



## Taking, Storing and Using Images of Children Policy

February 2025

### SECTION 1: Introduction

- 1.1 This Policy is intended to provide information to students and their parents, carers or guardians (referred to in this policy as "parents") about how images of students are normally used by St Christopher School ("the school").
- 1.2 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.
- 1.3 It applies in addition to the school's terms and conditions, and any other information the school may provide about a particular use of student images, including e.g. signage about the use of CCTV; and more general information about use of students' personal data, (e.g. the school's Privacy Notice).
- 1.4 Images of students in a safeguarding context are dealt with under the school's relevant safeguarding policies.

### SECTION 2: General

- 2.1 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.
- 2.2 Parents who accept a place for their child at the school are invited to indicate that they agree to the school using images of him/her as set out in this policy, via the form sent by the Admissions Department and 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 if they are included incidentally in CCTV or a photograph).
- 2.3 We hope parents will feel able to support the school in using student images to celebrate the achievements of students, sporting and academic; to promote the work of the school; and for important administrative purposes such as identification and security.



- 2.4 Parents are notified that we take images of children during the normal course of operations when they sign the 'Parental Acceptance Form'. Any parent who wishes to limit the use of images of a student for whom they are responsible should Rhiannon Butlin, Director of Marketing and Admissions in writing by emailing [hello@stchris.co.uk](mailto:hello@stchris.co.uk). The school will respect the wishes of parents/carers (and indeed students themselves) wherever reasonably possible, and in accordance with this policy.
- 2.5 Parents should be aware that, from around the age of 12 and upwards, the law recognises students' own rights to have a say in how their personal information is used – including images.

### **SECTION 3: Use of Student Images in School Publications**

- 3.1 During a child's time at St Chris images (including still photography and video) will be taken of activities which involve children. Unless the relevant student or their 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:
- 3.1.1 on internal displays (including clips of moving images) on digital and conventional notice boards within the school premises;
  - 3.1.2 in communications with the school community (parents, students, staff, Governors and alumni) including by email, on the school intranet and by post;
  - 3.1.3 on the school's website and, where appropriate, via the school's social media channels, e.g. Instagram, Facebook and LinkedIn. Such images would not normally be accompanied by the student's full name without permission; and
  - 3.1.4 in the school's prospectus and publications, and in online, press and other external advertising and marketing activity for the school. Such external advertising would not normally include students' names.
- 3.2 The source of these images will predominantly be the school's staff or a professional photographer used for marketing and promotional purposes, or occasionally students. The school will only use images of students in suitable dress and the images will be stored securely and centrally.
- 3.3 Occasionally, photographs and videos may be used by other companies or agencies who are contracted to promote the school, or used to illustrate the school on websites or literature produced by other partners or organisations with whom we have a relationship, such as the ISC (Independent Schools Council) or the Society of Heads.
- 3.4 In most circumstances, permission for photography cannot be withdrawn retrospectively. For example, photographs of a child that have already been taken and published in print cannot be recalled if permission for photography is withdrawn after publication. For



digital/online photographs, we shall endeavour to remove photographs where permissions are withdrawn where practicably possible.

- 3.5 Where a specific photo or video shoot is planned to take place (for example a whole school film or specific marketing project) and nominated students are selected to take part, parents will always be contacted to ensure permission is granted.
- 3.6 Students at St Chris will not be identified, or their names matched to their photograph without the consent of the parent while they are under the age of 13, or of the child once they turn 13.
- 3.7 We endeavour to ensure that students will always be made aware that photography is taking place, and the purposes for which the images will be used. They will always be given the opportunity to opt out of any photography that is taking place.

#### **SECTION 4: Use of Student Images for Identification and Security**

- 4.1 All students are photographed on entering the school and, thereafter, at yearly intervals, for the purposes of internal identification. These photographs identify the student by name, year group, and class/company/tutor group.
- 4.2 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 Notice

#### **SECTION 5: Use of Student Images in the 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 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.
- 5.2 The media often asks for the names of the relevant students to go alongside the images, and these will be provided where parents have been informed about the media's visit and either parent or student has consented as appropriate.

#### **SECTION 6: Security of Student 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 students are held by them 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 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.

- 6.3 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.

## **SECTION 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, subject to the following guidelines, which the school expects all parents to follow:
- 7.1.1 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.
  - 7.1.2 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.
  - 7.1.3 Parents are reminded that such images are for personal use only. Images which may, expressly or not, identify other students should not be made accessible to others via the internet (for example on Facebook), or published in any other way.
  - 7.1.4 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.
  - 7.1.5 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.
  - 7.1.6 In our EYFS settings (Nursery and Reception classes), no parent is permitted to take a photograph inside the classrooms without prior permission from the Head of the Junior School.
  - 7.1.7 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.
  - 7.1.8 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 students taking part in such plays and concerts will be consulted if it is intended to make such recordings available more widely.



- 7.1.9 Parents also have a responsibility to monitor the photographs which their children take and support the School in ensuring that they fulfil their responsibilities below.

### **SECTION 8: Use of Cameras and Filming Equipment by Students**

- 8.1 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.
- 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 students 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 Students, Parents and Carers, eSafety Policy, IT Acceptable Use Policy for Students, 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.

### **SECTION 9: Use of cameras and filming equipment by staff**

- 9.1 Staff and volunteers are allowed to take digital / video images to support educational aims but must follow the Acceptable Use Policy concerning the sharing, distribution, and publication of those images.
- 9.2 Staff must follow instructions from Director of Marketing and Admissions and/or Designated Safeguarding Lead with regards to use of images.
- 9.3 If a staff member believes they have inadvertently breached this policy, they should report themselves under Low Level Concerns and Staff Behaviour Policy.
- 9.4 Staff must use school devices to take photographs or videos of students (for instance on school trips, at school plays and concerts or at sporting activities).
- 9.5 Unless agreed in advance with the Head, staff may not upload images onto personal computers or other electronic devices.
- 9.6 Images must not be uploaded to personal social networking sites.
- 9.7 Staff must always comply with the Acceptable Use of ICT Policy for Staff.
- 9.8 No photographs are to be taken in changing rooms or toilets, and any photographs taken in a swimming pool or gymnastics environment must have express permission from parents and students first.
- 9.9 School staff should check the photo permissions "no consent" register for a list of current student permissions before taking any photos or videos. This is displayed in staff rooms and is sent periodically to all staff.



**SECTION 10: Other relevant policies**

- 10.1 Data Protection Policy
- 10.2 Privacy Notice
- 10.3 Safeguarding Policy
- 10.4 Terms and Conditions
- 10.5 Staff Code of Conduct Policy
- 10.6 Staff ICT Acceptable Use Policy
- 10.7 Student ICT Acceptable Use Policy
- 10.8 Anti-Bullying Policy
- 10.9 E-Safety Policy
- 10.10 CCTV Policy

<b>Responsible and Accountable Persons</b>	<b>Name</b>	<b>Position</b>
Responsible	Rhiannon Butlin	Director of Admissions & Marketing
Accountable	Simon Holmes	Chief Operating Officer
Date Policy Approved	February 2025	
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<b>Version History</b>	<b>Amendment Date</b>	<b>Amended by Whom</b>	<b>Previous Version Stored Where (If Applicable)</b>
Previous version	December 2018	Rich Jones, Deputy Head & DSL	Policy Archive Folder