



ROYAL
BALLET
SCHOOL

SETTING THE STANDARD

TAKING, STORING AND USING IMAGES OF STUDENTS POLICY

JULY 2019

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INTRODUCTION

This Policy is intended to provide information to students and their parents, carers or guardians (referred to in this policy as "parents") and any external visitor about how images of students are normally used by The Royal Ballet School ("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 students themselves, and the media.

The main legislation in this area is the Data Protection Act 2018 and the Independent School Standards Regulations 2014. Relevant guidance which has informed this Policy includes:

- [The Information Commissioner's Office \(ICO\) Code of Practice on Privacy Notices](#)
- [The ICO sector-specific guidance for Schools, universities and colleges](#)
- [The ICO's GDPR resources concerning education](#)
- [The ICO Code of Practice on CCTV](#)
- [The ICO's Guide to Data Protection](#)
- [The NSPCC's Using photographs of children for publication](#)

It applies in addition to the School's parent contract, and any other information the School may provide about a particular use of student images, including eg signage about the use of CCTV; and more general information about use of students' personal data, contained in the School's Privacy Policy. Images of students from a safeguarding context are dealt with under the School's relevant safeguarding policies.

General points to be aware of:

- 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 this policy, by signing the School's parent contract. If additional consent is required for a specific image parents and/or the student will be approached to sign a consent form for that image. 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 student images to celebrate the achievements of students, artistic 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 student for whom they are responsible should contact Annalise Goldingham, Marketing & Communications Manager in writing. The School will respect the wishes of parents (and indeed students themselves) wherever reasonably possible, and in accordance with this policy.

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

3. USE OF STUDENT IMAGES IN SCHOOL PUBLICATIONS

- Unless the relevant student or his or her parent has requested otherwise, the School will use images of its students 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, students, 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, eg Twitter, Instagram and Facebook. (Such images would not normally be accompanied by the student's full name without permission); and
 - in the School's printed marketing materials, in online, press and other external marketing for the School. Such external advertising would not normally include student's names (and in some circumstances the School will seek the parent or student's specific consent, depending on the nature of the image or the use).
- the images will predominantly be taken by 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 (who enter in to contractual agreements with the School), or occasionally students. The School will only use images of students in appropriate clothing and the images will be stored securely and centrally.

4. USE OF STUDENT IMAGES FOR IDENTIFICATION AND SECURITY

- All students are photographed on entering the School and, annually thereafter, for the purposes of internal identification. These photographs identify the student by name, year group, house and form/tutor group.
- Upper School students' data (including images) is passed to the Royal Opera House (ROH) for the preparation of ID cards. These cards allow students access to the School sites and the ROH.
- CCTV is in use on School premises, and will sometimes capture images of students. Images captured on the School's CCTV system are used in accordance with the Privacy Policy and CCTV Policy.

5. USE OF STUDENT IMAGES IN THE MEDIA

- 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 students are participating, and will make every reasonable effort to ensure that any student whose parent or carer 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 asks for the names of the relevant students to go alongside the images, and these will only be provided where parents have been informed about the media's visit and either parent or student has consented as appropriate.

6. SECURITY OF STUDENT IMAGES

- Professional photographers and the media are accompanied at all times by a member of staff when on School premises. The School uses only professional photographers with whom we have a contractual relationship and retains the copyright of all images (both still and moving).
- The School takes appropriate technical and organisational security measures to ensure that images of students held by the School are kept securely on School systems, and protected from loss or misuse. The School will take reasonable steps to ensure that members of staff only have access to images of students held by the School where it is necessary for them to do so.
- All staff are given guidance on the School'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 School purposes, and in accordance with School policies and the law.

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

- Parents are not permitted to take photographs of, or film, their children dancing or in a ballet pose at School or at School events. This restriction exists to ensure that images of our students in the public domain on social media or blogs, portray the high standards for which the School is renowned. All ballet images taken of students by staff or photographers are subject to a strict internal approval process, to ensure they meet the required high standard. The School permits the following exceptions where parents may photograph or film their own children:
 - the Year 11 Celebration or 3rd Year Graduation events
 - the School Summer Fair when they are not dancing
 - School parent days in non-ballet poses
- Parents may be offered the opportunity to buy professional photographs of their children taken at School performances. This is offered on the agreement that no images bought by parents be published on- or offline.
- Parents are asked not to take photographs of other students, except incidentally as part of a group shot, without the prior agreement of that student's parents.
- 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 students.
- 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.

8. 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 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 students in a manner that may offend or cause upset.
- The misuse of images, cameras or filming equipment is always taken seriously, and may be the subject of disciplinary procedures or dealt with under the relevant safeguarding policy as appropriate.

9. USE OF CAMERAS AND FILMING EQUIPMENT BY VISITORS

- Visitors to the School, including Governors, must adhere to the same rules as Parents or members of staff outlined above.
- The School invites external choreographers to work with students on a variety of projects. The contractual agreements between the School and the choreographer allows filming for reference and archival purposes but does not allow for the broadcast of the work on any public platform.