

Taking, Storing and Using Images of Children Policy
(this "Policy")

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| Authorised by: | The Board of Governors of CFBL |
| Date: | WR 7 March 2023 |
| Review Date: | A least <u>annually</u> March 2024 and/or following any updates to national and local guidance and procedures |
| Circulation: | Governors/all staff/volunteers, automatically Staff: on Staff shared drive > Policies Parents on request/School Website |

1. This Policy

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 CFBL. It also covers the School's approach to the use of cameras and filming equipment at school events and on school premises by parents and pupils themselves.

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 e.g. signage about the use of CCTV; and more general information about use of pupils' personal data, e.g. the School's Privacy Notice. Images of pupils in a safeguarding context are dealt with under the School's relevant safeguarding policies.

2. General points to be aware of

Certain uses of images are necessary for the ordinary running of the School; other uses are in the legitimate interest 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.

The School's Privacy Notices, this Policy and the School's CCTV policy are available on CFBL's website. Parents who accept a place for their child at the School should be aware of the fact that certain uses of their child's images may be necessary or unavoidable (for example if they are included incidentally in CCTV or a photograph).

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

Parents should be aware that, from around the age of 13 and upwards, the law recognises pupils' own rights to have a say in how their personal information is used – including images.

3. Use of Pupil Images in School Publications

The School will use images of its pupils to keep the School community updated on the activities of the School, including:

- on internal displays (including clips of moving images) on digital and conventional notice boards within the school premises;
- in communications with the School community (parents, pupils, staff, Governors and alumni) including by email, Pronote, Google drive, Google Classroom, the School Portal, through the Yearbook and the Parents' Handbook.

4. Class pictures

Class pictures, organised, taken, stored and sold to parents every year by the parents' association, do not fall within the scope of this policy.

The School ensures that only pupils for whom consent was granted as part of the Consent for audio or visual recordings and photographs for pupils (attached as Annex 1) sent every year to parents (or directly to their children if in 4e or 3e) are included on the class pictures.

5. Parents' consent for use of pupil's images for marketing and promotional purposes

The School will ask parents' explicit consent (or pupils' consent if they are over the age of 13 or in 4eme or 3eme) to use images of its pupils for marketing and promotional purposes in the School's prospectus, on the school's website, on third party's websites (e.g. AEFÉ and FSF) and on the School's media channels (e.g. Twitter, Instagram and Facebook) or in (on line) press or other external advertisements for the School as part of a consent form sent every year to parents and attached as Annex 1. Such publication will not include the pupil's name unless agreed differently with parents/pupil. Parents or pupils may withdraw their consent by contacting the school's Communications and Marketing Department at Communication@cfbl.org.uk.

6. Use of Pupil Images for Identification and Security

All pupils are photographed when they start to attend the School and, thereafter, at regular intervals, for the purposes of internal identification. These photographs identify the pupil by name, year group and class and are shared internally with teachers, administration and management teams.

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 Notice and the School's CCTV Policy.

7. Use of Pupil Images in the Media

Where practicably possible, the school will always notify parents in advance when the media is expected to attend an 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.

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 if above 13) has consented as appropriate.

8. Source and Security of Pupil Images

The source of pupil images will predominantly be the School's staff (who are subject to CFBL's Staff behaviour Policy) or a professional photographer or occasionally pupils. When we occasionally use a professional photographer, he/ she will be 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.

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.

All staff are given guidance on the School's 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.

The school requests all staff to use School's devices (iPhones, iPads, cameras ...) to record pupils' images. Only when this is not feasible and except in the Early Years (where this is never authorised), staff may use their personal device provided that they immediately send the photos by email to the School's drive and delete all copies on all their personal devices (included cloud).

The School will only take images of pupils in suitable dress and the images will be stored securely.

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

Parents or close family members (hereafter, parents) are welcome to take photographs of (and where appropriate, film) their own children taking part in School events, subject to the following guidelines, which the School 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. Flash photography can disturb others in the audience, or even cause distress for those with medical conditions; the School 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, expressly or not, identify other pupils should not be made accessible to others via the internet (for example on Facebook or other social media), or published in any other way.
- Parents 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.
- Parents must 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.
- For Early years, parents are generally prohibited from taking any photographs of children in the early years setting, but for special events such as school performances, may do so on the understanding that the images are not posted onto social media sites or otherwise shared.

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 who does not follow these guidelines, or is otherwise reasonably felt to be making inappropriate images.

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 parents for purchase, or the film may be privately made available to parents for free on Google Drive. Parents of pupils taking part in such plays and concerts will be consulted if it is intended to make such recordings available more widely.

9. Use of Cameras and Filming Equipment by Pupils

All pupils are encouraged to look after each other, and to report any concerns about the misuse of technology, or any worrying issues to a member of the pastoral staff.

The use of cameras or filming equipment (including on mobile phones) is not allowed in the School (except if for a particular school project, using the school's equipment under the supervision of a teacher)

The misuse of images, cameras or filming equipment in a way that breaches this Policy or any other School policy is always taken seriously, and may be the subject of disciplinary procedures or dealt with under the relevant safeguarding policy as appropriate.

Last review by the management: January 2023

RELATED POLICY

- Privacy notice for pupils
- Privacy notice applicable to all members of the School Community (Past and Present)
- CCTV Policy
- Consent for audio or visual recordings and photographs
- Safeguarding and Child Protection Policy
- E-safety and Use of Internet Policy (pupils)
- Anti-bullying Policy
- Behaviour and discipline Policy
- Staff Behaviour Policy
- Retention Policy

Annex 1 - Consent for audio or visual recordings and photographs

Consent for pupils under 13

At *Collège Français Bilingue de Londres* ('CFBL'), we sometimes take photographs, audio and/or visual recordings of our pupils. We use these to illustrate life at CFBL for the following purposes:

- To celebrate achievements in various fields (academic, sports, music etc.);
- To show contributions to exhibitions, shows, charitable events, internal journals / media;
- To show participation in outings, school trips and conferences;
- For educational purposes; and
- To promote the school.

In accordance with our Privacy Notice and Taking, Storing and Using Images of Children Policy, we are asking your explicit consent to use your child's image **outside** the School community, as described below.

All of the questions below relate to both individual and group recordings and photographs. Please consider carefully what will happen if you do not give permission in relation to some of these questions. **The pupil may be required to step out** of group photos and recordings celebrating life at CFBL e.g. at sports fixtures, on sports day, on a school trip, for fundraising (otherwise the picture could not be used and this will affect other pupils in the group).

Please tick all the relevant boxes and sign this form.

1. **CFBL WEBSITE:** I give consent for photos and audio and/or visual recordings of the pupil named below to be used on CFBL's website, including Radio Récré.

YES NO

2. **SCHOOL'S SOCIAL MEDIA FEEDS:** I give consent for photos and audio and/or visual recordings of the pupil named below to be included in images and recordings used on the school's social media accounts including its Facebook, Instagram, LinkedIn, Twitter, Soundcloud and Youtube accounts. This include images and recordings used by Radio Récré.

YES NO

3. **PHOTOS AND VIDEOS IN THE SCHOOL'S RECEPTION:** I give my consent for photos and audio and/or visual recordings of the pupil named below to be used in reception (e.g. the Perspex frames and the video screen).

YES NO

4. **BROCHURES, CARDS AND OTHER PROMOTIONAL MATERIAL:** I give my consent for photos of the pupil named below, to appear in the School's brochures, booklets, cards, banners, Power-point presentations and other promotional material.

YES NO

5. **NEWSPAPERS, GUIDES AND MAGAZINES:** I give my consent for photos of the pupil named below, to appear in newspapers and magazines in English or French, including newspapers, magazines

and school guides, aimed at parents and families, expatriates, the French community in the United Kingdom or the general public, including for their online version.

YES NO

6. **SCHOOL PRODUCTIONS AND EVENTS:** I give my consent for the pupil named below to be photographed and filmed by staff and fellow parents during school productions and events as long as it is made clear each time that these must only be used for personal viewing purposes and must not be published in any format including online.

YES NO

7. **FUNDRAISING PHOTOS:** I give my consent for photos and audio and/or visual recordings of the pupil named below to be taken in relation to CFBL Parents and FSF (French Scholarship Foundation) fundraising activities and for these photos to be shared with and used by CFBL Parents and FSF for their own activities.

YES NO

8. **CFBL AS AN AEFÉ SCHOOL:** CFBL is an approved school of the Agence pour l'enseignement français à l'étranger - AEFÉ (*établissement homologué*). In that context, we occasionally share photographs of our pupils with AEFÉ, for use on their website and their publications. I give my consent for photographs and audio and/or visual recordings of the pupil named below to be used on the AEFÉ website, social media, and in its publications.

YES NO

Pupil's name:

Pupil's date of birth:

Date:

Signed (Parent /Carer).....

Please note: The source of these images and recordings will be the school's staff (who are subject to policies and rules on how and when to take such images) or occasionally fellow parents. The name of the pupil will be omitted except for Radio Récré use where first name may be used.

This form takes effect immediately and replaces all previous consents that you may have given to CFBL for using your child's recordings or photographs outside the School community. It can be renewed or revised at any time. If you wish to make any changes, please email communication@cfbl.org.uk, and we will supply you with a new form. If you have any questions, please contact the school office.

Normally consent would last for the period of time that the pupil is at the school but there may be a few occasions where consent has been given for a photo to be used in school publicity (such as brochures, booklets, images on the website or photos around the school) where these would potentially remain in place after the pupil had left the school until consent was withdrawn.

Why are we asking for your consent again?

You may be aware that new data protection rules have recently come into force. To ensure CFBL meets the new requirements, we need to obtain your consent under the new regulations to take and use photos of the pupil in relation to specified activities.

We really value using photos and audio/visual recordings of our pupils to showcase what they do in school and demonstrate what school life is like to other stakeholders and the wider community, so we really appreciate you taking the time to give consent again.

Consent for pupils aged 13 and over

At Collège Français Bilingue de Londres ('CFBL'), we sometimes take photographs, audio and/or visual recordings of our pupils. We use these to illustrate life at CFBL for the following purposes:

- To celebrate achievements in various fields (academic, sports, music etc.);
- To show contributions to exhibitions, shows, charitable events, internal journals / media;
- To show participation in outings, school trips and conferences;
- For educational purposes; and
- To promote the school.

In accordance with our Privacy Notice and Taking, Storing and Using Images of Children Policy, we are asking your consent to use these recordings and photographs **outside** the School community, as described below.

When considering how you will answer, please note that if you do not give permission in relation to some of these questions, **you may be required to step out** of group photos and recordings celebrating life at CFBL e.g. at sports fixtures, on sports day, on a school trip, for fundraising (otherwise the picture could not be used and this will affect other pupils in the group).

Please tick all the relevant boxes and sign this form.

1. **CFBL WEBSITE:** I give consent for photos and audio and/or visual recordings of myself to be used on CFBL's website, including Radio Récré.

YES NO

2. **SCHOOL'S SOCIAL MEDIA FEEDS:** I give consent for photos and audio and/or visual recordings of myself to be included in images and recordings used on the school's social media accounts including its Facebook, Instagram, LinkedIn, Twitter, Soundcloud and Youtube accounts. This include images and recordings used by Radio Récré.

YES NO

3. **PHOTOS AND VIDEOS IN THE SCHOOL'S RECEPTION:** I give my consent for photos and audio and/or visual recordings of myself to be used in reception (e.g. the Perspex frames and the video screen).

YES NO

4. **BROCHURES, CARDS AND OTHER PROMOTIONAL MATERIAL:** I give my consent for photos of myself to appear in the School's brochures, booklets, cards, banners, Power-point presentations and other promotional material.

YES NO

5. **NEWSPAPERS, GUIDES AND MAGAZINES:** I give my consent for photos of myself to appear in newspapers and magazines in English or French, including newspapers, magazines and school

guides, aimed at parents and families, expatriates, the French community in the United Kingdom or the general public, including for their online version.

YES NO

6. **SCHOOL PRODUCTIONS AND EVENTS:** I give my consent to be photographed and filmed by staff and fellow parents during school productions and events as long as it is made clear each time that these must only be used for personal viewing purposes and must not be published in any format including online.

YES NO

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YES NO

8. **CFBL AS AN AEFÉ SCHOOL:** CFBL is an approved school of the Agence pour l'enseignement français à l'étranger - AEFÉ (*établissement homologué*). In that context, we occasionally share photographs of our pupils with AEFÉ, for use on their website and their publications. I give my consent for photographs and audio and/or visual recordings of myself to be used on the AEFÉ website, social media, and in its publications.

YES NO

Pupil's name:

Pupil's date of birth:

Date:

Signed

Please note: The source of these images and recordings will be the school's staff (who are subject to policies and rules on how and when to take such images) or occasionally fellow parents. Your name will be omitted except for Radio Récré use where first name may be used.

This form takes effect immediately and replaces all previous consents that you or your parents may have given to CFBL for using your recordings or photographs outside the School community. It can be renewed or revised at any time. If you wish to make any changes, please email communication@cfbl.org.uk, and we will supply you with a new form. If you have any questions, please contact the school office.

Normally consent would last for the period of time that a pupil is at the school but there may be a few occasions where consent has been given for a photo to be used in school publicity (such as brochures, booklets, images on the website or photos around the school) where these would potentially remain in place after the pupil had left the school until consent was withdrawn.

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