

PORT·REGIS

TAKING, STORING AND USING IMAGES OF CHILDREN POLICY

POLICY NAME	Taking, Storing and Using Images of Children Policy	POLICY OWNER	C Gates – Director of Communication and Development G White – Data Protection Lead
APPROVED BY	F Loveridge (Governor)	DATE APPROVED	November 2022
DATE OF LAST REVIEW	November 2022	DATE OF NEXT REVIEW	March 2025

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 Port Regis ("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 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 (for Pupils, Parents & Third Parties). Images of pupils in a safeguarding context are dealt with under the school's relevant safeguarding policies (Child Protection & Safeguarding Policy, Staff Code of Conduct and Mobile Phone, Mobile Device & Social Media Policy).

2. General points to be aware of

- 2.1. 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.
- 2.2. Parents who accept a place for their child at the school are invited to indicate if they do not agree to the school using images of him/her for social media and/or advertising and/or from time to time to agree 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).
- 2.3. We hope parents will feel able to support the school in using pupil images to celebrate the achievements of pupils - academic, sporting and co-curricular; to promote the work of the school; voice recognition and similar communication aid software/learning support tools for children with special educational needs; and for important administrative purposes such as identification and security.

- 2.4. Any parent who wishes to limit the use of images of a pupil for whom they are responsible should contact the Marketing Team (marketing@portregis.com or 01747 857 800). The school will respect the wishes of parents/carers (and indeed pupils themselves) wherever reasonably possible, and in accordance with this policy.
- 2.5. 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.

3. Use of pupil images in school publications

- 3.1. The school will use images of its pupils to keep parents updated on the activities of the school. Content is shared with parents directly and via our newsletter 'The Gateway' and the school Flickr account.
- 3.2. Unless the relevant pupil or his or her parent has requested otherwise, the school will use images of its pupils:
 - 3.2.1. 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 be accompanied by the pupil's full name); and
 - 3.2.2. in the school's prospectus, and in online, press and other external advertisements for the school. Such external advertising would not normally include pupils' 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.
- 3.3. 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. The school will only use images of pupils in suitable dress and the images will be stored securely and only accessible by a limited number of staff.

4. Use of pupil images for identification and security

- 4.1. All pupils are photographed on entering the school and, thereafter, at intervals, for the purposes of internal identification and pupil records.
- 4.2. 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 CCTV Policy, which is available on the school's website or from the Bursary (DPL@portregis.com).

5. Security of pupil images

- 5.1. 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.
- 5.2. 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.
- 5.3. All staff are given guidance on this policy, 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.

6. Use of cameras and filming equipment (including mobile phones) by parents

- 6.1. 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:
 - 6.1.1. 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.
 - 6.1.2. 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.
 - 6.1.3. 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 or social media (for example on Facebook), or published in any other way.
 - 6.1.4. Copyright issues may prevent the school from permitting the filming or recording of some plays and concerts. The school will print a reminder in the programme of events where issues of copyright apply where possible.
 - 6.1.5. Parents may not film or take photographs in changing rooms, during costume changes for school productions, or in any other circumstances in which photography or filming may embarrass or upset pupils.
- 6.2. 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. Use of cameras and filming equipment by the school

- 7.1. The school sometimes records plays, concerts, sporting events and other aspects of school life (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. The school will share these recordings with parents in accordance with the principles outlined in paragraph 3.1. Unless the relevant pupil or his or her parent has requested otherwise, these recordings, or extracts from them, may also be used for marketing and promotional purposes as outlined in paragraph 3.2.

8. Use of cameras and filming equipment by pupils

- 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 staff.
- 8.2. Pupils must not use cameras or filming equipment (including on mobile phones or devices) in a manner that may offend or cause upset to other pupils.
- 8.3. The misuse of images, cameras or filming equipment in a way that breaches this policy, the School Rules, the Pupils' Safe and Acceptable ICT Usage Policy, the Pupil Mobile Phone Agreement, or the school's Bullying and Behaviour Policies, will be taken seriously and result in appropriate measures/sanctions.