

Gloria Filiorum Patres

Each day, discovery.



ELTHAM COLLEGE

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

**August 2026**



## Version Control Information

| Reason For Amendment | Name   | Date        | Main changes                                                                                                                                                                                                                         |
|----------------------|--------|-------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| New document         | Bursar | May 2018    | Prepared in response to the requirements of the General Data Protection Regulation, due to come into effect on 25 May 2018                                                                                                           |
| Annual Review        | Bursar | Sept 2021   | No change                                                                                                                                                                                                                            |
| Annual Review        | Bursar | Aug 2022    | No change                                                                                                                                                                                                                            |
| Annual Review        | Bursar | July 2023   | No substantive change                                                                                                                                                                                                                |
| Annual Review        | Bursar | July 2024   | Updated to make clear that the use of photography or filming equipment (including on mobile phones) by students in classrooms is not permitted without the express permission of the teacher                                         |
| Annual Review        | Bursar | August 2025 | Clarified the basis of the School's legitimate interest in using images of students for relevant purposes (section 3); and the basis for parents (or students) to object to their image being used for certain purposes (section 2). |
| Annual Review        | Bursar | August 2026 | Policy reformatted to enhance clarity; new controls introduced for those with permission to post images on social media.                                                                                                             |

This document should be read in conjunction with the general Eltham College Privacy Notice, available on the School website.



## **1. Introduction**

This Policy provides guidance to staff and information to students and their parents, carers or guardians (referred to in this policy as "parents") about how images of students are normally used by Eltham College ("the School"). It also covers the School's approach to the use of cameras, video and filming equipment at school events and on school premises by parents and students themselves, and the media.

It applies alongside the School's Parent Contract and should be understood in the context of any other information the School may provide from time to time about a particular use of student images, including, for example the School's policy and signage on the use of CCTV; and more general information about use of students' personal data, such as the School's Privacy Notices.

All staff are given guidance on the School's Policy on Taking, Storing and Using Images of Students, and on the importance of ensuring that images of students are made and used responsibly, only for school purposes, and in accordance with wider school policies and the law.

## **2. General Points and Consent**

Certain uses of images are necessary for administration, identification, education, safeguarding, security and internal communications.

Other uses of images of students, which are in the legitimate interests of the School and its community, may include celebrating the achievements of students and promoting the work of the School. Such images may be used in:

- Parent communications & displays (including newsletters and event booklets)
- School publicity (including prospectus, promotional print and online material)
- School website
- School social media accounts

The Parent Contract, which all parents sign when accepting a place at the School, includes parental consent for the School to use images of the child for the purposes set out in this policy.

If a parent wishes to withdraw that consent, they can do so by writing to the Bursar ([bursar@eltham-college.org.uk](mailto:bursar@eltham-college.org.uk)). The School will respect the wishes of parents/carers (and indeed students themselves) wherever reasonably possible and take all reasonable steps to abide by any withdrawal of consent for images to be used externally, in line with this policy. However, parents should be aware that certain uses of their child's images may continue to be necessary, for example, for 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).

The School will take reasonable steps following the withdrawal of consent, but it may not be possible to recall or destroy printed materials. Any particular concerns or vulnerabilities relating to a student or their family should be drawn to the School's attention.

Parents should be aware that, from around the age of 12 and upwards, the law recognises students' own rights to have a say in how their personal information is used – including images.



### **3. Exceptional Circumstances**

For any exceptional uses of images which might be considered more intrusive or unexpected, such as if an individual child is the focus of a section of the website, social media post or other external media (for example, through personal academic, sporting or musical achievement), the school will discuss the use with the student and parents in advance and seek specific, ad hoc consent.

### **4. Use of Student Images in School Publications and on School-manage Social Media Sites**

The School will use images of its students to keep the school community updated on the activities of the School, and for marketing and promotional purposes, including:

- on internal displays and notice boards within the school premises
- as part of the school's email system and intranet, and in appropriate communications by whatever means with the school community (parents, students, staff, Governors and alumni)
- as part of school curricular activities, for example in sport, music or drama, or as a teaching aid and as part of official activities using school devices, tablets and applications
- in school magazines, marketing materials (including the school's prospectus) whether in printed form or online
- on the school's website and, where appropriate and in line with relevant policies, via the school's social media channels
- exceptionally, in the press and other external advertisements for the School.

The School will take care to use images that are appropriate and which minimise the risks associated with online publications and AI-enabled image manipulation (including through reasonable technical means).

Members of staff may only post images of students on school-sanctioned social media accounts if they have been given specific authority to do so by the Director of Marketing and Communications and only after they have received appropriate training from the Marketing & Communications Team (and have confirmed in writing their understanding of the requirements for safe and appropriate publishing of images).

### **4. Use of Student Images for Identification and Security**

Students are photographed for the purposes of internal identification. These photographs identify the student by name, year group, house and form/tutor group. The images are held on the School's information management system and are accessible by teaching, pastoral and administrative staff with the relevant permissions.

CCTV is in use on school premises and will capture images of students. Images captured on the School's CCTV system are used in accordance with the School's Privacy Notice and CCTV Policy, as amended from time to time.



## **5. Use of Student Images by External Media**

Where practicably possible, the School will notify parents in advance when the media is expected to attend (or report on) an event or school activity in which students are participating. The School will take all reasonable steps to ensure images are not captured in these circumstances of any student for whom consent has been withdrawn.

The School will never link an image available externally to the full name of a student. In exceptional circumstances where it is thought appropriate to do so (for example, to recognise a particularly exemplary achievement) specific consent of the student and parents would be sought in advance.

## **6. Security of Student Images**

The School takes appropriate technical and organisational security measures to ensure that images of students 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 students held by the School where it is necessary for them to do so.

Where a teacher has a legitimate reason to take an image of a student on their personal mobile phone or other device, they must transfer that image to the school's system at the earliest opportunity and then delete the image from their phone without delay.

The School may use professional photographers on occasions. The School will take all reasonable steps to ensure that images are appropriate, and are held by such persons securely, responsibly and in accordance with the School's instructions and wider data protection regulations.

## **7. Use of Cameras and Filming Equipment (including mobile phones and tablets) 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:

- 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, and so should not be used at indoor events.
- Parents are asked not to take photographs of other students, except incidentally as part of a group shot, without the prior agreement of that student's parents.
- Parents are reminded that such images are for personal use only. Images which may, expressly or not, identify other students should not be made accessible to others online (for example on Facebook, Instagram or by text or WhatsApp or other similar platforms), 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 students by reference to their dress or activity or any other factor.

Glasses fitted with a camera may not be used on site or at a school event under any circumstances. Surreptitious filming is never permitted.

The school reserves the right to refuse or withdraw permission to film or take photographs (at a specific event or more generally), either from all attendees / parents (e.g. where a safeguarding risk to an individual child has been identified, or from any individual parent who does not follow these guidelines or is otherwise reasonably felt to be making inappropriate images.

The School sometimes records plays, concerts or sporting events professionally (or engages a professional photographer or film company to do so), in which case physical or digital copies may be made available to parents for purchase. Parents of students taking part in such plays and concerts will be consulted if it is intended to make such recordings available more widely outside of the school community.

## **8. Use of Cameras and Filming Equipment by Students**

All students are expected to respect each other. Images of others should never be taken without their consent. Cameras or filming equipment (including on mobile phones) must not be used in a manner that may offend or cause upset.

Photography or filming equipment may not be used by students without the express permission of the teacher. The use of cameras or filming equipment (including on mobile phones) is never allowed in toilets, washing or changing areas.

The misuse of images, cameras or filming equipment in a way that breaches this Policy, or the School's Anti-Bullying Policies, Data Protection Policies, e-Safety Policy, Acceptable Use IT Policy for Students, Safeguarding Policy or the School Constitution (School Rules) is always taken seriously and may be the subject of disciplinary procedures or dealt with under the relevant policy as appropriate.