Taking, Storing and Using Images of Children Policy

The Perse School

September 2026

1. This Policy

- 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 The Perse 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 pupils themselves, and the media.
- This Policy refers to the term "images", which includes photographs, video and recordings.
- It applies alongside other policies, e.g. the School's terms and conditions/parent contract, where this includes terms around image use and marketing, 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, for example, signage about the use of CCTV; and more general information about use of pupils' 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.
- Staff are provided with detailed guidance and specific training to ensure images are taken and used in accordance with this Policy and associated School policies, which include the Staff Handbooks and Staff Code of Conduct.

2. General principles

The School will take a safeguarding-first approach to the creation and use of pupil images.

In deciding whether and how an image should be taken, retained, published or shared, the School will consider:

- the purpose for which the image is required;
- whether an image of an identifiable pupil is necessary to achieve that purpose;
- where and how the image will be published or shared;
- the prominence and identifiability of individual pupils;
- the age and any known vulnerability of pupils;
- the pupil's dress, activity and context;
- whether the image could readily be copied, extracted, manipulated or repurposed;
- whether identifying information is associated with the image; and
- the wishes and rights of pupils and parents.

The School will seek to use images proportionately and in a way which respects pupils' dignity, privacy and developing autonomy.

Consent or permission to use an image does not in itself remove safeguarding risk. The School may therefore decide not to take or publish an image even where the necessary permission has been obtained.

3. Types of image use

Different uses of pupil images require different approaches.

3.1 Essential and internal School use

Certain images are necessary for the ordinary running of the School and may be processed without consent where the School has an appropriate lawful basis.

Examples include:

- pupil identification and management systems;
- class lists and seating plans;
- identification relating to medical, dietary or safeguarding needs;
- educational and curricular activities;
- recording learning and development;
- internal School displays and resources where appropriate;
- security and CCTV; and
- other administrative purposes.

Images used for these purposes will be accessible only to those who require them and will be managed in accordance with the School's data protection, security and retention arrangements.

3.2 School community and educational communications

The School may take images of pupils engaged in learning, sport, music, drama, Outdoor Education, trips, clubs, performances, events and other aspects of school life.

Where these are shared within appropriately controlled School or parent communications, the School will take account of existing image permissions and any objections or restrictions recorded by pupils or parents.

3.3 Printed publications

Images may be used in printed School materials including prospectuses, magazines, newsletters, programmes, displays and other publications.

The School will only use pupil images in accordance with the permissions held and any preferences or restrictions recorded by pupils or parents. Where existing consent or permission covers the proposed use, the School will not ordinarily seek separate permission each time an image is published.

Where appropriate, the School may also rely on its legitimate interests for routine, contextual or group images in printed publications, having balanced the interests of the School and its community with the privacy rights, wishes and best interests of pupils and having provided an opportunity to object.

Additional specific permission will normally only be sought where the proposed use is particularly unusual or unexpected, or otherwise falls outside the scope of the permission already held.

All images selected for printed publications will also be subject to the School's safeguarding principles regarding identifiability, dress, context and vulnerability.

3.4 Website, social media and other publicly accessible online use

The School recognises that images published online may be copied, downloaded, scraped, altered or redistributed beyond the School's control. Particular care will therefore be taken when selecting images for the School's website, social media, digital advertising and other publicly accessible online channels.

Images will only be published in accordance with the consent or permissions held by the School and any preferences or restrictions recorded by pupils or parents. Where existing consent or permission covers online publication, separate permission will not ordinarily be sought each time an image is used.

For routine online communications, the School will normally prioritise group, activity-based and contextual images and will seek to reduce the unnecessary prominence or identifiability of individual pupils.

There will, however, be occasions when it is appropriate to feature an identifiable individual pupil, particularly as part of a news story celebrating a significant achievement or success. Where the School holds existing consent or permission covering online publication, this may be used without seeking additional permission for each individual image or story.

Where an individual pupil is featured in this way, the School will minimise the identifying information published alongside their image. Current pupils will be referred to by first name only in publicly accessible communications. Surnames, ages, year groups and other unnecessary identifying information will not be published alongside an identifiable image.

The pupil's own wishes will also be taken into account, having regard to their age and understanding.

Additional specific permission will be sought where the proposed use falls outside the scope of the consent or permission already held, or where particular safeguarding considerations make this appropriate.

All online publication will also be subject to the image-selection, safeguarding and image-security principles set out elsewhere in this Policy.

4. Selecting images for publication

When selecting or commissioning photographs for external communications, marketing or publicity, the School will normally prioritise group, activity-based and contextual imagery.

Where possible, images should:

- show pupils interacting with others or engaged naturally in an activity;
- include the wider classroom, sporting, performance or event environment;
- be taken from a suitable distance;
- use side, rear, over-the-shoulder or other less directly identifiable angles where appropriate; and

- communicate the atmosphere and nature of the activity rather than focusing solely on an individual pupil.

Close-up, front-facing standalone portraits of current pupils will generally be avoided for publicly accessible online use. Exceptions may be made where there is a clear reason to feature an individual pupil, for example to celebrate a significant achievement, where the School holds consent or permission covering the proposed use and the image is considered appropriate from a safeguarding perspective.

Images where an individual pupil is isolated prominently against a plain or simple background will generally be avoided for publicly accessible online use.

This does not prevent the School from publishing images in which individual pupils can be seen. The intention is to reduce unnecessary prominence and identifiability while continuing to communicate and celebrate school life authentically.

5. Individual portraits within collections

Individual photographs may be incorporated into a photographic montage, contact-sheet style collage or similar collection where each individual image is displayed at a relatively small size.

Where used online, such collections should normally be published at a resolution that makes it difficult to enlarge or extract an individual photograph to produce a high-quality standalone image.

This enables the School to represent and celebrate a wide range of pupils and activities while reducing the ease with which individual photographs can be extracted or repurposed.

6. Presentation, dress and vulnerability

All pupils must be represented respectfully and with appropriate regard to their age, dignity and the context in which an image is being used.

Pupils should be appropriately dressed for the activity being undertaken, for example in school uniform, sports kit, costume or other appropriate clothing.

Where activities naturally involve less clothing, such as swimming or certain sports, photography should focus on the activity rather than the pupil's body. Images which prominently or unnecessarily feature large areas of exposed skin should not normally be selected for publication.

Images should not be used where a pose, expression, composition or camera angle could reasonably be considered embarrassing, undignified or open to inappropriate interpretation.

Pupils must not be photographed in situations that could reasonably be regarded as unnecessarily personal, vulnerable or intrusive. This includes, for example:

- changing or washing;
- receiving medical treatment;
- being visibly distressed or upset;
- situations where injury is the principal focus of the image; or

- circumstances in which a pupil would reasonably expect privacy.

Particular care will be exercised in relation to younger children and pupils where the School is aware of specific safeguarding or vulnerability considerations.

7. Celebrating individual achievement

There will be circumstances where it is appropriate to feature an individual pupil more prominently, for example following significant:

- sporting success;
- academic achievement;
- competition or tournament success;
- musical, dramatic or artistic achievement;
- an award or scholarship; or
- another newsworthy accomplishment.

In such circumstances, the Marketing and Communications Team will consider whether the proposed image and publication are proportionate to the communications purpose and appropriate from a safeguarding perspective.

Where the School holds appropriate consent or permission covering the proposed use, additional parental permission will not ordinarily be required. Additional specific permission will be sought where the proposed use is unusual or unexpected, falls outside the scope of existing permission, or where particular safeguarding considerations make this appropriate.

The wishes of the pupil will also be taken into account. Where appropriate, having regard to their age and understanding, the pupil's agreement will be sought before they are individually and prominently featured.

Where possible, the image should relate naturally to the achievement – for example at the competition, presentation, performance or event – rather than relying solely upon a tightly cropped portrait.

Where the achievement is reported in publicly accessible communications, the pupil will be referred to by first name only. Their surname, age, year group and other unnecessary identifying information will not be published.

No pupil will be expected to participate in publicity about their achievement if they do not wish to do so.

8. Names and identifying information

Particular caution will be exercised where a pupil's image could be linked with other identifying information.

Current pupils will be referred to by first name only in publicly accessible School communications. The School will not publish a current pupil's surname alongside an identifiable image.

The School will also seek to avoid publishing unnecessary additional identifying information, including a pupil's age or year group, and will consider whether the content or context of publication could inadvertently reveal information such as:

- a pupil's regular location;
- timetable or routine;
- participation in regular activities; or
- other information that might increase safeguarding risk.

Where naming a pupil forms an important part of celebrating a significant achievement, the Marketing and Communications Team will determine the appropriate level of information to publish in accordance with these principles.

9. Image security and protection against digital misuse

The School recognises that publicly accessible pupil images may be vulnerable to web-scraping, unauthorised sharing and AI-assisted manipulation.

Reasonable measures will therefore be taken to reduce these risks.

For publicly accessible digital images, the School will, where practicable:

- use group and contextual imagery in preference to prominent individual portraits;
- use alternative camera angles and more distant compositions;
- publish images at an appropriate rather than unnecessarily high resolution;
- remove image metadata, including EXIF information, where this could reveal location, device or timestamp information;
- avoid associating images with unnecessary identifying information;
- review the privacy and security settings available on digital platforms;
- consider technological measures designed to make unauthorised downloading or manipulation more difficult; and
- periodically review publicly accessible pupil imagery.

No technical measure can provide complete protection once an image has been published online. Image selection and safeguarding judgement therefore remain the School's primary safeguards.

10. Pupil and parent wishes

The School will provide parents and pupils with information about the ways in which pupil images may be taken and used.

Permissions already provided to the School will continue to apply in accordance with their terms unless they are withdrawn or amended. The adoption or revision of this Policy does not in itself require existing permissions to be renewed.

Parents may communicate restrictions or objections to particular uses in accordance with the School's published procedures.

Children have an increasing right to participate in decisions about the use of their personal information as they mature. The School will therefore take account of a pupil's age, maturity and understanding when determining whose agreement is required.

Older pupils will be informed about the School's approach to photography and encouraged to express their own wishes.

Irrespective of any parent permission, the School will not normally photograph or publish an identifiable image of a pupil who has made clear that they do not wish to be photographed or featured, unless an image is required for an essential administrative, educational, safeguarding or security purpose.

Parents and pupils are encouraged to discuss their preferences regarding pupil images.

11. Withdrawal of consent or objection to use

Where the School relies on consent, consent may be withdrawn.

Where the School relies on another lawful basis, pupils or parents may raise an objection or concern about the use of a particular image.

The School will take reasonable steps to respond to any withdrawal or objection, taking account of safeguarding, data protection requirements and the circumstances of the particular use.

Where appropriate, an image will be removed from School-controlled websites or digital channels.

Withdrawal of consent will not ordinarily affect uses made before the School received the withdrawal. It may not be possible to recall or destroy printed materials already produced or distributed, or to remove copies of an image that have subsequently been copied, downloaded or shared by third parties.

12. Professional photographers and videographers

The School may engage professional photographers, videographers and production companies to record school activities.

The School will use reputable providers and will provide them with clear instructions about:

- the purpose and scope of the commission;
- which pupils may or may not be photographed;
- the School's photography and safeguarding requirements;
- appropriate image composition, dress and context;
- storage, security and transfer of images;
- permitted use of the images; and
- deletion of images following completion of the commission.

Professional photographers who have not undergone the School's required safeguarding checks will be appropriately supervised while on the School site.

External photographers must not make independent use of images of Perse pupils without express written authorisation from the School.

Where required by the School, photographers must securely delete images once the School has confirmed receipt.

13. External media

There may be occasions when journalists, broadcasters or other media organisations are invited to attend a School activity or where the School supplies an image to the media.

Where reasonably practicable, the School will notify relevant parents and pupils in advance.

Pupils will not normally be put forward for identifiable media photography, filming or interviews without appropriate permission.

Where the School provides information about a current pupil to an external media organisation in connection with an identifiable image, the School will provide the pupil's first name only and will not provide their surname, age, year group or other unnecessary identifying information.

Parents and pupils should be aware that once an image or information has been provided to an independent media organisation, editorial control will ordinarily rest with that organisation rather than the School.

14. School performances, sporting events and other activities

The School may photograph, film, record or livestream School activities such as:

- concerts and performances;
- assemblies and ceremonies;
- sporting fixtures;
- lectures and presentations; and
- other School events.

The audience, purpose, security arrangements and level of identifiability will be considered before such recording takes place.

Where livestreaming is provided through a secure, authenticated platform to a defined School audience, it will normally be treated as a controlled School use.

Public livestreaming or wider external publication will be subject to additional consideration and appropriate permissions.

Where events involve pupils from another school, the School will, where practicable, seek to understand and respect the other school's arrangements regarding photography, filming and livestreaming.

15. VEO and sports filming

Filming using VEO or equivalent video-analysis technology within the Sports Department will only take place in accordance with agreed School procedures.

Where another school is involved in a fixture, appropriate arrangements will be agreed between participating schools in advance.

Footage will be held securely on the relevant authorised platform and access restricted to those with a legitimate educational or sporting purpose.

Where footage is shared with another participating school, it will be provided for an agreed purpose and subject to appropriate access and confidentiality arrangements.

VEO and similar footage must not be made publicly available without consideration under the publication and consent provisions of this Policy.

16. Storage and retention of pupil images

Images taken or commissioned for School purposes must be stored securely on School-approved systems.

Staff must follow School guidance concerning:

- approved devices for taking images;
- transferring images to School systems;
- secure storage and access;
- retention and deletion; and
- the use of personal devices.

Personal devices should not normally be used to take or store official pupil images unless expressly authorised under School procedures. In particular, staff should not permit official pupil imagery to be automatically uploaded to personal cloud-storage or photo-sharing accounts.

Access to School image libraries will be restricted to staff who require access for their role.

External processors handling images on behalf of the School will be engaged only for lawful purposes and subject to appropriate due diligence and contractual safeguards.

Images will not be retained for longer than is reasonably necessary for the purpose for which they are held, subject to legitimate archival and historical purposes.

The School will periodically review images held on publicly accessible websites and social-media channels and remove or archive content where continued publication is no longer appropriate.

17. School archive and historical record

The School has a legitimate interest in preserving a record of its history and the achievements and activities of its pupils.

Selected photographs, films and other recordings may therefore be retained permanently within the School archive where they have historical value.

Access to and future publication of archive material will be considered separately from its retention and will be subject to appropriate safeguarding, privacy and data-protection considerations.

18. Photography and filming by parents

Parents and close family members may be permitted to photograph or film their own children at certain School events.

Whether photography or filming is permitted will be determined by the School for each event, having regard to safeguarding, privacy, copyright, performance rights and the nature of the activity.

Where permission is given:

- photographs and recordings should be for personal and family use;
- parents should avoid photographing other pupils individually without permission;
- incidental inclusion of other pupils in group or event photographs should be treated sensitively;
- images that identify other pupils must not be published or shared publicly online without appropriate permission;
- photography must not distract performers, participants or other members of the audience;
- flash photography should not be used where prohibited;
- photography or filming must never take place in changing rooms, toilets or other locations or circumstances where privacy is reasonably expected; and
- surreptitious recording using phones, smart glasses, watches or other devices is not permitted.

The School reserves the right to prohibit or withdraw photography or filming at an event, either generally or for an individual, where safeguarding or other concerns arise.

19. Photography and filming by pupils

Pupils are expected to respect the privacy and dignity of others when using cameras or recording equipment.

Photography, filming or audio recording by pupils is prohibited in toilets, changing rooms, washing areas and other places where privacy is reasonably expected.

Pupils must not photograph, record or share images of another person in circumstances which may embarrass, humiliate, distress or upset them.

Surreptitious photography or recording is prohibited.

These requirements apply to mobile phones, tablets, laptops, cameras, smart watches, smart glasses and any other technology capable of capturing or streaming images or audio.

Misuse may be dealt with under the School Rules, Safeguarding and Child Protection Policy, Anti-Bullying Policy, Online Safety/Acceptable Use policies or other relevant disciplinary procedures.

20. Smart and wearable technology

The principles in this Policy apply equally to new and emerging technologies capable of photographing, filming, recording audio or livestreaming.

Smart glasses, smart watches and similar wearable devices must not be used covertly to record pupils or staff.

The use of such technology by pupils will be governed by the School's wider rules on mobile and connected devices.

Staff and visitors must not use wearable recording technology to capture images or audio on School premises unless specifically authorised.

Exceptions may be considered where the technology forms part of an agreed reasonable adjustment for disability or an authorised educational activity. Appropriate safeguards and School IT requirements will apply.

21. Responding to misuse, manipulation or abuse of images

Any concern that a pupil image has been copied, manipulated, altered, misused or used for blackmail, harassment, sexual imagery or other harmful purposes must be treated as a safeguarding matter.

Staff becoming aware of such an incident must immediately notify the Designated Safeguarding Lead and follow the School's safeguarding and incident-response procedures.

The School will take appropriate steps which may include:

- safeguarding and supporting the affected pupil;
- securing relevant evidence without unnecessarily copying or redistributing harmful material;
- removing the School-controlled original image from public availability where appropriate;
- recording and assessing the incident;
- seeking advice from the police, safeguarding partners, insurers, legal advisers or specialist agencies as required;
- seeking removal of content from online platforms; and
- informing parents and the pupil as appropriate.

Where illegal imagery may be involved, staff must not independently investigate, download, copy or circulate the material and must follow specialist safeguarding guidance.

The safety, dignity and wellbeing of the affected pupil will be the first consideration.

22. Training and responsibilities

All staff are expected to understand the principles in this Policy.

Staff whose roles involve photography, communications, websites, social media, IT, data protection or management of image libraries will receive additional guidance appropriate to their responsibilities.

The Marketing and Communications Team is responsible for maintaining operational guidance governing external publication and marketing use of pupil images.

The Designated Safeguarding Lead should be consulted where there is a safeguarding concern or uncertainty regarding an individual pupil.

The Data Protection Lead should be consulted where the proposed use raises significant data-protection issues.

Where staff are uncertain whether a photograph or recording is appropriate for publication, they should retain the material securely and seek advice before publishing or sharing it.

23. Review

The School will keep this Policy and associated guidance under regular review, taking account of changes in safeguarding practice, data-protection guidance, online technology and the risks associated with artificial intelligence and image manipulation.

The School may update its operational photography guidance more frequently where developments in technology or safeguarding practice make this appropriate.

Related School documents

This Policy should be read alongside:

- Safeguarding and Child Protection Policy
- Privacy Notice
- CCTV Policy
- Online Safety Policy
- IT Acceptable Use Policy
- Staff Code of Conduct
- School Rules
- Photography Guidance for The Perse School
- Records Retention Policy
- Data Protection Policy

24. Version Control

Date of adoption of this policy	3 September 2026
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Policy owner (SMT)	Director of External Relations
Authorised by	Jonathan Scott On behalf of the board of governors