

COLLEGE POLICY ON THE TAKING AND USE OF PHOTOGRAPHS OF PUPILS

Introduction

- 1. 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 Dulwich 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.
- 2. This Policy applies in addition to the College's standard terms and conditions and any other information the College may provide about a particular use of pupil images, including e.g. signage about the use of CCTV and more general information about use of pupils' personal data, e.g. the College's data protection policies and notices.

Use of Pupil Images for Identification and Security

- 3. All pupils are photographed on entering the College and, thereafter, at appropriate intervals, for the purposes of internal identification. These photographs identify the pupil by name, year group, house and form/tutor group.
- 4. 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 CCTV Policy and any other information or policies touching upon CCTV which may be published by the College from time to time.

Use of Pupil Images in College Publications

- 5. Unless the relevant pupil or his/her parent have 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 communications with the College community (parents, pupils, staff, Governors and alumni) including by email, on the College intranet and by post;
 - on the College's website and, where appropriate, via the College's social media channels, e.g.
 Twitter, Instagram and Facebook.; and

• in the College's prospectus, and in online, press and other external advertisements for the College. Such external advertising would not normally include pupils' names

and the College may continue to use any photos and videos after the pupil has left the College.

- 6. Pupils' names are not normally included as an integral part of an image file or alt tag on the College's website.
- 7. The source of these images is generally a professional photographer or a member of College staff.
- 8. The College will only use images of pupils in suitable dress.

Sharing of Pupil Images

- 9. College pupils frequently participate in events and activities with other schools (e.g. in connection with drama, music and liberal studies) with other schools (including James Allen's Girls' School, Alleyn's and our educational partnership schools). The College may share photos of our pupils when participating in such events and activities with the other schools involved and those schools may wish to publish such photographs in their own communications and other materials.
- 10. In addition, on occasion the College may allow other third parties to use photographic images of pupils (including on their own websites), for example education sector bodies and associations. This is only done where the College considers permitting such usage is appropriate and beneficial to the College (for example, enhancing the reputation of the College or raising awareness of its work) and it is only done on a non-commercial basis (i.e. without charging a licence fee).

Use of Pupil Images in the Media

- 11. Where reasonably practical, the College will 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 effort to ensure that any pupil whose parent or carer has refused permission for images of that pupil to be made in these circumstances are not photographed or filmed by the media.
- 12. The media normally asks 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 either a parent or the pupil has consented (as appropriate).
- 13. Occasionally, visiting speakers ask for permission to use photographs taken by (or for) the College during their visit (e.g. to accompany reporting of their visit in the media, including social media). The College may agree to permit such usage, where it is appropriate and in the broader interests of the College.

Security of Pupil Images

- 14. Professional photographers and members of the media invited to the College are accompanied by a member of staff when on College premises.
- 15. The College 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 College's instructions.
- 16. The College takes appropriate technical and organisational security measures to ensure that images of pupils held by the College are kept securely, and protected from loss or misuse, and in particular 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.
- 17. College staff are given guidance on the importance of ensuring that images of pupils are made and used responsibly, only for College purposes, and in accordance with the College's policies and the law. New arrangements are being made to control staff access to archived images, including that access to or the sharing of any photographs or films older than a year will require the express permission of the Digital Communications Manager and/or the Director of Communications.

Restrictions on use of Pupil Images by College and right to object

- 18. We hope parents will feel able to support the College in using pupil images to celebrate the achievements of pupils and promote the work of the College. However, any parent who wishes to restrict the use of images of their child should contact the **Director of Communications** in writing (scottjm@dulwich.org.uk).
- 19. Parents should be aware that from the age of 13 onwards the law recognises pupils' own rights to decide how their personal information is used (including photographs of them).

Use of Cameras and Filming Equipment (including mobile phones) by Staff

20. The Staff Code of Conduct sets out clear protocols for staff taking and storing of digital images of pupils (with both College and their own devices) and the DUCKS Mobile Phone and Devices Policy contains specific guidance on the taking and storing of photographs in DUCKS. College staff are given guidance on the importance of ensuring that images of pupils are made and used responsibly, only for College purposes, and in accordance with the College's policies and the law.

Use of Cameras and Filming Equipment (including mobile phones) by Parents

- 21. Parents, guardians or close family members (hereafter, 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.
 - In particular, 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 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 College from permitting the filming or recording of some plays and concerts.
 - 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.
- 22. The College 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.
- 23. The College sometimes records plays and concerts professionally (or engages a professional photographer or film company to do so), in which case copies of the DVDs and CDs 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

24. All pupils are encouraged to look after each other, and to report any concerns about the misuse of technology, or any worrying issues to their form tutor, Head of Year or another member of staff.

- 25. 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.
- 26. The misuse of cameras or filming equipment in a way that breaches this Policy, or the College's Anti-Bullying Policies, Data Protection policies, IT Acceptable Use Policy or the College Rules is always taken seriously and may be the subject of disciplinary procedures or dealt with under the relevant policy as appropriate.

Any queries regarding this policy should be directed to the College's Director of Communications, Ms Jane Scott. Telephone 020 8693 3601. Email: scottjm@dulwich.org.uk

Policy Owner: Clerk to the Governors

Last Reviewed: January 2023

Date of Next Review: January 2025