



Taking, Storing and Using Images of Children Policy (Whole School inc EYFS)

Version Number:	2.1
Applies to:	Whole School
Author (s):	Director of Admissions and Marketing/ SS Deputy Head (Pastoral)
Review Frequency:	Annual
Policy category (1, 2, 3, 4):	3
Last reviewed:	Trinity term 2026
Next review due by:	Trinity term 2027
Approved on (date):	12.05.26
Committee (s) Responsible:	SLT
References (including legal and others eg ISBA).	ISBA Guidance and model policy
ISI Reg:	N/A
Other related policies and documents:	Staff Social Media Policy; Saff Code of Conduct; Online Safety Policy; Acceptable Use Policy

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1. Policy statement

- This Policy is intended to provide guidance to staff and 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 Woodbridge School ("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 students themselves, and the media.
- It applies alongside any individual parent or pupil consent forms provided, and the parent contract, where this includes terms around image use and an outline of the different image use purposes, 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 students' personal data in the school's Privacy Notice.
- Safeguarding and online safety issues are more specifically dealt with under the school's relevant safeguarding policies which are available on the school website.

2. General Principles of Image Use

- Certain uses of images, including pupil images, are necessary for the ordinary running of the school, for example, for administration, identification (such as students with allergies, anaphylaxis or other dietary requirements), educational and curricular purposes, and security (in the form of CCTV images). 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. 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.
- We hope parents will feel able to support the school in using pupil images to celebrate the achievements of students across all areas of school activities; to

promote the work of the school; and for important administrative purposes such as identification and security. However, for any uses of images which might be considered more intrusive or unexpected – examples of which are set out further in this Policy – we will seek specific consent from parents and, as appropriate, students.

- 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, by signing a copy of the “Consent Form for New Joiners – All School” form. However, parents should be aware that certain uses of their child's images may continue to be necessary or will be unavoidable (for example if they are included incidentally in CCTV or as a part of a whole-school photograph).
- Any parent who wishes to limit the use of images of a pupil for whom they are responsible should contact the Director of Admissions and Marketing. The school will respect the wishes of parents/carers (and indeed students themselves) wherever reasonably possible, and in accordance with this policy.
- Parents should be aware that, from secondary school age, the law recognises students' own rights to have a say in how their personal information is used – including images.

3. Use and Publication of Certain Pupil Images

- In accordance with any consents, notices or objections as may be applicable from time to time, 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:
 - on internal displays and noticeboards 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, students, staff, Governors and alumni);
 - as part of school co-curricular activities, for example music performances or drama productions.
 - in printed material, such as printed marketing material, including the school's prospectus;
 - on the school's website, the school e-newsletter and, where appropriate and in line with relevant policies, via the school's social media channels; and
 - exceptionally, in the press and other external advertisements for the school
- 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 intranet, in printed material such as a school 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.

- **Consent** will be sought for all other external uses of pupil images in print and online. In particular, where any intended use is more intrusive or unexpected – for example, if a child is the main focus of a marketing campaign and their face can clearly be seen – the school will discuss the use with the pupil or parents (as appropriate) in advance and seek further specific consent.
- 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 students will remain the school's priorities at all times.

4. Use of Pupil Images for Identification and Security

- All students 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, house and form/tutor group.
- CCTV is in use on school premises and in certain cases is likely to capture images of students. Images captured on the school's CCTV system are used in accordance with the Privacy Notice and CCTV Policy.

5. Use of Pupil Images by External 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 students 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 may ask for the names of the relevant students 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

- 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.

- 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 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.
- Pupils are also given mandatory and age-appropriate advice around online safety, including image use and social media safety.

7. 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 students 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 students should not be made accessible to others online (for example on Facebook, Instagram or by text or WhatsApp), 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 students, by reference to their dress or activity or any other factor.
- 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 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 students taking part in such plays and concerts will be consulted if it is intended to make such recordings available more widely.

8. Use of Cameras and Filming Equipment by Students

- 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.
- 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.
- 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, Online Safety Policy, Safeguarding Policy or the Behaviour, Rewards and Sanctions Policy is always taken seriously, and may be the subject of disciplinary procedures or dealt with under the relevant safeguarding policy as appropriate.

9. Compliance and Monitoring arrangements

This policy will be subject to a thorough review process including consideration at the SLT on an annual basis. This will ensure that practice across the whole School is in line with this policy, the Complaints procedure and with current guidance and legislation.