Habs

HABERDASHERS'
ELSTREE SCHOOLS

Taking, Storing and Using Images of Students' Policy

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Reviewed by	Director of Marketing, Communication and Admissions
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1 Introduction

This Policy provides information to students and their parents, carers, guardians or family members (referred to in this policy as "parents") on how images of students are used by Haberdashers' Elstree Schools. It also addresses the use of cameras and filming equipment by parents, students and the media on school premises.

Images of students in a safeguarding context are dealt with under the school's Safeguarding Policy.

This Policy forms part of the School's wider data protection framework and should be read alongside the supporting documents listed in Section 1.1.

1.1 Supporting Documents

The following related information is referred to in this policy:

CCTV Policy
Data Protection Policy
Privacy Notice for Parents
Privacy Notice for Older Students
Privacy Notice for Younger Students
Safeguarding Policy
Terms and Conditions

This ensures that the policy is fully aligned with the school's overall data protection practices.

1.2 Terminology

Head means either the Head of the Boys' School or the Head of the Girls' School.

School means Haberdashers' Boys' School and/or Haberdashers' Girls' School which are operated by Haberdashers' Aske's Elstree Schools Limited, the Schoos Trustee of Haberdashers' Aske's Charity.

Student or **Students** means any student or students in the School at any age.

2 General points to 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.

The School reserves the right to take, store and use images of all its students for the school's marketing and the Haberdashers' Company marketing purposes. Parents who accept a place for their child at the school are required to sign a copy of the policy below or the form attached to the school's terms and conditions. Parents will need to email the Head if they do not consent to the use of their child's images for marketing or other promotional purposes. However,

parents should be aware that certain uses of their child's images may be necessary or unavoidable, such as when included incidentally in CCTV footage or group photographs.

From around the age of 12, students have the right to have a say in how their personal information, including images, is used. The school will respect these rights and involve students in decisions about the use of their images in accordance with GDPR and the school's policies.

3 Use of Student Images in School Publications

Unless the relevant student or their parent has requested otherwise, the school will use images of its students 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, Haberdashers' Company, Haberdashers' Schools and alumni) including by email, on the school intranet and by post
- on the schools' websites and social media channels, e.g. Twitter, Instagram, Facebook and LinkedIn. [Such images would not normally be accompanied by the student's full name without permission]
- in the schools' prospectuses, other school marketing material, advertising (including digital, press and outdoor). External advertising would not normally include students' names
- in videos taken at school lessons and school events
- school brand film [the school will seek the parent or student's specific consent for featuring in the film and will share the script in advance, for reference]

The source of these images will by the schools' staff (who are subject to policies and rules in how and when to take such images), professional photographers and videographers or occasionally students. The school will store the images securely and centrally.

4 Use of Student Images for Identification and Security

All students are photographed on entering the school and, thereafter, at [three-yearly] intervals, for the purposes of internal identification. These photographs identify the student by name, year group, house and form/tutor group.

CCTV is in use on school premises and may 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.

5 Use of Student Images in the Media

Where practicably, 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. The School will make every reasonable effort to ensure that any student whose parent or carer has refused permission for their image to be used is not photographed or filmed by the media, nor will such images be provided for media purposes.

The media often requests the names of relevant students to accompany their images. These names will only be provided if parents have been informed about the media's visit and have given consent for their child's image or name to be used, or if the student has consented as appropriate.

6 Security of Student Images

Professional photographers and the media are always accompanied by a member of staff while on school premises. The school only engages reputable professional photographers and makes every effort to ensure that any images of students are held securely, responsibly and in accordance with the school's instructions.

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 school policies and the law.

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

Parents, guardians or close family members (hereafter, parents) must not take photographs or film at school events or sporting fixtures, unless specific permission has been granted by the school. If permission is granted to photograph or film, the following guidelines must be adhered to:

- 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 that may, either intentionally or unintentionally, identify other students should not be shared on

the internet (e.g., on WhatsApp, Facebook and Instagram), or published in any other way.

- Parents may not film or take photographs in changing rooms, backstage during school productions, or in any other circumstances where 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 believed 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 CD, DVD or digital copies may be made available to parents for purchase. Parents of students taking part in such events will be consulted if the intention is 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 mobile phones) is not permitted in school for anything other than educational purposes. If filming for educational purposes, there must be consent from a teacher and all students involved. Photography and filming must not be 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, e-Safety Policy, IT Acceptable Use Policy for Students or Safeguarding Policy, will always be taken seriously. Such misuse may result in the disciplinary procedures or be addressed under the Safeguarding Policy as appropriate.