



ST MARY'S SCHOOL HAMPSTEAD

Taking, Storing and Using Images of Children POLICY

September 2026

Reviewed September 2026
Next Review Date: September 2027

MISSION STATEMENT

St Mary's School seeks to provide an outstanding education firmly founded on the Catholic Faith.

Spiritual and moral principles are nurtured in a way that is reflected in daily life.

Within a happy and caring environment and based on the recognition of the dignity, worth and wellbeing of each child, high standards are expected. Intellectual development is emphasised and fostered along with the pursuit of academic excellence.

St Mary's values the unique contribution of every child within the school community.

St Mary's is inclusive and welcomes girls from all communities and faith backgrounds, or none, and believes that all benefit from the school's values.

St Mary's aims to encourage an active partnership between home, school, parish and the wider community.

INTRODUCTION

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 St Mary's School, Hampstead ("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.

It applies alongside any individual parent or pupil permission forms provided, and the School's terms and conditions/parent contract, 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 Notices.

Safeguarding and online safety issues are more specifically dealt with under the School's relevant safeguarding policies.

Staff are additionally subject to their own training (in accordance with their role) and School policies in this area, including under the Staff Handbook.

GENERAL PRINCIPLES OF IMAGE USE

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.

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.

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. However, for any uses of images which might be considered more intrusive or unusual – examples of which are set out further in this policy – we will seek specific permission from parents and, as appropriate, pupils.

Parents who accept a place for their child at the School are invited to indicate that they agree to the School using images of her as set out in this policy, by signing a copy of the policy below. However, parents should be aware that certain uses of their child's images may be necessary (for example, administration, education and security) or will be unavoidable (for example, if they are included incidentally in CCTV or as a part of a whole-school photograph).

Any parent who wishes to limit the use of images of a pupil for whom they are responsible should contact the Head's PA 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., Google Meet) is necessary, whether for lessons or, for example, 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).

USE AND PUBLICATION OF CERTAIN PUPIL IMAGES

In accordance with any permissions, 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 alumnae);
- 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;
- in printed material, such as school magazines and printed marketing material, including the School's prospectus;
- on the School's website and, where appropriate and in line with relevant policies, via the School's social media channels, e.g., X (formerly Twitter), Instagram, LinkedIn and Facebook including in the form of live-streamed video of school events. Such images would not be accompanied by the pupil's full name without specific permission; and
- exceptionally, in the press and other external advertisements for the School. Such external advertising would not include pupils' names without specific permission and in some circumstances the School will seek the parent or pupil's specific permission to use the image, depending on the nature of the image or the use.

The School's policy in respect of the above uses is as follows:

- **Legitimate interests** is the legal basis for the School using an image. We use this basis when using any of a child's personal data, including using an image, for all of the following five purposes:
 - To teach and educate your child and our other pupils;
 - To make sure that your child and others are behaving properly;
 - To look after your child and other people e.g., your child's friends;
 - To make sure that we comply with the law, our other obligations and to look after the School; and
 - To tell people about the School and what we do; for example, we may use photos of your child to advertise the School, including on our website or on social media.
- 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).
- Although our legal basis for using an image is legitimate interests, **permission** will be sought to use images of pupils (and parents) for marketing reasons (e.g. on the School's website or in a newsletter). Parents and pupils can opt-out at any time.
- Where any intended use is more intrusive or unusual – for example, if a pupil is going to feature very prominently, or their name will be included, or if the pupil is going to feature on the website homepage

or the front or back cover of the prospectus or on a bus advert or billboard – the School will discuss the use with the pupil or parents (as appropriate) in advance and seek a specific, ad hoc permission.

The School will take reasonable steps following any objection or withdrawal of permission 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.

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. These photographs identify the pupil by name, year group, house and form group.

CCTV is in use on School premises for certain notified purposes, including security, 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 CCTV Policy and the location of cameras will be clearly notified, including by signage.

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 permitted the sharing of their name, for an appropriate and necessary purpose.

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, and on the importance of ensuring that images of pupils are made and used responsibly, only for School purposes, and in accordance with the School's policies and the law.

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.

The School is careful in our use of images and digital media but there is always a risk that content shared online may be copied, altered or shared by others outside the School's control. This includes the online

misuse and manipulation of digital content for potentially unlawful purposes. The school has the following robust procedures in place to mitigate the risk of this happening, but it cannot be completely eliminated:

- Disabled right-click functionality: images on the School website cannot be copied, downloaded or saved by any user.
- Expiration date: marketing campaigns where images of a pupil(s) have been used, for example on an external poster, digital campaign or a local community display, have a pre-determined end date and will be removed as soon as possible upon its completion.
- Pupils are not routinely identified by name (first or full name) alongside photographs. Where names are used, permission is sought and the School carefully considers whether this is appropriate or necessary.
- Images are only used in accordance with the permission preferences recorded by the School.
- The School carefully selects images that present pupils appropriately. Where possible, photographs are taken from the backs of heads, from a distance or as part of a larger group.
- Images are reviewed to ensure they do not unintentionally disclose personal information.
- Comments on the School's social media channels are routinely monitored. Any inappropriate comments or requests are removed and reported. Users of the School website are unable to comment on pages, news posts or blog entries where photographs have been published.
- The School periodically reviews online content and removes outdated photographs where they are no longer required.
- If the School becomes aware of the inappropriate use of an image, it will take reasonable steps to request its removal, report it to the relevant platform where appropriate, and support any necessary safeguarding response.

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

Parents, guardians and 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 online (for example, on Facebook, Instagram or by text or WhatsApp), or published in any other way.
- Surreptitious filming using personal devices of any sort is never permissible.

- 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, by reference to their dress or any other factor.

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/parents (e.g. where a safeguarding risk to an individual child has been identified) or from any individual 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 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.

Should remote video provision at home (by Google Meet 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.

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 the pastoral staff.

The use of cameras or filming equipment (including on mobile phones and other forms of smart/wearable technology) 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, Child Protection & Safeguarding Policy, Data Protection Policy, Online Safety Policy and Guidelines, Pupil IT Acceptable Use Policy, or the School Rules is always taken seriously, and may be the subject of disciplinary procedures or dealt with under the relevant safeguarding policy as appropriate.

AWARENESS OF OTHER SCHOOLS' POLICIES AND PROCEDURES

We are not responsible for other schools' use of images policies – e.g. at sporting fixtures. Wherever practical, however, steps are taken with visiting schools and at away fixtures / events to check any arrangements they have regarding pupil images and video streaming, that any policies in this area are broadly aligned with our own and/or are notified to participating parents and pupils as applicable, and we remind the other school that it must not take photos or videos of our pupils without agreement from the School.

RETENTION

Images are retained in accordance with our Information and Records Retention Policy, with images being retained only for as long as they are required for the purpose for which they were taken, unless it is appropriate for these to be archived in the public interest and kept indefinitely. This would include whole school photographs, which are retained indefinitely once they are no longer required for public display.



St Mary's School, Hampstead

Use of Images for Permission Form

I agree to the School using photographs of my child or including them in video/film material, as described in the document "Taking, Storing and Using Images of Children Policy", including:

Please tick

- ☐ Within printed publications, such as the prospectus
- ☐ On the School's website
- ☐ On the School's social media pages

I have read and understood this document.

I understand that I may withdraw permission for my child's image to be used or shared in the future, but if I withdraw permission it may not be possible to remove images that have already been published or distributed.

I understand the potential risks associated with the use and distribution of these images.

I understand that at many events, the School and others will reasonably wish to take wide angle, general photos during or at specific points in the event.

I understand that I must gain permission before sharing photographs/videos of other people's children on social media or that I must not share photographs/videos taken during the School's events on social media.

I understand that if I share images of my child with friends and family, I should check the privacy settings of my social media account first to understand who else will be able to view these images.

Pupil name: _____

Class: _____

Parent / Guardian signature: _____

Date: __/__/__