



**HEADINGTON RYE**  
OXFORD

# **Taking, Storing and Using Images of Pupils Policy**

**Senior and Prep School  
(including EYFS)**

<b>Reviewed by:</b>	<b>Director of Marketing and Admissions</b>
<b>Date of last Review</b>	<b>April 2024</b>
<b>Next Review Date:</b>	<b>In line with legislative updates</b>

**HEADINGTON RYE OXFORD IS AN EQUAL OPPORTUNITIES EMPLOYER**

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## **1. INTRODUCTION**

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 Headington Rye Oxford ("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 by 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, for example signage about the use of CCTV and more general information about use of pupils' personal data eg the School's Privacy Notice. Images of pupils in a safeguarding context are dealt with under the School's Safeguarding Policy.

## **2. 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.

Parents who accept a place for their child at the School are invited to agree to the School using images of the child as set out in this policy, through our Online New Pupil Enrolment Form. 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 the background of a photograph, or for identification purposes.

We hope parents will feel able to support the School in using pupils' images to celebrate the achievements of pupils in all areas, 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 indicate this in our Online New Pupil Enrolment Form or contact the School's [Marketing Department](#). The School will respect the wishes of parents/carers (and pupils themselves) wherever reasonably possible and in accordance with this policy.

Parents should be aware that, from 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. In discussion with their parents, any pupil from U4 upwards may choose not to have their images used. They can do this by getting in touch with the Marketing Department as above to indicate their preferences.

## **3. USE OF PUPIL IMAGES IN SCHOOL PUBLICATIONS**

Unless the relevant pupil or their 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 and communications (including clips of moving images) on digital and conventional notice boards within the school premises
- in communications with the school community (parents, pupils, staff, Governors and alumnae) including by email, on the school intranet and by post
- in live streams of events, concerts, lectures and productions from fixed cameras and microphones located in key locations in the School which will be both broadcast live on to a website and recorded for later viewing and publication. While the live stream will usually only feature performers, some audience members may appear incidentally in the background
- in marketing and promotional materials, the School's prospectus, and in online, press and other external advertisements for the School. Such external advertising would not normally include pupils' 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. For example, if the image of a single pupil is to be used as the main subject of an advertising campaign, separate permission will be sought from both pupil and parent
- occasional third party use by organisations of which the School is a member, including but not limited to the Independent Schools Council, Girls' Schools Association, Independent Association of Prep Schools and Boarding Schools' Association

While full names are not used in most circumstances, the Head Girls' names will generally be published in full and separate consent will be sought from them.

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 other pupils. The School will only use images of pupils who are suitably dressed and the images will be stored securely and centrally.

#### **4. USE OF PUPIL IMAGES ONLINE**

The School will use images of children on the school website, [www.headington.org](http://www.headington.org), and, where appropriate, via the School's social media channels which currently include Twitter, Instagram, Flickr, Facebook and LinkedIn. Such images would not normally be accompanied by the pupil's full name without separate permission.

Separate consent will be sought for publication of images on social media at the point at which pupils join the School. Parents will be asked to provide consent where the child is aged under 13 while those over the age of 13 will be requested to supply consent themselves.

#### **5. USE OF PUPIL IMAGES IN ONLINE EDUCATIONAL PLATFORMS AND FOR OTHER EDUCATIONAL PURPOSES**

In the Prep School, a number of online educational platforms are used to communicate with parents. These currently include Tapestry for EYFS pupils and Seesaw in Key Stage 1 and Key Stage 2. Images of children are shared with parents and may include other children, for example during class or group work. These are stored on a closed server. Where a parent has refused permission for images of that pupil to be used as described elsewhere in this policy, separate consent will be sought via email prior to images of their child being shared with other parents.

Video Enhanced Observation is used by the PE and Sports Department to help analyse and improve performance. Pupils will be informed when this is in use.

On occasion, lessons in the senior school are recorded to improve quality of teaching and learning.

## **6. USE OF PUPIL IMAGES FOR IDENTIFICATION AND SECURITY**

All pupils are photographed on entering the School and, thereafter, at the start of U3, L5 and L6, for the purposes of internal identification. These photographs identify the pupil by name, year group, house, boarding house, where relevant, and form/tutor group. We also take a year group photograph at the end of U5 and U6 and a whole school photograph, which will take place usually once during your child's time at school. Class photographs and sports team photographs are taken annually in the Prep School. Copies of individual, class and year group photographs, where relevant, will be sent home with pupils and ordering information provided.

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 / any other information or policies concerning CCTV which may be published by the School from time to time.

## **6. USE OF PUPIL IMAGES IN THE MEDIA OR BY OTHER THIRD PARTIES**

Where the media wishes to publish a story about the School eg covering an event, activity or achievement, the School will make every reasonable effort to ensure that any pupil whose parent or carer has refused permission for images of that pupil, or who has themselves refused permission, is 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 or pupil have consented as appropriate.

On occasion the School will provide images for third party use for the purposes of promoting an aspect of independent, single-sex, co-educational or boarding education. This will usually be to organisations of which the School is a member, including but not limited to the Independent Schools Council, Girls' Schools Association, Independent Association of Prep Schools and Boarding Schools' Association. Such images would not normally be accompanied by a pupil's name. The School may also share images from joint events with the other schools who participate, for example sporting fixtures or social events, to allow

both schools to publicise the activity. The School will make every reasonable effort to ensure that images of any pupil whose parent or carer has refused permission for images of that pupil, or who has themselves refused permission, will not be provided to third parties.

## **7. 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.
- 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 school policies and the law.

## **8. 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:

- Use of cameras including mobile phones is not permitted in the EYFS area of the Prep School or the School Swimming Pool. The exception to this is school-owned devices which do not leave the setting. This is in alignment with both the Online Safety Policy and the Safeguarding Policy.
- 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 during indoor events.
- Photography is not permitted during productions in the Senior School Theatre. There will usually be opportunities to take photographs of your child after the performance.
- 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 or social media 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 or make an announcement.
- Parents should not be present in changing rooms or backstage during school productions and therefore may not film or take photographs in these or 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 Prep 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.

## **9. USE OF CAMERAS AND FILMING EQUIPMENT BY PUPILS**

Pupils from U3-U5 are issued with an iPad which has the ability to capture images and they will be provided with appropriate training about acceptable use and storage of images. 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 or any area where pupils may be in an inappropriate state of undress, 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 for Pupils, Parents and Carers, eSafety Policy, IT Acceptable Use Policy for Pupils, Safeguarding Policy or Behaviour Policy is always taken seriously and may be the subject of disciplinary procedures or dealt with under the relevant Safeguarding Policy as appropriate.

**April 2024**