



EAGLE HOUSE
SCHOOL

Academic Year 2023 - 2024

Document Control

Title of Policy:	Images of Pupils Policy
Policy/Procedure Owner:	Katherine Baker
Date Last Reviewed:	12th March 2023
Ratified by Governors:	If applicable which governing body and date it was ratified or n/a

Policy should be reviewed annually and review details included in italics at the end of the policy together with the initials of who reviewed the policy. Any amendment mid-year also to be tracked at the bottom of the policy.

All policies to use the font Gill Sans MT font size 11.

TAKING, STORING AND USING IMAGES OF PUPILS POLICY

I. This Policy

- a) This Policy is intended to provide information to pupils and their parents (which includes guardians and carers as well as anyone with parental responsibility for that pupil) about how images of pupils are normally used by Eagle House School and the charity of which it forms part, The Wellington College (the **School** or **EHS**). It also covers the School's approach to the use of cameras and filming equipment at School events (including those hosted by the Eagle House Association) and on premises by parents and pupils themselves, and the media.
- b) 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, the CCTV policy) and more general information about use of pupils' personal data such as the School's Privacy Notice.

2. General points to be aware of

- a) The School has a legitimate interest to use images of pupils for identification and security, for tuition purposes, to celebrate and share the work and achievements of pupils and to promote the School. The School is entitled lawfully to process such images and take decisions about how to use them, subject to any reasonable objections raised. More details about this can be found in Sections 3, 4 and 5 below.
- b) Notwithstanding the above, the School prioritises the safeguarding and welfare of its pupils above all else and recognises that there is a difference in using images of pupils in material which will primarily be used within the School or School community and material intended as external advertisements or which will be used by third parties such as the media. Therefore, the School will seek the consent of the parent before using images of a pupil in certain material. More details about this can be found in Section 7 below.
- c) The School will only use images of pupils dressed suitably for the activity in which they are participating. No images can be taken of pupils in just swimwear without the permission of the Business Manager unless the School has a legal obligation to take those images (for example, for examinations).
- d) The School appreciates that the images of some pupils may not be used for safeguarding purposes. We expect that the School's Designated Safeguarding Lead will know of such circumstances but please contact Mrs Goves (Jessica.Goves@eaglehouseschool.com) should this apply to any child for whom you are responsible. Where images of a child cannot be used for safeguarding purposes, Mrs Goves will discuss this with the parents and, subsequently inform the appropriate staff of the measures that have been agreed. This may mean that images of the child are not used internally (other than for security, safeguarding or medical purposes) or externally and to ask Relatives (as defined below) not to take any images of any child other than their own at any School event or on the School's premises.
- e) Other than where there are specific safeguarding concerns, we hope parents will feel able to support the School in using pupil images for its legitimate interests. However, any parent who wishes to limit the use of images of a pupil for whom they are responsible should contact the Marketing Manager (lexi.pepperday@eaglehouseschool.com). The School will

respect these wishes wherever reasonably possible, and in accordance with this policy. In respecting such wishes, the School may choose not to select the relevant child for a specific activity or role or position within an activity where this may otherwise limit the School's ability to otherwise utilise images of that activity. It should be noted that certain uses of pupil's images may be necessary or unavoidable (for example, if they are included in CCTV footage or included incidentally in a photograph).

3. Use of Pupil Images for Identification and Security

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

4. Use of Pupil Images in connection with Examinations

- a) On occasions where the School has a legal obligation in using images of its pupils for the purposes of examinations, such images will be obtained, processed and retained in accordance with guidance provided by the exam board (including with regard to the sharing of those images).

5. Use of Pupil Images in Virtual Lessons, Co-Curricular Activities and Sport

The School has a legitimate interest in recording lessons, co-curricular activities and sport organised or co-ordinated by the School and which are attended remotely by some or all participants as it is good safeguarding practice and allows pupils who cannot attend the live event due to time zone differences, illnesses or other reasons to catch up with or review the recording. Such recordings may include images of pupils. Unless the School can demonstrate that it has a legal obligation or legitimate interest to do so, the recording will not be shared with anyone who was not originally invited to participate in the event.

6. Use of Pupil Images in Internal Publications

- a) The School has a legitimate interest in using images of its pupils for the purposes of tuition, whether academic, sporting or co-curricular.
- b) The School has legitimate interests in using images of its pupils to celebrate the life of the School and the work and achievements of pupils at the School (whether academic, sporting or co-curricular, whether undertaken at School or elsewhere and whether the pupil is engaged in School activities or otherwise), keep members of the School, the Eagle House Community and other schools within the Wellington College family of schools updated on such matters, and for marketing and promotional purposes, including:
 - i. in internal publications (that is, publications published by the School whose target audience are those who are pupils (including those who have been offered a place at the College), their parents or staff);
 - ii. on internal displays (including clips of moving images) and on digital and conventional notice boards within the School premises;
 - iii. in communications with and directed at the Eagle House Community and the Wellington College family of schools, including by email and by post;
 - iv. on the School website; and
 - v. via the school's social media channels, e.g. Twitter, Instagram and Facebook.

- c) In internal publications, the School may publish the first name, year group and, if necessary, for the purpose of distinguishing between pupils with the same name in the same year group, the initial letter(s) of the surname of the pupil alongside the image or in the text accompanying the image.
- d) Other than as set out below, surnames will not accompany images of pupils in internal publications unless the consent of the pupil and the parent has been obtained. The exceptions to this are:
 - i. in commemorative programmes (such as those published for Speech Day or for concerts, shows or other events organised by the School whether held at the College or elsewhere), the School may publish the first name, surname and house of the pupil. Pupils will not be specifically identified but, from the images and the information in the programme, it may be possible to identify individual pupils;
 - ii. in commemorative photos (such as team and other group photos), copies being retained for internal use may include any or all of the initials, the first name, the surname and house of the pupil. If copies are to be made available to parents and others, the School will seek the consent of the pupils and the parent to the inclusion of name alongside the image; and
 - iii. where the inclusion of the surname is an integral part of the image (for example, a picture of a member of the swimming team where team members are wearing swimming caps which state their surname).
- e) Other than in the Nursery and Reception, pupils will not be identified in images used in internal displays, notice boards, communications aimed at the Eagle House Community or the College's family of schools.
- f) From time to time, the School may wish to include the name of a pupil alongside their image on the School website or on social media accounts, for example, when a pupil has won a national competition. In such circumstances, the School will seek the consent of the parent and the pupil before including the name of the pupil.
- g) The source of these images will predominantly be the School's staff, or a professional photographer engaged by the School for marketing and promotional purposes, or occasionally pupils.

7. Use of Pupil Images in External Publications, Advertisements and in the Media

- a) For the purposes of this policy:
 - i. "external publications" are publications published by the School whose target audience are those who are not pupils, staff or parents of current pupils (or those who have been offered a place at the School); and
 - ii. "identifiable images" are images in which an individual pupil or a small number of pupils can easily be recognised. It would not usually include (i) distant shots, (ii) shots of an individual pupil or group of pupils in which a large part of their faces cannot be seen or (iii) a large group shot where the faces of individual pupils are very small or blurred.
- b) The School has a legitimate interest in using images of its pupils for marketing and promotional purposes in external publications and in online (other than the School website), press and other external advertisements for the School.

- c) Notwithstanding paragraph (b) above, the School appreciates that parents would prefer to know before an identifiable image of their child will be used in external publications. Therefore, the School will endeavour to seek the consent of the parent and the pupil before using an identifiable image of the pupil in external publications, and in online (other than the School website), press and other external advertisements for the School.
- d) Where practicably possible, the School will always notify parents in advance when the media is expected to attend a School event or activity in which pupils are participating and will make every reasonable effort to ensure that any pupil whose parent 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.

8. Security of Pupil Images

- a) The School uses only reputable professional photographers and makes every effort to ensure that any images of pupils are held by them securely, responsibly, in accordance with the School's instructions and data protection legislation.
- b) 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. Where possible, images of pupils will only be taken on School devices. If members of staff take images of pupils on their personal device (for example, a pupil is participating in an activity away from the School site) those images can only be stored on that device until such time as they have transferred the photographs to a School device at which point the images on the personal device must be deleted. Members of staff should not download images taken on a personal device to any device other than a School device or, from their personal device, share the images with any other person or any social media accounts other than a School social media account. 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.
- c) All staff at Eagle House are aware of this 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.

9. Retention of Pupil Images

Images of pupils will be retained for the following periods:

- (i) other than as set out in paragraph (ii) and (iii) below, soft copy images of pupils shall be deleted within two years of the pupil leaving the School;
- (ii) soft copy images used in external publications shall be deleted within five years of the pupil leaving the School;
- (iii) images of pupils shared on social media accounts maintained by the School may be retained indefinitely on such social media accounts;
- (iv) images captured in lessons, co-curricular activities and sport organised or co-ordinated by the School and which are attended remotely by some or all participants will be deleted within two years of the date on which the recording took place;
- (v) hard copy images of pupils used prior to the date on which the pupil left the School shall be deleted within

ten years of the pupil leaving the School although copies of publications and communications in which such image was used may be retained indefinitely.

10. Use of Cameras and Filming Equipment (including mobile phones) by Parents, Relatives & Friends

- a) Parents, family members and friends of pupils (hereafter, “**Relatives**”) are welcome to take photographs of (and where appropriate, film) the children they have come to support taking part in School events, subject to the following guidelines, which the School expects all relatives to follow at events at which photographs and filming are permitted:
 - i. Relatives 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.
 - ii. Relatives are reminded that images taken by them 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.
 - iii. Relatives 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.
 - iv. Relatives 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.
 - v. When an event is held indoors, relatives 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.
- b) At certain events, photography or filming may not be permitted. In such circumstances, the School will notify Relatives at the beginning of the event. Any Relative who does then photograph or film such event will be asked to leave and to delete the images or footage.
- c) In addition to paragraph (b) above, the School reserves the right to refuse or withdraw permission to film or take photographs (at a specific event or more generally) from any Relative who does not follow these guidelines, or is otherwise reasonably felt to be making inappropriate images.
- d) 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 relatives for purchase.

11. Use of Cameras and Filming Equipment by Pupils

The misuse of images, cameras or filming equipment in a way that breaches any relevant School policies (including the Anti-Bullying Policy, the Child-on-Child Abuse Policy, the IT Acceptable Use Policy and the EH Code) is always taken seriously, and may be the subject of disciplinary procedures or dealt with under the relevant safeguarding policy as appropriate.

CONSENT FORM FOR EXTERNAL PUBLICATIONS, ADVERTISEMENTS AND IN THE MEDIA

Eagle House School and the charity of which it forms part, Wellington College (the **School**) I uses images and recordings of pupils for identification and security, for tuition purposes and to celebrate and share the work and achievements of pupils within our school. Further, and as set out in our Terms and Conditions, the School uses images and recordings of pupils in the School's prospectus, the School's website and the School's social media channels to promote the School to prospective pupils and parents, to publicise the School's activities and to communicate with the Eagle House community, including our alumni, former parents and staff and those within our international family of schools.

In line with the School's 'Images of Pupils Policy', we seek consent before using a prominent, identifiable image of a pupil in the School prospectus and in online, press and other external advertisements for the School (for example, in an educational magazine or a national newspaper).

We would be grateful if you could let us know whether you and your child are happy for their images to be included in the media listed above. If you and your child are also happy for images and videography to be used by Wellington College Educational Enterprises Ltd (a subsidiary company of Wellington College) and the WCI family of schools in their prospectuses, and in online, press and other external advertisements, please respond accordingly.

Before submitting your response below, please read the full 'Images of Pupils Policy' which can be found [here](#).

I hereby consent to any prominent, identifiable images or videography of my child being used by Eagle House in the following media and confirm that I have discussed this with my child: * Field is required

- School prospectus
- Online advertising
- Print advertising
- Press releases and news stories

Yes

No

I hereby consent to any prominent, identifiable images and videography of my child being used to promote Wellington College Educational Enterprises Ltd (WCEE) (a subsidiary company of The Wellington College) in the following media and confirm that I have discussed this with my child: * Field is required

- WCEE prospectus
- WCEE website
- WCEE social media
- WCEE online advertising

- WCEE print advertising
- WCEE press releases and news stories

Yes

No

I hereby consent to any prominent, identifiable images and videography being used for the promotion of international schools in the Wellington College family (please find a list of our current schools [here](#)) in the following media and confirm that I have discussed this with my child: * Field is required

- Prospectus
- Website
- Social media
- Online advertising
- Print advertising
- Press releases and news stories

Yes

No

I acknowledge and agree that I do not own copyright or have any claim of ownership or other claim over the images in which my child features.* field is required

If you wish to change your preferences at any time, please contact the Marketing Manager Lexi Pepperday (lexi.pepperday@eaglehouseschool.com).