

USE OF ICT, MOBILE PHONES< CAMERAS AND OTHER ELECTRONIC DEVICES: TAKING, STORING AND USING IMAGES OF CHILDREN

This policy applies to pupils throughout the School, including Nursery and the Reception Class, ie the Early Years Foundation Stage (EYFS). 'Use' in this policy statement therefore includes 'use in the EYFS setting'.

The School recognises that internet safety is a safeguarding issue. The DSL works closely with the Education Safeguarding Advisory Team (ESAT) and OCSB and other agencies in promoting a culture of responsible use of technology that is consistent with the ethos of the School. Action will be taken in accordance with safeguarding regulations in the event that School becomes aware of the use of technology or images that give rise to safeguarding issues.

The School's policy on the use of mobile phones and cameras in the EYFS setting

Staff must not carry or use personal mobile phones, tablets, cameras or any other devices in the EYFS settings, in any other area of the School where EYFS children are present or on trips. Staff may use School iPads and cameras for taking images of EYFS pupils and the EYFS setting has its own mobile phone, landline and camera for use by staff. Parents and visitors to the EYFS settings and other areas of the School premises where EYFS children are present are not permitted to use personal mobile phones, cameras, tablets or any other devices.

Use of personal devices

Pupils' mobile telephones and other personal electronic devices should be switched off and stored securely during the School day, unless they are being used for educational purposes with a teachers' permission. They may be used during break and lunch times and in boarding houses after School; they should not be visible outside form rooms. The use of cameras or filming equipment (including on mobile phones) by pupils is only allowed under the direction of a member of staff.

Staff are not permitted to use their personal mobile devices or cameras in School other than for the online registration of pupils in Years 6 to 13, access to work email and iSAMs applications. Staff who wish to take photographs or video of pupils must do so on a School device. Staff who wish to use their personal mobile devices or cameras in school for any other reason must first seek permission from the Headmistress. Staff who act in breach of this may be subject to disciplinary action.

Communication

The School expects a degree of formality in communications between staff and pupils, and we do not expect pupils and teaching staff to communicate informally with each other by email, texting or mobile telephone. Our policy on out-of-school visits (Educational Visits Policy) explains the circumstances when communication by mobile telephone may be appropriate. Teachers and current/former pupils should not communicate at all via social networking sites.

The School does not tolerate any illegal use of devices, and will always report illegal activity to the Police and/or OSCB. If we discover that a pupil is at risk as a consequence of online activity, we may seek assistance from the Child Exploitation and Online Protection Unit (CEOP). We shall impose a range of sanctions on any pupil who misuses technology to bully, harass or abuse another pupil in line with our Anti-Bullying Policy.

Taking, Storing And Using Images of Children

The 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 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, staff 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 for example signage about the use of CCTV and more general information about use of pupils' personal data, eg *the Privacy Notice*. Concerning images that give rise to safeguarding issues, action will be taken in accordance with safeguarding regulations.

The uses of images are necessary for the day-to-day running of the school; other uses are in the legitimate interests of the School and its wider community, including marketing, and are 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 and pupils over the age of 13 have the right to refuse consent to the use of images.

Parents who accept a place for their child at the School are invited to agree to the School using images of him/her as set out in this policy, via the School's terms and conditions and from time to time if a particular use of the pupil's image is requested. Parents should be aware, however, of the fact that certain uses of the pupil's image may be necessary or unavoidable, for example if they are included incidentally in CCTV footage or a photograph. We hope parents will feel able to support the School in using pupil images to celebrate the achievements of pupils, promote the work of the School, and for important administrative purposes such as identification and security. If, however, any parent wishes to limit the use of images of a pupil for whom they are responsible, the parent should contact the Headmistress in writing. The School will always respect the wishes of parents (and indeed pupils themselves) where reasonably possible, and in accordance with this policy.

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 communications with the School community (parents, pupils, staff, Governors and alumni) including by email, on the School intranet and by post
- on the School's website and, where appropriate, via the School's social media channels, eg Twitter, Instagram and Facebook (such images would not normally be accompanied by the pupil's full name in accordance with GDPR.)
- in the School's prospectus, and in online, press and other external advertisements for the School (such external advertising would not normally include pupils' names.) In some circumstances the School will seek the parent of 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 guidelines about how and when to take such images) or a professional photographer or occasionally pupils. The School will use such images of pupils in suitable dress only and the images will be stored securely and centrally.

Use of pupil images for identification and security

On acceptance of a place, parents are asked to provide two colour passport photographs of the new pupil. The photographs are held electronically on the pupil database, and hard copies are kept on the pupil's personal file. The pupil database is password-protected, and access is restricted to administrative, teaching and pastoral staff. Photographs are taken annually of all pupils and updated on the system; these photographs identify the pupil by name, year group, house and form. 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 any other information or policies concerning CCTV which may be published by the School from time to time.

Use of pupil images in the media

When the media is expected to attend an event or School activity in which School pupils are participating, the School will make every reasonable effort to ensure that no image is taken of any pupil who has refused permission, or whose parents have refused permission, for images of that pupil to be made in these circumstances. The media often ask 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 no objection from the parents or pupil has been received.

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 have access to images of pupils held by the School only when it is necessary for them to do so.

All staff are given guidance on the School's *Taking, Storing and Using Images of Pupils Policy*, 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 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 any EYFS setting, 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.
- Visitors to the EYFS settings and other areas of the School premises where EYFS children are present must not use personal mobile phones, cameras, tablets or any other devices.

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 cameras or filming equipment in a way that breaches this policy, the School's *Anti-Bullying Policy*, the *Privacy Notice*, the *IT Acceptable Use Policy*, the *BOYD Policy* or the *Behaviour Management Policy* is always taken seriously, and may be the subject of disciplinary procedures.

151119