

Taking, storing and using images of students policy

Action	Policy to be reviewed annually		
	Owner	Date	Completed
Review	Bursar	October	✓
Approved	Senior Management Team	15 November 2022	✓

To be published on the following:	
Website	✓
Staff Portal	✓
Student Portal	✓



Taking, storing and using images of students policy

Who this policy applies to

This policy applies to all members of the school's community, including students, parents, employees, temporary staff, contractors, agency workers, visiting music teachers and other peripatetic workers, volunteers, governors and all other people when working in or for the school. It applies whenever staff or volunteers are working with students, even where this is away from the school, e.g., on a school trip.

What this policy is for

This policy aims to:

- Provide information to students, to parents, carers or guardians (referred to in this policy as parents), and to guests of parents e.g., grandparents and family friends, (all referred to in this policy as parents) about how images of students are normally used by St Paul's Girls' School ('the school').
- Set out the school's approach to the use of cameras and filming equipment at school events and on school premises by parents, students, and the media.

Legal framework

- The UK General Data Protection Regulation (from 1 January 2021)
- The Data Protection Act 2018 and related legislation (from 25 May 2018 and as amended on 1 January 2021)
- The Protection of Freedoms Act 2012 (biometrics and CCTV)

Other relevant school policies

- Terms and Conditions of the Parent Contract;
- Privacy notices.
- Use of CCTV Policy
- Acceptable Use policies
- Document Retention and Disposal Policy

Guidance for staff on the taking and use of photographs and images is set out in the Staff Code of Conduct and the Staff Acceptable Use Policy..

Content of policy

1. General points to be aware of.
2. Use of student images in school publications.
3. Use of student images by partnership schools.
4. Use of student images by SPGS International Schools.
5. Use of student images for identification and security.
6. Use of student images in the media/publicity.
7. Use of student images in lessons.
8. Use of student images in examinations.
9. Security of student images.
10. Use of cameras and filming equipment (including mobile phones) by Parents.
11. Use of cameras and filming equipment by students.
12. Taking photographs and recordings of students from other schools.
13. Social media.
14. Monitoring.

1. General points to be aware of

- 1.1. 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 students or parents. The school is entitled lawfully to process such images and take decisions about how to use them, subject to any reasonable objections raised.
- 1.2. Please see the Privacy Notice and the Summary Privacy Notice for Students for more information about how the school uses photographs and videos of students. The school may seek specific consent from parents before using a photograph or video recording of the student where the school considers that the use is more privacy intrusive. Where the student is judged to be of sufficient maturity, we may seek the student's specific prior consent in addition to or instead of the parents' consent.
- 1.3. Parents who accept a place for their child at the school are asked to indicate their agreement to the school using images of them as set out in this policy via the Acceptance Form attached to the Parent Contract or from time to time if a particular use of the student's image is requested. CCTV is in use on the school premises and will sometimes capture images of students and parents. Images captured on CCTV systems are used in accordance with the Privacy Notice and CCTV Policy.
- 1.4. Any parent who wishes to limit the use of images of a student for whom they are responsible should complete the form on the Parent Portal.

2. Use of student images in school publications

- 2.1. Unless the relevant student or their parent has requested otherwise, the school will use images of its students to keep the school community updated on the activities of the school, and for marketing and promotional purposes, including:
 - use in the school's promotional material such as admissions publications, the website or social media;
 - use in the school's news and events publications (hard copy and electronic);
 - educational purposes as part of the curriculum or extra-curricular activities.

3. Use of student images by partnership schools

- 3.1. If the school wishes to share images of its students that it has taken during community activities with its partnership schools for use on their website, publications and social media platforms, it will seek consent from parents and/or students as appropriate. In addition, parents can indicate their agreement to the school's use of their child's images in this way on the Parent Portal.

4. Use of student images by SPGS International Schools

- 4.1. If the school wishes to share images of its students that it has taken of them undertaking school activities with its international school(s) for use on their website, publications and social media platforms, it will seek consent from parents

and/or students as appropriate. In addition, parents can indicate their agreement to the school's use of their child's images in this way on the Parent Portal.

5. Use of student images for identification and security

- 5.1 All students are photographed on entering the school and, thereafter at intervals, for the purposes of internal identification. These photographs identify the student by name, year group and tutor group.

6. Use of student images in the media/publicity

- 6.1 When media/publicity is expected at an event (including those organised by third parties) or school activities, the school will make every reasonable effort to ensure that any student who has or whose parent has refused permission for images of that student to be made in these circumstances, is not photographed or filmed by the media. However, if parents have notified the school that they do not want their child's image to be taken in a photograph or a video, they are also requested to discuss this with their child so that their child knows to remove themselves from a situation where a photograph or video is being taken.

- 6.2 The school will only use a student's first name and year group in publications (or first name and first initial of surname if more than one student with the same first name in that year group). If a full name becomes necessary to go alongside an image, this will only be provided where the parent or student has consented as appropriate. Full names of students may be printed in school publications if not associated to an image of that student.

7. Use of student images in lessons

- 7.1 Photographs and videos may be taken during lessons to support learning, and these may include images of students. These images will be stored on school systems and will remain within the school environment.
- 7.2 In the event that remote learning is required, the school may use interactive platforms such as Zoom. This may include video and audio of the teacher and, in some instances, of the students taking part in the session. Some of these sessions may be recorded. All 1:1 sessions will be recorded for safeguarding purposes and some lessons/sessions may be recorded at the discretion of the teacher to be used as a learning tool. Students should not turn off the camera on their device unless they have a legitimate reason for doing so that they have already discussed with their tutor.

8 Use of student images in examinations

- 8.1 For certain non-examination assessments, in subjects such as drama or PE, images or videos of candidates may be used as evidence of participation or contribution.

9. Security of student images

- 9.1 Professional photographers, film companies 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 reasonable effort to ensure

that any images of students are held by them securely, responsibly and in accordance with the school's instructions and Data Protection legislation,

- 9.2 The school takes appropriate technical and organisational security measures to ensure that images of students 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 students held by the school where it is necessary for them to do so.
- 9.3 All staff are given guidance on this policy, and on the importance of ensuring that images of students are made and used responsibly, only for school purposes, and in accordance with school policies and the law.

10. Use of cameras and filming equipment (including mobile phones) by Parents

- 10.1 Parents are asked to be mindful of the spirit of this policy when taking group photos and are reminded that such images are for personal use only. Only photos containing images of your own child/children may be shared on social media.
- 10.2 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.
- 10.3 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.
- 10.4 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.
- 10.5 The school sometimes records plays and concerts professionally (or engages a professional photographer or film company to do so).

11. Use of cameras and filming equipment by students

- 11.1 All students are encouraged to look after one another, and to report any concerns about the misuse of technology, or any worrying issues to a member of the pastoral staff.
- 11.2 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 students in a manner that may offend or cause upset.
- 11.3 The misuse of images, cameras or filming equipment in a way that breaches this policy, the school's Anti-Bullying Policy, or the School Acceptable Use policy, is always taken seriously, and may be the subject of disciplinary procedures or dealt with under the relevant safeguarding policy as appropriate.

12. Taking photographs and recordings of students from other schools

- 11.1 There will be situations where students and parents from other schools attend events at the school. The same considerations apply as set out in 9 above.

13. Social Media

- 13.1 The school has a number of official social media accounts, such as Twitter, Facebook and LinkedIn. These are monitored closely by the Communications Team and all members of staff are instructed to seek guidance from the Communications Team before posting images of students.

14. Monitoring

- 14.1 Responsibility for monitoring the Taking, storing and using images of students policy rests with the Bursar. The policy should be reviewed annually.