own Device Policy. Staff who act in breach of this may be subject to disciplinary action.

It is good practice at times to record photographic and video images of pupils, or to allow pupils to record images of each other to assist teaching and learning, or to celebrate achievement. There is, however, potential for images of children to be misused, in extreme cases for pornographic or grooming purposes.

All staff therefore adhere to the following code:

- School tablets using 2 Simple software and the school's own mobile devices are the agreed media for staff to take photographs of pupils. All these devices are securely locked via password protection
- only record images when there is a justifiable need
- ensure that pupils understand the reason for the recording of the images and how the images will be used and stored
- ensure that all images recorded are available for scrutiny
- avoid taking images where an individual child is the focus of the photograph
- only trained members of staff are permitted to make images of pupils available online with parental consent
- avoid making recordings in one-to-one situations
- on admission to the School, parents give consent that images and recordings of their children can be used for legitimate reasons
- if a photograph is used, the pupils should not be named without direct parental consent
- where the School has decided that images should be retained for future use, they should be stored and used only by those authorised to do so, and
- Images are transferred to a secure database on the school (internal) drive.

8. 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 or other forms of smart/wearable technology) 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 cameras or filming equipment in a way that breaches this Policy, or the school's Anti-Bullying Policy, Privacy Notice for Pupils, Parents and Carers, IT Acceptable Use Policy for Pupils, or the Behaviour Policy is always taken seriously and may be the subject of disciplinary procedures or dealt with under the relevant safeguarding policy as appropriate.

9. Awareness of other schools' policies and procedures

We are not responsible for other schools' use of images policies – e.g. at sporting fixtures. Wherever practical, however, steps are taken with visiting schools and at away fixtures / events to check any arrangements they have regarding pupil images and video streaming and that any policies in this area are broadly aligned with our own and/or are notified to participating parents and pupils as applicable.

10. Use of Images Consent Form

The consent form is shared with parents as part of the admissions process when their son joins the school. For parents that wish to update their consent regarding 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.

Tower House School is committed to safeguarding the welfare of children and expects all staff and volunteers to share this commitment.

Substantive change:

November 2020: Consent also covers FOTH Website

September 2021: Use of Cameras and Filming Equipment (including mobile phones) for Staff (newly added)

May 2024:

Filtering and monitoring information updated.

Use of personal mobile phones to take photos, videos etc is forbidden. Only the school's devices should be used.

February 2025: change to images consent form, now on MS Forms

September 2026: Awareness of other school policies added, reference to use of images consent form added, reference to wearable technology added.