



DULWICH PREP LONDON
Values & Academic Excellence since 1885

TAKING, STORING AND USING IMAGES OF CHILDREN POLICY

This is a whole school policy which applies to all sections of the School, including Early Years



Persons responsible for this policy:

Bursar

Data Protection Officer

Date of last policy review:

September 2022

TAKING, STORING AND USING IMAGES OF CHILDREN POLICY

I. GENERAL

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 Dulwich Prep London (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 Contract for Educational Services, and any other information the School may provide about a particular use of pupil images, including signage about the use of CCTV; and more general information about the use of pupils' personal data in the School's Privacy Notice.

2. USE OF PUPIL IMAGES FOR ADMINISTRATIVE, FUNCTIONAL, EDUCATIONAL OR PASTORAL PURPOSES

Certain uses of images are necessary for the ordinary running of the School, including for administrative, functional, educational or pastoral purposes, and the School has a legitimate interest in processing images for these purposes. For example:

- i. all pupils are photographed on admission to the School and, thereafter, at appropriate intervals, for the purposes of internal identification and security. These photographs identify the pupil by name, year group, Tribe and form/tutor group;
- ii. 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, CCTV Policy and any other information or policies concerning CCTV which may be published by the School from time to time;
- iii. the School may record lessons, co-curricular activities and sport organised or co-ordinated by the School. Some of these activities are attended remotely by some or all participants as it allows those who cannot attend the live event due to illness or other reasons to catch up with or review the recording. Unless the School can demonstrate that it has a legal obligation or legitimate interest to do so, the recording will not be shared with anyone who was not originally invited to participate in or spectate the event; and
- iv. lists of pupils with allergies and certain medical conditions, together with their photograph, are available to staff.

3. INTERNAL AND EXTERNAL USE OF PUPIL IMAGES

a. Image Use Consent Form

In addition to using images for the purposes described in Section 2 above, the School may wish to take, store and use images or videos of children for further purposes related to the School, including the following:

- i. on display boards, video screens and banners around the School site;
- ii. in newsletters and communications with the School community (parents, pupils, staff, Governors and alumni) including by email, on the School intranet and by post;
- iii. in research reports conducted by staff of the School;
- iv. in School year books;
- v. in Focus Magazine;
- vi. on the School's website;
- vii. on the School's social media channels;
- viii. in promotional materials including the School's prospectus, banners, flyers, brochures and in online and other external advertisements for the School; and
- ix. in information for the media such as press releases, or media requests to photograph or film at the School - please see section 4 below.

Uses (i), (ii), (iii) and (iv) shall hereafter be referred to as the **Internal Uses** and uses (v), (vi), (vii), (viii) and (ix) shall be referred to as the **External Uses**.

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, in particular the Staff Code of Conduct and the Safeguarding Policy), or a professional photographer used for marketing and promotional purposes, or occasionally pupils. Images will be sensitively chosen and will not be used out of context by us.

Parents are invited, via a Google form (the "**Image Use Consent Form**"), to indicate that they agree to the School using images of their child for Internal Uses and / or External Uses. We hope parents will feel able to support the School in using pupil images to celebrate the achievements of pupils and to promote the work of the School.

Data Protection law gives children rights over their own data where they are considered to have the required capacity to understand their data rights. Most children will reach this level of understanding from the age of 13 and so it may also be necessary for the School to ask the child to sign the Image Use Consent Form directly.

Consent to using your child's image will last throughout their time at the School unless you, or your child, withdraws such consent. It will continue to apply in accordance with our Privacy Policy.

Consent can be withdrawn at any time by contacting your Section Secretary. If consent is withdrawn, it may not be possible to change printed publications (such as the School magazine or prospectus), or third-party websites or publications (for example where the School has placed an advert or provided an image to a newspaper).

b. Use of Names

i. Internal Uses

For Internal Uses, the School may wish to include the first name of a pupil and the first initial of their surname alongside their image. Surnames will not accompany images of pupils unless the consent of the parent and/or the pupil has been obtained.

ii. **External Uses**

For External Uses, neither first names nor surnames will be used alongside the image of a pupil unless a new, specific consent from the parent and/or the pupil has been obtained.

4. THE MEDIA

Where reasonably practicable, 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. We will make every reasonable effort to ensure that any pupil who has not consented via the Image Use Consent Form is not photographed or filmed by the media, nor such images provided for media purposes.

5. OTHER SCHOOLS

Other schools may wish to capture images of DPL pupils, for example at inter-school sporting or debating events. In these circumstances, the School will notify the other school that it is not permitted to use images of DPL pupils (including on the other school's website, intranet, social media channels, school magazine or prospectus) without the prior written consent of the School.

The School may wish to capture images of pupils from other schools at these inter-school events. The School should be wary and mindful that other schools may have different views, policy and culture on such matters. The School will clarify the position with the other school before taking or making use of images that identify children from other schools.

6. 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 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.

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 school policies and the law.

7. USE OF CAMERAS AND FILMING EQUIPMENT (INCLUDING MOBILE PHONES) BY PARENTS

Unless advised otherwise before the event, parents are welcome to take photographs of and 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 a flash is not used at indoor events.
- Parents are asked not to take photographs of other pupils, except incidentally as part of a group shot of more than four children, 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 or shared 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 make an announcement before the event and will always print a reminder in the programme 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 taking inappropriate images.

The School sometimes records plays and concerts professionally (or engages a professional photographer or film company to do so), in which case 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. 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 images, cameras or filming equipment in a way that breaches this Policy, or the School's Anti-Bullying Policy, Data Protection Policy, ICT Acceptable Use and Screen Time Policy for Pupils or Safeguarding (Child Protection) Policy is always taken seriously, and may result in sanctions in accordance with the Behaviour, Rewards and Sanctions Policy.

9. RETENTION OF PUPIL IMAGES

Our retention policy for images of pupils is as follows:

- i. other than as set out in paragraph (ii), (iii) and (iv) below, soft copy images of pupils shall be deleted within two years of the pupil leaving the School;
- ii. soft copy images used in external publications shall be deleted within five years of the pupil leaving the School;
- iii. images of pupils shared on social media accounts maintained by the School may be retained indefinitely on such social media accounts;
- iv. images captured in lessons, co-curricular activities and sport organised or co-ordinated by the School will be deleted within two years of the date on which the recording took place, although some copies may be retained indefinitely for archival purposes and the School's historical records; and
- v. hard copy images of pupils used prior to the date on which the pupil left the School shall be deleted within ten years of the pupil leaving the School, although copies of such images may be retained indefinitely for archival purposes and the School's historical records.