



Taking, Storing and Using Images of Pupils Policy

This policy should be read in conjunction with:

- Safeguarding Policy
- Behaviour Policy
- ICT Acceptable Use Policy

HawleyHurst "the School" is obliged to comply with the General Data Protection Regulation (GDPR) and the Data Protection Act 2018 when it takes, stores or publishes images of its pupils. The school will always try to act in the best interest of the pupils and, as far as it legally can, it will take parental preferences into account.

Aim

This Policy is intended to provide information to pupils and their parents, carers or guardians (referred to in this policy as "parents") about how HawleyHurst normally uses images of pupils. 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 Parental Contract, the Privacy Policy 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 the use of pupils' personal data, e.g. the School's Privacy Policy. Images of pupils in a safeguarding context are dealt with under the School's relevant safeguarding policies.

General points

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 make decisions about how to use them, subject to any reasonable objections raised.

Parents who accept a place for their child or attend an event at the School are invited to indicate agreement to the School using images of him/her as set out in this policy, and 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.

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.

You may withdraw consent at any time in the future however it may not be possible to change printed publications, such as the School prospectus, or third-party publications (for example where we have placed an advert or provided an image to a newspaper). This too applies when a child leaves the school.

Any parent who wishes to withdraw consent should contact the School Office in writing. The School will respect the wishes of parents (and indeed pupils themselves) wherever reasonably possible, and in accordance with this policy. If no preferences are expressed, then we will act in accordance with the principles expressed in this policy.

The Data Protection Act gives children rights over their own data when they are considered to have adequate capacity to understand. Most children will reach this level of understanding at around age 12. For this reason, for most pupils in our Senior School, it will normally be up to the individual child to decide whether or not to be photographed/filmed. Where the school considers that the child does not have the capacity to make such a decision the school will act as it considers to be in the best interests of the child and in doing so will take account of any stated parental preference.



Use of Pupil Images in School Publications

In giving consent for the School to use images of pupils they will be used 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 notice boards within the school premises;
- in communications with the school community (parents, pupils and staff) including in the HawleyHurst newsletter, by email and by post;
- on the School's website and, where appropriate, via the School's social media sites, e.g. Twitter, Instagram and Facebook. The pupil's full name would not normally accompany such images without permission;
- in the School's prospectus, and in online, press and other external advertisements for the School including digital, print and outdoor advertising. Such external advertising would not normally include pupil's names. 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, a press photographer, or occasionally pupils. The School will only use images of pupils in suitable dress, and the images will be stored securely and centrally.

Use of Pupil Images for Identification and Security

All pupils are photographed on entering the School and, thereafter, at various intervals, for 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.

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. The School 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 either parent or pupil 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.



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 Anti-Bullying Policy, Behaviour 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.

This policy is due to be reviews in May 2019.