

Taking, Storing and Using Images of Pupils Policy



Reviewed by: Bursar, July 2026

Next review by: September 2027

1 Introduction

- 1.1 This Policy explains how the Godolphin and Latymer School (the “School”) takes, stores and uses photographs and video recordings of pupils (“images”).
- 1.2 This Policy should be read alongside the School’s Terms and Conditions, Data Protection Policy, CCTV Policy and How We Use Your Information (Privacy Notice for Parents and Pupils), together with any additional information provided about a particular use of pupil images, including CCTV signage.
- 1.3 The School uses images for the purposes set out in this Policy, including education, administration, safeguarding, security, communicating with the School community, and marketing and promotion. The lawful basis will depend on the purpose for which an image is used and is explained further in Privacy Notice for Parents and Pupils. Where the School relies on legitimate interests, it will consider whether the use of the image is necessary and balance those interests against the pupil’s interests, rights and freedoms, taking particular account of the fact that the Personal Data relates to a child.
- 1.4 Parents and pupils may be asked to indicate their preferences regarding the use of pupil images for communications, marketing and promotional purposes. The School will take those preferences into account. However, they will not apply to uses which the School considers necessary and lawful for purposes such as, administration, education, safeguarding or security, including incidental inclusion in CCTV footage.
- 1.5 Data protection rights in relation to a pupil’s images belong to the pupil. The School will take account of the pupil’s age, maturity and understanding when deciding whether the pupil is able to exercise those rights or provide consent for themselves. Where the School relies on consent, it will seek consent from the pupil if they have sufficient understanding to make the decision; otherwise, consent will be sought from a person with parental responsibility. Pupils entering the Sixth Form will normally be asked directly to indicate their preferences and, where applicable, provide their consent to the use of their images.
- 1.6 Any pupil, or person with parental responsibility acting on a pupil’s behalf, who wishes to object to a particular use of an image, change a stated preference or withdraw consent should contact the Bursar at DPOfficer@godolphinandlatymer.com. The School will consider any objection in accordance with Data Protection Law and will respect the preferences of parents and pupils wherever reasonably possible. However, some uses may continue where the School has another lawful basis and considers that the use remains necessary and lawful. Withdrawal of consent will not affect the lawfulness of any use made before consent was withdrawn.
- 1.7 The School will seek specific consent from the pupil or a person with parental responsibility, as appropriate, before using a photograph or video recording where the School considers that the proposed use could have a greater impact on the pupil’s privacy and consent is the appropriate lawful basis.

2 Use of Pupil Images in School Publications, Online and the Media

- 2.1 The School is proud of its pupils academic, artistic and sporting endeavours. The School may 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 (digital and conventional notice boards) within the School premises;

- in communications with the School community (parents, pupils, staff, Governors and alumnae) including by email, e-newsletters and on the School intranet;
 - on the School's website and, where appropriate, on the School's social media channels which may include Instagram, Flickr, YouTube, Vimeo and Facebook; and
 - in the School's handbooks, magazines and newsletters etc. and in online, press and other external advertisements for the School.
- 2.2 The School may continue to use images after the pupil has left the School where this remains necessary and lawful. For example, images may remain in publications, social media posts and other materials produced while the pupil attended the School and may be retained as part of the School's historical archive in accordance with the Record Keeping and Retention Policy. Any new use of an image after a pupil has left will take account of the purpose of the proposed use and any relevant preference, objection or withdrawal of consent communicated to the School.
- 2.3 The images used by the School will usually be taken by members of staff, professional photographers or videographers engaged by the School or, occasionally, pupils where this has been authorised. Staff must take, store and use pupil images in accordance with this Policy, the Data Protection Policy, Information Security Policy and Acceptable Use of ICT for Staff Policy. The School will only use images of pupils who are dressed appropriately for the activity and context in which the image is used.
- 2.4 The media may attend events or activities in which pupils are participating both on and off the School site. Where the School has invited the media or is aware that the media will attend, the School will normally inform pupils and parents in advance. Pupils may be included in photographs or recordings taken by the media. The School will not provide a pupil's name or other identifying information for publication with an image without specific consent from the pupil or a person with parental responsibility, as appropriate.

3 Use of Images for Internal Identification

- 3.1 All pupils are photographed on entering the School and, thereafter, at the start of Year 10 and LVI for the purposes of internal identification.
- 3.2 Photographs are securely stored in the password-protected School management information system, where access is restricted to staff. These photographs may be printed for use on residential visits or within School for the purpose of identifying pupils who may require emergency assistance due to a specific medical condition (e.g. asthma or anaphylaxis). Any printed copies must be kept secure, made available only to those who need the information and securely destroyed when they are no longer required.
- 3.3 CCTV is in use on the School premises and may capture images of pupils. CCTV images are collected and used in accordance with the School's CCTV Policy and Privacy Notice for Parents and Pupils.

4 Security of Pupil Images

- 4.1 Professional photographers engaged by the School are supervised by a member of staff when on School premises. The School uses only reputable professional photographers and requires that any images of pupils are handled, stored, used and deleted securely and in accordance with the School's instructions. Where a photographer processes Personal Data on the School's behalf, appropriate contractual arrangements will be put in place.

- 4.2 The School takes appropriate technical and organisational measures to ensure that images of pupils held by the School are kept securely and protected from loss, unauthorised access or misuse. This includes technical measures on the School's public website designed to prevent or deter pupil images from being downloaded, copied or captured by screenshot.
- 4.3 All staff are given guidance on this policy and on the importance of ensuring that images of pupils are taken, stored, shared and used responsibly, only for School purposes, and in accordance with the School's policies and Data Protection Law and safeguarding requirements.
- 4.4 Images will be retained and securely deleted in accordance with the School's Record Keeping and Retention Policy. Images may be retained for longer where they form part of the School's historical archive and this remains lawful.

5 Advice to Parents and Visitors

- 5.1 We ask parents and visitors not to take photographs or video recordings of pupils while visiting the School premises. This includes pupils taking part in School events and productions, unless permission has been granted by the School.
- 5.2 Where the School permits photography or filming, parents and visitors must follow any instructions given by the School. Photography or filming is not permitted in changing rooms, backstage areas or any other location where it may compromise a pupil's privacy or safety. The School may withdraw permission where these requirements are not followed or where it has safeguarding concerns.
- 5.3 Images which include a pupil other than your own child must not be published or shared on social media or any other internet platform without the permission of the pupil's parent or carer or, where appropriate, the pupil.

6 Safeguarding

- 6.1 All pupils are encouraged to look after each other and to report any concern about the taking, sharing, alteration or misuse of images or technology to a member of staff. The use of cameras on mobile phones by pupils is not allowed during School hours, nor should photography ever be used in a manner that may offend or cause upset. Photography must never be used to harass, humiliate, offend or cause distress to another person.
- 6.2 Any concern involving the inappropriate creation, sharing, alteration or misuse of an image of a pupil, including manipulation using artificial intelligence, must be reported immediately to the Designated Safeguarding Lead in accordance with the School's Safeguarding (Child Protection) Policy.
- 6.3 Misuse of images, cameras or filming equipment may be dealt with under the School's Behaviour Policy, Online Safety Policy, Acceptable Use of ICT policies or Safeguarding (Child Protection) Policy, as appropriate.