

USE OF PUPIL IMAGES POLICY

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Use of Pupil Images

Context

At Benenden we produce a number of publications – in print and digitally - throughout the year to update parents and the School community on events and activities; these include our termly magazine, our internal Portals and Benenden Connects, weekly bulletins, external website and social media platforms.

We also work with external partners, including the media, to promote the School's achievements and opportunities more widely.

Within such publications we frequently use photographs and video (hereafter referred to simply as 'images') of the pupils and, on occasion, their names. Such content typically includes pupils going about their daily routine, performing in a drama production, sports event or weekend activity.

Protecting the safety and privacy of the children in our care is the School's foremost priority. Our Use of Pupil Images Policy is underpinned by this principle, and also aims to ensure the School keeps pace with the rapidly-changing world of digital communications, and minimises the frequency with which the School contacts parents for individual consent to use images, which the School appreciates can be bothersome for parents. This policy is in accordance with Data Protection laws.

Images may be shared with third parties, such as design agencies, for the strict purposes of producing marketing materials. All images taken by the School will be kept in the School Archive indefinitely.

Consent for Using Pupils' Images

Every pupil in the School can be photographed or filmed. The act of taking an image does not present a problem. Thereafter we have a strict policy on how these images can be used, and their use falls into three categories, as follows:

1. Internal use

These publications are not shared outside of the Benenden community (which comprises current staff, students, parents, former parents, donors and Seniors).

Types of internal publications include: Weekly Benenden Bulletin, Parent Portal, Benenden Connects, termly diary and drama production programmes.

In these internal publications, the pupil's name **may** be used alongside her picture. The School will ensure she is always suitably dressed to be photographed/filmed (for example, not in a swimming costume).

2. School Magazine

The termly School magazine, called The Term, is distributed within the Benenden community (which comprises current staff, students, parents and Seniors) as well as to prospective parents and prep schools. It is also available in the School Entrance Hall for visitors.

In this publication, the pupil's name **may** be used alongside her picture. The School will ensure she is always suitably dressed to be photographed/filmed (for example, not in a swimming costume).

3. External use

The School may also use the pupil's image to promote the School to prep schools and to the wider public.

Types of external publications include: the School website, social media, publications which are uploaded to the School website such as the prospectus and Weekend Programme brochure, as well as in advertisements and issued to journalists for possible use in the media.

These images will always be anonymous. The School will **never** use a pupil's full name* for external use, including on the School's own website. If there is a good reason to name her alongside her picture, for example to celebrate individual success, **the School will contact the pupil and her parents to request separate consent for this specific use.**

The School will ensure she is always suitably dressed to be photographed/filmed (for example, not in a swimming costume).

*On occasion, she may be referred to by her first name only, alongside her picture on social media. For example, in a School Twitter post from a sports match where she has won a medal.

Maintaining the Records of Image Consent

The consent has been jointly signed by each pupil and her parents. In the event that we have not received a completed form expressing their consent, the pupil is automatically classed as not having granted image permission.

The Director of Marketing and Communications is responsible for maintaining an up-to-date list of pupils' image permissions and for ensuring all staff comply with this policy. In practice this means that the information about a pupil's permission is on her iSAMS record. In addition, the Director of Marketing and Communications will regularly circulate a list of pupils for whom we do not have permission to use their image externally.

The School's permissions last for the duration of a pupil's time as a pupil at Benenden School and for up to five years until after she has left (to allow time for publications in which she may appear to be updated and replaced).

A pupil or parent can change their minds at any time and withdraw this permission by informing the School in writing. In addition, pupils will be reminded of their right to withdraw their photo consent at appropriate intervals during her time at Benenden: at age 11, 13 and at 16.

Once she reaches the age of 16, a pupil is legally responsible for their own image rights and their views outweigh the views of her parents. Irrespective of this, Benenden's policy is that the parent should always be notified of such decisions. For example, if a student in Sixth Form agrees to take part in a media interview, the School will ensure their parents are aware of their decision. Benenden considers this to be best practice.

Breaches of the Policy

In the unlikely event that the School inadvertently uses an image of a pupil without permission, the School will remove the image as soon as it is notified of the error. A log will be kept of any such breaches so that the School can monitor the effectiveness of the policy.