



WESTMINSTER
SCHOOL

PUPIL IMAGES POLICY

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OVERVIEW

Westminster School values the rich range of pursuits that takes place in the School, and members of the school community will naturally want to record our vibrant activities. The possibility of misunderstanding or misuse (against both of which everyone should guard) is something that needs to be recognised. The purpose of this policy is to:

- Protect pupils who take part in the School's events and activities, specifically those where photographs and videos may be taken;
- Set out the overarching principles that guide the School's approach to photographs or videos being taken of pupils during the School's events and activities;
- Ensure that the School operates in line with its values and within the law when creating, using and sharing images of its pupils.

This policy applies to all staff, volunteers and other adults associated with Westminster School.

LEGAL FRAMEWORK AND GUIDANCE

This policy has been created based on legislation, policy and guidance that seek to protect children and young people in England. Summaries of key legislation and guidance are available here:

Online abuse: learning.nspcc.org.uk/child-abuse-and-neglect/online-abuse

Child protection: learning.nspcc.org.uk/child-protection-system

WESTMINSTER SCHOOL BELIEVES THAT:

- Children and young people should never experience abuse of any kind.
- All staff, volunteers, parents and other adults associated with the School have a responsibility to promote the welfare of all pupils and to take, share and use images of pupils safely.

WESTMINSTER SCHOOL RECOGNISES THAT:

- The welfare of the pupils taking part in its activities is paramount.
- Pupils and their parents have a right to decide whether their images are taken and how these may be used, regardless of any protected characteristics.

- Consent to take images of children is only meaningful when the child and their understand the potential risks associated with the use and distribution of these images.
- There are potential risks associated with sharing images of children online.

KEEPING CHILDREN SAFE

The School seeks to keep children safe by:

- Obtaining written consent from parents before taking and using a pupil's image, which is given through accepting the School's Terms and Condition (with the option to withdraw consent at any time).
- Making parents aware that they can elect not to give or can withdraw their consent to the use of a pupil's image at any time by contacting the Head Master's office, where a record will be maintained of all pupils whose images may not be taken or used by the School. Whenever a pupil is added to this list, staff will be notified.
- Only using first names where there is a need to identify pupils, whose images are being used in published material.
- Never publishing personal information about individual pupils.
- Ensuring that pupils and their parents understand how images of pupils will be securely stored and for how long (including how the School will control access to the images and their associated information).
- Reducing the risk of images being copied and used inappropriately – it will seek to do this by:
 - Only using images of pupils in appropriate clothing (including safety wear if necessary).
 - Seeking to avoid full-face and -body shots of pupils taking part in activities such as swimming, where there may be a heightened risk of images being misused.
 - Using images that reflect positively pupils' involvement in the activity.
 - Advising social media users to check their privacy settings.
 - Reminding others about those with whom they can talk if they have any concerns about images being shared.

The School also has a procedure for reporting the abuse or misuse of images of pupils as part of its Safeguarding procedures. The School will ensure everyone involved in its organisation knows the procedures to follow to keep children safe.

PHOTOGRAPHY AND FILMING FOR PERSONAL USE

When pupils themselves, parents or spectators are taking photographs or filming at the School's events and the images are for personal use, the School will notify in the event programmes and / or make an announcement before the start of the event, reminding participants they should only take and /or share images of their own children, and that full policy details are available on the School's website.

The wording should include the following:

If you want to take images or videos, then please ensure that they are of your own children and that those images or videos should not be shared publicly. Further information is available on the School's website.

PHOTOGRAPHY AND FILMING FOR SCHOOL USE

Internal media

The School seeks to recognise and celebrate its pupils' achievements both within the school community and more widely, often via social media channels such as Twitter or Instagram. The School also makes use of pupil images in its publicity materials. The School also recognises that group leaders may use photography and filming as a teaching aid in, for example, activities such as music or drama. For images or videos that are to be used internally or within internal publications, consent has already been given by subscribing to the School's Terms and Conditions.

External media

The School also works with trusted external bodies (such as Boarding Schools' Association [BSA], and Independent Schools Council [ISC]) and publications (such as School House Magazine and Independent School Parent magazine) to promote the work of the School and celebrate the achievements of pupils. For images or videos that are to be shared with external bodies or publications, specific consent will be sought.

Occasionally, external agencies (e.g.: news channels, print media, etc.) wish to take photographs or to film at the School, either in relation to a specific event or as part of a general interest piece. When such a request is received, in the first instance the Director of Communications, in consultation with the Head Master, will decide whether to grant permission for either filming or photography to occur. If permission is granted, the School will seek to keep its pupils safe by ensuring that:

- All journalists, film crew, etc. are registered and signed into the School in accordance with the School's published Safeguarding procedures.
- All journalists, film crew, etc. wear identification, and are accompanied by a member of school staff at all times while on site.
- Only images of crowd scenes are taken without specific consent and that all pupils will be given the option not to be filmed or photographed before such images are captured.
- Where it is desirable to capture images of an individual pupil and / or to identify an individual pupil, this will only be with the specific, written consent of both pupil (and parent / carer if the pupil is not deemed to be Gillick Competent).

External photographers and videographers

For some events, an external photographer or videographer may be engaged by the School to record the event. In such cases, the School will seek to keep its pupils safe by:

- Providing the photographer or videographer with a clear brief about appropriate content and behaviour.
- Ensuring the photographer or videographer wears identification at all times.
- Not allowing the photographer or videographer to have unsupervised access to children.
- Not allowing the photographer or videographer to carry out sessions outside the event or at a pupil's home.
- Reporting concerns regarding inappropriate or intrusive photography or videoing following the School's Safeguarding procedures.

Events with other schools present

At many such events, especially competitive fixtures, pupils from other schools will be present. Members of staff taking images of the event should seek to capture only Westminster School pupils insofar as that is possible. Ideally, the consent of the person responsible for the non-Westminster pupils should be sought for the fixture to be photographed, although it is acknowledged that this is likely often to be impractical. Certainly, any shots of fixtures including non-Westminster pupils should be crowd shots only.

STORING IMAGES

Westminster School will store photographs and videos of pupils securely, in accordance with its Safeguarding Policy, Data Protection Policy and in line with legislation on data protection.

The School's Archive will keep, securely and in accordance with data protection law, both digital and hard copy images of each pupil as part of its historical record of the School. The Archive also keeps an ongoing record of significant school events, including images of pupils. Such images are retained as part of the historical record and as such may periodically feature in exhibitions, publications, etc. The School will seek to avoid the unnecessary retention of pupil images once pupils are no longer members of the pupil body, but recognises that there will be foras in which pupil images are likely to remain visible in the longer term, such as School, house and team photographs or where images have been used (legitimately and with appropriate consent) as part of publicity materials or shared on social media in celebration of a pupil's achievements.

The School will never store images of pupils on unencrypted portable equipment such as laptops, memory sticks or mobile telephones.

The School recommends that only cameras or devices belonging to the School be used for the taking of images of pupils. However, the School recognises that this is not always practicable (for example during Expeditions). Where it is desirable for the celebration of pupil endeavour or achievement to take images of a pupil or group of pupils on a staff member or volunteer's personal device, the image(s) should be transferred securely to one of the School's devices or sent securely to Communications at the earliest opportunity: thereupon it should be immediately deleted from the personal device.