

Photography Guidelines

These guidelines intend to provide information to pupils and their parents, carers or guardians (referred to in this document as "parents") about how images of pupils are normally used by École Jeannine Manuel ("the school"). They also cover the school's approach to the use of cameras and filming equipment at school events and on school premises by parents and pupils themselves, and the media.

It applies in addition to the school's parent contract, 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, such as the school's Privacy Notice. Images of pupils in a safeguarding context are dealt with under the school's relevant safeguarding policies.

Ecole Jeannine Manuel is obliged to comply with the General Data Protection Regulation (GDPR) and the Data Protection Act 2018 when it takes or publishes photographs of its pupils. The School will always try to act in the best interest of the pupils and, as far as it legally can, it will take parental preferences into account.

The Data Protection Act gives children rights over their own data when they are considered to have adequate capacity to understand. Most children will reach this level of understanding at around age 12. For this reason, for most pupils in a secondary school, it will normally be up to the individual child to decide whether or not to be photographed. Where the School considers that the child does not have the capacity to make such a decision, the School will act as it considers to be in the best interests of the child and in doing so will take account of any stated parental preference.

If you wish to express a preference for the school to avoid taking or publishing photographs of your child in certain circumstances then please indicate your preferences by contacting dpo@jmanuel.uk.net. If no preferences are expressed then we will act in accordance with the principles expressed in these guidelines.

Ordinarily the following rules will apply to photographs in this school:

Photographs for School Use

- 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 are invited to indicate agreement to the school using images of him/her as set out in these guidelines by signing the policy acknowledgment form when they join the school. However, 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; and for important administrative purposes such as identification and security.
- Any parent who wishes to limit the use of images of a pupil for whom they are responsible should contact our Data Protection Officer (dpo@jmanuel.uk.net). The School will respect the wishes of parents/carers (and indeed pupils themselves) wherever reasonably possible, and in accordance with these guidelines.

- Parents should be aware that, from around the age of 12 and upwards, the law recognises pupils' own rights to have a say in how their personal information is used – including images.
- The School will take photographs for its own use. These will be unnamed photographs and will generally be for internal school use but may also include photographs for publication, such as photos for the annual yearbook, prospectuses, display boards, slides at a School event, and class photos.
- When the photograph is taken, the pupils will be informed that a photograph is being taken and told what it is for so that they can object if they wish.
- Where the school uses an external provider for official School portraits and class photos, all data processed by the School will be protected in compliance with the GDPR. 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.
- 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.

Use of Pupil Images for Identification and Security

- All pupils are photographed on entering the school and, thereafter, at a yearly interval, for the purposes of internal identification. These photographs identify the pupil by name, year group, house and form/tutor group.
- 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.

Family Photographs at School Events

- It shall be at the discretion of the School whether photographs may be taken at a school event.
- Family members taking photographs for the family album will not be covered by Data Protection legislation.
- Where the School decides to allow such photography, the family is asked not to publish any photographs showing children other than their own.

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 toilets, washing or changing areas, nor should photography or filming equipment be used by pupils in a manner that may offend or cause upset.
- The misuse of images, cameras or filming equipment in a way that breaches these guidelines, or the school's Anti-Bullying Policy, Behaviour Policy, Data Protection Policies, eSafety Policy, IT Acceptable Use Policy for Pupils, Safeguarding Policy or the School Rules is always taken seriously, and may be the subject of disciplinary procedures or dealt with under the relevant safeguarding policy as appropriate.