

Taking, Storing and Using Images of Children Policy



WYCHWOOD
SCHOOL • OXFORD

Date Reviewed	03.25
Reviewed By	JH
Date Of Next Review	03.26
Version	1.1

1. This Policy

- This Policy is intended to provide guidance to staff and 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 Wychwood School ("the school"). It also covers the school's approach to the use of cameras, video and filming equipment at school events and on school premises by parents and pupils themselves, and the media.
- It applies alongside any individual parent or pupil consent forms provided, and includes point 11.2 within the Parent Contract and should be understood in the context of any other information the school may provide from time to time about a particular use of pupil images and more general information about use of pupils' personal data in the school's Privacy Notice.
- Safeguarding and online safety issues are more specifically dealt with under the school's safeguarding policy [here](#).
- Staff are additionally subject to their own training (in accordance with their role) and school policies in this area, including under the Staff Handbook.

2. General Principles of Image Use

- Certain uses of images, including pupil images, are necessary for the ordinary running of the school (for example, for administration, identification, educational and curricular purposes, and security). It may not be possible to object to such uses, although any concerns in this regard will be duly considered by the school.
- Other uses are considered to be 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, although objections may be raised and the school will seek to accommodate any reasonable concerns.
- 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.
- Parents who accept a place for their child at the school are invited to indicate that they agree to the school using images of their child on the permissions form that is completed on entry to the school. Parents confirm if they:
 - Give consent for school photographs that contain my child to be used in promotional material so long as the images do not bear any identification of the individuals portrayed.
 - Give consent for school videos that contain my child to be used in promotional material so long as the videos do not bear any identification of the individuals portrayed.
- If there is an occasion where it is beneficial to both the school and the individual for the child's name to be published (for example a recognition of achievement), parents will be contacted by the school for specific permission to use an identifiable image in a specific situation.

- Parents should be aware that certain uses of their child's images may continue to be necessary (administration, education or security) or will be unavoidable (for example if they are included incidentally in CCTV footage).
- Any parent who wishes to limit the use of images of a pupil for whom they are responsible should contact Mrs Jane Evans, the Head in writing and copy in office@wychwoodschoo.org. The school will respect the wishes of parents/carers (and indeed pupils themselves) wherever reasonably possible, and in accordance with this policy.
- Where permission has been given for use of photographs/videos, the school may continue to use those images after the pupil has left the school unless permission has specifically been withdrawn in writing.
- Parents should be aware that, from around 12 years old (secondary school age), the law recognises pupils' own rights to have a say in how their personal information is used - including images.
- Where remote video provision for pupils (via e.g. Zoom or Teams) is necessary, whether for lessons or e.g. counselling, the school will notify its policies in respect of monitoring, recording and retention of such sessions (along with policies on appropriate dress and supervision).

3. Use and Publication of Certain Pupil Images

- In accordance with any consents, notices or objections as may be applicable from time to time, 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 displays within the school premises e.g. notice boards, displays, prints, canvases
 - as part of the school's email system and intranet, and in appropriate communications with the school community (parents/guardians, pupils, staff, Directors, parents association and alumni) including the weekly newsletter
 - as part of school curricular activities (for example for physical education or drama or as a teaching aid) or as part of official activities using school devices, tablets and applications
 - in printed material, such as the school magazine and printed marketing material including the school's prospectus, promotional leaflets and flyers, press advertising, display advertising, promotional banners or signage and other external advertising mechanics
 - in online, digital or web marketing advertising such as online social media campaigns, website banner advertising, newsletters,
 - on the school's website and, where appropriate and in line with relevant policies, via the school's social media channels (e.g. X (formerly) Twitter, Instagram, Facebook and LinkedIn)
- The school's policy in respect of the above uses is as follows:
 - **Legitimate interests** will be relied upon for any uses which are either essential (for example, security, administration and education) or which fall within a scope of reasonably expected uses. Reasonably expected uses include material listed above or any uses whereby an individual child cannot reasonably be identified by someone outside the school community.
 - The key effect of the school relying on legitimate interests is that parents and pupils may be entitled to object to such uses, although their specific consent will not be sought beforehand. Any objections will be duly considered by the school, but objections can be overridden by

other factors: for example, uses which the school considers essential; or uses which create little or no risk of harm (including where children are not at risk of outside identification).

- **Consent** will be sought for any additional, external or third party uses of pupil images not stated above.
- The school will take reasonable steps following any objection or withdrawal of consent but may not be able to recall or destroy printed materials. Any particular concerns or vulnerabilities relating to a pupil or their family should be drawn to the school's attention in advance. The safeguarding and best interests of pupils will remain the school's priorities at all times.

4. **Use of Pupil Images for Identification and Security**

- All pupils are photographed on entering the school and, thereafter, at regular intervals, for the purposes of internal identification. These photographs identify the pupil by name, year group, house and form/tutor group. These photographs will also appear on the pupil's academic report.
- CCTV is in use on school premises for certain notified purposes, including security and in certain cases is likely to capture images of pupils. Images captured on the school's CCTV system are used in accordance with the Privacy Notice and CCTV Policy. The location of cameras will be clearly notified, including by signage.

5. **Use of Pupil Images by External 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, and 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 may ask for the names of the relevant pupils to go alongside the images. It is not the School's policy to provide full or first names in this scenario, and these will only be provided where parents have been informed about the media's visit and either parent or pupil has specifically consented to the sharing of their name, for an appropriate and necessary purpose.

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 in suitable dress and held by such persons 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.
- Any external processors of pupil images are engaged only for lawful purposes consistent with those set out in this policy, and subject to proper due diligence and contractual protections.
- 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.

- If staff are taking pupils on a school trip there is a school trip phone available for their use. This is kept in the school office and only this phone should be used to take photographs. On no account should private phones be used by staff or staff ask pupils to take photos on their own devices. When the staff member returns from the trip, the phone should be handed by to the school office and Marketing will download the images from the device, delete them from the device and store them securely on the school system. Marketing will check photos before being utilised.
- Pupils are also given mandatory and age-appropriate training on their own privacy online and with their peers, including image use and social media safety.

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 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 online (for example on Facebook, Instagram, X or by text or WhatsApp), 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, by reference to their dress or activity or any other factor.
- The school reserves the right to refuse or withdraw permission to film or take photographs, at a specific event or more generally, either for all attendees/parents (e.g. where a safeguarding risk to an individual child has been identified) or from any individual 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 physical 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.
- Should remote video provision at home (by Zoom, teams or otherwise) be required or facilitated by the school in any context, specific guidelines and instructions will be provided to ensure privacy and safety, including around dress and recording of video.

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 policies on: Anti-Bullying, Data Protection for Pupils and Parents, ICT Acceptable Use 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.
- Any pupils who might be asked to take photographs at a school event (e.g. pupils studying photography) must adhere to the following process:

1. Mark Pennington (MP), photography teacher, to may ask certain pupils to take photos at school events. No other pupils should be taking photos without being asked or permission from MP.
2. MP to loan a school owned camera to any pupils taking photos at events. Pupils may NOT use their own devices to take photos on at events.
3. Pupil takes photos at the event.
4. Pupil hands camera back to MP at end of the event.
5. MP to download the photos from the school camera's memory card onto photography department computer and then upload to staff share. MP to delete all images off memory card and photography department computer. Please note: Pupils are not allowed to download the images themselves or share images with any other people (staff or pupils) until all photos have been checked.
6. MP to send link to marketing to review.
7. Marketing to review all photos and delete and photos of pupils who we do not have permissions to include.
8. Folder may then be shared with relevant parties. Images should not be shared with pupils directly as photo permissions are for use by the school not other pupils or any individual members of staff.
9. Marketing may then use approved photos on Social Media, in Wychwood Weekly, in the Elm and in any other school promotional material as appropriate to promote the school.