

BROCKWOOD PARK SCHOOL & INWOODS SMALL SCHOOL

TAKING, STORING & USING IMAGES OF STUDENTS POLICY

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1. Introduction

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 Brockwood Park School and Inwoods Small School. 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.

This Policy has been developed in line with Keeping Children Safe in Education (KCSIE 2025) and the EYFS Framework (2025), and is informed by relevant legislation and guidance, including:

- [UK GDPR](#) and the Data Protection Act 2018
- Education (Independent School Standards) Regulations 2014
- The Online Safety Act and the ICO Children's Code (although not directly applicable to schools, provide aspirational standards. In particular, *Standard 1 of the Code*).

Other relevant guidance includes:

- The ICO's Guidance on [Consent](#) and [Legitimate Interests](#)
- [The ICO's sector-specific guidance for schools, universities and colleges](#)
- The ICO's Guidance note: "[Taking photographs: data protection advice for schools](#)"
- Government guidance on [Data Protection in Schools](#) and using [Biometric Data](#)
- The NSPCC's [Using photographs of children for publication](#) (latest update 11 Jan 2024)
- The UKSIC's '[Managing student image and video content - UK Safer Internet Centre](#)' (February 2025)
- The Safer Schools Partnership: '[AI Extortion Scams Targeting Schools - Safer Schools](#)'

It applies in addition to the school's terms and conditions and any other information the school may provide about a particular use of pupil images, including more general information about use of pupils' personal data.

Images of pupils in a safeguarding context are dealt with under the school's Safeguarding and Child Protection Policy.

The school does not currently use generative AI tools to process, store, or generate pupil images. Any future consideration of AI in relation to pupil images would only be implemented in line with UK GDPR, the Data Protection Act 2018, safeguarding requirements, and with parental consent where applicable.

2. General points to be aware of - Brockwood and Inwoods

- Certain uses of images are necessary for the ordinary running of the school (for example, for administration, education or security). Other uses are in the legitimate interests of the school and its community, and are unlikely to cause any negative impact

on children. The school is therefore entitled lawfully to process such images and make decisions about their use, subject to any reasonable objections raised.

- Parents who accept a place for their child at the school are invited to indicate their agreement to the school using images of their child as set out in this policy. However, parents should be aware that some uses of images may be necessary or unavoidable (for example, where a pupil appears incidentally in a group photograph or is included for essential identification purposes).
- At Brockwood, as part of the registration process, parents are sent the Data Protection Consent Form, which should be read and completed jointly with their child. Pupils are asked to sign this form themselves, reflecting the fact that all students at Brockwood are of an age where they have the right to have a say in how their personal information, including images, is used.
- For Inwoods, after a child has been accepted at the school the parents are also asked to complete a Publicity Consent Form through the admissions online portal.
- We hope parents will feel able to support the school in using pupil images to document and share about school-related activities; 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 contact Mina Masoumian who is the DSL at Brockwood Park School and Inwoods or Kate Power who is the DDSL at Inwoods Small School and the Small School Coordinator or state this clearly on the consent form. The Schools will respect the wishes of parents/carers (and indeed pupils themselves) wherever reasonably possible, and in accordance with this policy.

3. Inwoods Small School EYFS

At Inwoods Small School staff are not permitted to use their personal mobile devices in school, other than in the staff office. Staff who wish to use their personal mobile devices or cameras outside of the school office in the rest of the school grounds must first speak with the Coordinator. Staff who act in breach of this may be subject to disciplinary action. Personal phones may be taken off site on outings and visits for emergency contact, but not for photographic purposes, unless approval from the Coordinator has been obtained. If approved photos are taken, they must be removed from personal phones within 24 hours.

Inwoods has a school mobile phone in one of the school classrooms for emergency calls. To take photographs the school has two digital cameras which are used in both classrooms, including the class with EYFS children. Parents have either consented or prohibited the staff from taking photos of their children by completing the *Publicity Consent Form* as part of the application process of the child.

4. Use of Pupil Images in School Publications

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 Tapestry (an online communication tool with parents at Inwoods), Brockwood Parents eNewsletter;
- On the school's website and, where appropriate, via the school's social media channels, e.g. Twitter, Instagram and Facebook. Such images would not normally be accompanied by the pupil's full name without permission;
- 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 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.
- 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.

5. Use of Pupil Images in the Media

In the rare event of the presence of the media at the school, the school will, where practicably possible, 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 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 has consented as appropriate.

6. 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 school policies and the law.
- As part of our IT education programme, pupils are also given age-appropriate training on their own privacy online and with their peers, including image use and social media safety.

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

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, Instagram or by text or WhatsApp), 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 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 sometimes records plays and concerts professionally (or may engage a professional photographer or film company to do so), in which case a digital copy may

be shared with the parents. Parents of pupils taking part in such plays and concerts will be consulted if it is intended to make such recordings available more widely.

8. Use of Cameras and Filming Equipment by Pupils

- 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. Our Anti-bullying Policy lays out how we deal with this and it is also clearly explained in the Parent Handbook for both Brockwood and Inwoods. The school is strongly committed to promoting equal opportunities for all, regardless of race, gender, gender orientation or physical disability.
- 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.
- Students of Brockwood and children at Inwoods are not allowed to take photographs or film any school events, unless specifically requested by a member of staff.
- The use of cameras or filming equipment (including on mobile phones) are 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 or could in any way be considered a form of bullying.
- The misuse of images, cameras or filming equipment in a way that breaches this Policy, or any other school policy, including; Anti-Bullying, Data Protection, Child Protection and Safeguarding Policy or the student agreements at Brockwood Park, is always taken seriously, and may be the subject of disciplinary procedures or dealt with under the relevant safeguarding policy as appropriate.