



TAKING, STORING AND USING OF PUPIL IMAGERY POLICY

Policy Custodian: Senior Master

Approving Body: MTS Senior Leadership Team

Approved: January 2024

(This policy does not extend to Merchant Taylors' Prep.)

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 Merchant Taylors' 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 parent contract, and any other information the school 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, contained in the school's Privacy Notice. [Images of pupils in a safeguarding context are dealt with under the school's relevant safeguarding policies].

General points to be aware of

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 children. The school is entitled lawfully to process such images and take decisions about how to use them, subject to any reasonable objections raised.

We hope parents will feel able to support the school in using pupil images to celebrate the achievements of pupils, sporting and academic; to promote the work of the school; 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 Senior Master in writing. The school respects the wishes of parents/carers (and pupils themselves) wherever reasonably possible, in accordance with this policy. However it needs to be kept in mind that one permission has been granted by parents, circumstances may arise where it will not be possible to withdraw an image if for example a pupil image has been shared with permission to national or international media organisation.

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 video footage) on digital and conventional notice boards within the school premises;
- in communications with the school community (parents, pupils, staff, Governors and alumni) including by email, the weekly School newsletter, Scissorum and publications including but not limited to the Tylorian, Parvae Res and Concordia.
- on the school's website and, where appropriate, via the school's social media channels, including but not limited to Twitter, Instagram, Snapchat and Facebook. [Such images would not normally be accompanied by the pupil's full name without specific 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 pupil's 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].

Consent to allow the school to use photography if its pupils is sought from parents upon entry of their son into the school.

Additional consent will be sought where the nature of the photography may be potentially more personally invasive. Examples of this nature might include, but are not limited to, imagery in the school's prospectus, external advertising campaigns or large circulation magazine articles centred on the school.

Consent obtained from parents to allow photography of their son within Merchant Taylors' School does not automatically permit the use of such photography by third parties with whom the school is in partnership. Additional consent is likely to be required in such circumstances. Once this consent is obtained a copy should be saved to the pupil's school record. Where third parties work with the school, photographs that make it difficult to identify individuals are preferred.

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 professional photographers who take images for administrative, 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 on the School Computer network.

Use of Pupil Images for Identification and Security

All pupils are photographed on entering the school and, thereafter, when they enter the Lower Sixth Form, for the purposes of internal identification. These photographs are used to identify the pupil by name, within his year group, house, tutor group, form group and class sets.

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 Privacy Notice and 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 these will 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 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 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.

Where staff take photographs of pupils engaging in school-centred activities, much importance is placed on ensuring that images of pupils are taken and used responsibly for school purposes only, and in accordance with school policies and the law. For the most part, staff should photograph pupils using devices provided by the school. On some occasions, a member of staff will use a personal device to photograph or take video footage of pupils. This imagery should be transferred to School systems and deleted from the personal device at the earliest opportunity.

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.
- School Sports matches may be filmed using video cameras or equivalent for subsequent match analysis or to offer a remote and safe experience for spectators. In such cases, only the school or an official photographer employed by the school should take the footage. As the footage is likely to feature pupils from other schools, both the MTS players and the opposing School must be notified in advance and agree to this filming. A copy of the video footage should be made available to the other school on request. As with photographs, the final video must be held securely on school systems.

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 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, Data Protection Policy, eSafety Policy, IT 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.

Senior Master