



CONSENT TO USE OF IMAGES POLICY

1. Policy Statement

- 1.1. This Policy is intended to provide information to students and their parents/carers about how images of students are normally used by Sir William Perkins's School ("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/carers and students themselves, and the media.
- 1.2. It applies in addition to the statement in the School's parent contract at the point of admission and is a supplement to the Data Protection Policy and should be read in conjunction with other relevant policies such as the Safeguarding and Child Protection Policy and Privacy Notices, all available on the school website at <https://www.swps.org.uk/about/isi-policies>.
- 1.3. This policy applies to images and media whether video, audio or static images (the Images) collected, stored and processed for the School, by the School or a third party engaged by the School to process them, except the use of CCTV which is covered by the GDPR - CCTV policy.
- 1.4. This policy also provides guidance for the taking of pictures or video by individuals, whether parents/carers, students, or volunteers for personal use rather than School use. This applies to publishing on Social Media or sharing privately. There is no requirement in law or through Data Privacy (GDPR) to restrict this practice, except where there is a legal implication for the taking and processing of children's images.
- 1.5. SWPS is fully committed to ensuring that the application of this policy is non-discriminatory, in line with the UK Equality Act (2010). Further details are available in the school's Equal Opportunities Policy.

2. Use of Student Images in School Publications

- 2.1. Certain uses of images are necessary for the ordinary running of the School and are a public task; other uses are in the legitimate interests of the School and its community and unlikely to cause any negative impact on a Student. The School is entitled lawfully to process such images and take decisions about how to use them, subject to any reasonable objections raised, and if a lawful basis applies.
- 2.2. Students, their parents/carers, or guardians who accept a place for their child at the School understand that images may therefore be used for these legitimate interests and that these images will not disclose the full name or home address of a Student without the parent's consent. Students and parents/carers of students should be aware that certain uses of their child's images may be necessary or unavoidable for example if they are included incidentally in a photograph.
- 2.3. The School will rely on "legitimate interests" as the legal grounds for taking and using photographs or videos which are less privacy intrusive. "Legitimate interests" is the appropriate legal ground when the use of the photograph or video is:
 - within the reasonable expectations of the student and their parents/carers; and

- they are unlikely to object to its use.
- 2.4. We hope that parents/carers will feel able to support the School in using student images to celebrate the achievements of students and promote the work of the School.
- 2.5. Parents/carers should be aware that, from around the age of 13, the law recognises students' own rights to have a say in how their personal information is used, including images, as long as the child possesses the appropriate level of maturity. Parents/carers should ensure that where consent is given on behalf of the child, that the child is made aware:
- for internal displays and exhibitions, official school photographs which may be purchased by parents/carers and video recordings for student assessment/coaching;
 - on the School's website and, where appropriate, via the School's social media channels, e.g. X (formerly Twitter), Instagram, Facebook and LinkedIn. Such images would not be accompanied by the student's full name without permission; and
 - in the School's prospectus, or other printed promotional material and in online, press and other external advertisements for the School. Such external advertising would not include student's full name without permission.
- 2.6. Unless the relevant student or their parent/carer 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 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/carers, students, staff, Governors and alumnae) including by email, via SchoolPost (the School's parent communication system) 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 (formerly Twitter), Instagram, Facebook and LinkedIn. Such images would not normally be accompanied by the student's full name without permission; and
 - in the School's prospectus, or other printed promotional material and in online, press and other external advertisements for the School. Such external advertising would not normally include students' names without permission.
- 2.7. The source of these images will predominantly be the School's staff, or a professional photographer used for marketing and promotional purposes, or occasionally students or their families. The School will only use images of students in suitable dress and the images will be stored securely and centrally in line with the Data Protection Policy and Safeguarding and Child Protection Policy.

3. Requirements for Consent

- 3.1. Any image which is more privacy intrusive, for example where it is a close-up image or clearly identifies the full name of the student and used for marketing purposes:
- on the School's website and, where appropriate, via the School's social media channels, e.g. X (formerly Twitter), Instagram, Facebook and LinkedIn
 - in the School's prospectus, or other printed promotional material and in online, press and other external advertisements for the School
- will require consent from a parent, carer or guardian if a student is under 16 along with the consent of the student if 13 or above or the student if 16 or over. This consent will be specific written consent for that image and will be controlled by the Director of Marketing and Admissions.
- 3.2 A student or parent acting on behalf of a student under 16 may wish to object to this image being used after it has been used and whilst attempts can be made to remove it from online systems the nature of social media and the internet can mean it is difficult to completely wipe

it. The same applies to any printed documentation and so a statement in the request for any consent will state that once consent is given, if subsequently withdrawn the School will do everything they can to remove it but cannot guarantee it will be completely removed.

4. Requesting Consent

- 4.1. Consent will be sought, using the consent form at **Appendix 1**, in circumstances listed in section 3 above, as follows:
 - for students in Years 7 to 11, consent will be sought from both students and parents/carers upon joining the school; and
 - for students in the sixth form, consent will only be obtained from the student.
- 4.2. A written record will be kept of how and when the consent was obtained. Consent or lack of consent will be recorded in the pupil record in SIMS, the School's management information system. In particular the following will be noted:
 - who consented
 - when they consented
 - how they consented e.g. in writing, email or verbally.
- 4.3. An individual is able to withdraw their consent at any time and they can do this by emailing maconsent@swps.org.uk.

5. Objections

- 5.1. The School allows parents/carers and students to object to the use of photographs and videos. For example, the School's privacy notice requires parents/carers/students to contact the Business Director with any objections and / or concerns. Any parents/carers, carer or guardian who wishes to limit the use of images of a student for whom they are responsible should contact the School in writing or by email at maconsent@swps.org.uk.
- 5.2. The School will respect the wishes of parents/carers and indeed students themselves wherever reasonably possible, and in accordance with this policy.
- 5.3. If consent is withdrawn this will be recorded on the written record referred to at 3.1 above. The withdrawal of consent does not apply retroactively. This means that any use of an image before the consent was withdrawn is still valid.

6. Use of Student Images for Identification and Security

- 6.1. All students are photographed on entering the School and, thereafter, annually, for the purposes of internal identification. These photographs identify the student by name, year group, house and form/tutor group and are used in accordance with the Parents/Carers and Students Privacy Notice.
- 6.2. 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 parents/carers and Student Privacy Notice and GDPR - CCTV policy, which may be published by the School from time to time.

7. Use of Student Images in the Media

- 7.1. Where practicably possible, the School will notify parents/carers in advance when the media is expected to attend an event or School activity, 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. The media often asks for the

names of the relevant students to go alongside the images, and these will only be provided where parents have been informed about the media's visit and either parent or student has consented as appropriate.

8. Security of Student Images

- 8.1. 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 students are held by them securely, responsibly and in accordance with the School's instructions.
- 8.2. 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 as outlined in the School's Safeguarding and Child Protection Policy. 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.

9. Use of Cameras and Filming Equipment (including mobile phones) by Parents/carers

- 9.1. Parents/carers 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/carers to follow:
 - When an event is held indoors, such as a play or a concert, parents/carers 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/carers 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/carers;
 - Parents/carers 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/carers 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/carers 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.
- 9.2 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.
- 9.3 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/carers for purchase. Parents/carers of students taking part in such plays and concerts will be consulted if it is intended to make such recordings available more widely.

10. Use of Cameras and Filming Equipment by Students

- 10.1. 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 staff.

- 10.2. 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 students in a manner that may offend or cause upset.
- 10.3. 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 for Students and Parents/carers, eSafety Policy, IT Acceptable Use Policy for Students, Safeguarding Policy, Digital Media Policy or the School Rules is always taken seriously, and may be the subject of disciplinary procedures or dealt with under the relevant safeguarding policy as appropriate.

11. Photographs and Videos of Students taken by Other Organisations

- 11.1. There may be situations where a third party takes photographs or videos of students. This should only happen with the consent of a senior member of staff and where there is appropriate supervision. For example:
- the School might hire a professional photographer to take official School photographs or to video a school play;
 - a company used by the School to provide extra-curricular activities/trips asks to use photographs of our students for advertising purposes; or
 - a photographer from a media outlet might attend an event at the School.
- 11.2 If the press will be attending school events, the School will let parents/carers and students know about this via newsletters, bulletins or on publicity materials. Informing parents/carers and students in this way will be done in a sufficiently clear way to meet the privacy notice requirements.

12. Monitoring and Review

The Governing Body is ultimately responsible for the effective oversight, review and amendment of this policy and understands its legal obligation to do so.

This document will be reviewed and updated annually by the Director of Marketing and Admissions or as events or legislation requires.

Next scheduled review date: Feb 2026	Last reviewed: Feb 2025
Key updates in this version:	<ul style="list-style-type: none"> • Updated reference to the School's CCTV Policy • Update of social media channels