

USE OF PUPILS’ IMAGES AND NAMES POLICY

Policy Lead	Deputy Head, Pastoral, & Head of Junior School
Reviewed By	Deputy Head, Pastoral, & Head of Junior School
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Governing Body Committee with oversight	Pastoral, Safeguarding and Compliance Committee

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I. Introduction

- 1.1 North London Collegiate School (the School) believes that the responsible use of photographic images and names makes a valuable contribution to the School community. This can increase pupil motivation, morale and help the School community to celebrate the School’s achievements.
- 1.2 It is important to note that data protection law is unlikely to apply in many cases where photographic images are taken in schools. If photographs are taken purely for personal use, such as by parents at a sports day for the family photo album, they will not be covered by data protection legislation.
- 1.3 For the purposes of this policy, the words “photographic images” includes still or moving images, with or without sound, and whether stored/transmitted electronically or as hard copies.
- 1.4 This policy must be read in conjunction with the following which are available on the School [website](#)
- Behaviour Policy
 - Code of Conduct for Staff (internal document)
 - Data Protection Policy
 - Digital Safety Policy for Pupils
 - Digital Safety Policy for Staff (internal document)
 - Privacy Notices
 - Safeguarding and Child Protection Policy
 - Terms and Conditions
- 1.5 This policy applies to the whole school from Early Years Foundation Stage (EYFS) to sixth form.
- 1.6 This policy is available on the School website.
- 1.7 Copies of the above are held at the Senior School Office for consultation by parents. You may also email the School at Office@nlcs.org.uk to request hard copies which can be made available in large print or other accessible format if required.

2. Aims and objectives

- 2.1 This policy aims to provide clear information to parents and pupils about how images and names of pupils are usually used by the School, and guidance to taking and using photographic images on School premises by parents, pupils and external organisations.
- 2.2 Images of pupils in a safeguarding context are dealt with under the School's Safeguarding and Child Protection policy.

3. Statutory and regulatory framework

- 3.1 This policy complies with the following:
- [General Data Protection Regulation \(EU 2016/679\)](#)
 - [Data Protection Act 2018](#)
 - [ICO guidance Taking photographs in schools](#)

4. Scope and responsibilities

- 4.1 The School seeks written consent from parents before taking or using photographic images of pupils. Where the School seeks consent to use personal data the option will be provided to withdraw this consent at any time. Any use of information before consent is withdrawn remains valid.
- 4.2 Parents are responsible for providing or withdrawing consent for their child/ren, in writing, via the Parent Portal. However, parents should be aware that, in some circumstances, the law recognises pupils' own rights to have a say in how their personal information is used.

5. Use of images and names

- 5.1 The School uses photographic images of pupils, individually or collectively, for many purposes including but not limited to; record keeping, educational use, on the School website, in the School prospectus, internal displays etc.
- 5.2 All School staff must adhere to the School's guidelines on taking, storing and using images of pupils as set out in the School's Code of Conduct for Staff, Safeguarding and Child Protection policy and Data Protection policy.
- 5.3 Where the School publishes photographic images of pupils the School will refer to pupils only by their first names.

- 5.4 Where the School publishes pupils' articles that are not accompanied by photographic images, the School will attribute articles to pupils by their first names and year groups.
- 5.5 The School may hire professional photographers to take photographic images of pupils for marketing purposes. External photographers are requested to act in accordance with the School's instructions regarding taking and storing photographic images, and will always be accompanied by a member of staff whilst they are on School premises.
- 5.6 On occasion, the School may invite the media to take photographic images of pupils to celebrate successful pupil performances in exams, sports, productions etc. If the media requests full names to accompany photographic images, the School will seek prior consent from parents before disclosing this information.

6. Guidance for pupils

- 6.1 The Senior School and Lower School Pupil Digital Safety Agreements', located in the School's Digital Safety Policy for Pupils, sets out the responsible behaviour expected in relation to photographic images.
- 6.2 All pupils are encouraged to be sensitive in their use of photographic images of their peers, and to report any misuse or concerns to their class teacher/form tutor.
- 6.3 Using photographic material of any kind to abuse, bully, harass or upset or intimidate others will not be tolerated and will constitute a serious breach of discipline.

7. Guidance for parents

- 7.1 Parents must be considerate when taking photographic images at School events . Flash photography must not be used during performances in School.
- 7.2 Parents are requested not to publish photographic images of other children in any public forum, or to 'tag' children from other families in images already published, without the permission of the relevant family. It is illegal to sell or distribute recordings from events without permission.

8. Security

- 8.1 All pupils are photographed upon entry to the School for internal identification purposes, and again at Years 7, 9 and 12. The photographs identify the pupil by

name and form group, and are saved on the School's database system which is accessible to staff.

- 8.2 The School uses CCTV on its premises. Pupil images will be captured on this system and are used in accordance with the School's Data Protection policy and Privacy Notices. CCTV is not used in private areas such as changing rooms and washroom facilities but is located in some teaching / form rooms. The school reserves the right to use CCTV footage to assist in any internal investigations.

9. Copyright

- 9.1 The School does not own the copyright of all photographic images and therefore cannot control how these are used.
- 9.2 The School will only work with reputable external photographers to minimise the risk of misuse of photographic images.
- 9.3 The School is unable to control the use of photographic images taken by parents.

10. Monitoring and review

- 10.1 The Head and Senior Team will regularly monitor and evaluate the effectiveness of this policy.
- 10.2 The policy will be subject to review every year (or more frequently if changes to legislation, regulation or statutory guidance so require) by the Deputy Head (Pastoral), Head of Junior School and the relevant committee of the Governing Body.
- 10.3 The date of the next review is shown on the front page.