

# **Taking, Storing and Using Images of Children Policy**

**Lancing College**



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## Introduction

Lancing College is very proud of its pupils' academic, artistic, musical, dramatic and sporting achievements. We celebrate our pupils' diverse talents and we welcome parents and families to our musical concerts, drama productions, Art and DT exhibitions and to sporting events, as well as to more formal occasions during the school year. The walls of Houses are decorated with House and team photographs, and photographs of trips and expeditions in which our pupils have participated. We make use of digital display screens inside the school. Our website, social media accounts and the Parent Portal are updated regularly, and we produce a termly magazine called *The Quad*.

## 1 This Policy

- 1.1 This Policy is intended 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 Lancing College. It also covers the school's approach to the use of cameras and filming equipment at school events and on school premises by parents and pupils themselves, and the media.
- 1.2 This policy is applicable in addition to the school's terms and conditions for parents, where this includes terms around image use and marketing. It is also applicable to any other information the school may provide about a particular use of pupil images (e.g. signage about the use of CCTV; and more general information about use of pupils' personal data, such as the school's publicly available Privacy Notice).
- 1.3 Images of pupils in a safeguarding context are dealt with under the school's Child Protection (Safeguarding) Policy and Online Safety Policy. Staff, parents and pupils should understand the safeguarding issues around images and videos and the mitigations in place to reduce the risks are outlined in this policy. Staff are trained and pupils learn about Online Safety (as stipulated in the Online Safety Policy). Parents are strongly encouraged to attend the annual Online Safety PSHE for Parents at the college.
- 1.4 The college recognises the risks involved in using images of pupils and sets out to mitigate against the risks. The benefits of sharing images of pupils' achievements, activities, and day-to-day school life outweigh the potential risks, provided proportionate safeguards are in place. Images strengthen our community and celebrate success. The College minimises and mitigates the risks associated with identification and misuse through using low-resolution images, removal of metadata, limiting direct linking of images to full names and personal information.

## 2 General points to be aware of

- 2.1 Parents who accept a place for their child at the school are invited to opt out of consent that they agree to the school using images of their child as set out in this policy. If parents do not want the child's photograph or image to appear in any of the college's promotional material they must make sure that the child knows this and must write immediately to the Head Master requesting an acknowledgement of their letter. However, parents should be aware that certain uses of their child's images may continue to be necessary (for example, administration, education or security) or will be unavoidable (for example if they are included incidentally in CCTV or as a part of a whole-school photograph).
- 2.2 Any parent who wishes to limit the use of images of a child, but upon joining the college did not initially opt out of consent that they agree to the school using images of him/her as set out in this policy, may opt out at any point in the future. The parent should contact the Head

Master and ensure that their request is acknowledged. The parent should ensure that the pupil is aware of any stipulated limitations on the use of their image.

- 2.3 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.
- 2.4 Certain uses are considered to be in the legitimate interests (for example, security, administration and education) 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. 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).

### **3 Use of Pupil Images in School Publications**

- 3.1 Unless the relevant pupil or his or her parent has requested otherwise, 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 (including clips of moving images) on digital and conventional notice boards within the school premises;
  - in communications with the school community (parents, pupils, staff, Governors and alumni) including by email, on the school intranet, newsletters via email from Houses and by post;
  - on the school's website and, where appropriate, via the school's social media channels, e.g. Instagram, LinkedIn, TikTok and Facebook (including Houses' respective facebook groups). Such images would not normally be accompanied by the pupil's full name without permission; and
  - in the school's prospectus, and other external advertisements, either online or printed, both in the UK and overseas. Such external advertising would not normally include pupil's names and in some circumstances the school will seek the parent or pupil's specific consent, depending on the nature of the image or the use.
- 3.2 The source of these images will predominantly be the school's staff (who are subject to policies and rules in how and when to take such images), or a professional photographer used for marketing and promotional purposes, or occasionally pupils. The school will only use images of pupils in suitable dress and the images will be stored securely and centrally. Where third-party photographers are used, contractual terms will require them to handle and delete images in accordance with UK data-protection law as well as adhering to the safeguarding procedures and policies of the school.
- 3.3 The images that we use for display and communication purposes on our website and external publications do not fully identify an individual pupil; instead, the pupil's first name and surname initial may be used. In internal communications (e.g. newsletters) and the termly publication *The Quad* (for parents, pupils and OLs) we may name pupils fully – but would not do so were there any safeguarding concerns about such identification. We only use images of school activities, such as plays, concerts, sporting fixtures, prize-giving, school trips etc. in their proper context. We never use any image that might embarrass or humiliate a pupil. Pupils are always properly supervised when professional photographers visit the school and parents are given the opportunity to purchase copies of these

photographs. AI tools shall not be used to alter or enhance pupil images for promotional purposes.

- 3.4 At the college, Housemasters and Housemistress update the parents of pupils within the Academic House in regards to achievements, celebrations and activities that pupils in the Academic House are involved in. Images and videos of pupils may be shared within a newsletter emailed to parents of pupils in the House and/or on the House Facebook page. The House Facebook page is a closed group and may involve the sharing of names of pupils within the parent/pupil closed community of the Academic House. House staff shall ensure that images posted on closed social-media groups respect any parental consent limitations recorded by the college.

#### **4 Use of Pupil Images for Identification and Security**

- 4.1 All pupils are photographed on entering the school and, thereafter, at annual intervals, for the purposes of internal identification. These photographs identify the pupil by name, year group, House and form/tutor group. Such images are used primarily for operational and the pupils are also available for parents to purchase.
- 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 and are retained only for the period specified in the CCTV Policy. CCTV footage is viewed only by authorised personnel and may be shared with external agencies such as the police when legally required.

#### **Recording of Lessons**

In circumstances where pupils' education is disrupted (for example, during periods of enforced remote learning or exceptional school closure), the College may provide recorded lessons where it is educationally appropriate to do so. This allows all students, whether physically on site or not, to access these valuable live lessons at a later point. While events such as a global pandemic may leave the nature of public examinations and their timing in flux, recording classes allows the school to preserve the excellence of teachers' practice for the benefit of those who attend their classes, for use in consolidation and revision. It will also, where needed, provide a record of student progression alongside assessed work.

Lancing College offers the following conditions relating to the recording of lessons:

- They will not be used for performance management or surveillance – lessons are recorded for the educational benefit of students only;
- Recorded lessons must only be stored on Lancing College's Microsoft Office 365 site by teachers;
- They will not ever be distributed elsewhere;
- It is the preserve of the individual teacher to record and store lessons. Students may watch these recordings but are not permitted to download or disseminate them nor make recordings of their own;
- This measure is temporary and will be used only in exceptional circumstances. When it is prudent to do so, class recordings will cease and will only be retained for access by students involved in the class.

- All lesson recordings will be clearly labelled with their intended purpose and retention period, and deleted once that purpose has expired;
- Recordings must not be edited, enhanced, or processed using AI or third-party applications; and
- Teachers and pupils should ensure that recordings respect privacy, contain only educational content, and do not include personal or sensitive discussions.

## **5 Use of Pupil Images in the Media**

- 5.1 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. Where advance notice is not possible, the College will act promptly afterwards to ensure consent and safeguarding standards are met.
- 5.2 The media often asks for the names of the relevant pupils to go alongside the images, and these will be provided where parents have been informed about the media's visit and either parent or pupil (if over 12 years of age) has consented as appropriate. No pupil image will be released to external media without the required consent, and the College will ensure that identifying details are limited wherever possible.
- 5.3 The College will report any breach of standards or misuse of pupil images by the press or other media outlets to the relevant regulator, including IPSO (Independent Press Standards Organisation) or Ofcom, if the media fails to comply with the appropriate code of practice for the protection of young people, including the children of celebrities.

## **6 Security of Pupil Images**

- 6.1 Professional photographers (that are not associated with the school) 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. All third-party photographers and media representatives shall confirm in writing that they will process images in compliance with the UK GDPR and delete them once the agreed purpose has been fulfilled.
- 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. Images stored digitally must be saved on approved College systems and not on personal devices or external drives. Files must be accessible only to authorised staff.
- 6.3 Any external processors of pupil images are engaged only for lawful purposes consistent with those set out in this policy and are required to meet College data-protection standards through documented due diligence and written contractual safeguards, including confidentiality, security, and deletion obligations.
- 6.4 No image of a pupil shall be altered, enhanced, or processed using artificial intelligence or similar software without a clearly defined educational purpose, prior approval by a senior

member of staff, and documented parental consent.

## **7 Use of Cameras and Filming Equipment (including mobile phones) by Parents**

7.1 Parents, guardians or 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 via the internet (for example on Facebook), or published in any other way. Images must not be edited, altered, enhanced, or shared using AI or other digital-manipulation tools.
- 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.
- Parents are asked to respect the privacy of other families by avoiding posting or tagging identifiable pupil images on public social-media accounts.

7.2 The school reserves the right to refuse or withdraw permission to film or take photographs (at a specific event or more generally) if a parent fails to follow these guidelines or is otherwise considered to be capturing, editing or sharing inappropriate images. Any persistent or serious breach will be treated as a safeguarding concern and referred to the Designated Safeguarding Lead.

7.3 The school sometimes records plays and concerts professionally (or engages a professional photographer or film company to do so), in which case 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. Professional recordings are subject to the same data-protection and safeguarding standards as other school imagery and are reviewed by the Marketing and Safeguarding teams before wider use.

## **8 Use of Cameras and Filming Equipment (including mobile phones) by Staff**

8.1 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. Annual safeguarding training includes practical reminders on image use, storage, and consent obligations.

- 8.2 Staff are not permitted to use personal mobile phones, iPads, cameras or any other devices to take or record any images of children and must only use the school cameras or mobile phones purchased or provided for the purpose. Staff may take photographs in other areas using a school camera or mobile phone where there is clear educational purpose. This could be recording a trip or a visit or recording a piece of work or recording a competency (e.g. in coursework for sport). It must be made clear that this image is being taken, for what purpose and with the agreement of colleagues/ pupils concerned.

Staff must regularly delete all photos and videos from such devices once transferred to the College's secure systems. Photographs are uploaded to a secure software systems and can only be accessed by the appropriate staff. Visitors, volunteers and students are not permitted to take any photos of children.

Images or videos of pupils must never be altered, enhanced, generated or processed using artificial-intelligence tools or other editing software unless for a defined educational purpose, authorised by a senior member of staff, and with prior consent from the pupil (where appropriate) and their parent. Any other use will be treated as a safeguarding matter.

- 8.3 The school may record or live stream sporting events. This can sometimes happen at events organised by other schools too. Any live streaming or recording must follow the College's safeguarding, consent and data-protection protocols. No live stream may include identifying information about pupils unless consent has been confirmed.
- 8.4 Should remote video provision at home (by Zoom, Teams 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. Staff must ensure that only educational content is captured and that recordings are stored securely on College systems for the minimum period required.

## **9 Use of Cameras and Filming Equipment (including mobile phones) 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 the pastoral staff. Staff will ensure pupils understand how to report incidents quickly and safely, including concerns involving image-sharing, AI manipulation, or online publication.
- 9.2 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 in a manner that may offend or cause upset. Any breach will be treated as a safeguarding issue.
- 9.3 The misuse of images, cameras or filming equipment in a way that breaches this Policy, or the School Rules, Behaviour and Discipline Policy, Anti-Bullying Policy, Data Protection Policy for Pupils, Network Acceptable Use Policy for Pupils, Child Protection (Safeguarding) Policy is always taken seriously, and may be the subject of disciplinary procedures or dealt with under the relevant safeguarding policy as appropriate. This includes the creation or distribution of digitally altered or AI-generated images.
- 9.4 Pupils may only use cameras (of any sort) in lessons with the express permission of the member of staff in charge and with the permission of those appearing in the image. Teachers may withdraw this permission at any time if the use becomes inappropriate.
- 9.5 Pupils may only take images with cameras (of any sort) with the express permission of all those appearing in the image. All pupils must allow staff access to images stored on mobile

electronic devices and/or cameras, and must delete images if requested to do so. Staff may request to view or delete content where there are safeguarding concerns or a potential breach of this policy.

- 9.6 Pupils must not create, alter, enhance or share any image or video of another pupil or staff member using AI or digital tools, except as part of a supervised educational project that has been approved by a teacher and with the informed consent of all individuals featured. Any other use will be treated as a disciplinary and safeguarding matter.
- 9.7 Where pupils use their phones to create portraiture such images should be downloaded and stored on the school network in folders that cannot be publicly accessed and deleted from phone storage as soon as possible. Images must not be shared on personal or social-media accounts.
- 9.8 Rights to privacy must be respected, and images which could be construed as indecent are prohibited. See also the School's policies on Mobile Phone Use and Behaviour and the School Rules. Any creation or circulation of indecent or deepfake images of pupils or staff will be reported to the Designated Safeguarding Lead and may be referred to external agencies, including the police.
- 9.9 Using photographic material or video material to bully, harass or intimidate others is strictly prohibited and will be treated as a serious breach of discipline. This includes online misuse, such as posting or sharing images without consent, or manipulating images to cause embarrassment or distress. Appropriate action will be taken under the School's Anti-Bullying and Behaviour policies.
- 9.10 Photographs of any member of the School community are not permitted to be displayed publicly around the school campus unless sanctioned by an appropriate member of staff for official use on notice boards or authorised brochures/posters, and only with the consent of the individual(s) in the image.

## **10 Child Protection**

- 10.1 All staff receive safeguarding training and understand their responsibility to promote the welfare of pupils and protect them from harm. When publishing images of children in school documents or on the website, care will be taken to minimise any risk of those images being altered or misused. Where possible, technical measures such as watermarking, metadata removal and restricted sharing will be used to reduce this risk.
- 10.2 Unfortunately there have been occasions in schools in the UK where images of pupils have been manipulated using AI in order to create an indecent image or video of children. If pupils, parents or staff come to understand that an image of a pupil has been manipulated in such a way (whether that is with a photo published by the college or not), then they should inform the Designated Safeguarding Lead immediately. Such images must never be forwarded, shared or downloaded. The College will respond in accordance with its Child Protection (Safeguarding) Policy, Keeping Children Safe in Education (KCSIE) and all other applicable statutory guidance.
- 10.3 Staff will be mindful of child protection issues and will raise concerns with the Designated Safeguarding Lead if they become aware of anyone:
- Taking an unusually large number of images;
  - Taking images in inappropriate settings such as the swimming pool, toilets or

changing areas or;

- Taking images of children who are apparently unaware that they are being photographed or filmed
- Using digital or AI-based tools to manipulate images of a child without a clear educational purpose and without the consent of the child.

10.4 The College recognises that emerging technologies, including AI and other digital editing tools, increase the risk of image misuse. Any creation, sharing, possession or circulation of altered, “deepfake” or otherwise fabricated images of pupils, staff or other members of the school community is strictly prohibited and will be treated as a serious safeguarding and disciplinary matter. Such incidents may also be referred to external agencies, including the police, where appropriate.

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