



CHURCHER'S COLLEGE

TAKING, STORING AND USING IMAGES OF CHILDREN POLICY

October 2025

1 Introduction

- 1.1 This Policy is intended to provide guidance to staff and 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 Churcher's College ("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 (the Form of Undertaking), 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 Whilst the school cannot eliminate the risks inherent in placing pupil images online (particularly given recent developments in artificial intelligence manipulation of images), it seeks to minimise these risks by taking a cautious approach when placing pupil images online and will seek consent for online publication of images, as set out in this policy.
- 1.4 Safeguarding and online safety issues are more specifically dealt with under the school's relevant safeguarding policies, including the Child Protection and Safeguarding Policy and Procedures, the Online Safety Policy and the Youth Produced Sexual Imagery Policy.
- 1.5 Staff are additionally subject to their own training (in accordance with their role) and school policies in this area, including under the Employment Manual.

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 unlikely to cause any negative impact on children eg. use of an image whereby an individual child cannot reasonably be identified by someone outside the school community, for example, where their face cannot be seen. 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.
- 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 that they agree to the school using images of their child as set out in this policy. Parents provide consent by completing and submitting the relevant form. In addition, parents (and/or pupils who are of sufficient maturity) may be asked to provide specific consent from time to time if a particular use of the pupil's image is requested eg. use of a pupil image on a billboard to advertise the school. However, parents should be aware that certain uses of their child's images may continue to be necessary (for example for administration, education or security)

or unavoidable (for example if they are included incidentally in CCTV or as part of a whole school photograph).

- 2.5 The School seeks a general form of consent from parents, rather than an itemised list of approved uses. This approach has been adopted in order to ensure a practical workable system which enables the school to reflect the wishes of parents effectively. A new consent will be sought for Junior School pupils at the point at which they join the Senior School.
- 2.6 If consent is not given (including circumstances where the relevant form is not submitted), the pupil will be recorded on iSAMS (the school's management information system) as not having image permission. The Marketing Department also maintain a list of pupils for whom consent has not been provided.
- 2.7 Any parent may withdraw consent at any time. In order to withdraw consent, parents should contact Mr Chris Jones, Deputy Head (Pastoral) (Senior School) or Mrs Philipa Yugin-Power, Deputy Head (Junior School and Nursery), in writing. The school will respect the wishes of parents/carers (and indeed pupils themselves) wherever reasonably possible, and in accordance with this policy.
- 2.8 Staff working in the Early Years Foundation Stage should not use their own personal mobile phones, cameras or other electronic devices with imaging and sharing capabilities whilst working with the children to photograph or record the pupils. The Early Years Foundation Stage teachers will monitor use of equipment in the classroom and make all staff aware of this protocol. Photographs of pupils will only be taken by approved individuals in agreement with the Early Years Foundation Stage class teacher and images will only be used for School purposes.
- 2.9 Parents should be aware that, from around the age of 12, the law recognises pupils' own rights to have a say in how their personal information is used – including images.

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) eg Headmaster's newsletters and Mrs Robinson's weekly post;
 - as part of school curricular activities for example for physical education or drama, 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 (which are routinely made available online via the school's website). Such images will occasionally be accompanied by the pupil's first name, although full names will not be used without parental permission;
 - on the school's website and, where appropriate and in line with relevant policies, via the school's social media channels, e.g. Instagram, Facebook, YouTube and LinkedIn. Such images will not be accompanied by the pupil's name without permission. The exception

to this is where the school is reissuing a story produced by a third party, which is already in the public domain; and

- occasionally in the press and other external advertisements for the school.

3.2 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.

3.3 If pupils without permission are incidentally or inadvertently photographed, the school will endeavour, where possible, to remove or cover their image so that they would not be identifiable in any resulting picture if used.

4 Use of Pupil Images for Identification and Security

4.1 All pupils 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.

4.2 CCTV is in use on school premises, 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 any other information or policies concerning CCTV which may be published by the school from time to time and the location of cameras will be clearly notified by signage.

5 Use of Pupil Images to Support Classroom Learning

5.1 In the Junior School & Nursery, class teachers will take photos/video recordings of children that are shared with parents on *Seesaw* – this is password protected and only used internally. Parents should not reuse these photos on social media. *Seesaw* is an online portfolio, used to support classroom learning. If a child does not have permission to appear in photos, they will need to be removed from group shots in a discreet and respectful manner.

6 Use of Pupil Images by External Media

6.1 When the media is expected to attend an event or school activity in which school pupils are participating, the school will make every reasonable effort to ensure that any pupil whose parent or carer has declined 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.

6.2 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.

7 Security of Pupil Images

7.1 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.

- 7.2 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.
- 7.3 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.
- 7.4 Pupils are also educated in an age-appropriate way on their own privacy online and with their peers, including image use and social media safety.

8 Use of Cameras and Filming Equipment (including mobile phones) by Parents

- 8.1 Churcher's College is committed to safeguarding and promoting the welfare of all children. In line with our commitment to safeguarding, and in acknowledgement of the fact that the school does not hold image consent for a number of pupils, we request that parents do not use cameras or filming equipment to record images of children at school events.
- 8.2 Where possible, a specifically authorised event photographer will be identified. This will enable digital images to be captured, checked in line with the school's internal procedures and then shared with parents as appropriate.
- 8.3 Parents may not film or take photographs in the swimming pool. On some occasions in the Senior School, parents of children from other schools may request permission to film their child in a competitive swimming event held at Churcher's for academic qualification purposes. This may include incidental filming of Churcher's pupils and will therefore only be permitted if prior consent has been obtained from the Director of Sport. In these circumstances, the parents will be reminded that the images must be used solely for the purpose of the relevant academic qualification.
- 8.4 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.

9 Use of Cameras and Filming Equipment by Pupils

- 9.1 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.
- 9.2 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.
- 9.3 The misuse of images, cameras or filming equipment in a way that breaches this Policy, or any other relevant school policies (including the Anti-Bullying Policy, Data Protection Policy, Online Safety Policy, the IT Acceptable Use Policy for Pupils, the Child Protection and Safeguarding Policy and Procedures or the School Rules) is always taken seriously, and may

be the subject of disciplinary procedures or dealt with under the relevant policy as appropriate.

Authorised by	Deputy Head (Pastoral)
Date	April 2025
	Revised: October 2025
Date of next review	April 2026 or earlier as required