



West Lodge School

A co-educational prep school for 3-11 year olds

The Taking, Storing and Using of Images of Children Policy

This Policy

- 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 and their work are normally used by West Lodge 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 is written in line with UK GDPR and the 2018 Data Protection Act.
- It applies to all pupils in the school including the Early Years Foundation Stage (EYFS) and before and after school activities.
- It applies in addition to the school's *Home School and Pupil Agreement*, *Social Media Policy*, *Taking Storing and Using Images: Guidelines for Staff* document, *ICT Policy*, *Child Protection Policy*, *Anti-Cyberbullying Policy*, *Data Protection Policy*, *Safeguarding Policy* 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.
- Staff are required to undertake training (in accordance with their role) and adhere to school policies in this area, including the Staff Handbook.
- An awareness of the potential for those with ill intent to misuse AI in relation to images has always informed our Taking, Using and Storing Images of Children Policy and the associated guidelines and training we provide to staff. We keep up to date with the latest industry advice relating to this and staff are regularly trained on any updates.

2. General principles of image use

- Certain uses of images of pupils 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 concerns in this regard will be duly considered by the school.
- 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.

- 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 (and from time to time if a particular use of the pupil's image is requested), by responding via the digital form. However, parents should be aware of the fact that certain uses of their child's images may be necessary (eg for identification and security) or unavoidable, for example if they are included incidentally in a photograph (although staff will make every effort to try to ensure that this doesn't happen).
- Any parent who wishes to limit the use of images of a pupil for whom they are responsible should contact the School Office in writing. 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.
- 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 Pupil images (including photographs and video) in school publications**

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. The use of images will be in line with the specific preferences made by parents on the digital form.

- Images will be taken in line with our **Taking Storing and Using Images: Guidelines for Staff** and will include pupils wearing their school uniform, PE kit, or own clothes (on own clothes day/school visits) and will include:
 - Pupils and their work.
 - Pupils taking part in a wide variety of activities in school.
 - Pupils taking part in activities (such as sports fixtures) and trips outside of school.
- The images that we use for the above purposes **will never identify an individual pupil**. Instead, a caption may name the event, the term and year that the photograph was taken (for example, "Rugby Team, Spring Term 2022") and/or the pupil's year group (for example "excellent artwork from Year 4 pupils today", " a superb poem from this Year 2 pupil today").

- We only use images of School activities, such as plays, concerts, sporting fixtures, prize-giving, School trips etc in their proper context. We never use any image that might embarrass or humiliate a pupil.
- Staff are given clear guidance in the Taking Using and Storing of Images Guidelines document on how to take, use and store images of children.

Images will appear in the following places:

Within the school premises and community:

- 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, on the school intranet and by post;
- on our 'closed' Instagram account, to update parents of day-to-day successes and events within school. Whilst no social media platform can be completely secure, every effort will be made to restrict general access by ensuring that the account is private and that only West Lodge parents will be accepted as followers;
- in the Early Years Foundation Stage as a means of assessment and observation;
- an image of your child in a class or whole school photograph, displayed within the school.
- shared to parents via a secure electronic folder. This usually relates to formal pictures (for example, of a school play, sporting event or occasion) taken by the school, that parents may wish to keep as a memento of an event. These images are strictly for your family to view and should not be shared on any social media platforms. Images will be available in the electronic folder for no longer than seven years (or a shorter period of time, if specified at the time of sharing).
- As part of the school's email system and in appropriate communications by whatever means with the school community (parents, pupils, staff, governors and alumni).

Outside of the school:

- to promote the School by website, by prospectus, on banners, by displays at educational fairs, in publications and other marketing functions, both inside the UK and overseas and by other means;
- the school may use suitable social media channels to share images including on the school's website and, where appropriate, via the school's social media channels, e.g. X (formerly Twitter), Instagram, Facebook and LinkedIn. External channels will be managed by the Marketing and Communications Manager;

- in the school's prospectus, and in online, 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;
- in the school newsletter, which is sent to parents but also appears on the school website and may also be used for marketing purposes.

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 as set out in our *Taking Storing and Using Images: Guidelines for Staff* document), 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'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, administration, identification, educational and curricular purposes and security.)
- 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).
- **Consent** will be sought for all other uses of pupil images
- 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.

How we use Pupil Images

4. Use of Pupil Images for Identification and Security

- All pupils are photographed on entering the school and, thereafter, at yearly intervals, for the purposes of internal identification and safeguarding. These photographs identify the pupil by name, year group, house and class name.

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 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 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.
- We will always complain to the Press Complaints Council (PCC) if the media fails to follow the appropriate code of practice for the protection of young people, including the children of public figures.

6. **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 in suitable dress and held by such persons 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.
- 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 Pupils (in our '*Taking Storing and Using Images: Guidelines for Staff*' document) 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. The use of personal mobile phones as a camera is prohibited as per our Child Protection Policy.
- Images of your child will be kept by the school for the time that they are at the school and for a period of time afterwards, usually 2 years. After this time a small number of images will be moved to our School archive.
- 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.

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

- Parents, guardians, carers 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 the internet and social media channels (for example on Facebook, Instagram, 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 pupils.
- Parents who are accompanying pupils on school trips may not use their personal mobile phone during the trip, and pictures should not be taken of any pupils during the course of the trip.
- 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.
- 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.
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8. 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 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 *Anti-Bullying Policy*, *Data Protection Policy*, *ICT Policy* or *Safeguarding Policy* is always taken seriously, and may be the subject of disciplinary procedures or dealt with under the relevant safeguarding policy as appropriate.

This policy is based on



Other references:

"Schools and Children" and "Editor's Code of Practice" PCC codes of Practice

"Data Protection Good Practice Note: Taking Photographs in Schools" ICO Guidance

"Advice to schools on the use of images on school websites." ISC

Reviewed Date: March 2025

Next Review Date: March 2026

Reviewer: Marketing and Communications Manager