



**Exeter School**

**Taking, storing and using images of children policy**

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### Taking, storing and using images of children policy

#### 1 This policy

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 Exeter School ("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 and 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.

#### 2 General points to be aware of

Certain uses of 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, academic and co-curricular; to promote the work of the school; and for important administrative purposes such as identification and security.

By signing a copy of the school's terms and conditions and/or by granting photography and filming consent on the new pupil form, parents who accept a place for their child at the school agree to the school using images of him/her for:

- the school's promotional material such as the prospectus, the website or social media;
- press and media purposes;
- educational purposes as part of the curriculum or extra-curricular activities.

The school may seek specific consent from the parents before using a photograph or video recording of the pupil where the school considers that the use is more privacy intrusive. Where the pupil is 13 years old or over we may seek the pupil's specific prior consent in addition to, or instead of the parents' consent. We would not disclose the home address of the pupil without the parents' consent.

Any parent who wishes to limit the use of images of a pupil for whom they are responsible should indicate so on the new pupil form. They may also wish to contact the Head's PA in writing. The school will respect the wishes of parents/carers (and indeed pupils themselves) wherever reasonably possible, and in accordance with this policy.

Parents should be aware that, from 13 years old and upwards, the law recognises pupils' own rights to have a say in how their personal information is used – including images.



### 3 Use of pupil images in school publications

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 internal displays (including clips of moving images) on digital and conventional notice boards within the school premises;
- as part of the school's email system and intranet, and in appropriate communications by whatever means with the school community (parents, pupils, staff, Governors and alumni);
- as part of school curricular activities or as a teaching aid, and/or as part of official activities using school devices, tablets and applications;
- in printed material, such as school magazines and printed marketing material, including the school's prospectus;
- on the school's website and, where appropriate and in line with relevant policies, via the school's social media channels e.g. Instagram, TikTok, LinkedIn and Facebook]; and
- in the press, outdoor media and other external advertisements for the school.

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), a professional photographer used for marketing and promotional purposes, parents or occasionally pupils. The school will only use images of pupils in suitable dress and the images will be stored securely and centrally.

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 via internal school or parent communications, on the intranet, in printed material such as a school magazine or prospectus, or any uses whereby an individual child cannot reasonably be identified by someone outside the school community, for example, where their face cannot clearly be seen.

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 all other external uses of pupil images online. In particular, where any intended use is more intrusive or unexpected – for example, if a child is the focus of the image and their face can clearly be seen. This consent will be taken from the new pupil photography consent form although in some cases, for example a bus campaign, the school will discuss the use with the pupil or parents (as appropriate) in advance and seek a specific, *ad hoc* consent.

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 appropriate intervals, for the purposes of 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 policies concerning CCTV which may be published by the school from time to time.

### **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 who do not have DBS clearance and the media are always accompanied 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 relevant 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 by parents**

The use on the school site of cameras and filming equipment (including mobile phones, smart glasses and other recording technologies) by parents or other family members or friends is not permitted.

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 made aware 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, smart glasses and other recording technologies) must be in accordance with the school rules and 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, data protection 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.

### **9 Use of cameras and filming equipment by visitors other than parents**

All visitors to the school are given a copy of the school's safeguarding leaflet and reminded not to take photos of children using their own phone, camera, smart glasses or other recording technology while on site.