

Taking, Storing and Using Images of Children Policy

**Lancing College, Lancing College Preparatory Schools
and Little Lancing Day Nursery and Forest School**



Lancing College

Introduction

Lancing College is very proud of its pupils' academic, artistic, musical, dramatic and sporting achievements. We celebrate our pupils' diverse talents and we welcome parents and families to our musical concerts, drama productions, Art and DT exhibitions and to sporting events, as well as to more formal occasions during the school year. The walls of Houses are decorated with House and team photographs, and photographs of trips and expeditions in which our pupils have participated. We make use of digital display screens inside the school. Our website, social media pages and the Parent Portal are updated regularly, and we produce a termly magazine called *The Quad*.

1 This Policy

- 1.1 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 Lancing College, its prep schools at Hove and Worthing ("the school"), including EYFS and Little Lancing Day Nursery and Forest School, also including EYFS. 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.
- 1.2 This policy is applicable in addition to the school's terms and conditions for parents, 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 publicly available Privacy Notice. Images of pupils in a safeguarding context are dealt with under the school's relevant safeguarding policies which are also publicly available.

2 General points to be aware of

- 2.1 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.
- 2.2 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.
- 2.3 Any parent who wishes to limit the use of images of a pupil for whom they are responsible should contact the Head Master and ensure that their request is acknowledged. The parent should ensure that the pupil is aware of any stipulated limitations on the use of their image. The School will respect the wishes of parents/carers (and indeed pupils themselves) wherever reasonably possible, and in accordance with this policy. 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.
- 2.4 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

- 3.1 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 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
- in the school's prospectus, and other external advertisements, either online or printed, both in the UK and overseas. Such external advertising would not normally include pupil's names and in some circumstances the school will seek the parent or pupil's specific consent, depending on the nature of the image or the use.

3.2 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.

3.3 The images that we use for display and communication purposes on our website and external publications do not fully identify an individual pupil; instead, the pupil's first name and surname initial may be used. In internal communications (e.g. newsletters) and the termly publication *The Quad* (for parents, pupils and OLs) we may name pupils fully – but would not do so were there any safeguarding concerns about such identification. We only use images of school activities, such as plays, concerts, sporting fixtures, prize-giving, school trips etc. in their proper context. We never use any image that might embarrass or humiliate a pupil. Pupils are always properly supervised when professional photographers visit the school and parents are given the opportunity to purchase copies of these photographs.

4 Use of Pupil Images for Identification and Security

4.1 All pupils are photographed on entering the school and, thereafter, at annual intervals, for the purposes of internal identification. These photographs identify the pupil by name, year group, House and form/tutor group.

4.2 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 Privacy Notice and CCTV Policy / any other information or policies concerning CCTV which may be published by the school from time to time.

5 Recording of Lessons

5.1 At a time when, despite the excellence of the school's remote learning provision, students' education has undoubtedly been disrupted by Covid-19, the school believes it is prudent for a period to provide at the senior school– where it is useful to do so – a recording of lessons taught. This allows all students, whether physically on site or not, to access these valuable live lessons at a later point. While the global pandemic leaves the nature of public examinations and their timing in flux, recording classes allows the school to preserve the excellence of teachers' practice for the benefit of those who attend their classes, for use in consolidation and revision. It will also, where needed, provide a record of student

progression alongside assessed work. The school aims to produce a growing library of lessons with the sole purpose of supporting educational progress.

5.2 Lancing College offers the following conditions relating to the recording of lessons:

- They will not be used for performance management or surveillance – lessons are recorded for the educational benefit of students only;
- Recorded lessons must only be stored on Lancing College's Microsoft Office 365 site by teachers;
- They will not ever be distributed elsewhere;
- It is the preserve of the individual teacher to record and store lessons. Students may watch these recordings but are not permitted to download or disseminate them nor make recordings of their own;
- This expedient move in relation to the current pandemic is a temporary measure. When it is prudent to do so, class recordings will cease and will only be retained for access by students involved in the class.

6 Use of Pupil Images in the Media

- 6.1 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.
- 6.2 The media often 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 (if over 12 years of age) has consented as appropriate.
- 6.3 We will always complain to the Press Complaints Council (PCC) if the media fails to comply with the appropriate code of practice for the protection of young people, including the children of celebrities.

7 Security of Pupil Images

- 7.1 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.
- 7.2 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.

7.3 All staff are given guidance on this policy, 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.

8 Use of Cameras and Filming Equipment (including mobile phones) by Parents

8.1 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.

8.2 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.

8.3 The school sometimes records plays and concerts professionally (or engages a professional photographer or film company to do so), in which case CD, DVD 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.

8.4 The school may record or live stream sporting events. This can sometimes happen at events organised by other schools too.

8.5 Staff are not permitted to use personal mobile phones, iPads, cameras or any other devices to take or record any images of children but instead must use the school cameras or mobile phones purchased or provided for the purpose. Staff may take photographs in other areas using a school camera or mobile phone where there is clear educational purpose. This could be recording a trip or a visit or recording a piece of work or recording a competency (e.g. in coursework for sport). It must be made clear that this image is being taken, for what purpose and with the agreement of colleagues/ pupils concerned.

Staff must regularly delete all photos and videos from such devices. Photographs are uploaded to a secure software systems and can only be accessed by the appropriate staff. Visitors, volunteers and students are not permitted to take any photos of children.

- 8.6 **Use of mobile phones and cameras in the EYFS setting:** Children have their photographs taken to provide evidence of their achievements for developmental records (The Early Years Foundation Stage, EYFS 2012). Staff may take photographs of children in the EYFS setting using a school camera or iPad for the following purposes: in order to provide evidence of any practical educational activities or outdoor learning that has taken place during the day, or on school trips to document their outing for newsletters and for their learning journey and for inspection by the ISI.

Staff must regularly delete all photos and videos from such devices. Photographs are uploaded to a secure software systems and can only be accessed by the appropriate staff. Visitors, volunteers and students are not permitted to take any photos of children.

9 Use of Cameras and Filming Equipment by Pupils

- 9.1 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.
- 9.2 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.
- 9.3 The misuse of images, cameras or filming equipment in a way that breaches this Policy, or the School rules, Anti-Bullying Policy, Data Protection Policy for Pupils, Parents and Carers, Network Acceptable Use Policy for Pupils, Safeguarding Policy is always taken seriously, and may be the subject of disciplinary procedures or dealt with under the relevant safeguarding policy as appropriate.
- 9.4 Pupils may only use cameras (of any sort) in lessons with the express permission of the member of staff in charge and with the permission of those appearing in the image.
- 9.5 Pupils may only take images with cameras (of any sort) with the express permission of all those appearing in the image. All pupils must allow staff access to images stored on mobile electronic devices and/or cameras, and must delete images if requested to do so.
- 9.6 Where pupils use their phones to create portraiture such images should be downloaded and stored on the school network in folders that cannot be publicly accessed and deleted from phone storage as soon as possible.
- 9.7 Rights to privacy must be respected, and images which could be construed as indecent are prohibited. See also the School's policies on Mobile Phone Use and Behaviour and the School Rules.
- 9.8 Using photographic material of any kind to bully, harass or intimidate others will not be tolerated and will constitute a serious breach of discipline. Appropriate action will be taken in accordance with the School's Anti-Bullying and Behaviour policies.
- 9.9 Photographs of any member of the School community are not permitted to be displayed publicly around the school campus unless sanctioned by an appropriate member of staff

for official use on notice boards or authorised brochures/posters, and only with the consent of the individual(s) in the image.

10 Child Protection

10.1 All staff are trained in Safeguarding, and all staff and senior pupils are aware of their individual roles in promoting the welfare of pupils and protecting them from any harm. When publishing images of children in school documents or on the website, care will be taken to minimise the risk of such images being modified to create inappropriate or indecent images.

10.2 Staff will be mindful of child protection issues and will raise concerns with the Designated Safeguarding Lead (RPD) if they become aware of anyone:

- Taking an unusually large number of images;
- Taking images in inappropriate settings such as the swimming pool, toilets or changing areas or;
- Taking images of children who are apparently unaware that they are being photographed or filmed.

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