

Gloria Filiorum Patres

Each day, discovery.



ELTHAM COLLEGE

**Policy on Taking, Storing and Using  
Images of Children**

**July 2023**



## Version Control Information

Reason For Amendment	Name	Date	Main changes
New document	Bursar	May 2018	Prepared in response to the requirements of the General Data Protection Regulation, due to come into effect on 25 May 2018
Annual Review	Bursar	Sept 2021	No change
Annual Review	Bursar	Aug 2022	No change
Annual Review	Bursar	July 2023	No substantive change

This document should be read in conjunction with the general Eltham College Privacy Notice, available on the school website.



## **1. This Policy**

This Policy is intended to provide information to students and their parents, carers or guardians (referred to in this policy as "parents") about how images of students are normally used by Eltham College ("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 students 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 student images, including, for example the school's policy and signage on the use of CCTV; and more general information about use of students' personal data, such as the school's Privacy Notices.

## **2. General points of which to be aware**

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 are 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.

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

On special occasions the school may use the services of an appropriately qualified/checked professional photographer to capture high quality photographic or film images that are subsequently made available for purchase by parents – such as large drama or music productions or sports events.

Any parent who wishes to limit the use of images of a pupil for whom they are responsible should contact the Bursar ([bursar@eltham-college.org.uk](mailto:bursar@eltham-college.org.uk)). 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 students' own rights to have a say in how their personal information is used – including images.

## **3. Use of Student Images in School Publications**

Unless the relevant student or his or her parent has requested otherwise, the school will use images of its students (taken both on the premises and away from the site on trips or at special events) 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, students, staff, Governors and alumni) including by email, in termly updates and annual Elthamian magazines, on the school intranet, in event programmes and posters, on the alumni website and in alumni publications, and by post;
- on the school's website and, where appropriate, via the school's social media channels, including Twitter, Instagram and Facebook. Such images would not normally be accompanied by the student'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 student names.

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 students themselves. The school will only use images of students in suitable dress and the images will be stored securely.

#### **4. Use of Student Images for Identification and Security**

All students are photographed by a professional photographer on joining the school and then additionally at Year 9 and Year 12, for the purposes of internal identification. These photographs identify the student by name, year group, house and form/tutor group. The images are held on the school's information management system and are accessible by teaching, pastoral and administrative staff with the relevant permissions (see below).

CCTV is in use on school premises, and will sometimes capture images of students. Images captured on the School's CCTV system are used in accordance with the school's Privacy Notice and CCTV Policy, as amended from time to time.

#### **5. Use of Student Images in the Media**

Where practicably possible, the school will notify parents in advance when the media is expected to attend an event or school activity in which school students are participating, and will make every reasonable effort to ensure that any student whose parent or carer has refused permission for images of that student, or themselves, to be made in these circumstances are not photographed or filmed by the media, nor such images provided for media purposes. Such images would not normally be accompanied by the student's full name without permission.

#### **6. Security of Student 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 students are held by them securely, responsibly and in accordance with the school's instructions and wider data protection regulations.

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.

All staff are given guidance on the school's Policy on Taking, Storing and Using Images of Students, and on the importance of ensuring that images of students are made and used responsibly, only for school purposes, and in accordance with wider school policies and the law.

#### **7. Use of Cameras and Filming Equipment (including mobile phones and tablets) 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 students, except incidentally as part of a group shot, without the prior agreement of that student's parents.
- Parents are reminded that such images are for personal use only. Images which may, expressly or not, identify other students 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 students.

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, concerts or sporting events professionally (or engages a professional photographer or film company to do so), in which case CD, DVD, digital or print copies may be made available to parents for purchase. Parents of students taking part in such plays and concerts will be consulted if it is intended to make such recordings available more widely.

## **8. Use of Cameras and Filming Equipment by Students**

All students 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 students without permission or 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 Policies, Data Protection Policies, eSafety Policy, IT Acceptable Use Policy for Students, Safeguarding Policy or the School Constitution (School Rules) is always taken seriously, and may be the subject of disciplinary procedures or dealt with under the relevant policy as appropriate.