

TAKING, STORING AND USING IMAGES OF PUPILS

INTRODUCTION

This Policy is intended to provide information to pupils¹ and their parents, carers or guardians (referred to in this policy as "parents") about how images of pupils are normally used by Tonbridge 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 and pupils themselves, and the media.

It applies in addition to the School's Terms and Conditions, 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 information in the School's Privacy Notice.

This policy should be read in conjunction with the following School policies:

- Safeguarding (Including the Child Protection Policy);
- Prevent Duty at Tonbridge School;
- Cyberbullying;
- Anti-bullying;
- Behaviour Rewards and Sanctions;
- CCTV;
- Privacy Notice for Boys;
- Acceptable use of Computers (Boys);
- Mobile phone;
- IT Acceptable Use (Staff);
- Emerging Technologies and Use of New Media;
- Online Safety;
- Away Fixtures Handbook;
- Conduct of Tonbridge Sport;
- Head Injuries;
- The Prevent Duty at Tonbridge School;
- Staff Recruitment;
- Visitors;
- Visitor and Contractor;
- Security;
- Staff Code of Conduct.

GENERAL POINTS TO NOTE

Certain uses of images are necessary for the ordinary running of the School; other uses are in the legitimate interests of the School and its community and unlikely to cause any negative impact on pupils. The School 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 boy at the School are invited to agree to the School using images of him as set out in this policy via the form attached to the School's Terms and Conditions, and 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 son'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 the School in using pupil images: to celebrate the academic, sporting and cultural achievements of pupils; to promote the work of the School;

¹ "Pupils" includes boys at the School and other pupils who may be involved in activities at the School (such as School Plays).

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 School's Second Master in writing. The School will respect the wishes of parents/carers (and indeed pupils themselves) wherever reasonably possible, and in accordance with this policy.

Parents should be aware that, from around the age of 13 and upwards, the law recognises pupils' own rights to have a say in how their personal information is used – including images.

USE OF PUPIL IMAGES IN SCHOOL PUBLICATIONS

Unless the relevant pupil or his or her 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 various publications such as the Tonbridgian magazine and in formal photographs (of year groups, Houses, teams, and other groups);
- in communications with the School community (parents, pupils, staff, Governors and alumni) including by email, on the School intranet and by post;
- in live streams or video recordings of School events and activities, such as concerts, plays and sports matches;
- on the School's website and, where appropriate, via the School's social media channels, e.g. Twitter, Instagram and Facebook; such images would not normally be accompanied by the pupils' full names without permission; 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' full 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 School will only use images of pupils in suitable dress and the images will be stored securely and centrally.

USE OF PUPIL IMAGES IN LIVE STREAMS

Where School events such as concerts, plays and sports matches are live streamed the following precautions are taken:

- Pupils' full names are not used
- A delay is put on the feed wherever possible to allow the feed to be stopped if needed
- Instructions for the camera operator are given instructions to pan away from injured player
- The live recording cannot be rewound and immediately after the action, the footage disappears
- The audio can be adjusted low and positioned away from the crowd. Some background noise is preferable for the user experience.
- Opposition permissions to be sought before fixtures
- Recordings remain on eStream rather than on publicly facing platforms
- Links to live streams are shared with the Tonbridge School community only

USE OF PUPIL IMAGES FOR IDENTIFICATION AND SECURITY

All pupils are photographed on entering the School and, thereafter, in the Third Year and when they enter the sixth form, 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 School premises, and will sometimes capture images of pupils. Images captured on the School's CCTV system are used in accordance with the School's Privacy Notice, and the School's CCTV Policy.

USE OF PUPIL IMAGES IN THE MEDIA

Where practicably possible, 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, 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 a full name will only be provided where parents have been informed about the media's visit and either parent or pupil has consented as appropriate.

SECURITY OF PUPIL IMAGES

Professional photographers and the media when on School premises follow the guidelines set out in policies above. 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 the School's policies and the law.

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 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 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 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 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 making inappropriate images.
- 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 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.

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, Acceptable Use of Computers Policy, Cyberbullying Policy, Emerging Technologies and Use of New Media Policy, Online Safety Policy, Safeguarding Policy or Memoranda (School Rules) is always taken seriously, and may be the subject of disciplinary procedures or dealt with under the relevant Safeguarding policy as appropriate.