



St Hilda's School  
HARPENDEN  
*Caring, Curious & Confident*

## Taking, Storing and Using Images of Children Policy

### Important Note

Unless otherwise stated, all Policies of St Hilda's School apply to the School in its entirety. This comprises all staff and pupils in the Early Years Foundation Stage (EYFS), the Junior School (Key Stage 1) and the Senior School (Key Stage 2).

**REVIEW DATE:** November 2019

**REVIEWED BY:** Dan Sayers (Headmaster)

**SIGNED:** 

**DATED:** 11.11.19

### INTRODUCTION

As individuals we want to know that personal information and images about ourselves is handled properly. We and others have specific rights in this regard. In the course of its activities St Hilda's School collects, stores and processes personal data. The School recognises that the correct and lawful treatment of this data will maintain confidence in its organisation and is of importance to its successful operation.

The types of personal data that the School may be required to handle includes information about current, past and prospective employees, parents, pupils and others with whom it communicates. The personal data, which may be held on paper or on a computer or other media, is subject to certain legal safeguards specified in the General Data Protection Regulations ("the GDPR") and other regulations. GDPR imposes restrictions on how the School may process personal data. The School recognises that a breach of the GDPR could give rise to criminal sanctions as well as bad publicity.

### WHO IS COVERED BY THE POLICY

This policy covers all those registered at the School as pupils, and all individuals employed by the School, irrespective of their status, level or grade. It therefore includes members of the Senior Management Team, Heads of Departments, teaching staff, non-teaching staff, part-time or fixed-term employees Peripatetic staff and volunteers (collectively referred to as employees in this policy).

## **STATUS OF THE POLICY**

This policy has been approved by the School's Board of Governors. It sets out the School's rules on taking, storing and using images of children. These principles specify the legal conditions that must be satisfied in relation to the obtaining, handling, processing, transportation and storage of images.

The Headmaster is responsible for ensuring compliance with this policy. Any questions or concerns about the interpretation or operation of this policy should be taken up in the first instance with the Headmaster.

This policy is not part of the contract of employment of any employee and the School may amend it at any time. However, it is a condition of employment that employees and others who obtain, handle, process, transport and store personal data will adhere to the rules of the policy. Any breach of the policy will be taken seriously and may result in disciplinary action.

## **PURPOSE OF 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 St Hilda's 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.

It applies in addition to the School's terms and conditions / parent contract, 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. Images of pupils in a safeguarding context are dealt with under the School's relevant safeguarding policies.

## **IMAGES OF CHILDREN**

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.

## **PARENTAL CONSENT**

Parents who accept a place for their child at the School are invited to indicate whether they agree to the School using images of her as set out in this policy, by signing a copy of the consent form sent out via the office and/or 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).

Parental consent requests will be reissued annually.

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.

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

Parents should be aware that, from around the age of 12 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;
- 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; and
- 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 and in some circumstances the School will seek the parent'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, or occasionally pupils. Images will be stored securely and centrally.

The School will, wherever possible, use images that do not include a pupil's full face. Partial face shots or blurred distance images will be used when appropriate. Images of pupils will be in full uniform wherever possible. Images of pupils in shorts/skorts will not be used where possible. If images of pupils in shorts/skorts are taken (for example as part of a wider group shot), consideration to "positioning" will be given.

Images of pupils used by the School for social media, and with parental consent, will be removed after one year. Individual images of former pupils will be removed as soon as the pupil leaves the School, however group photos containing pupils who leave "in year" may on occasion remain until the end of the following Summer Term.

Images on School social media will, wherever possible, be protected and unavailable for copy or downloading.

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

All pupils are photographed on entering the School and, thereafter, annually, 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, 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 IN THE 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 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 been informed about the media's visit and the parent has consented as appropriate.

## **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. Staff are issued with a written checklist that is to be considered when taking images of pupils.

## **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:

- 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), 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 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 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 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) 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 other policies, such as Anti-Bullying Policy, Privacy Policy, eSafety Policy, IT Acceptable Use Policy for Pupils, 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.

#### **COMPLAINTS AND QUERIES**

Any complaints or queries in relation to the content or operation of this policy should be taken up in the first instance with the Headmaster.

**This policy will be reviewed annually, by the Senior Management Team, in line with the School's review schedule for policies.**