



Policy on the Use of Images and Recordings

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This policy is available on the Handbook page of the School Intranet and policies page of the School Website and can be made available in large print or other accessible format if required; such requests can be made by email to policyquery@stpaulsschool.org.uk

1. This Policy

- 1.1 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 St Paul's School ("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, other visitors and the media.
- 1.2 It applies alongside any individual parent or pupil consent forms provided, and should be understood in the context of any other information the School may provide from time to time about use of pupil images, including e.g. signage about the use of CCTV; and more general information about use of pupils' personal data in the [School's Privacy Notices](#).
- 1.3 The School is aware of emerging issues relating to the unauthorised use of pupil images in AI-generated images and follows the guidance set out by the UK Safer Internet Centre (UKSIC), for

example the deletion of metadata from published images and use of low-resolution images where appropriate.

1.4 School staff are additionally subject to their own training (in accordance with their role) and School policies in this area, including under the Staff Code of Conduct.

2. General points to be aware of

2.1 Certain uses of images are necessary for the ordinary running of the School; other uses (such as for the School's promotional materials or social media accounts) are in the legitimate interests of the School and its community and unlikely to cause any negative impact on children. The School is entitled lawfully to process such images and take decisions about how to use them, subject to any reasonable objections raised.

2.2 Parents who accept a place for their child at the School are invited to indicate agreement to the School using images of them as set out in this policy, by completing and digitally signing a photograph permissions form. However, parents should be aware of the fact that certain uses of their child's images may be necessary or unavoidable (for example as part of the curriculum or if they are included incidentally in CCTV).

2.3 We hope parents will feel able to support the School in using pupil images to celebrate the achievements of pupils; to promote the work of the School; and for important administrative purposes such as identification and security.

2.4 Any parent who wishes to limit the use of images of a pupil for whom they are responsible should fill in the photography consent form, which forms part of their onboarding paperwork. That consent may subsequently be withdrawn at any time (or consent may be given if previously withheld) by contacting the Head of Marketing, on IRG@stpaulsschool.org.uk. A list of pupils whose images may not be used is maintained by the Marketing department. The School will respect the wishes of parents/carers (and indeed pupils themselves) wherever reasonably possible, and in accordance with this policy.

2.5 From around the age of 12 and upwards, The UK General Data Protection Regulation (UK GDPR) recognises pupils' own rights to have a say in how their personal information is used – including images. Please refer to the School's [Data Protection Policy](#) (Appendix 1) for further information.

3. Use of Pupil Images and Recordings in School Publications and other areas ("Internal Use")

3.1 Unless otherwise indicated in the permissions form, 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:

3.1.1 on internal displays (including clips of moving images) on digital and conventional notice boards within the School premises;

3.1.2 on external displays (including clips of moving images) on digital scoreboards on the Sports Pitches;

3.1.3 in communications with the School community (parents, pupils, staff, Governors, St Paul's School Group schools and alumni) including by email, on the School intranet and by School Post;

- 3.1.4 on the School's website and, where appropriate, via the School's social media channels, e.g. Instagram, LinkedIn and Facebook. Such images will not be accompanied by the pupil's full name without prior permission;
 - 3.1.5 in the School's prospectus, internal publications and other promotional materials; and
 - 3.1.6 in the instance of a joint St Paul's School/St Paul's Girls School event.
- 3.2 For the purposes of this Policy, "School Publications" refers to all channels affiliated with St Paul's School, St Paul's Prep School, St Paul's School Group and the Old Pauline Club, all of which are managed by the Marketing department.
- 3.3 The source of these images will predominantly be the School's staff (who are subject to the Staff Code of Conduct, which details how and when to take and store such images), or a professional photographer or videographer used for marketing and promotional purposes, or occasionally pupils. The School will only use images of pupils in suitable dress (and the images will be stored securely and centrally in accordance with the School's Data Protection policies).
- 3.4 Where the School has commissioned a professional photographer or videographer for a specific event, for example a music concert or sports fixture, the photographs will be made available on the School's Digital Asset Management System (DAMS) for parents to view via a secure link. Any photographs containing pupils without the relevant permissions will be removed by the School prior to sharing.
- 3.5 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 more widely for parents. Parents of pupils taking part in such plays and concerts will be consulted by the event organiser if it is intended to make such recordings available more widely.
- 3.6 The School's Veo Video equipment is used during sporting fixtures against other schools and training sessions. This is for sports coaching analysis and feedback after match play, and will be shared only in the following circumstances:
 - 3.6.1 Team video analysis sessions where a coach uses the footage to highlight coaching points;
 - 3.6.2 Investigating behaviour incidents (including with the opposition school) or to assist with disciplinary investigations;
 - 3.6.3 Sharing with team members to watch back their game (no onward sharing is permitted within the usage guidelines that team members must commit to);
 - 3.6.4 Reciprocal footage sharing with opposition teams (where no onward sharing is permitted within the usage guidelines that opposition teams must first agree to);
 - 3.6.5 Creation of highlight reels to support player US or other university applications;
 - 3.6.6 Creation of highlights to show on School social media.
 - 3.6.7 Showing replays of goals/tries and livestreaming School fixtures on the School's digital scoreboard.
 - 3.6.8 Where we need to comply with any legal obligation or respond to legal action.
- 3.7 The use of the School's video equipment, including the Veo camera, is considered to be in the legitimate interest of the school. When Veo is used for fixtures with pupils from other schools the Director of Sport will ensure that the opposition school has been informed with

due notice so that any objections can be raised. Where an objection is raised Veo will not be used.

3.8 Opposition schools sometimes bring their Veo camera to film fixtures on the School site. These schools will be relying on the lawful basis of Legitimate Interests or Public Task in sharing the footage for coaching and analysis purposes only between the two schools. When footage is shared with other schools, it is done so with the proviso that it will not be published on social media. The Director of Sport manages this process.

3.9 Sports events and awards events may be filmed or live streamed with a standard video camera. Pupils will be informed in advance where this is the case and given the opportunity to opt out of the filming or, where possible, limit exposure.

3.10 The Boat Club and other sports film pupils for the same purposes as the Veo camera is used. School devices are used for this purpose, and the footage uploaded to a restricted-access sharing platform for participants and coaches to view, subject to the usage guidelines requiring no onward sharing.

4. Use of Pupil Images in Academic Work

4.1 There will be occasions where, for academic purposes, pupils will need to be recorded as part of the curriculum. This may include submission of the recordings to external examination boards.

5. Use of Pupil Images for Identification and Security

5.1 All pupils are photographed on entering the School and, thereafter, at intervals, for the purposes of internal identification. These photographs identify the pupil by name, year group, house and form/tutor group.

5.2 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 Privacy Notices, CCTV Policy and any other information or policies concerning CCTV which may be published by the School from time to time.

6. Use of Pupil Images in the Media ("External Use")

6.1 The School may use images of pupils when placing advertisements in external publications or online, or when providing images to a publication when accompanying a feature. These occasions would not usually involve identifying pupils by name, but if such occasions arise then the School will seek the parents' specific consent.

6.2 Where practicably possible, the School will always notify parents in advance if the media is expected to attend a School event or School activity in which School 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.

6.3 Staff running School events or activities where the media is expected to attend must notify the Strategic Director of Development and Engagement in advance.

6.4 The media often 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 parent or pupil has consented as appropriate. Whilst a pupil is considered as capable of consenting to the use of their own data from around the age of 12, the School will have due regard to all circumstances surrounding any conflict between parent/pupil consent and consult further with parents where appropriate.

7. Security of Pupil Images

7.1 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.

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

7.3 All staff are given guidance annually on the School's procedures for 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.

8. Use of Cameras and Filming Equipment (including mobile phones) by Parents / Visitors

8.1 Parents, guardians or close family members (hereafter, parents) are welcome to take photographs of (and where appropriate, film) their **own children**, subject to the expectations set out in Appendix A.

8.2 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 or visitor who does not observe these expectations or is otherwise reasonably felt to be making inappropriate images. Persistent failure to observe these expectations may result in parents being asked to leave an event. School staff are aware that they may call upon the Security Team for assistance with any such situation. School staff are acting within their duty of care to pupils in approaching and challenging any parent or visitor who fails to follow the School's expectations regarding the use of cameras and filming equipment.

Appendix A – Expectations for Parents and Visitors - Use of Cameras and Filming Equipment

1. When an event is held indoors, such as a play or a concert, parents and other visitors should not film or take photographs as this can disturb others in the audience and reduce enjoyment of the event.
2. Parents and visitors should not take photographs or recordings of other pupils, except incidentally as part of a group shot including their own child, without the prior agreement of the other pupils or the pupils' parents, as appropriate.
3. Parents and visitors are reminded that such images or recordings are for personal use only. Images or recordings 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 (for example social media channels).
4. Parents and visitors 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, and make appropriate announcements at the start, where issues of copyright apply.
5. Parents and visitors 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, offend or upset pupils.