



Taking, Storing and Using Images of Children Policy

Policy date:	June 2026
Date of next review:	May 2027
Owner:	Chief Finance and Operating Officer / Deputy Master
SLT committee responsible:	SLT
Intended audience:	Pupils, parents and staff
Location:	School Portal

1. Purpose and scope of this policy

- 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 Haileybury ("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 in addition to and alongside the School's terms and conditions, its Privacy Notice (available on the policies page of the website [here](#)) and any other information the School may provide from time to time about a particular use of pupil images (e.g. signage about the use of CCTV) or pupils' personal data.
- 1.3 Safeguarding and online safety issues are also dealt with in the School's Safeguarding and Child Protection Policy, the Staff Code of Conduct, and the Social Media Policy.
- 1.4 Staff also receive training in relation to this policy as appropriate.

2. General principles of image use

- 2.1 Certain uses of pupil images are necessary for the ordinary running of the School (for example, 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. 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.
- 2.3 We hope parents will feel able to support the School in using pupil images to celebrate the academic and co-curricular achievements of pupils; to promote the work of the School; and for important administrative purposes such as identification and security.
- 2.4 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 on schooloffice@haileybury.com. The School will respect the wishes of parents (and indeed pupils themselves) wherever reasonably possible, and in accordance with this policy.
- 2.5 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.

3. Use of pupil images in school publications

- 3.1 Subject to any objections, 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:
 - 3.1.1 on internal displays (including clips of moving images) on digital and conventional notice boards within the School premises;
 - 3.1.2 in communications with the School community (parents, pupils, staff, Governors and alumni) by email, on the School intranet, and by any other appropriate means;

- 3.1.3 as part of school curricular activities, for example for physical education or drama, or as a teaching aid, as part of official activities using school devices, tablets and applications;
 - 3.1.4 in printed material, such as school magazines and printed marketing material, including in the School's prospectus;
 - 3.1.5 on the School's website and, where appropriate and in line with the School's relevant policies, including the Social Media Policy, via the School's social media channels; and
 - 3.1.6 exceptionally, in the press and other external advertisements for the School.
- 3.2 The School's policy in respect of the above uses is that they fall within the following lawful bases for processing data:
- 3.2.1 legal obligation - the processing is necessary for the School to comply with the law (e.g. certain education or safeguarding records); or
 - 3.2.2 public task - the processing is necessary to perform a task in the public interest and it has a clear basis in law (e.g. security); or
 - 3.2.3 legitimate interests - the processing is necessary for the School's legitimate interests, or those of a third party unless there is a good reason to protect the individual's personal data which overrides those legitimate interests (e.g. the School's day to day operations, educational uses, promotional publications including the School's website and publicity).
- 3.3 Where the School relies on legitimate interests, parents and pupils may be entitled to object to such uses, although their specific consent will not be sought beforehand. Any objections will be considered by the School. In the case of images of pupils being used for marketing materials or publicity, the marketing team will as a matter of course always check with the pupil in question, and their parents if necessary, as to whether they have any objections to a particular photograph being used.
- 3.4 The source of these images will predominantly be the School's staff (who are subject to policies and rules as to how and when to take such images), or a professional photographer used for marketing and promotional purposes, or occasionally pupils themselves. The School will only use images of pupils in suitable dress and the images will be stored securely and centrally.
- 3.5 Safeguarding of pupils remains the School's priority at all times. Safeguarding will always take priority over data protection.

4. Use of pupil images for identification and security

- 4.1 All pupils are photographed on starting at the School and, thereafter, at appropriate intervals, for the purposes of internal identification. These photographs identify the pupil by name, year group, and House, and are attached to the pupils' records kept on the School's information management system.
- 4.2 CCTV is in use on school premises, and will sometimes capture images of pupils. Images captured on the School's CCTV system are used in accordance with the Privacy Notice and CCTV Policy.

5. Use of pupil images in the media

- 5.1 The School asks parents to notify the School if for any reason they or their child does not wish their image to be used for publicity or media purposes. The School maintains a list of such

pupils and ensures that no images of these pupils are used for these purposes. Parents are reminded to provide this information termly.

- 5.2 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.
- 5.3 The media often asks for the names of the relevant pupils to go alongside the images. It is not the School's policy to provide names in this scenario, and these will 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

- 6.1 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 held by them securely, responsibly and in accordance with the School's instructions.
- 6.2 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. 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.
- 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 school policies and the law.
- 6.4 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.

7. Use of cameras and filming equipment by staff

- 7.1 It is accepted that there will be occasions when staff will need to take photographs or film of pupils in the normal course of their duties and for purposes authorised by the School, for example to record sports or other co-curricular activities, or on school trips etc. Staff must only ever take such photographs or film where it is professionally and educationally appropriate and staff should always use a school device. Staff must not take photographs or videos of pupils on their own personal device. Staff must always check with the Marketing Department as to whether any pupils or their parents have objected to having their image used, and should not use any images if an objection has been received. Staff must also be aware of the potential for images of pupils to be misused, and particular care must be taken when filming or photographing young or vulnerable pupils who may be unable to question how or why the photography or filming is taking place. Staff should discuss any concerns with the Child Protection Team.
- 7.2 A member of staff who is also a parent, should follow the guidelines below in relation to taking photographs or film for their own child.

8. Use of cameras and filming equipment (including mobile phones) by parents

- 8.1 Parents (which for this section includes guardians and close family members) are welcome to take photographs of (and where appropriate, film) their own children taking part in some school

events, subject to the following guidelines, which the School expects all parents to follow:

- 8.1.1 When an event is held indoors, such as a play or a concert, parents are not permitted to take pictures or videos unless specifically invited to do so by the member of staff in charge of the event. For sporting events or outdoor events, taking pictures is permitted subject to the parameters set out below.
- 8.1.2 Parents must not take photographs of other pupils, except incidentally as part of a group shot, without the prior agreement of that pupil's parents.
- 8.1.3 Parents are reminded that such images are for personal use only. Images which may, expressly or not, identify other pupils must not be made accessible to others online (for example on any social media channel), or published in any other way.
- 8.1.4 Filming of pupils is not permitted at any time either inside or outside, without the specific permission of the member of staff in charge.
- 8.1.5 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.
- 8.1.6 Parents may not film or take photographs in any other circumstances in which photography or filming may embarrass or upset pupils or which could be deemed as inappropriate due to their dress or activity or any other factor (e.g. in changing rooms or backstage). This is at the School's discretion and the School's decision is final.
- 8.2 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, or from an individual parent who does not follow these guidelines, or is otherwise reasonably felt to be making inappropriate images.
- 8.3 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.

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 staff.
- 9.2 The use of cameras or filming equipment (including 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 to another.
- 9.3 The misuse of images, cameras or filming equipment in a way that breaches this policy, or the School's Countering Bullying Policy, Data Protection Policy, ICT Acceptable Use Policy, Safeguarding and Child Protection Policy, or any of the School's rules published from time to time, is always taken seriously, and may be the subject of formal action in accordance with the School's policies and procedures where appropriate.

Version history		
Date	Reviewed by	Notes
September 2022	SLT	New policy
September 2023	SLT	Reviewed and updated
May 2025	COO/SLT	Reviewed and updated
June 2026	SLT	Reviewed
June 2026	Executive Leadership Team (ELT)	Reviewed and approved.