



Images of Children Policy

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Reviewed by:	Matthew Hodge, Bursar
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1. Introduction

This Policy is intended to provide information to students and their parents, carers or guardians (referred to in this policy as "parents") about how images of students are normally used by Concord College ("the College"). It also covers the College's approach to the use of cameras and filming equipment at College events and on College premises by parents and students themselves, and the media.

It applies in addition to the College's parent contract, and any other information the College may provide about a particular use of student images, including e.g. signage about the use of CCTV; and more general information about use of students' personal data, e.g. the College's Privacy Notice. Images of students in a safeguarding context are dealt with under the College's relevant safeguarding policies.

2. General points to be aware of

Certain uses of images are necessary for the ordinary running of the College; other uses are in the legitimate interests of the College and its community and unlikely to cause any negative impact on students. The College 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 Concord College are invited to indicate that they agree to the College using images of him/her as set out in this policy via the form attached to the College's parent contract. In addition, Any parent who wishes to limit the use of images of their child should contact the Data Protection Officer at dataprotectionofficer@concordcollege.org.uk. The College will always respect the wishes of parents/guardians and students where 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 or unavoidable (for example if they are included incidentally in CCTV or a photograph).

We hope parents will feel able to support the College in using pupil images to celebrate the achievements of students, sporting and academic; to promote the work of the College; 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 Principal's Personal Assistant & Registrar in writing. The College will respect the wishes of parents/carers (and indeed students themselves) wherever reasonably possible, and in accordance with this policy.

Parents should be aware that, from around the age of 12 and upwards, UK law recognises students' own rights to have a say in how their personal information is used - including images.

3. Use of Student Images in College Publications

Unless the relevant pupil or his or her parent has requested otherwise, the College will use images of its students to keep the College community updated on the activities of the College, and for marketing and promotional purposes, including:

- on internal displays (including clips of moving images) on digital and conventional notice boards within the College premises;
- in communications with the College community (parents, students, staff, Trustees and alumni) including by email, on the college intranet and by post;
- on the College's website and, where appropriate, via the College's social media channels, e.g. Twitter, Instagram and Facebook. Such images would not normally be accompanied by the student's full name without permission; and
- in the College's prospectus, and in online, press and other external advertisements for the College, as well as in exhibitions to promote the College including the success of students. Such external advertising would not normally include students' names.

The source of these images will predominantly be the College'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 students. The College will only use images of students in suitable dress.

4. Use of Student Images for Identification and Security

All students are photographed on entering the College and, thereafter, at regular intervals, for the purposes of internal identification. These photographs identify the pupil by name, year group, house and tutor group.

CCTV is in use on College premises, and will sometimes capture images of students. Images captured on the College's CCTV system are used in accordance with the Privacy Notice and any other information or policies concerning CCTV which may be published by the college from time to time.

The College provides items including books and stationery at a charge to students that are added to students' bills. The image of the student is used to validate the student's identity to ensure accurate and correct billing.

5. Use of Student Images in the Media

Where practicably possible, the College will always notify parents in advance when the media is expected to attend an event or College activity in which College students are participating, 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 be provided where parents have been informed about the media's visit and either parent or student has consented as appropriate.

6. Security of Student Images

Professional photographers and the media are accompanied at all times by a member of staff when on College premises. The College 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 College's instructions.

The College takes appropriate technical and organisational security measures to ensure that images of students held by the College are kept securely on College systems, and protected from loss or misuse. The College will take reasonable steps to ensure that members of staff only have access to images of students held by the College where it is necessary for them to do so.

All staff are given guidance on the College's Policy on Taking, Storing and Using Images of Students, and on the importance of ensuring that images of students are made and used responsibly, only for College purposes, and in accordance with College policies and the law.

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

Parents (including guardians or close family members) are welcome to take photographs of (and where appropriate, film) their own children taking part in college events, subject to the following guidelines, which the college 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 college therefore asks that it is not used at indoor events.

- Parents 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.
- Parents 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 are reminded that copyright issues may prevent the College from permitting the filming or recording of some plays and concerts. The College 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 College productions, nor in any other circumstances in which photography or filming may embarrass or upset students.

The College 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 College sometimes records plays and concerts professionally (or may engage a professional photographer or film company to do so). Parents of students taking part in such plays and concerts will be consulted if it is intended to make such recordings available more widely.

The College streams the 6.2 Ball over the internet so that families that are geographically dispersed can join in the celebrations. All students are named and identified at the Ball as part of the Ceremony. The video stream is password protected to restrict viewing to invited guests only.

8. Use of Cameras and Filming Equipment by Students

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 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 students 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 any of the College's other policies is always taken seriously and may be the subject of disciplinary procedures or dealt with under the relevant safeguarding policy as appropriate.

9. Use of staff mobile devices for taking images of students

College Staff should use College devices to take photographs of students. Where a student has requested their photograph to be taken, staff should use the student's device. Where there is no alternative method in place, staff may use their own personal device to take pictures but must transfer these photographs to the Marketing Department and then delete the original from their device. Staff should not have photographs of students on their personal devices.