



## TAKING, STORING AND USING IMAGES OF PUPILS POLICY

This policy is intended to provide information to pupils and their parents or guardians about how images (including still photographs and video footage) of pupils are normally used by Queen Mary's School in accordance with the Keeping Children Safe in Education (KCSiE) DfE 2020, the Information Commissioner's Office recommendations, data protection law and the school's safeguarding procedures. It also covers the school's approach to the use of cameras and filming equipment at school events and on school premises by professional photographers, parents and pupils themselves, and the media.

We hope parents and pupils will feel able to support the school in using pupil images to celebrate achievement, promote the work of the school and for important administrative purposes such as identification and security.

The school has developed this guidance for the following reasons:

- To ensure that photographs are only used for the purpose intended
- To ensure that the appropriate school use of photographs is facilitated
- To ensure that individual rights and child protection are respected
- To ensure that parents and pupils are given the opportunity to opt out (unless in circumstances where the school is required to process personal data to fulfil the contract)
- To ensure that the inappropriate use, adaptation or copying of images is prevented

This policy covers:

- Images taken by staff for school use
- Images taken by professional photographers with the school's authorisation
- Images taken by parents and pupils

The purposes for which the school takes, stores, shares and uses the personal data of pupils (including images of pupils) are set out in the school's Privacy Policy.

### Use of Pupil Images for Identification and Security

In order for Queen Mary's School to care for and ensure the safety of pupils, the school has a legitimate interest to process pupil images for identification and security:

All pupils are photographed on entering the school and, thereafter, at yearly intervals, for the purposes of internal identification. These photographs are stored securely. Within the school's system (iSAMS) the photograph identifies the pupil by name, year group, house and form/tutor group. Photographs of pupils may also be used in areas of the school including the staff room to

highlight pupils with health concerns. A sign including photographs of pupils who may not wish to be photographed for marketing purposes is placed in the staffroom, a room only accessed by staff.

CCTV is in use on school premises for the safety and security of pupils, staff and visitors, and will sometimes capture images of pupils. Images captured on the school's CCTV system are used in accordance with data protection law, the school's Privacy Notice, and any other information or policies concerning CCTV which may be published by the school from time to time.

### **Use of Pupil Images for Teaching and Learning**

There are various occasions where images of pupils can be taken as a form of teaching and learning and assessment. It is within the school's legitimate interest to conduct online learning (eg through Google Suite for Education) and collect and store images securely where necessary. Only authorised people and authorities will have access.

### **Authorisation and Consent**

Upon joining the school pupils (Years 8-11) and all parents are asked to give permission for the use of images to celebrate achievement of pupils and promote the work of the school both within school and externally (for example in the media). A note of whether this permission has been granted is kept on the pupil's individual record on the school's MIS system (iSAMS).

Children are usually considered mature enough to exercise their own data protection rights when they are aged 13 years or older (further details are available within the school's Privacy Policy). Whether consent should be obtained from the parents, the pupil or both will depend on the age of the pupil. The School's policy is that when consent is required it should be obtained as follows:

- Where the pupil is in Year 7 or below, consent is sought from a parent, guardian or carer
- Where the pupil is in Year 8, 9, 10 or 11 then consent is sought from both the pupil and her parent, guardian or carer.

Consent is freely given by completing the Taking, Storing and Using Images of Pupils' Consent Form. The Consent Form will be then be valid unless the pupil's circumstances change in any way. If any parent or pupil withdraws or changes their consent, or the Designated Safeguarding Lead reports any changes to a pupil's security risk, or there are any other changes to consent, the information will be updated and staff will be informed by email.

Current parents, and pupils who are sufficiently mature, are offered the chance to update consent preferences each year. Any pupil (Year 8-11) or parent who wishes to limit the use of images for a pupil for whom they are responsible at any other time should contact the Office Administrator, in writing. Where consent is withdrawn, it will not always be possible or reasonable for the school to recall or delete copies of images which have already been published online, in the media or used in promotional material. However, the School will make every reasonable effort to delete any published images.

Once consent has been given the school will use images of these pupils to keep the school community updated regarding 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 alumnae) including by email, on the school systems and by post.
- On the school's website and, where appropriate, via the school's social media channels, eg Twitter, Facebook Instagram and YouTube. Images on social media channels would not normally be accompanied by the pupil's full name unless specific permission is granted following safeguarding procedures regarding online safety.
- In the school's prospectus, and in press, online and other marketing materials and external advertisements for the school.

### Recording of Events

The school records and live streams plays, concerts and other school activities (or engages a professional photographer or film company to do so). Videos can be published on the school's website and social media channels subject to any copyright issues.

- If all pupils taking part have given consent, the video may be uploaded to social media as a public video.
- If the video includes use of full names of pupils, the school will use an unlisted temporary link or secure login to allow the school community to view the video. These videos will include the statement 'For internal purposes only. Copyright of Queen Mary's School'.
- If a pupil involved in the event has not given consent, the Office will speak with the family to organise whether an unlisted temporary link, blurred image, secure login can be organised to allow the school community to view the video. These videos will include the statement 'For internal purposes only. Copyright of Queen Mary's School'. Extracts of the video not including this pupil may be published publicly.

### Taking of Pupil Images

The source of images is predominantly the school's professional photo shoots for marketing and promotional purposes, or staff/pupils photographs in relation to learning, school events, sports or trips, or local journalists attending an event. The school uses only reputable professional photographers and makes every effort to ensure that any images of pupils are held securely, responsibly and in accordance with the school's instructions.

If the school hires a photographer for an event or photo shoot, the school will seek to keep children and young people safe by:

- providing the photographer with a clear brief about appropriate content and behaviour
- ensuring the photographer wears identification and is supervised at all times
- informing children, their parents and carers that a photographer will be in school
- not allowing the photographer to have unsupervised access to children
- not allowing the photographer to carry out sessions outside the event or at a child's home
- reporting concerns regarding inappropriate or intrusive photography following safeguarding procedures.

If a member of staff or pupil takes images for promotional purposes, the following must be considered:

- the purpose of the activity should be clear as should what will happen to the photographs or videos.
- images should not be taken during one-to-one situations unless in a public place
- the photographer must ensure that the pupil is appropriately dressed
- the photographer must ensure that the pupil understands why the images are being taken and has agreed to the activity
- equipment must be provided or authorised by the School, no personal devices to be used unless the Head gives specific permission and data is deleted as soon as possible.
- images must not be taken secretly.

If a local journalist or photographer requests to attend an event the following must be considered:

- Queen Mary's School will log the name and company address of the person using the camera and the reason for taking the images and/or what the images will be used for
- where practically possible, the school will 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 pupils whose parents or guardians have refused permission for images of that pupil to be made in these circumstances are not photographed or filmed by the media.
- at the event we will inform children, parents and carers that an external photographer is present and ensure they are easily identifiable and supervised
- the media normally asks for the names of the relevant pupils to go alongside the images, and these will be provided if parents have given permission.
- if Queen Mary's is concerned that someone unknown to us is taking photographs or filming, we will ask them to leave and (depending on the nature of the concerns) follow our safeguarding procedures.
- Queen Mary's School can complain to the Press Complaints Council (PCC) if the media fails to follow the appropriate code of practice for the protection of young people, including the children of celebrities.

### **Security and Storage of Pupil Images**

The school takes appropriate technical and organisational security measures to ensure that images of pupils held by the school are kept securely on the school's servers, and protected from loss or misuse. The school will take reasonable steps to ensure that members of staff and any third party suppliers, acting on behalf of Queen Mary's School, only have access to images of pupils where it is necessary for them to do so and members of staff must not use personal devices.

All staff are given guidance on this policy through the Staff Code of Conduct, and on the importance of ensuring that images of pupils are taken, stored and used responsibly, only for school purposes, and in accordance with the school's policies and the law.

### **Use of Cameras and Filming Equipment (including mobile phones) by Parents**

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 cameras and filming devices with consideration and courtesy for cast members or performers on stage and the comfort of others. In particular, 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 via the internet (for example on social media), 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. Following the school's safeguarding procedures, 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 felt to be taking inappropriate images.

### **Use of Cameras and Filming Equipment by Pupils**

All pupils are taught online safety within the curriculum, in line with the Online Safety Policy (7h), and 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 cameras or filming equipment in a way that breaches this Policy, or any other related school policies, is always taken seriously, and may be subject to sanctions detailed in the Behaviour Management Policy (9a).

Related Policies:

Data Protection Policy

Privacy Policy

Safeguarding Policy

Online Safety Policy

Behaviour Management Policy

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## CONSENT FOR TAKING, STORING AND USING IMAGES OF PUPILS FORM

For pupils in Year 7 or below, a parent, guardian or carer should complete this form.

For pupils in Years 8 – 11 consent is sought from both the pupil and their parent, guardian or carer.

We hope parents and pupils will feel able to support the school in using pupil images to celebrate achievement, promote the work of the school and for important administrative purposes such as identification and security.

**Name of Pupil (block capitals):**

**Year Group:**

We\* have read the school's Taking, Storing and Using Images of Pupils' Policy, and agree to the images (still photographs and video footage) of the named pupil to appear on:

Consent Type	Please Circle Yes or No
Internal displays	Yes / No
In communications with the school community	Yes / No
On the school's website and, where appropriate, via the school's social media channels	Yes / No
In the school's prospectus, and within online, press and other external advertisements for the school.	Yes / No
The use of my child's full name accompanying an image (Images on social media channels would not normally be accompanied by the pupil's full name unless specific permission is granted)	Yes / No

We\* understand that if we wish to limit the use of those images we can contact Queen Mary's Office Administrator, in writing, as set out in the Policy. We also agree to follow the guidelines set out within the 'Use of Cameras and Filming Equipment (including mobile phones) by Parents and Pupils' sections of the Policy; and will ensure that anyone attending on our behalf, or in our company, does the same.

We understand that, where consent is given, images may be used for the purposes indicated above both during and after the named pupil's time at the school. Changes to this policy will be published on the website. Where consent is withdrawn, we understand that it will not always be possible or reasonable for the school to recall or delete copies of images which have already been published online, in the media or used in promotional material.

### Parent, Guardian or Carer

Signature:

Print Name:

Date:

### Pupils in Years 8, 9, 10, 11

Pupil Signature:

Print Pupil Name:

Date: