



EPSOM

COLLEGE

Date: June 2024

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Responsibility: Bursar/Director of Marketing &

TAKING AND USING IMAGES OF PUPILS

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 used by Epsom 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 pupils themselves, and the media.

"Pupils" includes girls and boys at the College and other pupils who may be involved in activities at the College (such as College Plays). It also includes those children attending summer and Easter sports courses and activities.

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

Images could be still photography, or film.

This policy should be read in conjunction with the following College Policies and Guidance:

- Child Protection and Safeguarding Policy;
- Anti-Bullying Policy;
- CCTV Policy;
- Privacy Notice for Pupils;
- Overarching Data Protection Policy;
- Code of Conduct for Staff;
- Pupils' Use of ICT, Mobile Phones & Other Electronic Equipment Policy;
- Use of the Internet Rules for Pupils; and
- Guidance for Pupils.

2. GENERAL POINTS TO NOTE

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 pupils. 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 the College are invited to agree to the College using images of him/her as set out in

this policy via the enrolment form attached to the College's Terms and Conditions, sent prior to enrolling at the College, 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 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 academic, sporting and cultural achievements of pupils; 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 has the opportunity to opt out of providing their consent via the enrolment forms. Parents also have the right, under GDPR regulations to withdraw their consent, and request the removal of images of their child, post-publication, should they wish. The College 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.

3. USE OF PUPIL IMAGES IN COLLEGE PUBLICATIONS

Unless the relevant pupil or his or her parent has requested otherwise, the College will use images of its pupils 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 various publications such as the Epsomian and in formal photographs (of year groups, Houses, teams, and other groups) displayed around the College, within Houses, Academic Departments, on signage and at public-facing events such as Open Mornings;
- in communications with the College community (Parents, pupils, staff, Governors and alumni) including by email, on the College website, intranet and by post;
- in live streams or video recordings of College events and activities, such as concerts, plays and sports matches;
- on the College's website and, where appropriate, via the College's social media channels, for example, and not limited to, Instagram, Twitter/X, Facebook, TikTok, YouTube, Vimeo and LinkedIn; such images would not be accompanied by the pupils' full names without permission; and
- in the College's prospectus, and in online, press and other external advertisements for the School; such external advertising would not include pupils' full names, and in some circumstances the College 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 be the College's staff (who are subject to policies and rules in how and when to take such images), or a professional photographer or videographer used for marketing and promotional purposes, or occasionally pupils. All third parties or external suppliers will have been employed by the College, vetted by the College, and will be chaperoned by members of the College staff while they are filming or photographing College pupils. The College will only use images of pupils in suitable dress and the images will be stored securely and centrally.

4. USE OF PUPIL IMAGES IN LIVE STREAMS

Where College 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.
- Links to live streams are shared with the Epsom College community only.

5. USE OF PUPIL IMAGES FOR IDENTIFICATION AND SECURITY

CCTV is in use on College premises, and will sometimes capture images of pupils. Images captured on the College's CCTV system are used in accordance with the College's Privacy Notices and CCTV Policy.

6. USE OF PUPIL 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 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.

7. SECURITY OF PUPIL IMAGES

Professional photographers and the media when on College premises follow the guidelines set out in policies above. The College uses only reputable professional photographers/videographers and makes every effort to ensure that any images of pupils 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 pupils 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 pupils 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 and Using Images of Pupils, and on the importance of ensuring that images of pupils are made and used responsibly, only for College's purposes, and in accordance with the College's policies and the law.

8. USE OF CAMERAS AND FILMING EQUIPMENT (INCLUDING MOBILE PHONES) BY PARENTS

Parents 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 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 social media platforms), 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 pupils.
- The College reserves the right to refuse or withdraw permission to film or take photographs (at a specific event or more generally), from any aren't 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 engages a professional photographer or film company to do so), in which case digital copies may sometimes be made available to Parents. 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

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. As stated in the Policy on Pupils' Use of ICT, Mobile Phones And Other Electronic Equipment, pupils in Lower School (Years 7-8) through to Fifth Form (Year 11) must hand their mobile phones in to staff for the duration of the school day. Sixth Form students may keep their mobile phones, but these should not be seen in lessons or when moving around the College. The use of cameras or filming equipment (including on mobile phones) should therefore be restricted by this overarching policy. Outside of those parameters, the use of cameras or filming equipment (including mobile phones) is strictly prohibited 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 Child Protection & Safeguarding Policy, School's Anti-Bullying Policy, Overarching Data Protection Policy, Pupils' Use of ICT, Mobile Phones & Other Electronic Equipment Policy, Use of the Internet Rules for Pupils, Safeguarding Policy or Guidance for Pupils is always taken seriously, and may be the subject of disciplinary procedures or dealt with under the relevant Safeguarding Policy as appropriate.