

TAKING, STORING and USING IMAGES of CHILDREN POLICY

1. This Policy

- This Policy is intended to provide information to all pupils including the early years foundation stage (EYFS) and their parents, carers or guardians (referred to in this policy as "parents") about how images of pupils are normally used by Holy Cross Preparatory 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 / parent contract, 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, e.g. the school's Privacy Notice. Images of pupils in a safeguarding context are dealt with under the school's relevant safeguarding policies.
- Staff are additionally subject to relevant training, in accordance with their role, and to the School's policies and procedures in this area, including the Staff Handbook, Safeguarding Policy, Online Safety Policy and Acceptable Use policies.

2. General Principles of Image Use

- Certain uses of 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 will be duly considered by the School. For uses that may be more intrusive or unexpected, particularly identifiable images published externally online, the School will seek appropriate consent from parents and, where appropriate, having regard to the pupil's age and understanding, from the pupil. 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 agreement to the school using images as set out in this policy via the Pupil Data Sheet and/or 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).
- Any parent who wishes to limit the use of images of a pupil for whom they are responsible should contact the School Office 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 around the age of 12 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 applicable consent, privacy information and objections, the School may use images of its pupils to keep the School community updated on School activities and, where appropriate, for marketing and promotional purposes including:

- In school publications, prospectus, school photo magazine, leavers' yearbook, weekly newsletter(s), social media posts, and other printed and online publications that reasonably promote the work of the school;
- On school website (both public and password-protected areas);
- On school social media e.g., Facebook and Instagram;

TAKING, STORING and USING IMAGES of CHILDREN POLICY

- In communications within the school community (parents, pupils, staff, Trustees and alumni) including by email, on the school intranet and by post;
- In other electronic communications: such as password protected Class List and Tapestry platforms for sharing images/videos of girls' life at school with parents - these can be downloaded by parents for their private use;
- For administrative purposes such as for identification and security, including CCTV;
- For assessment and monitoring, for teaching materials for use with future pupils, on webcam for appropriate curriculum purposes, in books or in digital folders to record learning development/progress, or other educational uses - on and off-site;
- In displays around the school (digital and conventional) within the school premises; and
- Special events and achievements.

The School will generally rely upon legitimate interests for uses of pupil images which are necessary for the ordinary operation of the School, including administration, security, identification, education and curricular purposes, and for other reasonably expected uses where the privacy risk to the pupil is low.

For external online uses of images where an individual pupil is identifiable, including appropriate use on the School's website and social media, the School will normally seek consent. Where an intended use is particularly prominent, unusual or potentially intrusive, the School may seek specific consent before publication.

Where consent is relied upon, it may be withdrawn. The School will take reasonable steps following withdrawal, including removing relevant online material where reasonably practicable, although it may not be possible to recall or destroy printed materials already produced and distributed lawfully.

The safeguarding and best interests of pupils will remain the School's priority when decisions are made about the taking, use or publication of images.

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, or occasionally pupils. The school will only use images of pupils in suitable dress and the images will be stored securely and centrally.

4. Online Publication of Images

The School recognises that images and digital media made publicly available online may be copied, altered, manipulated or shared by others outside the School's control. The School will therefore take a cautious and risk-based approach when selecting images for external online publication.

In particular, consideration will be given to whether an individual pupil can readily be identified, the prominence of the pupil within the image, the nature of the activity and the pupil's dress, and whether publication could create a safeguarding or privacy risk. Where appropriate, the School will favour group or activity-based images over prominent close-up images of individual pupils and will avoid associating pupils' names with publicly available online images unless there is a particular reason for doing so and appropriate consent has been obtained.

TAKING, STORING and USING IMAGES of CHILDREN POLICY

The School will take reasonable technical and organisational measures to reduce the risk of inappropriate downloading, reuse or manipulation of pupil images, recognising that such risks cannot be eliminated completely.

Use of AI and Digital Image Modification

The School may use approved digital or artificial intelligence (AI) tools to alter pupil images for safeguarding and privacy purposes prior to publication. This may include obscuring or modifying identifiable features or producing a non-identifiable representation of an original photograph.

Any such processing will be undertaken in accordance with the School's Data Protection Policy, Privacy Notices and procedures governing pupil images. The School will consider the privacy and safeguarding implications of any AI service used, including how images are transferred, stored, retained and used by the service provider.

AI-altered images will not be used to depict a pupil in a misleading, inappropriate or harmful manner.

5. Use of Pupil Images for Identification and Security

- All pupils are photographed on entering the school and, thereafter, as required, for the purposes of internal identification. These photographs identify the pupil by name, year group, house and form group.
- CCTV may be 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 and CCTV Policy / any other information or policies concerning CCTV which may be published by the school from time to time.

6. 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, 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 pupils' names to accompany images. It is not ordinarily the School's policy to provide a pupil's full or first name in these circumstances. A name will only be provided where the parent has been informed about the media involvement and the parent or pupil, as appropriate, has specifically consented to the sharing of the name for an appropriate and necessary purpose.

7. Livestreaming and Recording of School Events

Where the School livestreams or provides recorded access to a School event, appropriate safeguards will be put in place having regard to the nature of the event and whether pupils may be identifiable. These may include secure or restricted access, appropriate notices to participants and viewers and controls upon recording, sharing, accessibility and retention.

Livestreaming or recording involving identifiable pupils must take place only with the authority and oversight of the School and in accordance with applicable consent arrangements, data protection requirements and safeguarding procedures.

TAKING, STORING and USING IMAGES of CHILDREN POLICY

8. 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.

Any third party engaged by the School to take, process, store or otherwise handle pupil images on the School's behalf will be engaged only for lawful purposes consistent with this policy and will be subject to appropriate due diligence, security requirements and contractual data protection safeguards.

- 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.

Pupils will receive age-appropriate education and guidance about protecting their own and others' privacy online, including the responsible taking, sharing and use of images and the risks associated with social media and digital manipulation of images.

9. Use of Cameras and Filming Equipment (including mobile phones and wearable technology) 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.
 - We ask parents to respect acts of collective worship and refrain from filming or taking photographs during masses and services.
 - Surreptitious filming or recording using personal devices, including smart or wearable technology is not permitted.
- 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.

TAKING, STORING and USING IMAGES of CHILDREN POLICY

- 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.

10. 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 an appropriate member of staff.
- The use of cameras or filming equipment, including mobile phones or other smart or wearable technology capable of recording images, video or audio, is not allowed in toilets, washing or changing areas, nor may such equipment be used in a manner that may offend, cause upset, compromise another person's privacy or create a safeguarding concern.
- The misuse of images, cameras or filming equipment in a way that breaches this Policy, or the school's Anti-Bullying Policy, Online Safety Policy, IT Acceptable Use Policy for Pupils, Safeguarding Policy, the School Rules or other relevant policies is always taken seriously, and may be the subject of disciplinary procedures or dealt with under the relevant safeguarding policy as appropriate.

11. Other School's Policies and Procedures

The School recognises that other schools may operate different policies concerning photography, filming and livestreaming, including at inter-school sporting fixtures and other events. Where reasonably practicable, the School will seek to establish the relevant arrangements with visiting or host schools and ensure that appropriate information is provided to participating pupils and parents where necessary.

11. Retention and Removal of Images

Images will not be retained for longer than is necessary for the purposes for which they are used, having regard to the School's Privacy Notice and data retention arrangements.

Images published on the School's website and social media channels will be reviewed periodically and removed or archived where they are no longer required or appropriate.

Where consent for an online use is withdrawn, or where a pupil or parent raises a reasonable objection, the School will take reasonable steps to remove the relevant image from platforms within its control where appropriate. The School cannot guarantee the deletion of images that have already been copied, downloaded or otherwise shared by third parties outside its control.

Requests from former pupils for removal of publicly accessible images will be considered reasonably, taking account of the circumstances, applicable data protection rights and any safeguarding or privacy considerations.