Beachborough School

Taking, Storing & Using Images of Children Policy

Updated: September 2026

Date of next Review: September 2027

Policy Lead: Ms SJ Lapper (Deputy Head Pastoral - DSL)

Reviewed by: Mrs S Mitchell (Head)

This policy is intended to provide information to Beachborough pupils and their parents, carers or guardians (referred to in this policy as "parents") about how images of pupils are normally used by Beachborough 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 terms and conditions, and any other information the school may provide about a particular use of pupil images, 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.

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.
- The school processes photographs and video images of pupils in accordance with UK data protection legislation, including the UK GDPR, Data Protection Act 2018 and associated guidance. Images which identify a pupil constitute personal data and will be processed, retained and deleted in accordance with the school's Privacy Notice and Records Retention Schedule.
- Parents who accept a place for their child at the school are invited to indicate whether they agree to the school using images of their child as set out in this policy, via the form attached to the school's terms and conditions, and/or from time to time if a particular use of the pupil's image is requested. However, parents should know certain uses of their child's images may be necessary or unavoidable (for example if they are included incidentally in a photograph).
- The school's lawful basis for processing pupil images will normally be legitimate interests, educational purposes and safeguarding requirements, with consent sought where appropriate for specific uses. Parents and pupils will be informed how images will be used and may object where appropriate.
- 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.
- Any parent who wishes to limit the use of images of a pupil for whom they are responsible should complete a form available from the school office. The school will respect the wishes of parents/carers (and indeed pupils themselves) wherever reasonably possible, and in accordance with this policy.
- As pupils mature, the school will consider their views and rights regarding the use of their personal data and images in accordance with data protection legislation and their level of understanding.

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, newsletter, on the school intranet and by post.
- On the school's website and, where appropriate, via the school's authorised social media platforms. Such images will not normally be accompanied by a pupil's full name without permission.
- The school will avoid publishing personal information alongside images that may increase the risk of identification or location tracking and will never publish personal contact details.
- In the school's prospectus, and in online, press and other external advertisements for the school. Such external advertising will not include pupil's names and in some 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 be Beachborough 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.

Use of Pupil Images for Identification and Security:

We also use pupil photos for their Office 365 profile picture which is shown in emails, Teams, SharePoint etc. These photos can only be seen if logged in with a Beachborough School Office 365 account. The photos are primarily sourced from the professional annual school photos and are updated on an annual basis. These photographs are held for the purposes of internal identification and identify the pupil by name, year group, club and form/tutor group.

Use of Pupil 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 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 only be provided where parents have been informed about the media's visit and either parent or pupil has consented as appropriate.

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. Any third-party provider processing pupil images on behalf of the school must comply with applicable data protection legislation and the school's data processing requirements.

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. Images will not be retained longer than necessary. Retention and deletion of images will be managed in accordance with the school's Records Retention Schedule, Privacy Notice and Data Protection policies.
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.
Any concerns regarding the taking, storage, sharing or misuse of images must be reported immediately to the Designated Safeguarding Lead and, where appropriate, the Bursar who oversees Data Protection.

Emerging Risks and Artificial Intelligence (AI):

The school recognises emerging safeguarding risks associated with artificial intelligence (AI), image editing technologies and digital image manipulation. Any deliberate creation, alteration, sharing or misuse of pupil images

using AI or other digital technologies which may harm, exploit, embarrass, harass or identify a child will be treated as a safeguarding concern and addressed in accordance with the school's safeguarding, behaviour and online safety policies.

Use of Cameras and Filming Equipment by Staff:

- Staff may only take photos / videos of children on school approved devices, such as a mobile phone, iPad and school camera.
- Staff may only take photos / videos if they comply with this policy in full and if the images and videos are directly for educational / school related purposes.
- The use of cameras or filming equipment (this includes any image-sharing device) is not permitted in toilets, washing, or changing areas, nor should photography or filming equipment be used in a manner that may offend, or cause upset. Pupils should always be appropriately dressed when having their photographs taken.
- Staff must not under any circumstances take photos / videos on their own personal mobile phones or personal devices.
- In EYFS, only school-approved devices may be used to take or store images of children. Personal mobile phones, cameras and devices capable of recording images must not be used in the presence of children except in emergency circumstances and in accordance with school procedures.
- All photos should be downloaded to secure storage (the school network) as soon as practically possible.
- Staff must not store, upload or share pupil images using personal devices, personal email accounts, personal cloud storage services, private messaging applications or personal social media accounts. Images must only be stored and shared using approved school systems

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 made accessible to others via the internet (for example on social media platforms), 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 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 making inappropriate images.

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 pupils taking part in such plays and concerts will be consulted if it is intended to make such recordings available more widely.

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.

Children are not permitted to have mobile phones or smart technology in school or at any school events - this includes smart watches and Meta glasses - unless specific permission has been sought from the relevant member of staff.

Children may be given access to a camera or filming equipment in school for a specific activity e.g. Photography Club. Children in Form VII and VIII will have use of a camera on their school issued personal device, that should only be used to enhance their learning experience. 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 any of the school's policies is always taken seriously and may be dealt with under the relevant disciplinary and safeguarding procedures.

This policy applies across the whole school including Boarding and EYFS and will be reviewed and updated regularly. ***Linked Policies and read in conjunction with:*** *Acceptable Usage, Safeguarding, Low Level Concerns, Boarding, Staff Code of Conduct, Internet Safety.*