

## Taking, Storing and Using Images of Children Policy

### 1. Introduction

- 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 Radnor House Sevenoaks ("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 & 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 in the school Safeguarding Policy and E-Safety Policy, which can be seen on the school website.

### 2. General points to be aware of

- 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.
- Parents who accept a place for their child at the school are invited to indicate agreement to the school using images of him/her as set out in this policy, by returning the Parental Consent Form (Use of Images) which is included in the Welcome Pack. From time to time, further consent may be sought, if a particular use of the pupil's image is requested. Parents should, however, be aware of the fact that certain uses of their child's images may be necessary for administrative purposes, or unavoidable (for example if they are included incidentally in CCTV or a group 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.
- Any parent who wishes to limit the use of images of a pupil for whom they are responsible should contact the school's Marketing Manager, or withhold their consent when they return the Parental Consent Form (Use of Images) to the school. The school will respect the wishes of parents (and indeed pupils themselves) wherever reasonably possible, and in accordance with this policy.
- Parents should be aware that, from around the age of 13 and upwards, when a pupil may have sufficient maturity and understanding, the law recognises pupils' own rights to have a say in how their personal information is used – including images. Where appropriate (owing to the pupil's age or nature of the use of the image) the school may also seek the verbal or written consent of a particular pupil before publishing any image where that pupil is a particular focus of the shot, or identified by name, but not usually when included as part of a larger group or team shot.

### **3. 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, and directors) 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 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).
- 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.

### **4. 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. They are not used for marketing purposes.
- CCTV is in use on school premises, to assist in the prevention and detection of crime, and to protect school premises and property therein. It will sometimes capture images of pupils. Images captured on the school's CCTV system are used in accordance with the Data Protection Policy, Appendix: Use of CCTV.

### **5. Use of Pupil Images by the Press**

- Where practicably possible, the school will always notify parents in advance when the press, or representatives from other media channels, are expected to attend an event or school activity in which school pupils are participating. The school will make every reasonable effort to ensure that any pupil whose parent has refused permission for images of that pupil or themselves to be made, are not photographed or filmed nor such images provided for media purposes.
- On Prize Days and Examination Results Days, the press may ask for the names of the relevant pupils to go alongside the images. The school will only provide first names, and these will be provided only after either parent or pupil has consented (as appropriate).

### **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 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.

## **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:
  - 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.

## **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) 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 Safeguarding Policy, Anti-Bullying Policy, Data Protection Policy, E-Safety Policy, IT Acceptable Use Policy, or the Radnor House Sevenoaks School Rules is always taken seriously, and may be the subject of disciplinary procedures or dealt with under the relevant safeguarding policy as appropriate.

## 9. Mobile Technology and Cameras in the Early Years Setting (EYFS)

- All staff, volunteers and visitors working with children at the Prep which includes the EYFS are provided with a secure locker to store their personal mobile devices whilst in the building. EYFS staff must ensure their mobile phones and/or other personal devices are safely stored.
- All individuals who bring mobile phones or other personal devices into the school including the EYFS must ensure that they hold no inappropriate or illegal content.
- No one is allowed to use their personal mobile device except in areas where the children are not present: use of mobile phones and personal devices must be restricted to staff breaks unless agreed by the DSL. All staff must ensure, when using a mobile phone or other personal device, that no children are present in the room or outside whilst the phone or personal device is being used.
- Staff must not use their own personal mobile phones for contacting parents or carers. All phone calls/text messages /parent mails must go via the Prep School Office.
- Photographs are only taken with school cameras and equipment and not with private cameras or devices.
- The camera/video recording or audio recording functions on non-school mobile phones are prohibited.
- All mobile phones or other personal devices must be open to scrutiny, should this be deemed necessary. The DSL or Head may withdraw or restrict authorisation for use if at any time it is deemed desirable to do so. messages /parent mails must go via the Prep School Office.
- Parents or other visitors to the school may not take photographs of children in any part of the school building or grounds school using personal cameras or mobile phones except when specific written permission is given for example for school productions and sports days. Photographs taken on these occasions must not be shared or posted on the internet e.g. on social networking sites etc.
- Members of staff, parent helpers in school, or parents or other members of the family assisting on outings or visits must not use their personal cameras or mobile phones to take photographs and must only use their mobiles on a school visit in an emergency.
- A walkie-talkie should be taken by one member of staff, for emergency use, when walking with the children in the school grounds. Should a child in the EYFS have a medical need which may possibly require immediate assistance then their 'key person' may carry a mobile phone with them, with the written authorisation of the DSL.