



SURBITON

HIGH SCHOOL

Taking, storing and using images of children

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Surbiton High School: Ethos and Aims

Surbiton High School aims to **inspire, encourage and empower** all its students to discover and embrace their individual talents, within United Learning's core mission to bring out "the best in everyone". We combine an intellectually rigorous academic environment with outstanding pastoral care and outstanding co-curricular opportunities; through this provision, we encourage our students to live out our **School values**, and become compassionate, respectful, courageous, and inquisitive members of the community.

Our Values

We are compassionate:

We are kind and we care, in both thought and action. We consider those less fortunate and strive to support and offer aid. We are mindful of the gentle power of positive actions. We support and encourage those around us, living out the School's motto: *Amor nos semper ducat* (May love always lead us).

We are respectful:

We respect all people equally. We respect ourselves, our learning, our community, our environment, and the planet we all share. We strive to act with respect and integrity in all things. When we disagree, we do so respectfully.

We are courageous:

When challenged by our fears we are determined, not deterred. We call on resilience for strength when in the heat of the struggle. We bravely chase our dreams and fight for what we believe. When we fall, we pick ourselves up and forge forward.

We are inquisitive:

We understand that a thoughtful question is the key to unlock understanding. We believe where answers provide ends, questions pose exciting beginnings. We are eager to explore, we question to discover, we are curious to learn more of the world at large.

We are a community:

We are united - with a common focus. We value belonging to a wider community: our school community, our local community, our global community. We are inclusive of all, no matter our differences. We value and nurture the connections we form.

United Learning and the United Church Schools' Trust

Surbiton High School is part of *United Learning* and the *United Church Schools' Trust*. The School has an Anglican foundation, valuing its Christian heritage whilst welcoming staff and children from all faiths and none. We share with United Learning its core mission statement "to bring out the best in everyone". We are committed to the aims of United Learning, including its *Framework for Excellence*, which can be found at: www.unitedlearning.org.uk

Policy Statement

The policy and procedure set out in this document applies to all current and past pupils of Surbiton High School (“the School”) acting as part of UCST. Any reference to either organisation is taken to include the other.

The data controller for personal information held by Surbiton High School is United Church Schools Trust (UCST). UCST is registered with the Information Commissioner’s Office (ICO). The registration number is Z533407X. The Company Secretary, Alison Hussain, is responsible for ensuring that UCST complies with the Data Protection Law. She can be contacted on company.secretary@unitedlearning.org.uk or 01832 864538.

Policy Aims and Guidance

This policy aims to set out the reasons why images of children may be taken and what such images may/may not be used for.

We take and store images for a number of purposes:

- For safeguarding and identification purposes, such as individual pupil photos stored on our Management Information Systems.
- To take images of pupils, individually or in groups, as part of the School’s record and as a service for parents, such as whole-school and whole-class photographs
- For security via CCTV recordings
- For teaching and learning purposes, including for use in classroom displays and images taken as an integral part of a project, assignment, coursework module or as evidence of educational achievement
- For use in the celebration of activities in School, such as yearbooks and images and photographs/videos of school concerts, events and productions to be shared within the School community

Photographs taken in School, whether for the purposes of identification, record, security and teaching and learning, or as a service for parents are processed on the basis of legitimate interest. This is either because we need to process these images as part of running Surbiton High School or because this is an activity that people might reasonably expect us to perform.

We will ask for consent to use images in promotional material.

How we use your data

All images will be used in a manner respectful of the eight Data Protection Principles. This means that images will be:

- fairly and lawfully processed
- processed for limited, specifically stated purposes only
- used in a way that is adequate, relevant, and not excessive
- accurate and up to date
- kept on file for no longer than is necessary
- processed in line with an individual’s legal rights
- kept securely

- adequately protected if transferred to other countries.

The Director of Marketing, Communications and Admissions, is responsible for ensuring the acceptable, safe use and storage of all images within the School. This includes the management, implementation, monitoring and review of this policy. For further information on the internal processes used to check photo usage, please refer to Appendix 1.

How we seek your consent for images used for promotion

- Written parental permission will be sought on entry to the School, except in the case of Sixth Form students, who will be asked to sign their own consent forms. A record of all consent details will be kept securely on file. Consent forms will clearly specify the purposes for which photographs will be used, including use by: School, UCST, SHSPA, external news providers.
- Should permission later be withdrawn by parents/carers (or students in the case of Sixth Formers), records will be updated, and the relevant staff informed, and no further images of the pupil/student concerned will be captured for use in publicity. *(Please note that images already in circulation cannot be withdrawn.)*
- We will always make individuals aware if photography is taking place and will talk about how and why we are taking the images in an age-appropriate way.
- We will always respect the individual and will never take images of anyone against their wishes.
- When taking images, careful consideration will be given before involving very young or vulnerable children who may be unable to question why or how activities are taking place.
- Photography is not permitted in sensitive areas such as changing rooms, toilets, etc.

There are always some risks associated with the distribution of images. These measures help to mitigate those risks, but you should make sure you are comfortable with your child being featured in images before you give consent.

How we use images for promotion

Images are a way for us to celebrate achievement, keep parents and communities informed about our activities, and raise our profile. Parents and families and the children themselves often derive great pleasure from seeing their loved ones in print or on a website.

- Images may be included in print or digital media. Examples might include printed publications; websites; adverts; in communications channels such as newsletters or social media; as part of wall displays; or to accompany stories in the media.
- Children's full names will not be associated with photographs except where directly relevant, for example where the child has won a major competition.

Capture of images by Parents/Carers

- Parents/Carers are generally discouraged from taking photographs or video footage of events. Where this is permitted it should be for private use only.
- Parents/Carers must not share images of anyone on social media, other than their own child.
- Parents/Carers are not permitted to take photographs in sensitive areas such as changing rooms, toilets, swimming areas etc.

- Parents/Carers who are using photographic equipment must be mindful of others when capturing images.
- Parents/Carers may contact the School's Designated Safeguarding Lead (DSL) to discuss any concerns regarding the use of images.

Capture of images by children

- We will discuss and agree age-appropriate acceptable use rules with children regarding the use of cameras, such as places children must not capture images (e.g. unsupervised areas, toilets etc).
- All staff will be made aware of the acceptable use rules regarding children's use of cameras and will ensure that children are appropriately supervised when taking images for official or curriculum use.
- Members of staff will role model positive behaviour to the children by encouraging them to ask permission before they take any photos.
- Images taken by children which are used for School purposes will be processed and stored in accordance with this policy and process outlined below.
- Any breaches of this policy may result in disciplinary action, in accordance with United Learning and Surbiton High School's disciplinary procedures.

Use of Closed-Circuit Television (CCTV)

For information on how we capture and process images through CCTV, please refer to our CCTV policy.

Further information

You can read more about how we capture, use, process and store images in the following policies:

- Pupil and Parent Privacy Notice
- Safeguarding and Child Protection Policy
- Records retention schedule
- Acceptable use of ICT policies
- Social Media Policy
- Parent contract/Terms & Conditions

Appendix 1 – internal image checking procedures

1. Approval checks & staff information

- 1.1 For the Senior School, the GDPR list of approved pupils will be updated by the Digital and Social Media Producer on a half-termly basis, or with every new pupil joining the School.
- 1.2 For the Prep Schools, the Administration Staff hold an up-to-date list of GDPR approved pupils.
- 1.3 This policy will be available on our website for all staff members, students, parents/guardians, and other relevant individuals associated with Surbiton High School to access.
- 1.4 Any updates to staff will be provided as appropriate.

2. Consent/Withdraw of Consent for Publishing Photographs

- 2.1 Surbiton High School will obtain separate consent from parents/carers/Sixth Form students for publishing photographs of pupils when this goes beyond the reasonable scope of the originally given consent, for example, use on a public-facing billboard, national television advert, or advert on a bus etc.
- 2.2 Parents/carers have the right to withdraw photo permissions for their child at any time. Surbiton High School will provide clear and accessible methods for individuals to withdraw their consent through our MIS at any time. The Communications and Administration Teams across the senior and relevant Prep School will be informed of this withdrawal of consent by the MIS team.
- 2.3 Sixth Form students have the right to withdraw photo permissions at any time, this is completed via a request to the Sixth Form, Communications or Administration Teams.
- 2.4 Surbiton High School will promptly remove any published photographs upon receiving a withdrawal of photo permission, except in cases where legal obligations or legitimate interests require otherwise. We are unable to remove any images that have already been published in print, but will discontinue use of these images and remove them from our archives wherever possible.

3. Ongoing Photo Usage Process

- 3.1 Photos Taken by Preparatory Staff:
 - a) Prep School staff will only take photos of those pupils where we have consent in place for their photos to be used for marketing purposes. The exceptions to this are:
 - whole-school events (see section 3.2), or
 - photographs that are needed to evidence class work.
 - b) Photos will be checked by the relevant Prep Admin Team and then saved in a Prep School media drive shared folder. Only the most relevant and highest quality photos will be retained and these are then shared with the Comms Team.
 - c) The Communications Team will then be informed, and the Digital and Social Media Producer will check the photos in the folder against Picasa Facial Recognition Software (PFRS).
 - d) Should there be an instance where a photo of a non-approved pupil has been taken inadvertently (such as a pupil participating in an event), this will then be deleted from the School network as soon as reasonably practicable.

- e) All photos taken by Digital and Social Media Producer are checked at the point of use by the Communications Team. Ideally, once all photos have been checked the folder name on the School network will be renamed 'Best and approved' within the sub-folder.

3.2 Whole-School Events:

- a) Where images are taken of events, productions, year-group events etc, the Digital and Social Media Producer will only retain the images likely to be used for promotional purposes.
- b) The Digital and Social Media Producer will check the retained images against PFRS.
- c) Any images of non-approved pupils will be deleted.
- d) The images will then be saved in the media drive on the School network and the relevant team will be informed:
 - In the Prep Schools this will be the relevant Admin Team.
 - In the Senior School, this will be another member of the Communications Team.
- e) The relevant team (Prep School Admin Team / Communications Team) will double-check there are no images of non-approved pupils in the relevant folder.
- f) Once this is completed, the folder name will be changed to 'Best and Approved' and the Communications Team informed.
- g) Where whole-school productions take place and are filmed, the video will be only viewable on a private YouTube link that enables School community members to view and will contain the following statement: *'This event has been recorded for the purpose of sharing the performance with the Surbiton High School community. All content is subject to copyright and must not be shared outside of the School community, including on social media.'*

4. Training - New staff and Ongoing

- 4.1 All new staff are trained on the protocols of taking and using images of pupils as appropriate for their role.
- 4.2 At the start of every academic year, all staff will be asked to sign to agree that they have read this policy and that they will follow the procedure.

Appendix 2 - Sample Parent Consent Form

For operational and safeguarding purposes, Surbiton High School takes and stores photographs and video recordings of pupils as part of the day to day running of the School. These include photographs stored on our Management Information Systems, CCTV recordings, classroom displays and images taken as an integral part of a project, assignment, coursework module or as evidence of educational achievement. We also take images as a service for parents, such as whole school and whole class photographs, images taken at school events to be shared within the school community, on information screens around the School and within yearbooks. Such images are processed on the basis of our legitimate interests, because this is an activity that people might reasonably expect us to perform.

Photographs and videos are also an invaluable tool to help us celebrate achievement, keep prospective parents and the local community informed about our activities, and raise our profile. Parents and families, as well as the children themselves, often derive great pleasure from seeing their loved ones in print or on a website. We would love to be able to include your child in this way, but will only use their image in the following circumstances if we have your consent to do so:

1. Use of photographs and video recordings of activities and events to document day-to-day life at Surbiton High School for prospective parents, and for marketing and publicity purposes. This includes, but is not limited to, newsletters, co-curricular and curriculum booklets, concert and event programmes, the school website, alumni website and newsletter (Green & Silver Community), and the school social media platforms such as X, Facebook, YouTube and Instagram.
2. Inclusion of photographs and videos of pupils on The United Church Schools Trust (UCST) website or Intranet.
3. Inclusion of photographs and videos of pupils on the Surbiton High School Parents' Association (SHSPA) website or Intranet.
4. Sharing photographs and videos of pupils with external news providers and agencies in relation to activities taking place at the School.

You may update or withdraw your consent for non-operational image usage at any time by contacting us at data.protection@surbitonhigh.com. If you wish to withdraw your consent in relation to images which are already in use in the wider domain, we will endeavour to remove these as expediently as possible. Please note, however, that it may not be possible to remove images from any materials or documents which have already been printed.

I understand that:

- Images of my child will be held in accordance with the GDPR guidelines (the General Data Protection Regulation);
- The images of my child captured in the video recordings and/or photographs will be the copyright of Surbiton High School and United Learning;
- It may not always be possible to recall existing images of my child from circulation if I withdraw consent at a later date.

Please tick below as appropriate:

- I give consent for the use of photography and video recordings of my child for marketing and publicity purposes by Surbiton High School and the Green & Silver Community.

- I give consent for the use of photography and video recordings of my child for marketing and publicity purposes by United Church Schools Trust.

- I give consent for the use of photography and video recordings of my child for marketing and publicity purposes by Surbiton High School Parents' Association.

- Do you consent to use of photography and video recordings of my child for marketing and publicity purposes by external news providers (online and in print).

Child's full name (please print in block capitals):

Signed:

Name (please print in block capitals):

Date:

Appendix 3 - Sample Sixth Form Student Consent Form

For operational and safeguarding purposes, Surbiton High School takes and stores photographs and video recordings of students as part of the day to day running of the School. These include photographs stored on our Management Information Systems, CCTV recordings, classroom displays and images taken as an integral part of a project, assignment, coursework module or as evidence of educational achievement. We also take images as a service for families, such as whole school and whole class photographs, images taken at school events to be shared within the school community, on information screens around the School and within yearbooks. Such images are processed on the basis of our legitimate interests, because this is an activity that people might reasonably expect us to perform.

Photographs and videos are also an invaluable tool to help us celebrate achievement, keep prospective parents, students and the local community informed about our activities, and raise our profile. Parents and families, as well as student's themselves, often derive great pleasure from seeing their loved ones in print or on a website. We would love to be able to include your image in this way, but will only use your image in the following circumstances if we have your consent to do so:

1. Use of photographs and video recordings of activities and events to document day-to-day life at Surbiton High School for prospective parents and students, and for marketing and publicity purposes. This includes, but is not limited to, the school prospectus, newsletters, co-curricular and curriculum booklets, concert and event programmes, the school website, alumni website and newsletter (Green & Silver Community), and the school social media platforms such as Twitter, Facebook, YouTube and Instagram.
2. Inclusion of photographs and videos of students on The United Church Schools Trust (UCST) website or Intranet.
3. Inclusion of photographs and videos of students on the Surbiton High School Parents' Association (SHSPA) website or Intranet.
4. Sharing photographs and videos of students with external news providers and agencies in relation to activities taking place at the School.

You may update or withdraw your consent for non-operational image usage at any time by contacting us at data.protection@surbitonhigh.com. If you wish to withdraw your consent in relation to images which are already in use in the wider domain, we will endeavour to remove these as expediently as possible. Please note, however, that it may not be possible to remove images from any materials or documents which have already been printed.

I understand that:

- My images will be held in accordance with the GDPR guidelines (the General Data Protection Regulation);
- My images of me captured in the video recordings and/or photographs will be the copyright of Surbiton High School and United Learning;
- It may not always be possible to recall existing images of me from circulation if I withdraw consent at a later date.

Please tick below as appropriate:

- I give consent for the use of photographs and video recordings of me for marketing and publicity purposes by Surbiton High School and the Green & Silver Community.

- I give consent for the use of photographs and video recordings of me for marketing and publicity purposes by United Church Schools Trust.

- I give consent for the use of photographs and video recordings of me for marketing and publicity purposes by Surbiton High School Parents' Association.

- I give consent for the use of photographs and video recordings of me for marketing and publicity purposes by external news providers (online and in print).

Signed:

Full Name (please print in block capitals):

Date:

Document information

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