

# **Taking and Storing Images of Pupils Policy**

Every member of the school community should read this policy in conjunction with the following linked policies:

- Anti-Bullying Policy
- Safeguarding Policy
- E-Safety Policy
- Staff behaviour policy (Code of Conduct)
- iPad acceptable use Policy

Pupils will be made aware of their responsibilities to each other when taking and storing images of each other on their mobile devices. This will be addressed in tutorials, in ICT/Computing lessons and on the first day of every new academic year.

#### Rationale:

At Edgbaston High School we are an open and inclusive community that is very proud of all of the achievements of all of our pupils in their academic, artistic and sporting endeavours. The school celebrates its diversity and gives all of its many visitors a warm welcome.

The school particularly welcomes parents to its concerts, plays and sporting events as well as to more formal occasions during the school year. The school walls are decorated with examples of pupils' work, team photographs and photographs of trips and expeditions in which our pupils have participated. We make full use of electronic notice boards inside the school to enhance our displays. The school's website is updated regularly and all parents are sent e-bulletins in order to keep them fully abreast of the news of the school's active community.

From time to time the school may be visited by the media who may take photographs or film footage at a school event. Pupils will often appear in these images which may then appear in local or national media (press and/or TV).

# **Objectives**

- Safeguard the welfare and privacy of our pupils.
- Establish clear procedures for obtaining parental consent.
- Ensure appropriate use and storage of pupil images.
- Comply with legal and regulatory obligations regarding data protection

#### **Success Criteria**

- Members of the school community only take, and store images as outlined in the policy
- Images are not use without consent

# Methodology

#### **Implementation**

## The Application of Data Protection Laws to Taking, Using and Storing Images of Children

When taking and storing images of children, our school adheres to the legal framework established in the Data Protection Act 2018, the General Data Protection Regulation (GDPR), and the Education Act 1996. We acknowledge that individuals have the right to control their personal information, including images. Therefore, we obtain appropriate consent from parents/carers before capturing and using images of their children.

Parents who accept a place for their child at EHS are invited to agree to the school using anonymous photographs of their child and information relating to her achievements for promotional purposes which may be published in the prospectus or on the website, as well as displayed within the premises, and in bulletins sent to the school community. Full details of the school's Data Protection and Privacy Policy is available on request.

Pupils like to be photographed and to see their work displayed so we hope that parents will feel able to support the school by consenting to the school using images in the ways described herewith.

# Use of Images: Displays Etc

Edgbaston High School will use photographic images of its pupils for the following purposes:

- Internal displays (including clips of moving images) on digital and conventional noticeboards within the school premises. Internal displays will show first names only and no contact details.
- Communications with the school community (parents, pupils, staff, Governors and alumni).
- Marketing the school digitally through the website, via carefully managed social media channels and through the school's prospectus, displays at educational fairs and other marketing.

## Use of Images: Internal Identification

All pupils are photographed on entering the school and, thereafter, at three yearly intervals in the Senior School and annually in the Preparatory School, for the purposes of internal identification.

These passport-sized photographs identify the pupil by:

- Name
- Year Group and form/tutor group
- House

They are securely stored in All Staff > iSAMS > Photographs where access is restricted to academic, pastoral and school office staff. Any parent who so requests will be sent a copy of his or her daughter's photograph.

# Images that the School uses in Displays and on its Website

The images that the school uses for displays and communications purposes never identify an individual pupil by their full name. Instead, they name the event, the term and year that the photograph was taken. The school only uses images of school activities, such as plays, concerts, sporting fixtures, prizegiving, school trips etc in their proper context. The school will never use any image that might embarrass or humiliate a pupil. It will also only use images of pupils who are suitably dressed. Pupils are always properly supervised when professional photographers visit the school. Parents are given the opportunity to purchase copies of these photographs, from the supplier.

#### Storage, Access and Review

- Photographic images are stored securely either in locked filing cabinets or in a password-protected section of the school's network or approved cloud platforms.
- They are reviewed annually and are deleted when no longer required or when a pupil leaves Edgbaston High School. Parents are advised that the school will endeavour to ensure that images of their children will not be published in any new school material once they have left the school. Please note that the school's existing publications, website and archived material may contain these images.
- Metadata (e.g. GPS, EXIF) is stripped from all files before storage or publication.
- Access to image archives is restricted to authorised staff only.

The school has a procedure in place for regularly checking and updating its website.

## Media Coverage

Edgbaston High School will make every effort to ensure that children whose parents or guardians have refused permission for images of their children to be used are not photographed by the press.

The school will always complain to the Press Complaints Council (PCC) if the media fails to follow the appropriate code of practice for the protection of young people including the children of celebrities.

#### Consent

- Written parental consent is required for all pupils under 13.
- Pupils aged 13 and above may provide verbal assent alongside parental consent.
- Consent is renewed annually and stored in a secure digital register.
- Specific consent is required for major media projects (e.g. promotional videos, external publications).

## **Staff Induction**

All new teaching and office staff are given guidance on the school's policy on taking, using and storing images of children as part of their safeguarding induction

## Use of Cameras and Recording Equipment by Parents and Guardians

Parents are welcome to take photographs of their own children taking part in sporting and outdoor events. School productions and assemblies are recorded by the school and the use of cameras by parents is prohibited.

The school asks parents not to take photographs of other pupils on their own without the prior agreement of that child's parents.

The school also asks parents not to take photographs of their child or his/her fellow pupils in the swimming pool or changing rooms.

The school asks parents not to share photos on social media even if they have the permission of another parent to take a photograph of their daughter.

Flash photography can disturb others in the audience or even cause distress for those with medical conditions; we therefore ask that it is not used at indoor events.

Parents are also reminded that copyright issues may prevent the school from permitting the filming or recording of some plays and concerts. The school always prints a reminder in the programme of events where issues of copyright apply.

Where EHS does record plays and concerts, the videos are stored securely on the network and password protected links are shared with the appropriate parents for free.

#### Please see Appendix 1 for Enhanced Marketing Photo & Video Protocols

# **CCTV**

Edgbaston High School would like to inform parents that it has Closed Circuit Television Cameras (CCTV) installed on its premises for security reasons. EHS believes that CCTV offers improved security protection for both pupils and staff although it is by no means considered to be the school's only means of security surveillance.

At Edgbaston High School CCTV is located at the exterior entrances to the school and in the playground and carparks. It is NOT installed in classrooms, changing rooms or toilets.

## CCTV in the Year 11 Common Room and on the School Mini buses

The primary purpose of the CCTV cameras in these locations is to monitor the behaviour of pupils, passengers and drivers, ensuring a safe and secure environment for all. The presence of these cameras will also assist in managing and investigating any incidents that may arise, thereby supporting our commitment to safeguarding every individual.

Each minibus is equipped with dual cameras strategically positioned as follows:

- Inside the vehicle at the front, covering all passengers, including the driver
- Forward facing through the windscreen

The Year 11 Common Room has 2 cameras positioned as follows

- Pointing into the room on either side
- Both are clearly visible

Regarding the handling of personal information, please rest assured that we will only share data where it is both appropriate and in accordance with the law, adhering strictly to the Data Protection Act 2018.

The CCTV recording system operates on a loop, retaining data for a maximum of 28 days. After this period, the oldest recordings will be automatically overwritten. We may retain the data for a longer duration only if legally required, such as during an ongoing investigation.

To safeguard your personal information, we have implemented rigorous security measures to prevent any unauthorised access or loss. Access to personal data is strictly limited to those with a genuine need to know, and all personnel involved are bound by a duty of confidentiality. If there is a need, the CCTV footage will be stored on an encrypted hard drive, accessible solely via a key, and can only be viewed with a password.

Should there be any suspected data security breach, we have established protocols to address the situation effectively. We will notify you and any relevant regulatory authorities of such an incident, as legally required.

EHS is registered with the Information Commissioner's Office and has three Designated Safeguarding Leads one in each section of the school. It also has 2 deputy DSL's

Pre-Prep and Prep School
Deputy
Senior School
Deputy
Governor with responsibility for safeguarding

Miss Claire Robinson
Mrs Nina Hobson
Mrs Antonietta Cirillo-Campbell
Mrs Naomi Jones-Owen
Mrs Anne Howarth

The school will respond to any 'Subject Access Requests' within 40 days of receipt of the correct request documentation.

Parents are assured that EHS does not stream images collected via CCTV to any third parties or outside agencies. Please note, however, that the school may be legally required to provide CCTV footage to the Police or other law enforcement agencies if requested.

#### **Treating Others with Respect**

Everyone has a right to feel secure and to be treated with respect, particularly the vulnerable. Harassment and bullying will not be tolerated. The school's Anti-Bullying policy is available on the website. The school is strongly committed to promoting equal opportunities for all, to ensure that no one is discriminated against, be they staff or pupil, on the grounds of race, age, sex, disability, religion or belief, sexual orientation, gender reassignment, pregnancy, maternity or paternity, marriage or civil partnership.

All pupils are encouraged to look after each other and to report any concerns about the misuse of technology or a worrying issue to a member of the pastoral staff. The use of cameras on mobile phones is not allowed in washing and changing areas, nor should photography be used in a manner that may offend or cause upset. The misuse of cameras in a way that breaches our Anti-Bullying Policy is always taken seriously and may be the subject of disciplinary procedures.

#### **Staff Recording Images**

Staff are not permitted to use personal digital equipment, such as mobile phones, iPads and cameras, to record images of pupils, this includes when on field trips. However, with the express permission of the Headteacher, images can be taken provided they are transferred immediately and solely to the school's network and deleted from the staff device.

Pupils and staff are not permitted to use personal portable media for storage of images (e.g., USB sticks) without the express permission of the Headteacher.

# Monitoring

Staff training provides the opportunity to reiterate the school position relating to the taking and storing of images. This will be delivered as part of the safeguarding update by the Deputy Head Pastoral.

During school events parents are given guidance in the use of personal devices by the organiser of the event.

# **Evaluation and Review**

Review Date: August 2027

This policy will be reviewed every two years by the Deputy Head Pastoral

# **Appendix 1**

# **Enhanced Marketing Photo & Video Protocols**

This appendix outlines reflects the evolving digital landscape and reinforcing safeguarding, governance, and ethical media practices.

#### 1. Digital Risk Awareness

- Acknowledges threats from deepfakes, Al manipulation, and unauthorized screenshots.
- Highlights risks of metadata exposure (e.g., GPS, EXIF) and enduring digital footprints.

#### 2. Consent Management

- Centralized consent register maintained for all pupils.
- Annual re-confirmation of parental consent, beyond initial enrolment.
- Pupils aged 13+ may provide verbal assent alongside parental approval.
- Additional consent required for major media projects (e.g., promotional videos).

## 3. Third-Party Engagement

- External photographers must sign Data Processing Agreements.
- Safeguarding protocols include ID badges, supervised access, and formal briefings.

## 4. Technical Safeguards

- Use of invisible watermarking considered for image protection.
- Metadata stripped from all media files before publication.
- Online images restricted to 72 DPI and max width of 800px.
- Website configured to disable right-click saving.

## 5. Governance & Training

- Incident response protocol integrates Marketing, Safeguarding, IT, and SLT.
- Staff trained on risks of image misuse and ethical sharing.
- Parent workshops proposed to promote safe digital sharing practices.

## 6. Content Lifecycle

• Legacy online content older than 12 months reviewed for potential removal.

## 7. Social Media Guidelines

- Official school accounts do not tag pupils or families.
- Departmental/student-run accounts must be private, monitored, and pre-approved.
- Training provided for staff and students managing social media platforms.

#### 8. Channel-Specific Protocols

- Website imagery reviewed regularly and stored at low resolution.
- Extra permissions required for signage and website use.
- Pupil naming restricted to first name + initial only.
- Annual or bi-annual audits of public review-site profiles.