



Taking, Storing and Using Images of Children Policy

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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 Tower House 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, e.g. the school's Privacy Notice. Images of pupils in a safeguarding context are dealt with under the school's safeguarding policy.

1. General points of be aware of

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 children. The school is entitled lawfully to process such images and take decisions about how to use them, subject to any reasonable objections raised.

Parents who accept a place for their child at the school are invited to agree to the school using images of him as set out in this policy, by signing the form attached to the school's terms and conditions 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).

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

Any parent who wishes to limit the use of images of a pupil for whom they are responsible should contact the Head in writing. The School will always respect the wishes of parents/carers (and indeed pupils themselves) where 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 decide how their personal information is used – including images.

2. Use of Pupil Images in School Publications

Unless the relevant pupil or his or her parent has requested otherwise, 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;
- in communications with the school community (parents, pupils, staff, Governors and alumni) including by email, on the school intranet and by post;
- on the school's and FOTHs website and, where appropriate, via the school's social media channels, e.g. Twitter, Instagram and Facebook. Such images would not normally be accompanied by the pupil's full name without permission; and
- use by The Old Vicarage School on their website, social media channels, and marketing materials. Such images would not normally be accompanied by the pupil's full name without permission; and
- in the school's prospectus, and in online, press and other external advertisements for the school. Such external advertising would not normally include pupil's names.

The source of these images is predominantly the school's professional photographer for marketing and promotional purposes, or staff/pupils in relation to school events, sports or trips. The school will only use images of pupils in suitable dress.

3. Use of Pupil Images for Identification and Security

All pupils are photographed on entering the school and, thereafter, at three-yearly 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 school's Data Protection Policy for Pupils and Parents/Carers, and any other information or policies concerning CCTV which may be published by the school from time to time.

4. 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 effort to ensure that any pupil whose parent or carer has refused permission for images of that pupil to be made in these circumstances are not photographed or filmed by the media.

The media normally asks for the names of the relevant pupils to go alongside the images, and these will be provided where parents have been informed about the media's visit and either parent or pupil has consented as appropriate.

5. 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, and protected from loss or misuse, and in particular 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 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 the school's policies and the law. Images of pupils in a safeguarding context are dealt with under the school's relevant safeguarding policies and the law.

6. 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, 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 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.

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.

The school sometimes records plays and concerts professionally (or engages a professional photographer or film company to do so), in which case copies of the DVDs and CDs 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.

By Staff

Staff are not permitted under any circumstances to use their personal devices when taking images, videos or other recording of any pupil nor to have any images, videos or other recording of any pupil on their personal devices. Please read this in conjunction with the Safeguarding Policy, Acceptable Use, Online, Staff Code of Conduct and School Trips Policies. Staff who wish to use their personal mobile devices or cameras in school must read and abide by the School's Bring Your Own Device Policy. Staff who act in breach of this may be subject to disciplinary action.

It is good practice at times to record photographic and video images of pupils, or to allow pupils to record images of each other to assist teaching and learning, or to celebrate achievement. There is, however, potential for images of children to be misused, in extreme cases for pornographic or grooming purposes.

All staff therefore adhere to the following code:

- School tablets using 2 Simple software and the school's own mobile devices are the agreed media for staff to take photographs of pupils. All these devices are securely locked via password protection
- only record images when there is a justifiable need
- ensure that pupils understand the reason for the recording of the images and how the images will be used and stored
- ensure that all images recorded are available for scrutiny
- avoid making recordings in one-to-one situations
- on admission to the School, parents give consent that images and recordings of their children can be used for legitimate reasons
- if a photograph is used, the pupils should not be named without direct parental consent
- where the School has decided that images should be retained for future use, they should be stored and used only by those authorised to do so, and
- Images are transferred to a secure database on the school (internal) drive.

7. 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 cameras or filming equipment in a way that breaches this Policy, or the school's Anti-Bullying Policy, Privacy Notice for Pupils, Parents and Carers, IT Acceptable Use Policy for Pupils, or the Behaviour Policy is always taken seriously and may be the subject of disciplinary procedures or dealt with under the relevant safeguarding policy as appropriate.

8. Use of Images Consent Form

The consent form can be found here: <https://forms.office.com/e/ieA7DF65LE>

Tower House School is committed to safeguarding the welfare of children and expects all staff and volunteers to share this commitment.

Substantive change:

November 2020: Consent also covers FOTH Website

September 2021: Use of Cameras and Filming Equipment (including mobile phones) for Staff (newly added)

May 2024:

Filtering and monitoring information updated.

Use of personal mobile phones to take photos, videos etc is forbidden. Only the school's devices should be used.

February 2025: change to images consent form, no on MS Forms

Approved and Signed by Chair of Governors

Name: Antony Phillips

Signature:

Date:
