



Alley's School

Policies & Procedures

Taking Storing and Using Images of Children

Name of Policy	Taking Storing and Using Images of Children
ISSR	N/A
Reviewed by	SLT
Author/SMT	Guy Collins-Down, Chief Operating Officer
Date of school review	September 2025
Date of next school review	December 2025

This policy is undergoing major review in light of the changing landscape, particularly around technology. The scope of policy and practice has been widened, with the revised policy to be known as: Prevention of Digital Exploitation Policy. This policy will include:

- Assessment of range of digital threats e.g. AI image manipulation, deepfakes and unauthorised data use
- School wide exploitation risk register, focussing on key stakeholder groups (pupils, staff, alumni, parents etc).
- The storage and presentation of digital imagery across all platforms
- Education and training programmes for the School community as part of risk mitigation.

APPLICABILITY

Entity	Applicable?
Alley's School	Y
Alley's Junior School	Y
Alley's Oakfield	Y
Alley's School Enterprises Limited	Y
Alley's School International Limited	Y
Edward Alley's Club	Y

CHANGES TO PREVIOUS

- With Alley's Oakfield joining the Alley's Schools Group and being fully under Alley's

School as part of the charity, Alley's Oakfield is now covered under this policy.

- Given the proposed changes to the policy outlined above, all areas of the school will become applicable, as it does not just relate to children.
- Use of pupil images changed to reflect use of community images for instance staff ID badges.

POLICY OVERVIEW

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 Alley's School ("the School"), including all those applicable entities outlined above. 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.

It applies in addition to the following School policies, which should be read in conjunction:

- Standard Terms and Conditions
- Safeguarding Policy
- CCTV Policy
- Data Protection Policy
- Privacy Notices
- Artificial Intelligence Policy
- For staff: staff handbooks and staff code of conduct

GENERAL POINTS TO BE AWARE OF

- Certain uses of images are necessary for the ordinary running of the School; other uses are 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, subject to any reasonable objections raised.
- Parents who accept a place for their child at the School are invited to indicate agreement to the School using images of their child as set out in this policy, via the consent form attached to the School's Terms and Conditions, and from time to time if a particular use of the pupil's image is requested. Parents should be aware that certain uses of their child's images may be necessary or unavoidable - for example if they are included incidentally on CCTV.
- We hope parents will feel able to support the School in using pupil images to celebrate the achievements of pupils; to promote the work of the School; and for important administrative purposes such as identification and security.
- Any parent who wishes to limit the use of images of a pupil for whom they are responsible should indicate on the consent form. 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 upwards, the law recognises pupils'

own rights to have a say in how their personal information is used – including images. At Alleyn's, this principle is applied to pupils from year 9 onwards.

- If a parent of child decides to change their mind and withdraw consent, it will not be possible to retract what has already been shared or published.

USE OF PUPIL IMAGES IN SCHOOL PUBLICATIONS

- Unless the relevant pupil or their 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 but not limited to:
 - 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 but (not limited to) email (Alleyn's On), on the Hub, Alleyn's Post and by physical post;
 - on the School's website and, where appropriate, via the School's social media channels, e.g. X, Threads, YouTube, Vimeo, Instagram and Facebook; and
 - in the School's prospectus, and in online, press and other external advertisements for the School. Such external advertising would not normally include pupil's full 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 proposed use.
- The source of these images will predominantly be the School's staff (who are subject to policies and rules on how and when to take such images), but may also occasionally be a professional photographer used for marketing and promotional purposes. The School will only use images of pupils in suitable dress.

USE OF IMAGES FOR IDENTIFICATION AND SECURITY

All pupils are photographed upon joining the School and, thereafter at intervals, for the purposes of internal identification. These photographs identify the pupil by name.

Senior School Pupils, Staff, Peripatetic Staff and Visitors are required to wear identification badges, which contain their name and image for the purposes of building access and verification.

CCTV is in use on school premises and will sometimes capture images of pupils. Images captured on the School's CCTV system are stored or used in accordance with the Privacy Notices and the CCTV Policy.

USE OF PUPIL IMAGES IN THE MEDIA

Where practical, the School will 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 has refused permission for images of that pupil, or themselves, to be made in these circumstances is not photographed or filmed by the media, nor such images provided for media purposes.

The media may ask for the names of relevant pupils to go alongside the images, and these will be provided where either parent or pupil has consented as appropriate.

SECURITY OF PUPIL IMAGES

Professional photographers and, if present, 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.

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.

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 school policies and the law. Only School devices are to be used by staff taking images of children in the Reception (EYFS) class.

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

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 careful to use their cameras or phones with consideration and courtesy for cast members or performers on stage and the comfort of others. Flash photography can disturb others or cause distress for those with medical conditions, so the School asks that it is not used at indoor events. Smartphone screens must be turned to their dimmest setting in the theatre.
- 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.
- 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, swimming pool or backstage during school productions, nor in any other

circumstances in which photography or filming may embarrass or upset pupils.

The School reserves the right to refuse or withdraw permission to film or take photographs (at a specific event or more generally), from any parent who does not follow these guidelines, or is otherwise reasonably felt to be making inappropriate images.

The School may sometimes record plays and concerts professionally (or engage 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 but will not be made accessible to others via the internet. Parents of pupils taking part in such events will be consulted if it is intended to make recordings available more widely.

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) 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, pupil Code of Conduct, Privacy Notices, eSafety Policy, IT Acceptable Use Policy for Pupils, Safeguarding 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.

ENDS