

The Use of Images Policy

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The Use of Images Policy

Introduction

This policy applies to:

Francis Holland Regent's Park

Francis Holland Sloane Square

Francis Holland Prep

Where there are differences between the schools these have been clearly highlighted.

This policy is intended to provide information to pupils of Francis Holland Schools Trust ('the Trust') and their parents, carers or guardians (referred to in this policy as 'parents') about how images (photographs/videos) of pupils are normally taken and used by the Trust. It also covers the Trust'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.

This policy covers all photography taken on Trust premises, on school trips or at school events and it complies with the General Data Protection Regulation (GDPR), the Data Protection Act 2018 (DPA) and the specific guidance of the Information Commissioner's Office. It should be read in conjunction with the Trust's Safeguarding, ICT Acceptable Use and Data Protection policies and guidance, as well as the Trust's Terms and Conditions.

This policy also provides information and guidance to employees ('staff') about taking images of pupils, and how images of staff may be used by the Trust.

This policy also covers the use of cameras and filming equipment (including mobile phones) at School events and on School premises by parents, pupils, staff and third parties such as professional photographers including those not contracted by the school and the media.

It applies in addition to the School's Standard Terms and Conditions and any other information the School may provide about a particular use of images of pupils, including signage about the use of CCTV and more generally about the use of pupils' personal data in the Privacy Notice. Images of pupils in a safeguarding context are dealt with in the Trust's Safeguarding and Child Protection Policy and Online Safety Policy, which can be seen on the website.

General Information

Certain uses of images of pupils and staff are necessary for the ordinary running of the Trust schools. Such uses are internal to the Trust and do not involve third parties. They include, but are not limited to, the use of photographs to identify pupils for School activities, for reasons of health and safety, pastoral care or welfare; the use of photographs for building passes; the use of photographs to celebrate pupil successes, this may include use in a House blog; the use of video footage for sports coaching, the recording of School events to be made available to the School community etc. It is considered that such uses are in the legitimate interests of the School and its community, and are unlikely to cause any negative impact on pupils or staff. The school is entitled lawfully to process such images and take decisions about how to use them, although objections may be raised and the school will seek to accommodate any reasonable concerns. The School will process such images in line with the School's Data Protection Policy and Privacy Notice that will outline the lawful basis on which these images are used.

Parents should be aware that certain uses of their child's images may be necessary for administrative purposes, or unavoidable (for example if they are included incidentally in CCTV or a group photograph).

We trust parents to support the school in using pupil images to celebrate the achievements of pupils, both academic and co-curricular, to promote the work of the school and for important administrative purposes such as identification and security.

On joining the school, parents have the ability to opt out of their daughter's images being used for marketing purposes. The Trust will respect the wishes of parents (and indeed pupils themselves) wherever reasonably possible, and in accordance with this policy. In order to plan photography before any activity, the list of all pupils of whom photos and videos must not be taken will be checked by a member of staff responsible for the activity in advance.

Parents should be aware that, from the age of 13, the law recognises pupils' own rights to have a say in how their personal information is used – including images. Where third parties are invited to the Trust premises for a specific event with the intention of taking photographs of pupils for publication externally, consent of the pupils must be sought either prior to or at the start of the event. Consent can be sought by the third party or the Trust on the third party's behalf, asking the pupils to sign their consent or send an email clearly stating their consent.

Any staff member who has organised an event at the Trust whereby a photographer will be present are responsible for the photographer whilst on Trust premises and for ensuring the correct consents are in place.

Photographs will be retained within the Trust for as long as necessary to fulfil the purpose for which they were collected. In some cases, photographs are parts of documents and publications which the Trust wishes to keep for archive purposes.

Staff and Pupils' Right to Request Non-Publication of Images

All pupils and staff members have the right to request that their image not be published on the school's social media platforms or used in promotional literature for both internal and external purposes. Such requests should be made by email directly to each school's marketing email address. The school will respect these requests and ensure that the relevant images are not used or are removed if already published.

Use of Pupil Images for Identification and Security

All pupils are photographed on joining the school, and thereafter at intervals, for the purposes of internal identification, and if parents wish to purchase these photos they may do so. These photographs identify the pupil by name/year group/house and form/tutor group. These photos are not used for marketing purposes.

CCTV is in use on Trust premises, to assist in the prevention and detection of crime, and to protect school premises and property therein. The system will sometimes capture images of pupils. Images captured on the school's CCTV system are used in accordance with the Trust's CCTV and Data Protection policies.

Use of Pupil Images in Communications and Marketing

Unless the relevant pupil or their 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, in school newsletters, on the school intranet and by post;
- on the school's website and, where appropriate, via the school's social media channels, e.g. X, Instagram and Facebook, LinkedIn, Flickr and blogs. Where it might be appropriate to name a pupil in an image, only a pupil's first name would be used; and
- in the school's prospectus, and in online, press and other external advertisements for the school. Such external advertising would not normally include pupils' 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.

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 Trust will only use images of pupils in suitable dress and displaying appropriate conduct, and the images will be stored securely.

Consent might be required if the use of photos and/or videos has the potential to be more intrusive upon pupils' privacy.

The school will take reasonable steps following any objection or withdrawal of consent but may not be able to recall or destroy printed materials. Any particular concerns or vulnerabilities relating to a pupil or their family should be drawn to the school's attention when the pupil joins the school or as soon as an issue develops. The safeguarding and best interests of pupils will remain the school's priorities at all times.

Security of Pupil Images

Professional photographers and the media hired by the Trust 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 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 takes all 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 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.

Staff have a responsibility to ensure that third parties have sought pupil consent prior to taking and using their images if the use of photos and/or videos has the potential to be more intrusive upon pupils' privacy.

Use of Pupil Images by the Press

Where practicably possible, the school will always notify parents in advance when the press, or representatives from other media channels, are expected to attend an event or school activity in which school pupils are participating. The school will make every reasonable effort to ensure that any pupil whose parent has refused permission for images of that pupil to be made are not photographed or filmed, and nor are such images provided for media purposes.

On Prizegiving days and examination results days, the press may ask for the names of the relevant pupils to go alongside the images. The school will only provide first names, and these will be provided only after either parent or pupil has consented, as appropriate.

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

We ask parents, carers and other family members and friends not to take photographs or film children taking part in school events, such as concerts and school productions. Taking photographs and filming at school events disturbs cast members and other members of the audience. Issues of copyright may also apply.

Images of pupils must NOT be shared with others via the internet, on social media or published in any way.

Our marketing team take photographs and record many events to ensure that such images are used appropriately.

- 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 must never film or take photographs in changing rooms, toilets or washing areas, or backstage during school productions, nor in any other circumstances in which photography or filming may embarrass or upset pupils.

Use of Cameras and Filming Equipment by Pupils

The schools are mobile-free zones for pupils until the VIth Form, when pupils may have their mobile phones on them during the day in the Sixth Form areas, but not the other main school areas. In line with the pupil IT Code of Conduct/Acceptable Use Agreement, they know not to “take images, videos or audio recordings of other people, including staff and peers, unless I have their permission”, nor to share images without consent.

All Trust 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.

If a member of staff has concerns about the inappropriate taking or misuse of pupil images, they should report to their line manager or escalate to the School’s Designated Safeguarding Lead or one of the Deputy Designated Safeguarding Leads.

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 images, cameras or filming equipment in a way that breaches this policy, or the school's Safeguarding and Child Protection Policy, Anti-Bullying Policy, Data Protection Policy, Online Safety Policy, ICT Acceptable Use Policy, 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.

Use of Staff Images

Unless the relevant member of staff has requested otherwise, the School will use images of its staff to keep the School community (parents, pupils, staff, Governors and alumni) updated on the activities of the School, and for marketing and promotional purposes, including (but not limited to):

- in print;
- in emails;
- on the School intranet;
- in direct (posted) mailings;
- on School's staff photo board (Regent's Park);
- on the School's website;
- on the School's social media channels, e.g. X, Instagram, Facebook, LinkedIn, Flickr;
- in blogs;
- in media content e.g. newspaper articles; and
- in online and print advertisements.

All staff members are photographed on joining the Trust and thereafter at intervals, for the purposes of internal identification. These photographs identify the employee by name and job role.

Copyright

The Trust does not hold the copyright of all images (for example, those taken by parents or pupils), so it cannot control their use by the media or external agencies; however, we only use external photographers and film companies with an established reputation in School photography and filming.

With the continuing development and convergence of technology (e.g. very small cameras, mobile phones that can take photographic images etc.), it is not always possible to prevent the creation of images of pupils and staff, and their use, in some circumstances.

Contact Information

If you would like further information regarding the contents of this Policy, please speak with the respective School's Designated Safeguarding Lead.

Policy Review

This Review by Schools/SLT: January 2025

Next Review by Schools/SLT: Spring 2027

Policy approved by the Education Committee of the Court of Governors, February 2025