

Collège Français Bilingue de Londres
("CFBL" or the "School")

Taking, Storing and Using Images of Children Policy

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 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.
- Parents who accept a place for their child at the School (or who re-register for the next school year) are invited to review the School's policy on using images of him/her as set out in this policy. Parents 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, on the School intranet, through the Yearbook and by post;
- The source of these images will predominantly be the School's staff (who are subject to policies and rules in how and when to take such images), or a professional photographer or occasionally pupils. The School will only use images of pupils in suitable dress and the images will be stored securely.

4. 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. AEFE 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 . Such publication will not include the pupil's name unless agreed differently with parents/pupil. Consents will be freely given, and parents or pupils will be able to withdraw it by contacting the school's Communication and Marketing Officer at Communication@cfbl.org.uk .

5. 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.

6. 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.

7. Security of Pupil Images

- If 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.

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 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.
- 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. Parents of pupils taking part in such plays and concerts will be consulted if it is intended to make such recordings available more widely.

8. 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 the School's Anti-Bullying Policy, Privacy Notices, , eSafety Policy and Use of Internet Policy for Pupils, Child Protection and Safeguarding Policy or the School Rules (*règlement Interieur*) 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 safeguarding committee 24 August 2020

Last review by the Governors – 21 September 2020