



## CROSS CAMPUS POLICY ON TAKING, STORING & USING IMAGES OF PUPILS

**Academic Year 2020 – 21**

Name of Policy:	Taking, Storing and Using Images of Pupils
Date of Policy Revision:	October 2020
Revised by:	SMH Deputy Headmaster
Approved by:	The Executive Team
Date approved:	October 2020
Date of next revision	Summer 2021 <i>(SMH Deputy Headmaster + Director of Technical Services in consultation with the College and SMH DSLs)</i>
Location(s) where Policy can be found	<ul style="list-style-type: none"> <li>✓ Intranet</li> <li>✓ Hard copy files in the following offices:                             <ul style="list-style-type: none"> <li>❖ Compliance &amp; Legal Support</li> <li>❖ Headmaster’s PA</li> <li>❖ SMH Headmaster’s PA</li> <li>❖ Bursar’s PA</li> </ul> </li> </ul>

## **1. This Policy**

- 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 Stonyhurst, including Stonyhurst College and Saint Mary's Hall. It also covers Stonyhurst's approach to the use of cameras and filming equipment at Stonyhurst events and on Stonyhurst premises by parents and pupils themselves, and the media.
- It applies in addition to Stonyhurst's Parent Contract, and any other information Stonyhurst may provide about a particular use of pupil images, including e.g. signage about the use of CCTV, Stonyhurst's Privacy Notice, Stonyhurst's CCTV policy and Stonyhurst's Social Media Policy. Images of pupils in a safeguarding context are dealt with under Stonyhurst's relevant safeguarding policies.

## **2. General points to be aware of**

- Certain uses of images are necessary for the ordinary running of Stonyhurst; other uses are in the legitimate interests of Stonyhurst and its community and unlikely to cause any negative impact on children. Stonyhurst is entitled lawfully to process such images and take decisions about how to use them, subject to any reasonable objections raised.
- This policy, in addition to the Parent Contract and Stonyhurst's Privacy Notice, set out the way in which Stonyhurst may use the images of pupils. Generally, we will not require specific consent from parents to use a child's image unless the use of the photograph is by nature more intrusive than usual (such as if we are intending to put a close-up image on our website homepage or on the front of our prospectus) .
- We hope parents will feel able to support Stonyhurst in using pupil images to celebrate the achievements of pupils, sporting and academic; to promote the work of Stonyhurst; and for important administrative purposes such as identification and security.
- Any parent who wishes to limit the use of images of a pupil for whom they are responsible should contact the Deputy Head (External) in writing. Stonyhurst 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 (for example on their personal identification key card, in order to identify them as a Stonyhurst pupil) or unavoidable (for example if they appear on our CCTV or incidentally in a photograph).
- Parents should be aware that, from around the age of 12 or 13 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 Stonyhurst Publications**

- Unless the relevant pupil or his or her parent has requested otherwise, Stonyhurst will use images of its pupils to keep the Stonyhurst community updated on the activities of Stonyhurst, and for marketing and promotional purposes, including:
- on internal displays (including clips of moving images) on digital and conventional notice boards within Stonyhurst premises;
- in communications with the Stonyhurst community (parents, pupils, staff, Governors and alumni) including by email, on the Stonyhurst intranet and by post;
- on Stonyhurst's website and, where appropriate, via Stonyhurst's social media channels, e.g. Twitter, Instagram and Facebook (in line with our Staff Social Media Policy). Such images would not normally be accompanied by the pupil's full name without permission; and
- in Stonyhurst's prospectus, and in online, press and other external advertisements for Stonyhurst. Such external advertising would not normally include pupil's names and in some circumstances Stonyhurst will seek the parent or pupil's specific consent, depending on the nature of the image or the use.
- Pupil images which are included within publicity materials (hard copy or electronic) will be carefully, methodically and sensitively vetted by staff prior to any release. Any image which potentially could cause any embarrassment or distress will not be published.
- The source of these images will predominantly be Stonyhurst'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. Stonyhurst will only use images of pupils in suitable dress.

### **4. Use of Pupil Images for Identification and Security**

- All pupils are photographed on entering Stonyhurst and, thereafter, at regular intervals usually at the start of each academic year, for the purposes of internal identification. These photographs identify the pupil by name, year group, house and form/tutor group.
- CCTV is in use on Stonyhurst premises, and will sometimes capture images of pupils. Images captured on Stonyhurst's CCTV system are used in accordance with Stonyhurst's Privacy Notice and CCTV Policy.

### **5. Use of Pupil Images in the Media**

- Where practicably possible, Stonyhurst will notify parents in advance when the media is expected to attend an event or Stonyhurst activity in which 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.

- 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 has consented as appropriate.

## **6. Security of Pupil Images**

- Professional photographers and the media are accompanied at all times by a member of staff when on Stonyhurst premises. Stonyhurst 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 Stonyhurst's instructions.
- Stonyhurst takes appropriate technical and organisational security measures to ensure that images of pupils held by Stonyhurst are kept securely on Stonyhurst systems, and protected from loss or misuse. Stonyhurst will take reasonable steps to ensure that members of staff only have access to images of pupils held by Stonyhurst where it is necessary for them to do so.
- All staff are given guidance on Stonyhurst'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 college/school purposes, and in accordance with Stonyhurst policies and the law.

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

- Parents, guardians or close family members (hereafter, parents) are welcome to take photographs of (and where appropriate, film) their own children taking part in Stonyhurst events, subject to the following guidelines, which Stonyhurst 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; Stonyhurst 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 Stonyhurst from permitting the filming or recording of some plays and/or concerts. Stonyhurst will always print a reminder in the programme of events or make an announcement where issues of copyright apply.

- Parents may not film or take photographs in changing rooms or backstage during Stonyhurst productions, nor in any other circumstances in which photography or filming may embarrass or upset pupils.
- Stonyhurst 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.
- Stonyhurst 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. 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 Stonyhurst's Anti-Bullying Policy, eSafety Policy, ICT Acceptable Use Policy, Safeguarding 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.