

TAKING, STORING AND USING OF IMAGES OF STUDENTS POLICY

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USE OF CAMERAS AND FILMING EQUIPMENT BY STUDENTS

INTRODUCTION

- This Policy is intended to provide information to students and their parents, carers or guardians (referred to in this policy as "parents") about how images of students are normally used by St Clare's, Oxford ("the College"). It also covers the College's approach to the use of cameras and filming equipment at College events and on College premises by parents and students themselves, and the media.
- The policy applies in addition to the College's terms and conditions, and any other information the College may provide about a particular use of student images (for example, signage about the use of CCTV), and more general information about use of students' personal data, such as the College's Privacy Notice. Images of students in a safeguarding context are dealt with under the College's relevant safeguarding policies.

GENERAL POINTS TO BE AWARE OF

- Certain uses of images are necessary for the ordinary running of the College; other uses are in the legitimate interests of the College and its community, and are unlikely to have any negative impact on students. The College is entitled lawfully to process such images and take decisions about how to use them, subject to any reasonable objections raised.
- Images must never be taken of students in swimming or gymnastics clothing, nor should they be taken in any place where students can expect privacy (such as their bedrooms and changing rooms).
- Wherever possible, images should be taken using only College devices. If images are taken using a member of staff's personal camera/phone/tablet or other device (for example on a trip or excursion), they must be transferred to a College device as soon as practically possible and then deleted immediately from the personal device.
- Students at the College aged 13 or over are considered old enough to make their own decisions about the taking and use of images of them. For that reason, they are requested to indicate their agreement to the College using images of them, as explained in this policy, when they start attending their course. They will be asked for specific consent if particular use of their image is required (for example, in a context in which their name will be shown).
- Parents of students who are under the age of 18 will also be asked to indicate their agreement to the College using images of their child, as explained in this policy, when enrolling for the course. They will be asked for specific consent if particular use of their child's image is required.
- Parents who accept a place for their child who is under the age of 13 are invited to indicate their agreement to the College using images of him/her as set out in this policy, when enrolling for the course. They will be asked for

specific consent if particular use of their image is required (for example, in a context in which their name will be shown).

- Students and parents should also be aware of the fact that certain uses of their image may be necessary or unavoidable (for example if they are included incidentally in CCTV or a photograph).
- We hope that students and parents will feel able to support the College in using student images to celebrate the achievements of students, sporting and academic; to promote the work of the College; and for important administrative purposes such as identification and security.
- Any student or parent who wishes to limit the use of images of a student for whom they are responsible should contact the College by email at marketing@stclares.ac.uk – please include "Withdrawal of consent! In the subject line of the email. The College will respect the wishes of parents/carers (and indeed students themselves) wherever reasonably possible, and in accordance with this policy.

USE OF STUDENT IMAGES IN COLLEGE PUBLICATIONS

- Unless the relevant student or his/her parent has requested otherwise, the College will use images of its students to keep the College community updated on the activities of the College, and for marketing and promotional purposes, including:
 - on internal displays (including clips of moving images) on digital and conventional notice boards within the College premises;
 - in communications with the College community (parents, students, staff, Governors and alumni) including by email, on the College intranet and by post;
 - on the College's website and, where appropriate, via the College's social media channels, e.g. Twitter, Instagram and Facebook. Such images would not normally be accompanied by the student's full name without permission; and
 - in the College's prospectus, and in online, press and other external advertisements for the College. Such external advertising would not normally include student's names or other identifying information.
- The source of these images will predominantly be the College's staff (who are subject to policies and rules in how and when to take such images), or a professional photographer used for marketing and promotional purposes, or occasionally other students. The College will only use images of students in suitable dress and the images will be stored securely and centrally.

USE OF STUDENT IMAGES FOR IDENTIFICATION AND SECURITY

- Students may be photographed on joining the College intervals, for the purposes of internal identification. These photographs, together with those which they provide themselves, identify the student by name, student number, year group and nationality.
- CCTV is in use on College premises, and will sometimes capture images of students. Images captured on the College's CCTV system are used in accordance with the Privacy Notice and the CCTV Policy.

USE OF STUDENT IMAGES IN THE MEDIA

- Where practicably possible, the College will always notify parents in advance when the media are expected to attend an event or College activity in which College students are participating. It will make every reasonable effort to ensure that any student whose parent has refused permission for images of that student, 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 ask for the names of the relevant students to go alongside the images, and these will be provided where parents have been informed about the media's visit and either parent or the student has consented as appropriate.

SECURITY OF STUDENT IMAGES

- Professional photographers and the media are accompanied at all times by a member of staff when on College premises. The College uses only reputable professional photographers and makes every effort to ensure that any images of students are held by them securely, responsibly and in accordance with the College's instructions.
- The College takes appropriate technical and organisational security measures to ensure that images of students held by the College are kept securely on College systems, and protected from loss or misuse. The College will take reasonable steps to ensure that members of staff only have access to images of students held by the College where it is necessary for them to do so.
- All staff are given guidance on the College's Policy on Taking, Storing and Using Images of Students, and on the importance of ensuring that images of students are made and used responsibly, only for College purposes, and in accordance with College policies and the law.

USE OF CAMERAS AND FILMING EQUIPMENT (INCLUDING MOBILE PHONES) BY PARENTS

- Parents, guardians or close family members ("parents") are welcome to take photographs of and film their own children taking part in College events, subject to the following guidelines, which the College 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 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 College therefore asks that it is not used at indoor events.
 - Parents are asked not to take photographs of other students, except incidentally as part of a group shot, without the prior agreement of those students.
 - Parents are reminded that such images are for personal use only. Images which may, expressly or not, identify other students 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 College from permitting the filming or recording of some plays and concerts. The College will always print a reminder in the programme of events where issues of copyright apply.
 - Parents may not film or take photographs in changing rooms or backstage during College productions, nor in any other circumstances in which photography or filming may embarrass or upset students.
- The College 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 College 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. Students and the parents of students under the age of 18 taking part in such plays and concerts will be asked to provide consent if it is intended to make such recordings available more widely.

USE OF CAMERAS AND FILMING EQUIPMENT BY STUDENTS

- All students 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 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 students in a manner that may offend or cause upset.
- The misuse of images, cameras or filming equipment in a way that breaches this Policy, or the College's Anti-Bullying Policy, Privacy Notice, ePolicy, CCTV Policy, Safeguarding Policy, Staff Code of Conduct, or the College Regulations is always taken seriously, and may be the subject of disciplinary procedures or dealt with under the relevant safeguarding policy as appropriate.

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