



*inspirans flammam  
posteritatis*

**ROSEMEAD  
PREPARATORY  
SCHOOL & NURSERY**  
DULWICH

**P14.5 - Taking, Storing and Using  
Images of Children Policy  
(INCLUDING EYFS)**

## **RATIONALE:**

The General Data Protection Regulations (GDPR) (May 2018) introduces new requirements in relation to the consent and use of images. Rosemead will not, in most cases, strictly need consent for processing of most types of images of children. However, given the potential for intrusion, and the special protections accorded children under GDPR, Rosemead in relying on our "legitimate interests" under the GDPR, seeks to be clear about how we intend to use such images generally, and wherever practical to consider seeking consent of parents for particularly intrusive uses: for example, external marketing and media (including online) where particular children are featured prominently, or by name, or are involved in an activity or state of dress that might cause embarrassment.

### **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 Thurlow Educational Trust, trading as Rosemead Prep School ("Rosemead"). It also covers Rosemead'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 Rosemead's terms and conditions, and any other information Rosemead may provide about a particular use of pupil images, including e.g. signage about the use of CCTV; and more general information about use of pupils' personal data, e.g. Rosemead's Privacy Notice. Images of pupils in a safeguarding context are dealt with under Rosemead's relevant safeguarding policy.

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

- Certain uses of images are necessary for the ordinary running of Rosemead; other uses are in the legitimate interests of Rosemead and its community and unlikely to cause any negative impact on children. Rosemead is entitled lawfully to process such images and take decisions about how to use them, subject to any reasonable objections raised.
- Parents who accept a place for their child at Rosemead are invited to indicate they agree to Rosemead using images of him/her as set out in this policy, via the form attached to Rosemead's registration documentation and/or from time to time if a particular use of the pupil's image is requested. However, parents should be aware of the fact that certain uses of their child's images may be necessary or unavoidable (for example if they are included incidentally in CCTV or a photograph).
- We hope parents will feel able to support Rosemead in using pupil images to celebrate the achievements of pupils, sporting and academic; to promote the work of Rosemead; 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 Headmaster in writing or fill in the form attached.

Rosemead will respect the wishes of parents (and indeed pupils themselves) wherever reasonably possible, and in accordance with this policy.

- Parents should be aware that, from around the age of 12 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 School Publications**

- Unless the relevant pupil or his or her parent has requested otherwise, Rosemead will use images of its pupils to keep Rosemead community updated on the activities of Rosemead, and for marketing and promotional purposes, including:
  - on internal displays (including clips of moving images) on digital and conventional notice boards within Rosemead premises;
  - in communications with Rosemead community (parents, pupils, staff, Governors and alumni) including by email, on Rosemead intranet and by post;
  - on Rosemead's website and, where appropriate, via Rosemead's social media channels, e.g. Twitter, Instagram and Facebook. Such images would not normally be accompanied by the pupil's full name without permission; and
  - in Rosemead's prospectus, and in online, press and other external advertisements for Rosemead. Such external advertising would not normally include pupil's names and in some circumstances Rosemead 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 Rosemead'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. Rosemead will only use images of pupils in suitable dress.

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

- All pupils are photographed on entering Rosemead and, thereafter, at yearly intervals, for the purposes of internal identification and parental use. These photographs identify the pupil by name, year group, house and form group.
- CCTV is in use on school premises, and will sometimes capture images of pupils. Images captured on Rosemead's CCTV system are used in accordance with the Privacy Notice

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

- Where practicably possible, Rosemead will always notify parents in advance when the media is expected to attend an event or school activity in which school 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 school premises. Rosemead 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 Rosemead's instructions.
- Rosemead takes appropriate technical and organisational security measures to ensure that images of pupils held by Rosemead are kept securely on school systems, and protected from loss or misuse. Rosemead will take reasonable steps to ensure that members of staff only have access to images of pupils held by Rosemead where it is necessary for them to do so.
- All staff are given guidance on Rosemead'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

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

- Rosemead 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.
- Rosemead 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 Rosemead's Anti-Bullying Policy, Data Protection Policy, Online Safety Policy, IT Acceptable Use Agreements for Pupils, Safeguarding Policy or Rosemead Rules is always taken seriously, and may be the subject of disciplinary procedures or dealt with under the relevant safeguarding policy as appropriate.