EST. 1881

PORT·REGIS

# TAKING, STORING AND USING IMAGES OF CHILDREN POLICY

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| POLICY NAME | **Taking, Storing and Using Images of Children Policy** | POLICY OWNER | **P Scudds**<br>**Director of Marketing & Communications**<br><br>**S Ehlen**<br>**Data Protection Lead** |
| APPROVED BY | **Data Protection Lead** | DATE APPROVED | **September 2026** |
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## 1. This policy

1.1. 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 Port Regis ("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 and pupils themselves, and the media.

1.2. It applies alongside any individual parent or pupil consent forms provided and the school's parent contract and image consent forms, and should be understood in the context of any other information the school may provide from time to time 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 in the school's Privacy Notice.

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

1.4. Staff are additionally subject to their own training (in accordance with their role) and school policies in this area.

## 2. General Principles of Image Use

2.1. 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.

2.2. Other uses are considered to be in the legitimate interests of the school and its community and are 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, although objections may be raised and the school will seek to accommodate any reasonable concerns. Examples are given in this policy.

2.3. 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.

2.4. Parents who accept a place for their child at the school are invited to indicate whether or not they give permission to the school using images of them as set out in this policy, via a form in the joining pack. However, parents should be aware that certain uses of their child's images may continue to be necessary (for example, administration, education or security or will be unavoidable (for example if they are included incidentally in CCTV or as a part of a whole-school photograph).

2.5. Any parent who wishes to limit the use of images of a pupil for whom they are responsible should contact the Head's PA, Rebecca Walker, or indicate this via the form in the joining pack. The school will respect the wishes of parents/carers (and indeed pupils themselves) wherever reasonably possible, and in accordance with this policy.

2.6. Parents should be aware that, from around 12 / secondary school age, the law recognises pupils' own rights to have a say in how their personal information is used – including images.

2.7. Where remote video provision for pupils (via e.g. Zoom or Teams) is necessary, whether for lessons or e.g. counselling, the school will notify its policies in respect of monitoring, recording and retention of such sessions (along with policies on appropriate dress and supervision).

## 3. Use and Publication of Certain Pupil Images

3.1. In accordance with any consents, notices or objections as may be applicable from time to time, 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 and notice boards within the school premises;
- as part of the school's email system and intranet, and in appropriate communications by whatever means with the school community (parents, pupils, staff, Governors and alumni);
- as part of school curricular activities (for example for physical education or drama), or as a teaching aid or as part of official activities using school devices, tablets and applications;
- in printed material, such as school magazines and printed marketing material, including the school's prospectus;
- on the school's website and, where appropriate and in line with relevant policies, via the school's social media channels e.g. Instagram and Facebook (such images would not be accompanied by the pupil's full name); and
- exceptionally, in the press and other external advertisements for the school. In some circumstances the school will seek the parent or pupil's specific consent, depending on the nature of the image or the use.

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

- Legitimate interests will be relied upon for any uses which are either essential (for example, security, administration and education) or which fall within a scope of reasonably expected uses. Reasonably expected uses include via internal school or parent communications, on the school Flickr account, in printed material such as the school newsletter, magazine or

prospectus, or any uses whereby an individual child cannot reasonably be identified by someone outside the school community: for example, where their face cannot clearly be seen.

- 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).

3.3. 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.

## 4. Use of Pupil Images for Identification and Security

4.1. All pupils are photographed on entering the school and, thereafter, at intervals, for the purposes of internal identification and pupil records. These photographs identify the pupil by name, year group, house and form/tutor group.

4.2. CCTV is in use on school premises for certain notified purposes, including security, and in certain cases is likely to capture images of pupils. Images captured on the school's CCTV system are used in accordance with the Privacy Notice and CCTV Policy and the location of cameras will be clearly notified, including by signage.

## 5. Use of Pupil Images by External Media

5.1. 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 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.

5.2. The media may ask for the names of the relevant pupils to go alongside the images. It is not the School's policy to provide full or first names in this scenario, and these will only be provided where parents have been informed about the media's visit and either parent or pupil has specifically consented to the sharing of their name, for an appropriate and necessary purpose.

## 6. Security of Pupil Images

6.1. 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 in suitable dress and held by such persons securely, responsibly and in accordance with the school's instructions.

6.2. 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.

6.3. 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.

6.4. 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.

6.5. Pupils are also given mandatory and age-appropriate training on their own privacy online and with their peers, including image use and social media safety.

6.6. The school is careful in our use of images and digital media but there is always a risk that content shared online may be copied, altered or shared by others outside the school's control. This includes the online misuse and manipulation of digital content for potentially unlawful purposes. The school has robust procedures in place to mitigate the risk of this happening but it cannot be completely eliminated.

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

7.1. 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, including sports matches, plays and concerts, 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 to focus tightly on their own child and avoid taking deliberate close-ups or standalone photographs of other pupils.

- Parents are reminded that such images are for personal use only. They must not be sold or commercially distributed. Images which may, expressly or not, identify other pupils should not be made accessible to others online (for example on social media feeds such as Facebook or Instagram). Images containing other pupils may be shared on class WhatsApp groups with other parents but these must be for personal use only and must not be published without the permission of the parents of the other pupils involved.

- 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 or activity or any other factor.

7.2. 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.

7.3. The school sometimes records plays and concerts professionally (or engages a professional photographer or film company to do so), in which case physical 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.

7.4. Should remote video provision at home (by Zoom, teams or otherwise) be required or facilitated by the school in any context, specific guidelines and instructions will be provided to ensure privacy and safety, including around dress and recording of video.

## 8. Use of Cameras and Filming Equipment by Pupils

8.1. 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.

8.2. 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.

8.3. The misuse of images, cameras or filming equipment in a way that breaches this Policy, or the school's Anti-Bullying Policy, Data Protection Policy for Pupils, Parents and Carers, Online Safety Policy, IT Acceptable Use Policy for Pupils, Safeguarding Policy 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.

## 9. Use of Cameras and Filming Equipment by Staff

9.1. The use of cameras and filming equipment by staff can be found within the 'Mobile Phone, Mobile Device and Social Media Policy'.

## 10. Retention of Images by the School

10.1 Pupils and their parents are informed through the External Privacy Notice that images of pupils may be used after they have left the School.

## 11. GDPR guidance

The main legislation in this area is the UK GDPR, the Data Protection Act 2018 and the Education (Independent School Standards) Regulations 2014. The Online Safety Act and the ICO's Children's Code do not directly apply to schools, but the ICO's introduction to the Code here sets out how schools should aspire to meet certain of its standards:

"Standard 1 of the code – to ensure that the best interests of children are a primary consideration when their personal information is processed – closely aligns with schools' own duties. Schools must comply with your obligations under UK GDPR and the DPA 2018. The code sets out what good practice compliance looks like in the specific areas it covers. Schools should aspire to meet the code's 15 standards as general good practice".