



Westbourne
House School

CHICHESTER

TAKING, STORING & USING IMAGES OF CHILDREN POLICY

This is the policy of Westbourne House School, which incorporates the Prep School, Pre-Prep, Early Years Foundation Stage as well as provision for boarding

Policy Statement

Westbourne House is very proud of its pupils' academic, artistic, musical, dramatic and sporting achievements. We celebrate the pupils' diverse talents and parents, friends and families are welcomed to our musical concerts, drama productions, Art and DT exhibitions, sporting events and other formal occasions during the year.

Corridors, classrooms and communal areas feature many photographs of pupils at work, on trips and expeditions, participating in sporting events and performing in drama productions.

Digital display screens on the premises, as well as the School's website and social media pages, are updated regularly. The School produces an annual magazine for the school community and prospective families and shares news with educational magazines, newspapers and local publications.

Aims

This policy is intended to provide guidance to staff and 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 Westbourne House, including the EYFS. It also covers the School's approach to the use of cameras, video and filming equipment at events and on School's premises by parents, pupils and the media.

This policy is applicable and in addition to Section 11b of 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 the use of pupils' personal data, e.g. the School's publicly available Privacy Notice & Records Management Policy and CCTV Policy. Parents sign the School's Acceptance Form prior to their child/ren joining, which gives the School permission to use images of them.

Images of pupils in a safeguarding context are dealt with under the School's Child Protection (Safeguarding) Policy (and all other relevant safeguarding policies) which are also publicly available via the website.

Practice and Procedure

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.

It is the School's aim for parents to be able to feel that they can support the School in using pupil images to celebrate the achievements of pupils, sporting and academic; to promote the work of the School; as well as 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 advise the Admissions Manager who will ensure that the request is logged on the School's database (iSAMS) and communicated to staff.

The School will respect the wishes of parents (and indeed pupils themselves) wherever reasonably possible, and are therefore in accordance with this policy. However, parents should be aware of the fact that certain uses of their child's images may be necessary or unavoidable, for example if they are included incidentally in CCTV or a photograph. Parents should be aware that, from 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.

Image Use

Marketing & Publications

Unless the relevant pupil or his/her parent has requested otherwise, the School will use images of its pupils to keep the community updated on activities, and for marketing/promotional purposes, including:

- Internal displays (including clips and moving images) on digital and conventional notice boards within the school premises;
- Communications with the school community (parents, pupils, staff, Governors and alumni) including by email, on the intranet and by post;
- Website and social media channels (Instagram, Facebook, LinkedIn, Rednote). Images would not be accompanied by the pupil's full name unless express consent has been sought;
- Prospectus, and other external advertisements, either online or printed, both in the UK and overseas. Such external advertising would not include the pupil's name(s). The School will seek permission depending on the usage – see Appendix 1.

The images that are used for display and communication purposes on the School's website and external publications do not identify individual pupils. In internal communications (e.g. newsletters) and the annual magazine, pupils are named fully, although not necessarily in the order in which the pupils are shown on the photograph; however, the School would not do so were there any safeguarding concerns about such identification. The School only uses images of activities, such as plays, concerts, sporting fixtures, trips etc in their proper context. An image is never used that might embarrass or humiliate a pupil.

Identification and School Site Security

Photographs are taken at regular intervals, for the purposes of internal identification. These ID photographs identify the pupil by name, year group and form/tutor group. A professional photographer takes these photographs and parents are given the opportunity to purchase these.

CCTV is in use on the premises and will sometimes capture images of pupils. Images captured on the CCTV system are used in accordance with the Privacy Notice and CCTV Policy.

Media Use

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 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, are not photographed or filmed, nor are such images provided for media purposes.

Names of the relevant pupils will only be provided to the media where the parent has consented.

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

Artificial Intelligence (AI)

The School does not allow pupil images to be used in connection with Artificial Intelligence (AI) systems (including training, testing or content generation) without explicit consent of parents and, where appropriate, pupils.

The only exception to this is the use of AI technology by our approved external school photography supplier, Splaat Photo, which uses their own facial recognition software to help correctly identify children in photographs and to facilitate secure ordering by parents. This process is carried out under a data processing agreement with the supplier, who is required to meet the School's standards of safeguarding and data protection. Images are not used for any other AI purposes and are deleted after an agreed period (currently three years).

Security of Pupil Images

Images are primarily taken by staff, who receive guidance on this policy and are reminded of the importance of handling pupil images responsibly, solely for school purposes, and in line with policies and the law. Occasionally, pupils may take images themselves, under staff supervision. All images will depict pupils in appropriate dress and will be stored securely.

Professional Photographers

Professional photographers and the media are always accompanied on-site. Only reputable photographers are used and every effort is made to ensure that any images of pupils are held securely, responsibly and in accordance with instructions and GDPR requirements.

Official External School Photography Supplier – Splaat Photo

Westbourne House has an agreement with Splaat Photo for photography and videography. Splaat take and deliver photos using facial recognition to parents, who have registered directly with Splaat Photo. The photos are stored securely within the EU with SSL encryption and two-factor identification. Splaat manage all consent and GDPR obligations relating to the photography and videography of pupils on behalf of the School and have robust safeguarding protocols. New Splaat photographers are given a comprehensive tour and are accompanied on site. When familiar with the site, the photographer is registered on arrival, after which he or she can visit different parts of the school unaccompanied – staff are made aware of these visits prior to their arrival.

Professional Recordings and Live Streaming

The School may record or live stream events, such as plays, concerts, or sporting fixtures, either for internal use or to make copies available to parents for purchase.

Parents of pupils taking part will be consulted if recordings are intended for wider distribution.

Storage and Long-Term Retention of Images

The School takes the security and lawful use of pupil images very seriously. All images are handled in accordance with UK GDPR, safeguarding obligations and the School's wider Data Protection, E-Safety (Acceptable Use) and Safeguarding policies.

Storage of Images

- **Historical images (pre-2023)** are stored securely on the School's internal servers, protected by access controls and backup systems.
- **Current images (2023 onwards)** are stored on the School's secure Google Drive for Business, which operates under UK/EU GDPR-compliant data protection agreements.
- Access to all images is strictly limited to authorised staff who require them for professional purposes.

Third-Party Processors

Any external suppliers of photographs or marketing services must process images in accordance with a formal Data Processing Agreement.

Historical and Archival Retention

Certain images may be retained for long-term historical, archival or educational purposes, including but not limited to whole-school photos, yearbooks, leavers' albums, school events, performances, trips and sporting fixtures.

Images may also be used for alumni engagement, commemorative publications, or displays of the School's heritage.

All archived images are stored securely with restricted access, reviewed periodically to confirm retention remains necessary and used in ways consistent with safeguarding obligations.

Parent and Pupil Rights

Any objections, withdrawals of consent or concerns regarding storage, AI use, or archival use should be raised with the Admissions Manager or School's GDPR Manager.

The School ensures that all use of pupil images remains lawful, proportionate and secure, balancing educational, promotional, historical and safeguarding needs.

Use of Cameras and Filming Equipment by Parents

Parents are welcome to take photographs and, where appropriate, film their own children at School events, subject to the following guidelines:

- Parents should use cameras and filming devices with consideration for performers, other audience members, and the comfort of those with medical conditions. Flash photography is not permitted at indoor events.
- Parents must not intentionally photograph or film other pupils without the prior consent of their parents.
- Images of other pupils, even incidentally captured, must not be shared online or with third parties without consent, in accordance with GDPR.
- Certain performances or productions may be subject to copyright restrictions. The School will inform parents where restrictions apply and may print reminders in event programmes.
- Photography or filming is strictly prohibited in changing rooms, backstage areas, or other situations that could embarrass or distress pupils.
- The School reserves the right to refuse or withdraw permission to photograph or film at any event, or from any parent who does not follow these guidelines.

All use of cameras and filming equipment by parents must comply with the School's Safeguarding, E-Safety (Acceptable Use) and Data Protection policies. The School is

committed to balancing the enjoyment of capturing school memories with the protection, privacy and safety of all pupils.

Use of mobile phones and cameras in the EYFS Setting

As per Appendix 7 of the School's Child Protection (Safeguarding) Policy, photographs taken of children in the EYFS are only taken for valid reasons:

- Recording of curriculum activities in action.
- Documenting pupils' learning and development for observational records and profiles.
- Providing evidence for ISI Inspections
- Photographs for marketing purposes
- Photographs for displays within the EYFS setting

Staff responsibilities

Staff in the EYFS setting are not permitted to use their own mobile phones, iPads, smart watches or cameras to take or record any images of children for their own records during session times but instead must use school devices.

Staff are aware of their data protection responsibilities and images are stored on the School's secure shared drive which has staff access and is password protected. Photographs are then deleted from the device on which the photographs were taken. No external access is available to the shared drive. Visitors, volunteers and students are not permitted to take any photos of children.

The misuse of images, cameras or filming equipment in a way that breaches this policy, or its associated policies listed below, is always taken seriously, and may be the subject of disciplinary procedures or dealt with under the relevant safeguarding policy as appropriate.

Child Protection

All staff are trained in Safeguarding and are aware of their individual roles in promoting the welfare of pupils and protecting them from any harm. When publishing images of children in School documents or on the website, care will be taken to minimise the risk of such images being modified to create inappropriate or indecent images.

Staff are persistently 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.

As with all behaviour towards pupils, staff must ensure that any communication they have with a pupil is appropriate, and common sense is used when judging how to approach a given situation. Staff are to be aware of all the supporting policies listed below and abide by the following:

- Staff must not use personal devices to take or record images of children. School-provided devices (cameras, iPhones or iPads) must be used instead.
- Upload any pupil data/image (eg: a photo for the magazine) from the school device (if it has not already automatically uploaded to the school’s managed Google account) to the school’s secure network and delete it from the school device used.
- Abide by all the rules set out in this policy and those in Appendix 1 – Staff Guide for the Use of Images

Supporting Documentation/Policies:

- Anti-Bullying & Cyber-Bullying Policy
- CCTV Policy
- Child Protection (Safeguarding) Policy
 - Please refer to Appendix 7 for Use of Mobile Phones and Cameras in the EYFS
- Data Protection Policy
- E-Safety Policy
- Privacy Notice & Records Management Policy
- Staff Behaviour & Code of Conduct Policy

Monitoring and review

The School will review and monitor the effectiveness and compliance of this policy (and appendices – if appropriate). This policy will be kept up-to-date and amended to take account of legislative and regulatory changes.

Last Review Date	Next Review Date	Reviewer(s)
September 2025	September 2026	Marketing Manager PR Manager Bursar Designated Safeguarding Lead Head of Pre-Prep Network Manager

Appendix 1 – Staff Guide for the Use of Images

The School's approach to the use of images and the legal grounds for processing them is described in the table below:

Key

●	The School considers that the use falls within the legitimate interests ground to which the parents have already consented. Accordingly, no additional consent will be sought from parents to the use of such image.
●	The use of the image may or may not fall within the legitimate interests ground. Consideration must be given at the time, and dependent upon the circumstances, as to whether consent will be sought from parents to use the image.
●	The School considers that the use may involve a greater intrusion into the pupil's privacy rights than reliance on legitimate interests permits. Therefore, consent will be sought from parents to use the image.

Use of Images

Example of Proposed Use of Image	Prep School	Pre-Prep (incl. Nursery & Pre-Nursery)
A photograph of a group of pupils or an individual, without their names, published on the School's website or in the prospectus, annual school magazine, half-termly newsletters or other publications produced throughout the year.	●	●
Photographs of pupils taken at school, on a trip or at a sporting event to be used for an internal exhibition or display.	●	●
Official school photographs of the whole school, Pre-Prep, year group or class which are made available for parents to purchase from the official photographer.	●	●
Official individual school photographs of a pupil to be used internally, for identification purposes on iSAMS, form and/or class lists. Photographs are also made available for parents to purchase from the official photographer.	●	●
Video recordings taken for internal pupil assessments/coaching purposes. For example: music, drama or sports lessons.	●	●
The use of a webcam to broadcast images of pupils internally, for example, to allow one class to see another as part of a lesson e.g. drama, IT etc.	●	●
A photograph used in a third-party publication (e.g. the local newspaper) without the pupil's name.	●	●

A photograph or video recording (group or individual) used on social media without the pupil's name e.g. Instagram or Facebook.	●	●
The streaming of live video footage of sport matches/practices, productions, concerts etc, with/without commentary – as appropriate. <i>(NB: It should be made clear to the parents of players/participants that the pupils will be recorded. If another school(s) is involved they will be advised of the recording in advance, asked to notify their parents and relay any objections to the School in advance).</i>	●	●
The use of a webcam to broadcast images of a class of pupils to another school (for example, where two schools are working together on a classroom project).	●	●
A photograph published alongside a pupil's name in a local newspaper.	●	●
A photograph or video published alongside a pupil's town of residence.	●	●
A photograph on the School's website or in the prospectus or other publications produced throughout the year with the pupil's name.	●	●
A photograph used on social media with the pupil's first name e.g. Instagram or Facebook.	●	●
A photograph displayed in a prominent place e.g. on the side of the School's minibus or on a billboard.	●	●
A photograph used in a national/overseas advertising campaign.	●	●