



[School name/logo]

Use of Pupil Images Policy

Owner:	Data Compliance Lead	Date Reviewed:	July 2025
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Review Period:	1 Year	Next Review Date:	July 2026
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USE OF IMAGES POLICY

1 INTRODUCTION

- 1.1 Radley Schools Group (“the Group”) is obliged to comply with data protection law when it takes, uses or publishes images of its pupils, and specifically to comply with obligations set out in the UK General Data Protection Regulation (“UK GDPR”), the Data Protection Act 2018 (“DPA 2018”) and other legal and regulatory requirements as applicable.
- 1.2 In this policy, the term ‘school(s)’ means Barfield, Beeston Hall, Chandlings Prep, Cothill House, Kitebrook Preparatory, Mowden Hall and West Hill Park. For the avoidance of doubt, the Group is the data controller for all the schools governed and administered by the Group and this policy is therefore intended to be written on behalf of all the schools in the Group .
- 1.3 In this policy the term ‘images’ includes photographs, digital photographs, film, webcam/video conferencing recordings, CCTV, and photographs and videos captured by mobile/camera phones or other devices such as tablets.
- 1.4 The aim of this policy is to provide 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 the Group and its schools. It also covers the Group’s approach to the use of cameras and filming equipment on school premises by the school(s), parents, pupils and the media.
- 1.5 This policy applies in addition to any information the Group may provide about a particular use of pupil images and other personal data, including the Group’s privacy notice. Images of pupils in a safeguarding context are dealt with under the Group’s safeguarding policy.
- 1.6 The Group will always act in the best interest of its pupils and, as far as it legally can, will take parental preferences into account.

2 GENERAL USE OF IMAGES

- 2.1 Certain uses of images are necessary for the ordinary running of the Group, its schools and its community and unlikely to cause any negative impact on its pupils. The Group is entitled lawfully to process such images and take decisions about how to use them, subject to any objections raised.
- 2.2 The Group will respect the wishes of parents wherever reasonably possible, and in accordance with this policy, subject to the data rights of their child. Parents should be aware that when a pupil has sufficient understanding they may decide for themselves about how their image is used by the Group. The law recognises children’s own rights to have a say in how their personal information is used – including images; this is usually around the age of 13 years but could be younger or older depending on the individual child’s ability to understand.
- 2.3 Where consent is required to use a pupil image, parents are invited to indicate if they agree to the Group using images of their child as set out in this policy. Parents may do this by signing the parental consent form found in Appendix 1, and/or from time to time if we request a particular use of a pupil’s image.
 - 2.3.1 However, parents and pupils should be aware of the fact that the Group does not rely on consent for processing certain images, for example, where photographs of pupils are stored

within pupil records for identification purposes. This is because the processing of the image is necessary for purposes of the legitimate interests of the Group .

- 2.3.2 Individuals have the right to object to the processing of their personal data in these circumstances, and can do so by contacting [named person and contact details at named School].

3 USE OF PUPIL IMAGES IN SCHOOL PUBLICATIONS

- 3.1 [School name] will, with consent where required, use images of pupils to keep the its school community updated on its activities, and for marketing and promotional purposes, including:
- 3.1.1 school (and occasionally Group) publications (e.g. prospectus, information booklets, newsletters and magazines);
 - 3.1.2 school (and occasionally Group) marketing e.g. in advertisements, on leaflets, flyers, posters, videos (which may include digital advertising such as google display advertising and 3rd party websites e.g. red kite days and independent school parent).
 - 3.1.3 on the school and Group websites;
 - 3.1.4 on various social networking and or photograph/video sharing platforms (e.g. Facebook, Twitter, Instagram, LinkedIn, YouTube); and
 - 3.1.5 in press releases, editorial features and for the school or Group 's own journalistic purposes in hard copy and/or digital.
- 3.2 The source of these images will predominantly be school staff (who are subject to policies and rules on how and when to take such images), or an external professional photographer used for marketing and promotional purposes, or occasionally pupils themselves. The images will be stored securely.

4 USE OF PUPIL IMAGES FOR IDENTIFICATION AND SECURITY

- 4.1 All pupils are photographed on entering the school and, thereafter, may be updated, for the purposes of internal identification. These photographs identify the pupil by name.
- 4.2 [CCTV is in use on premises, and will capture images of pupils. Images captured on the school's CCTV system are used in accordance with the relevant Privacy Notice and any other information or policies concerning CCTV which may be published by the Group and/or schools from time to time.]

5 USE OF PUPIL IMAGES IN THE MEDIA

- 5.1 The school will fully consider the interests of its pupils when deciding whether to allow external organisations to take photographs or to film. When the media are allowed to be present, this will be on the condition that they observe this policy.
- 5.2 The Group may record events and training professionally (or engage a professional photographer or film company (including for drone footage) to do so).

6 SECURITY OF PUPIL IMAGES

- 6.1 Professional photographers and the media are accompanied at all times by a member of staff when on school premises or undertake DBS checks. The school uses only reputable professional photographers and ensures that any images of pupils are held by them securely, responsibly and in accordance with the school's instructions.
- 6.2 The Group takes appropriate technical and organisational security measures to ensure that images of pupils held by the school are kept securely on systems, and protected from loss or misuse. The Group will take steps to ensure that staff have access to images of pupils held by the school only where it is necessary.
- 6.3 All staff are given guidance on this policy, and on the importance of ensuring that images of pupils are made and used responsibly, only for school purposes, and in accordance with Group policies and relevant law.

7 USE OF CAMERAS AND FILMING EQUIPMENT (INCLUDING MOBILE PHONES) BY PARENTS

- 7.1 It shall be at the discretion of the school whether photographs may be taken at a school event. Family and friends taking photographs for the family album will not be covered by data protection legislation.
- 7.2 Where parents are permitted to take photographs of (and where appropriate, film) their own children, this will be subject to the following guidelines, which the school expects all parents to follow:
 - 7.2.1 Parents should be mindful of the need to use their cameras and filming devices with consideration and courtesy of others.
 - 7.2.2 Parents are reminded that such images are for personal use only. Parents should only ever share images which include other children if they have permission from the parent/guardians of the children.
 - 7.2.3 Parents are reminded that copyright issues may prevent the school from permitting the filming or recording of some events. The school will provide a reminder where issues of copyright apply.
 - 7.2.4 Parents may not film or take photographs in other circumstances in which photography or filming may embarrass or upset pupils, or where parents / pupils have made it known to you that they do not wish to be filmed or photographed.
- 7.3 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.

8 USE OF CAMERAS AND FILMING EQUIPMENT BY PUPILS

- 8.1 All pupils are encouraged to report any concerns about the misuse of technology, or any worrying issues to a member of 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 pupils covertly or otherwise 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 Group's data protection and data subject rights policy for staff, safeguarding policy or the behaviour policy is

always taken seriously, and may be the subject of disciplinary procedures or dealt with under the relevant policy as appropriate.