



RYDE SCHOOL
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Ryde School's Privacy Notice (with Web Browser and Cookies Notice)

Applicable to all members of the school community (prospective, current and past)

Reviewed by JAFM: May 2018

Next Review: May 2019

This Privacy Notice covers uses of staff and alumni data as well as that of parents and pupils; prospective, current and past.

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WHO WE ARE

Ryde School is an Independent co-educational day and boarding school on the Isle of Wight for children aged 2 to 18. Ryde School is a company limited by Guarantee No. 432077. Ryde School is a Registered Charity No. 307409. Our registered address is:

Ryde School
Queen's Road
Ryde
Isle of Wight
PO33 3BE

WHAT THIS PRIVACY NOTICE IS FOR

This Privacy Notice is intended to provide information about how the School will use (or "process") personal data about individuals including: its staff; its current, past and prospective pupils; and their parents, carers or guardians (referred to in this Privacy Notice as "parents").

This information is provided because Data Protection Law gives individuals rights to understand how their data is used. Staff, parents and pupils are all encouraged to read this Privacy Notice and understand the School's obligations to its entire community.

This Privacy Notice applies alongside any other information the School may provide about a particular use of personal data, for example when collecting data via an online or paper form.

This Privacy Notice also applies in addition to the School's other relevant terms and conditions and policies, including:

- any contract between the School and its staff or the parents of pupils;
- the School's procedures on taking, storing and using images of children, see appendix
- the School's safeguarding, pastoral, or health and safety policies, including as to how concerns or incidents are recorded; and
- the School's IT policies

Anyone who works for, or acts on behalf of, the School (including staff, volunteers, governors and service providers) should also be aware of and comply with this Privacy Notice which also provides further information about how personal data about those individuals will be used.

RESPONSIBILITY FOR DATA PROTECTION

- The School has appointed the Bursar as Data Handler.
who will deal with all requests and enquiries concerning the School's uses of personal data (see section on Your Rights below) and endeavour to ensure that all personal data is processed in compliance with this Privacy Notice and Data Protection Law.

The Data Handler can be contacted via the postal address shown above or email bursar@rydeschool.net

WHY THE SCHOOL NEEDS TO PROCESS PERSONAL DATA

In order to carry out its ordinary duties to staff, pupils and parents, the School needs to process a wide range of personal data about individuals (including current, past and prospective staff, pupils or parents) as part of its daily operation.

Some of this activity the School will need to carry out in order to fulfil its legal rights, duties or obligations – including those under a contract with its staff, or parents of its pupils.

Other uses of personal data will be made in accordance with the School's legitimate interests, or the legitimate interests of another, provided that these are not outweighed by the impact on individuals, and provided it does not involve special or sensitive types of data.

The school expects that the following uses will fall within that category of its (or its community's) "**legitimate interests**":

- To provide services, activities or online content, to provide information about them and to deal with requests and enquiries
- For the purposes of pupil selection (and to confirm the identity of prospective pupils and their parents);
- To provide education services (including SEND), including musical and physical education, career services, and extra-curricular activities to pupils, and monitoring pupils' progress and educational needs;
- Maintaining relationships with alumni and the School community;
- For the purposes of management planning and forecasting, research and statistical analysis, including that imposed or provided for by law (such as tax, diversity and gender pay gap analysis);
- To enable relevant authorities to monitor the School's performance and to intervene or assist with incidents as appropriate;
- To give and receive information and references about past, current and prospective pupils, including relating to outstanding fees or payment history, to/from any educational institution that the pupil attended or where it is proposed they attend; and to provide references to potential employers of past pupils;
- To promote and raise funds for the School;
- To enable pupils to take part in national or other assessments, and to publish the results of public examinations or other achievements of pupils of the School;
- To safeguard pupils' welfare and provide appropriate pastoral (and where necessary, medical) care, and to take appropriate action in the event of an emergency or accident, including by disclosing details of an individual's medical condition where it is in the individual's interests to do so, for example for medical advice, insurance purposes or to organisers of school trips;
- To monitor (as appropriate) use of the School's IT and communications systems in accordance with the School's Internet, Email and IT Acceptable Use Policy;
- To make use of photographic images of pupils in School publications, on the School website and (where appropriate) on the School's social media channels in accordance with the School's procedures on taking, storing and using images of children, referenced in the attached appendix;

- For security purposes, including CCTV in accordance with the School's procedures on taking, storing and using images of children
- To carry out or cooperate with any school or external complaints, disciplinary or investigation process;
- For security purposes and for regulatory and legal purposes (for example child protection and health and safety) and to comply with its legal obligations: and
- Where otherwise reasonably necessary for the School's purposes, including to obtain appropriate professional advice and insurance for the School.

In addition, the School will on occasion need to process **special category personal data** (concerning health, ethnicity, religion or biometrics) or criminal records information (such as when carrying out DBS checks) in accordance with rights or duties imposed on it by law, including as regards safeguarding and employment, or from time to time by explicit consent where required, for example if the School commissioned any biometric services. These reasons will include:

- To safeguard pupils' welfare and provide appropriate pastoral (and where necessary, medical) care, and to take appropriate action in the event of an emergency, incident or accident, including by disclosing details of an individual's medical condition or other relevant information where it is in the individual's interests to do so: for example for medical advice, for social protection, safeguarding and cooperation with police or social services, for insurance purposes or to caterers or organisers of school trips who need to be made aware of dietary or medical needs;
- To provide educational services in the context of any special educational needs of a pupil;
- In connection with employment of its staff, for example DBS checks, welfare, union membership or pension plans;
- To run any of its systems that operates on biometric data, such as for security.
- As part of any school or external complaints, disciplinary or investigation process that involves such data, for example if there are SEN, health or safeguarding elements; or
- For legal and regulatory purposes (for example child protection, diversity monitoring and health and safety) and to comply with its legal obligations and duties of care.

TYPES OF PERSONAL DATA PROCESSED BY THE SCHOOL

This will include by way of example:

- names, addresses, telephone numbers, e-mail addresses and other contact details;
- car details (about those who use our car parking facilities);
- biometric information, which, should the School at a future date decide to collect, will be collected and used by the School in accordance with an associated biometrics policy. Biometric data will only ever be collected by Ryde School with the individual's explicit consent;
- bank details and other financial information, e.g. about parents who pay fees to the School;
- past, present and prospective pupils' academic, disciplinary, admissions and attendance records (including information about any special needs), and examination scripts and marks;
- personnel files, including in connection with academics, employment or safeguarding;
- where appropriate, information about individuals' health and welfare and contact details for their next of kin;

- references given or received by the School about pupils, and relevant information provided by previous educational establishments and/or other professionals or organisations working with pupils;
- correspondence with and concerning staff, pupils and parents past and present; and
- images of pupils (and occasionally other individuals) engaging in school activities, and images captured by the school's CCTV system (in accordance with the School's procedures on taking, storing and using images of children);

HOW THE SCHOOL COLLECTS DATA

Generally, the School receives personal data from the individual directly (including, in the case of pupils, from their parents). This may be via a form, or simply in the ordinary course of interaction or communication (such as email or written assessments).

However in some cases personal data will be supplied by third parties (for example another school, or other professionals or authorities working with that individual); an example of this may be information received from a third party agency for safeguarding reasons, in accordance with Working Together 2015.

Ryde School also collects information about users of our Ryde School website. This includes collecting unique online identifiers such as IP addresses, which are numbers that can uniquely identify a specific computer or other network device on the internet. See the section on cookies later in this document.

WHO HAS ACCESS TO PERSONAL DATA AND WHO THE SCHOOL SHARES IT WITH

- The School will need to share personal information, which may include special category data where required, relating to its community with third parties, such as;
- professional advisers (e.g. lawyers, insurers, PR advisers and accountants);
- government authorities (e.g. HMRC, DfE, police or the local authority); and
- appropriate regulatory bodies (e.g. NCTL, the Independent Schools Inspectorate, the Charity Commission or the Information Commissioner); and
- third party service providers for the purpose of educational and extra-curricular provision. Examples of such providers will include:
 - External activities providers
 - Travel operators
 - School photographer

The School obtains Information Sharing Agreements with the various third party providers in order to maintain security of personal information.

For the most part, personal data collected by the School will remain within the School, and will be processed by appropriate individuals only in accordance with access protocols (i.e. on a 'need to know' basis). Particularly strict rules of access apply in the context of:

- medical records; and
- pastoral or safeguarding files.

However, a certain amount of any SEND pupil's relevant information will need to be provided to staff more widely in the context of providing the necessary care and education that the pupil requires.

Staff, pupils and parents are reminded that the School is under duties imposed by law and statutory guidance (including [Keeping Children Safe in Education](#)) to record or report incidents and concerns that arise or are reported to it, in some cases regardless of whether they are proven, if they meet a certain threshold of seriousness in their nature or regularity. This is likely to include file notes on personnel or safeguarding files, and in some cases referrals to relevant authorities such as the LADO (Local Authority Designated Officer) or police. For further information about this, please view the School's Child Protection and Safeguarding Policy.

Finally, in accordance with Data Protection Law, some of the school's processing activity is carried out on its behalf by third parties, such as IT systems, web developers or cloud storage providers. This is always subject to contractual assurances that personal data will be kept securely and only in accordance with the School's specific directions.

HOW LONG WE KEEP PERSONAL DATA

The School will retain personal data securely and only in line with how long it is necessary to keep for a legitimate and lawful reason and in line with statutory duties, government guidance, disclosure requirements, contractual obligations and the Data Protection Act, to be replaced on 25 May 2018 with the General Data Protection Regulations.

Specific queries about how we retain or archive data, or requests that personal data is considered for erasure are to be made to the Data Handler via bursar@rydeschool.net. However, bear in mind that the School will often have lawful and necessary reasons to hold on to some personal data even following such a request.

A limited and reasonable amount of information will be kept for archiving purposes for example; and even where individuals have requested we no longer keep in touch, we will need to keep a record of the fact in order to fulfil individual wishes (called a "suppression record").

KEEPING IN TOUCH AND SUPPORTING THE SCHOOL

The School will use the contact details of parents, alumni and other members of the School community to keep them updated about the activities of the School, alumni and parent events of interest, including by sending updates and newsletters, by email and by post. Unless the relevant individual objects, the school will also:

- Contact parents and/or alumni (including via the organisations above) by post and email in order to promote and raise funds for the School and, where appropriate, other worthy causes;
- Collect information from publicly available sources about parents' and former pupils' occupations and activities, in order to maximise the School's fundraising potential;
- Should you wish to limit or object to any such use, or would like further information about them, please contact the Data Handler in writing at the School's registered address or email bursar@rydeschool.net. You always have the right to withdraw consent, where given, or otherwise object to direct marketing or

fundraising. However, the School is nonetheless likely to retain some of your details (not least to ensure that no more communications are sent to that particular address, email or telephone number).

The School will also, with explicit consent, share personal data about parents and/or alumni, as appropriate, with organisations set up to help establish and maintain relationships with the school community, such as the Old Rydeians' Association, the Old Bembridgians' Association and the Upper Chine Old Girls' Association which exist outside of the School;

YOUR RIGHTS

- Rights of access, etc.

Individuals have various rights under Data Protection Law to access and understand personal data about them held by the School, and in some cases ask for it to be erased or amended or have it transferred to others, or for the School to stop processing it, but subject to certain exemptions and limitations.

Any individual wishing to access or amend their personal data, or wishing it to be transferred to another person or organisation, or who has some other objection to how their personal data is used, should put their request in writing to the Data Handler at the School's registered address or email bursar@rydeschool.net.

The School will endeavour to respond to any such written requests as soon as is reasonably practicable and in any event within statutory time-limits (which is one month in the case of requests for access to information).

The School will be better able to respond quickly to smaller, targeted requests for information. If the request for information is manifestly excessive or similar to previous requests, the School may ask you to reconsider or require a proportionate fee (but only where Data Protection Law allows it).

- Requests that cannot be fulfilled

The right of access is limited to an individual's own personal data, and certain data is exempt from the right of access. This will include information which identifies other individuals (and parents need to be aware this may include their own children, in certain limited situations – please see further below), or information which is subject to legal privilege (for example legal advice given to or sought by the School, or documents prepared in connection with a legal action).

The School is also not required to disclose any pupil examination scripts (or other information consisting solely of pupil test answers), provide examination or other test marks ahead of any ordinary publication, nor share any confidential reference given by the School itself for the purposes of the education, training or employment of any individual.

There is a "right to be forgotten". However we will sometimes have compelling reasons to refuse specific requests to amend, delete or stop processing personal data: for example, legal requirement, or where it falls within a legitimate interest identified in this Privacy Notice. All such requests will be considered on their own merits, by the Data Handler.

- Pupil requests

Pupils aged 13 or above can make subject access requests for their own personal data, provided that, in the reasonable opinion of the school, they have sufficient maturity to understand the request they are making (see section Whose Rights? below). A pupil of any age may ask a parent or other representative to make a subject access request on his/her behalf.

Indeed, while a person with parental responsibility will generally be entitled to make a subject access request on behalf of pupils under the age of 13, the law still considers the information in question to be the child's.

For pupils aged 13 or above the parent making the request may need to evidence their child's authority for the specific request.

Pupils aged 13 and above are generally assumed to have this level of maturity, although this will depend on both the child and the personal data requested, including any relevant circumstances at home.

- Parental requests, etc.

It should be clearly understood that the rules on subject access are not the sole basis on which information requests are handled. Parents may not have a statutory right to information, but they and others will often have a legitimate interest or expectation in receiving certain information about pupils without their consent. The School may consider there are lawful grounds for sharing with or without reference to that pupil.

Parents will in general receive educational and pastoral updates about their children, in accordance with the Parent Contract. Where parents are separated, the School will in most cases aim to provide the same information to each person with parental responsibility, but may need to factor in all the circumstances including express wishes of the child.

All information requests from, on behalf of, or concerning pupils – whether made under subject access or simply as an incidental request – will therefore be considered on a case by case basis by the Data Handler.

- Consent

Where the School is relying on consent as a means to process personal data, any person may withdraw this consent at any time (subject to similar age considerations as above). Examples where we do rely on consent are certain types of uses of images and certain types of marketing activity. Please be aware however that the School may not be relying on consent but have another lawful reason to process the personal data in question even without your consent.

That reason will usually have been asserted under this Privacy Notice, or may otherwise exist under some form of contract or agreement with the individual (e.g. an employment or parent contract, or because a purchase of goods, services or membership of an organisation such as an alumni or parents' association has been requested).

- Whose rights?

The rights under Data Protection Law belong to the individual to whom the data relates. However, the School will often rely on parental authority or notice for the necessary ways it processes personal data relating to pupils – for example, under the Parent Contract, or via a form. Parents and pupils should be aware that this is not necessarily the same as the School relying on strict consent (see section on Consent above).

Where consent is required, it may in some cases be necessary or appropriate – given the nature of the processing in question, and the pupil's age and understanding - to seek the pupil's consent.

Parents should be aware that in such situations they may not be consulted, depending on the interests of the child, the parents' rights at law or under their contract, and all the circumstances.

In general, the School will assume that pupils' consent is not required for ordinary disclosure of their personal data to their parents, e.g. for the purposes of keeping parents informed about the pupil's activities, progress and behaviour, and in the interests of the pupil's welfare. That is unless, in the School's opinion, there is a good reason to do otherwise.

However, where a pupil seeks to raise concerns confidentially with a member of staff and expressly withholds their agreement to their personal data being disclosed to their parents, the School may be under an obligation to maintain confidentiality unless, in the School's opinion, there is a good reason to do otherwise; for example where the School believes disclosure will be in the best interests of the pupil or other pupils, or if required by law.

Pupils are required to respect the personal data and privacy of others, and to comply with Ryde School's Internet, Email and IT Acceptable Use Policy and the school rules. Staff are under professional duties to do the same covered under the relevant staff policy.

DATA ACCURACY AND SECURITY

The School will endeavour to ensure that all personal data held in relation to an individual is as up to date and accurate as possible. Individuals must notify the Data Handler of any significant changes to important information, such as contact details, held about them.

An individual has the right to request that any out-of-date, irrelevant or inaccurate or information about them is erased or corrected (subject to certain exemptions and limitations under Data Protection Law): see above for details of why the School may need to process your data, of who you may contact if you disagree.

The School will take appropriate technical and organisational steps to ensure the security of personal data about individuals, including policies around use of technology and devices, and access to School systems. All staff and governors will be made aware of this Privacy Notice and their duties under Data Protection Law.

THIS PRIVACY NOTICE

The School will review this Privacy Notice annually or as required by relevant law or legislation. Any substantial changes that affect your rights will be provided to you directly as far as is reasonably practicable.

QUERIES AND COMPLAINTS

Any comments or queries on this Privacy Notice should be directed to the Data Handler at the School's registered address or email bursar@rydeschool.net.

If an individual believes that the School has not complied with this Privacy Notice or acted otherwise than in accordance with Data Protection Law, they should utilise the School complaints procedure and should also notify the Data Handler. You can also make a referral to or lodge a complaint with the Information Commissioner's Office (ICO, <https://ico.org.uk/>), although the ICO recommends that steps are taken to resolve the matter with the School before involving the regulator.

GLOSSARY OF KEY TERMS

"Data controllers" means organisations, including independent schools, that determine how people's personal data is processed and for what purpose. Strictly – and in liability terms – this may be trustees / board of governors, or the "top" company or charity in a group, depending on how the school (or group of schools) is structured. However, as a pragmatic distinction, each individual school is likely to make its own decisions about use of data and needs its own policies and Privacy Notice.

"Data Subjects" means any living individuals whose data the Data Controller processes.

"Medical Records" means the Ryde School medical form completed by pupils upon joining and moving through sections of the School and/or records obtained with consent directly from an individual's GP or healthcare provider.

"Processing" means any action in relation to that personal data, including filing and communication.

"Personal Data" includes everything from which a Data Subject can be identified. It ranges from simple contact details via personnel or pupil files to safeguarding information, and encompasses opinions, file notes or minutes, a record of anyone's intentions towards that person, and communications (such as emails) with or about them.

Some categories of Personal Data are **"special category data"** under the GDPR (broadly equivalent to "sensitive" personal data under the old law, but with criminal data treated separately). These comprise data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership; data concerning health or data concerning a natural person's sex life or sexual orientation; and (new to GDPR) biometric data. Extra safeguards are provided by law for processing of such data.

WEB BROWSER COOKIES

What is a cookie?

A cookie is a small amount of data, which often includes a unique identifier that is sent to your computer, tablet or mobile phone (all referred to here as a "device") web browser from a website's computer and is stored on your device's hard drive. Each website can send its own cookie to your web browser if your browser's preferences allow it. Many websites do this whenever a user visits their website in order to track online traffic flows. Similar technologies are also often used within emails to understand whether the email has been read or if any links have been clicked. If you continue without changing your settings, we'll assume that you are happy to receive all cookies on the Ryde School website. However, you can change your cookie settings at any time.

On the Ryde School website, cookies record information about your online preferences and allow us to tailor our website to your interests.

During the course of any visit to the Ryde School website, the pages you see, along with a cookie, are downloaded to your device. Many websites do this, because cookies enable website publishers to do useful things like find out whether the device (and probably its user) has visited the website before. This is done on a repeat visit by checking to see, and finding, the cookie left there on the last visit.

How does Ryde School use cookies?

Information supplied by cookies can help us to understand the profile of our visitors and help us to provide you with a better user experience.

Third Party Cookies in embedded content on Ryde School pages

Please note that during your visits to the Ryde School website you may notice some cookies that are not related to Ryde School. We sometimes embed content from social media and other third party websites. These may include YouTube, Twitter, Facebook, and LinkedIn.

As a result, when you visit a page containing such content, you may be presented with cookies from these websites and these third party cookies may track your use of our website. Ryde School does not control the dissemination of these cookies and you should check the relevant third party's website for more information. If you continue without changing your settings, we'll assume that you are happy to receive all cookies on the Ryde School website.

Ryde School uses Google Analytics to collect data about user behaviour but where Ryde School embeds content from social media and other third party websites, they may also use Google Analytics to collect data about user behaviour for their own purposes. Ryde School does not control this.

Ryde School cookies and how to reject cookies

It is important to note that if you change your settings and block certain cookies, you will not be able to take full advantage of some features of Ryde School services, and we might not be able to provide some features you have previously chosen to receive.

Other information collected from web browsers

Your web browser may also provide Ryde School with information about your device, such as an IP address and details about the browser that you are using. We use information provided by your browser or by the link that you have clicked to understand the webpage that directed you to Ryde School's website and this may be captured by performance cookies.

If you have any concerns about the way that we use cookies or respect your settings, then please contact us at bursar@rydeschool.net

Appendix

Procedures on taking, storing and using images of children

Most images, where an individual may be identified, will constitute “personal data” under the definitions of the General Data Protection Regulations (GDPR) May 2018. GDPR imposes an obligation to keep individuals (in the case of younger pupils, their parents) informed of how their personal data will be used and in some cases to secure their consent. The procedures for taking, storing and using images of children is intended to provide information to pupils and their parents, carers or guardians (referred to in this procedure as "parents") about how images of pupils are normally used by the School. 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, 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 on site and more general information about the use of pupils' personal data as set out in the Privacy Notice.

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.

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.

Parents who accept a place for their child at the School but wish to limit the use of images of a pupil for whom they are responsible can do so by completing the appropriate form, issued with new pupil joining information. Parents can also amend their consent wishes at any point by writing to the Data Handler via bursar@rydeschool.net. Historic publications will not be amended at that point. The School will always respect the wishes of parents/carers (and indeed pupils themselves) wherever reasonably possible, and in accordance with this procedure.

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).

Parents should be aware that, from around the age of 13 and upwards, the law recognises pupils' own rights to decide have a say in how their personal information is used – including images.

Use of Pupil Images in School Publications

Unless the relevant pupil or his or her parent has requested otherwise, the School will use images of its pupils to keep the School community updated on the activities of the School, and for marketing and promotional purposes, 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 and by post;
- on the School's website and, where appropriate, via the School's social media channels, e.g. Twitter, Instagram and Facebook. Such images would not normally be accompanied by the pupil's full name without permission; and
- in the School's prospectus, and in online, press and other external advertisements for the School. Such external advertising would not normally include pupil's names and in some circumstances the School will seek the parent or pupil's specific consent, depending on the nature of the image or the use.
- 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 used for marketing and promotional purposes, or staff/pupils in relation to School events, sports or trips or occasionally pupils. The School will only use images of pupils in suitable dress and the images will be stored securely and centrally.

Where the School wishes to use an image of a child that might be considered intrusive or surprising, the School will seek separate consent from either the parent or child. Each will be considered on a case by case basis.

Use of Pupil Images for Identification and Security

All pupils are photographed on entering the School and, thereafter, at the progression points between sections of the School (Fiveways into Junior School, Junior School into Senior School and Senior School into Sixth Form), for the purposes of internal identification. These photographs are uploaded securely to the pupil's MIS (iSAMS) record and will also appear on Senior School individual lunch cards.

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 School's Data Protection Policy and this Privacy Notice.

Use of Pupil Images in the Media

Where the media is expected to attend an event or school activity in which School pupils are participating, the School will make every reasonable effort to ensure that any pupil whose parent or carer has limited the use of 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 has consented as appropriate.

5. Security of Pupil Images

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 and relevant data protection laws.

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, and in particular. 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 procedures 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 the School's policies and the law.

Use of Cameras and Filming Equipment (including mobile phones) by Parents

Parents, guardians 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 by name 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 may 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.

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 this procedure, or the school's Anti-Bullying Policy, Data Protection Policy, Privacy Notice, Internet, Email and IT Acceptable Use Policies for pupils and staff, 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.