

Taking, Storing and Using Images of Children Policy

Policy reviewed by	SDHP and Head of Marketing
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SLT Review Period	Annual
Next SLT Review Date Due	September 2027

TAKING, STORING AND USING IMAGES OF CHILDREN POLICY

Related Policies and Documents:

This policy relates to the whole school including EYFS.

Safeguarding and online safety issues are more specifically dealt with under the school's relevant safeguarding policies;

- Online Safety Policy
- IT Usage Policy
- Child Protection and Safeguarding Policy
- Data Protection Privacy Notices

1. Statement on Intent

- This Policy is intended to provide information to pupils and their parents, carers or guardians (referred to in this policy as "parents") about how images of pupils are normally used by Edge Grove 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 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 for example signage about the use of CCTV; and more general information about use of pupils' personal data, e.g. the School's Privacy Notice. Images of pupils in a safeguarding context are dealt with under the School's relevant safeguarding policies.
- Whilst the school cannot eliminate the risks inherent in placing pupil images online (particularly given recent developments in artificial intelligence manipulation of images), it seeks to minimise these risks by taking a cautious approach when placing pupil images online and will seek consent for online publication of images, as set out in this policy.

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.

2. General points to be aware of

- Certain uses of images are necessary for the ordinary running of the School or 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 considered to be in the legitimate interests of the school and its community and unlikely to cause any negative impact on children eg. use of an image whereby an individual child cannot reasonably be identified by someone outside the school community, for example, where their face cannot be seen. 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.

- Parents who accept a place for their child at the School are invited to indicate consent to the School using images of him/her as set out in this policy, via SchoolBase (the school's management information system) and/or from time to time if a particular use of the pupil's image is requested. However, parents should be aware of the fact that certain uses of their child's images may be necessary or unavoidable, for example where they may be included incidentally in CCTV or a photograph.
- Any parent who wishes to limit the use of images of a pupil for whom they are responsible should contact the School. The School will respect the wishes of parents/carers (and indeed pupils themselves) wherever reasonably possible, and in accordance with this policy.
- If consent is not given (including circumstances where the relevant form is not submitted), the pupil will be recorded on Schoolbase as not having image permission. The Marketing Department also maintains a list of pupils for whom consent has not been provided.
- Any parent may withdraw or change consent at any time, by amending in the MIS system **SchoolBase** which will alert the School Office & Marketing dept. The school will respect the wishes of parents/carers (and indeed pupils themselves) wherever reasonably possible, and in accordance with this policy.
- Parents should be aware that, from around the age of 12 and upwards, the law recognises pupils' own rights to have a say in how their personal information is used – including images. Most pupils at Edge Grove School are generally assumed not to have this level of maturity. However, it is possible that a child at Edge Grove School may be deemed to be mature and will be assessed on a case by case basis.

3. 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, weekly newsletters, and materials by post.
- on the School's website and, where appropriate, via the School's social media channels, e.g. Instagram and Facebook. Such images will not be accompanied by the pupil's full name without permission. The exception to this is where the

school is reissuing a story produced by a third party, which is already in the public domain.

- in the School's prospectus, and in online, press and other external advertisements for the School. Such external advertising will not normally include pupil's names and in these 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 occasionally pupils. The School will only use images of pupils in suitable dress and the images will be stored securely and centrally.
- The school will take reasonable steps following any objection or withdrawal of consent but may not be able to recall or destroy printed materials. 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.
- If pupils without permission are incidentally or inadvertently photographed, the school will endeavour, where possible, to remove or cover their image so that they would not be identifiable in any resulting picture if used.

4. Use of Pupil Images for Identification and Security

- All pupils are photographed on entering the School and, thereafter, annually, for the purposes of internal identification. These photographs identify the pupil by name, year group, house and form/tutor group.
- 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 Data Protection Privacy Notice and CCTV Policy and any other information or policies concerning CCTV which may be published by the School from time to time.

5. Use of Pupil Images to Support Classroom Learning

- In the EYFS Nursery, class teachers will take photos/video recordings of children that are shared with parents on Tapestry – this is password protected and only used internally. Parents should not reuse these photos on social media. Tapestry is an online portfolio, used to support classroom learning. As part of the admissions process, parents are also asked about this.

6. Use of Pupil Images in the Media

- The School will endeavour to notify parents in advance when the media is expected to attend an event or School activity in which School pupils are participating, and will make every reasonable effort to ensure that any pupil whose parent or carer has

refused permission for 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.

7. 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.
- 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.
- All staff are given guidance on the School's Policy 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 School policies and the law.
- Pupils are also educated in an age-appropriate way on their own privacy online and with their peers, including image use and social media safety.
- Extra security has been added to the School's website to protect all imagery. SchoolDXP created by mso web agency, is a Digital Experience Platform for schools, designed to extend and enhance the functionality of WordPress specifically for school marketing, communications and admissions teams. Safeguarding, privacy and responsible digital publishing form an important part of that ongoing development. The SchoolDXP Image Protection Suite includes a range of configurable safeguards designed to help schools manage publicly accessible imagery more responsibly, including:
 - EXIF metadata stripping to remove embedded location and device information
 - Hotlink protection to prevent third-party image embedding and misuse
 - Right-click and drag protection as a deterrent against casual image copying

8. 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 should not be made accessible to others via social media 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 the swimming pool; 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 taking inappropriate images.
- The School sometimes records events professionally (or engages a professional photographer or film company to do so), in which case 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.

9. 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 Policy, or the School's Counter Bullying Policy, Data Protection Privacy Notices, Online Safety Policy, including the IT Acceptable Use Policy for Pupils, Child Protection and Safeguarding Policy or the Code of Conduct is always taken seriously, and may be the subject of behaviour management procedures or dealt with under the relevant safeguarding policy as appropriate.

10. Legislation

The main legislation in this area is the GDPR (as related in the UK following the withdrawal of the UK from the European Union), the Data Protection Act 2018 and the Education (Independent School Standards) Regulations 2014. Relevant guidance which has informed this Policy includes:

10.1.1. The ICO Code of Practice on Privacy Notices

10.1.2. The ICO sector-specific guidance for schools, universities and colleges

10.1.3. The ICO's GDPR resources concerning education

10.1.4. The ICO Code of Practice on CCTV

10.1.5. The ICO's Guide to Data Protection

10.1.6. The NSPCC's Using photographs of children for publication

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