



Taking, Storing and Using Images of Pupils Policy

Updated: 03-26

Prepared by: KED/NAP/SHCC

Next Review: 03-28

Approved by: JOH

This Policy applies throughout the School from the EYFS to Year 6 and should be read in conjunction with the School's Safeguarding and Child Protection Policy, Online Safety Policy and Privacy Notice.

Aim and scope

This Policy is intended to provide guidance to staff and information to pupils and their parents, guardians or carers (hereafter 'parents') about how images of pupils are normally used by the School. It also covers the School's approach to the use of cameras, video and filming equipment at School events and on School premises by parents, pupils themselves, staff, professional photographers and the media.

It applies in addition to the School's Terms and Conditions (also known as the 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, e.g. the School's Privacy Notice and CCTV Policy. Images of pupils in a safeguarding context are dealt with under the School's Safeguarding and Child Protection Policy.

The School recognises that images of pupils constitute personal data under the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018, and will ensure that such data is processed lawfully, fairly and transparently.

General points to be aware of

Certain uses of images, including pupil images, are necessary for the ordinary running of the School; for example, for administration, identification, educational and curricular purposes and security. It may not be possible to object to such uses, although any concerns in this regard will be duly considered by the school.

Other uses are in the legitimate interests of the School and its community and are unlikely to cause any negative impact on pupils. The School is entitled lawfully to process such images and take decisions about how to use them, although objections may be raised and the school will seek to accommodate any reasonable concerns. Examples are given in this policy.

Parents who accept a place for their child at the School are invited to consent to, or opt out of, the School using images of their child as set out in this Policy via the admissions form and/or by specific consent from time to time if a particular use of the pupil's image is requested.

Parents are asked to opt in or out of internal use of images and external use of images separately. Internal use of images includes images of pupils in lessons or other school activities, for example, notice boards, parent portal or other apps, such as Tapestry, with access restricted to staff, pupils and parents. Children may use images of themselves, e.g., in their artwork, as when making 'Tudor portraits'. There may be a small photo of a child alongside a particular piece of work that is celebrated in one of our displays. External use of images includes images of pupils to celebrate

achievements and promote the school externally, in printed publications and online (including newspaper features), including on the School website, in the school newsletter or its social media channels. This generally involves photos or video footage in lessons, playing games or other educational activities. This is not an exhaustive list.

Parents who choose to opt out can make any exclusions necessary, e.g. their child can be photographed in group activities only. However, parents should be aware of the fact that certain uses of their child's images may be necessary or unavoidable (for example, for internal identification, if they are included incidentally in CCTV or a photograph, or if a photo is taken of children from the back and images are non-recognisable).

A list of pupils whose parents have not consented to the use of their images is drawn up from the consent forms and consulted by those members of staff who manage the School's website, publications and social media. The list is available to all staff on Shared Staff folders and staff responsible for publishing images must check this list before sharing pupil images externally.

We hope parents will feel able to support the School in using pupil images to celebrate the academic, sporting and other achievements of pupils and to promote the work of the School. Parents and their wider family often enjoy seeing photos of their children engaging in and enjoying school life, and choose to opt into this process. Where images of children's faces are used, e.g. on social media, they are not identified by name.

Any parent of a current pupil who wishes to discuss limiting the use of images of a pupil for whom they are responsible should contact the Head of HR & Compliance (who is responsible for data protection management in the School) in writing. The School will respect the wishes of parents (and indeed pupils themselves) wherever reasonably possible, and in accordance with this Policy.

Use of pupil images in School publications

Unless the relevant pupil or the pupil's parents have 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 and by post
- On the School's website and, where appropriate, via the School's social media channels. On rare occasions, where pupils' names accompany such images, an identifying surname is never used, unless separate consent is obtained from parents. If a pupil has featured in the press by name, this may be shared more widely with the School community
- In any prospectus issued by the School, and in online, press and other external advertisements for the School. Such external advertising will never include pupils' names and in some circumstances, the School will seek the parents' 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 on how and when to take such images) or a professional photographer for marketing and promotional purposes. The School will only use images of pupils in suitable dress and the images will be stored securely and centrally.

The school's policy in respect of the above uses is as follows:

- Legitimate interests will be relied upon for any uses which are essential (for example, security, administration and education) or which fall within a scope of reasonably expected uses.
- The key effect of the school relying on legitimate interests is that parents and pupils may be entitled to object to such uses, although their specific consent will not be sought beforehand. Any objections will be duly considered by the school, but objections can be overridden by other factors: for example, uses which the school considers essential, or uses which create little or no risk of harm (including where children are not at risk of outside identification).
- Consent will be sought for external uses of pupil images online. This is done via general consent for the use of external images (see above). From time to time, the school may seek specific additional ad-hoc consent for any more prominent online or external media uses. These will, as far as possible, be specifically described to you and/or your child before being published
- The school will take reasonable steps following any objection or withdrawal of consent, but may not be able to recall or destroy printed materials or those published by external companies, such as a newspaper article. Any particular concerns or vulnerabilities relating to a pupil or their family should be drawn to the school's attention in advance. The safeguarding and best interests of pupils will remain the school's priorities at all times.

Use of pupil images for identification and security

All pupils are photographed on entering the School and, thereafter, at yearly intervals, for the purposes of internal identification. These photographs identify the pupil by name, year group and class and are stored on the School's management information system.

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 Privacy Notice and CCTV Policy. The location of cameras is clearly indicated by signage.

Use of pupil images in Nursery and Reception (Early Years)

Images of our youngest pupils will be used as laid out in this policy, with the addition of the Tapestry website. Tapestry is a secure platform that we use to record photos and observations of the children, share their experiences in School and their learning journey with parents. Accounts are created for parents for which a login is required. More information can be found at: <https://tapestry.info/parents-carers.html>.

Access to Tapestry is password protected and parents are responsible for keeping their login details secure. Images accessed through Tapestry must not be downloaded, copied or shared on social media or other public platforms where other children may be identifiable.

In accordance with safeguarding requirements in the Early Years Foundation Stage, staff do not use personal mobile phones or personal devices to take photographs or videos of children. Only School devices are used for this purpose and images are uploaded securely to the School's systems.

Use of pupil images in the media

Where practicably possible, the School will notify parents in advance when 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 has refused permission for images of that pupil to be used in the media are not photographed or filmed by the media, nor such images provided for media purposes.

The School generally refuses requests from the media for the names of the relevant pupils to go alongside images. These would be provided only where parents have been informed about the media's visit and the parent has specifically consented to the sharing of their name, for an appropriate and necessary purpose.

Security of pupil images

Professional photographers and the media are accompanied at all times by a member of staff when on School premises in accordance with the School's Visitors and Visiting Speakers Policy. 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.

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. 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.

Images of pupils must not be uploaded to external artificial intelligence (AI) tools, facial recognition systems or image-generation platforms unless expressly authorised by the School and compliant with data protection requirements.

Any external processors of pupil images are engaged only for lawful purposes consistent with those set out in this policy, and subject to proper due diligence and contractual protections.

All staff are given guidance on this Policy 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 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 should not be shared or otherwise made accessible to

others online (for example, on Facebook or Instagram or sent via text message or WhatsApp), or published in any other way

- Parents should not take photographs of staff or share or make accessible on the internet (for example, on Facebook or Instagram), or publish in any other way photographs which include staff without the prior agreement of the staff member
- 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, by reference to their dress, activity or any other factor
- Parents must not use their phones or any image recording devices, or take photos, in our Early Years setting (Nursery and Reception)

A reminder of these guidelines is given to parents at the start of these events.

The School reserves the right to refuse or withdraw permission to film or take photographs (at a specific event or more generally), either for all attendees/parents (e.g. where a safeguarding risk to an individual child has been identified) or from any individual parent who does not follow these guidelines, or is otherwise reasonably felt to be making inappropriate images.

The School sometimes records plays and concerts to allow families who are not able to attend to view the recording. This would be done in school, on a school based device.

Use of cameras and filming equipment (including mobile phones) by staff

Where staff record School events and activities, they must do so using School devices. Images and film should be uploaded to the media drive on the School's server system promptly and deleted from the School's equipment. Personal cameras and equipment must never be used. Staff follow the School's Code of Conduct and Safeguarding and Child Protection Policy regarding personal mobile phone use on School grounds, including in the Early Years setting.

Any misuse of images by staff, including using personal devices, sharing images inappropriately, or posting them online, will be treated as a safeguarding and disciplinary matter. Incidents must be reported to the DSL and the Head. The Head will contact the LADO and/or police if necessary, in line with Keeping Children Safe in Education. Staff found to have misused pupil images may face disciplinary action, up to and including dismissal and in serious cases, possible criminal investigation.

Use of cameras and filming equipment (including mobile phones) 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.

Pupils sometimes film each other as part of their curriculum using school devices. Such recordings must only be made under the supervision of a member of staff and must be stored on School systems.

Pupils are educated through the School's online safety curriculum about responsible image sharing and the risks associated with posting images online.

Pupils in Year 6 who have parental permission to bring a mobile phone to School have to hand it into the office each morning and collect it at home time.

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 Policy, or the School's Safeguarding and Child Protection Policy, Anti-Bullying Policy for Pupils, Privacy Notice, Online Safety Policy, IT and Acceptable Use Policy or any School rules is always taken seriously, and may be the subject of disciplinary procedures.

Linked policies

- Anti-bullying Policy for Pupils
- CCTV Policy
- Code of Conduct
- Code of Conduct for Other Adults who are not employees of the School
- IT and Acceptable Use Policy
- Online Safety Policy
- Privacy Notice
- Safeguarding and Child Protection Policy
- Social Media Policy
- Visitors and Visiting Speakers Policy