



Loughborough
Schools Foundation

Nursery • Fairfield • Grammar • High

Taking, Using and Storing Images of Pupils

Document Management Information

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Approved By:	David Goodacre, Bursar
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Dissemination:	The policy will be available to staff via the Policies SharePoint.

Revision History

Version	Description of Revision	Date Approved
1.0	Initial creation of policy document.	September 2020
1.1	No changes made.	August 2022
1.2	Reformatted into new policy layout, updated against ISBA guidance, corrected typographical errors, and edited policy names to reflect latest policies, such as eSafety becoming Online Safety.	September 2024
2.0	Significant change to utilising consent for all external use of images following guidance. Adopted ISBA recommendations.	September 2025

Taking, Storing and Use Images of Pupils Policy

1. Introduction

- 1.1. 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 Loughborough Foundations Foundation ("the Foundation") and the Foundations it runs. The Foundation comprises Fairfield Preparatory Foundation (co-educational, 3-11), Loughborough Amherst Foundation (co-educational 4-18) Loughborough Grammar Foundation (boys, 10-18, day and boarding), Loughborough High Foundation (girls, 11-18), and 'The Nursery' for children from 6 weeks to 4 years. It also covers the Foundations' approach to the use of cameras and filming equipment at Foundation events and on Foundation premises by parents and pupils themselves, and the media.
- 1.2. It applies in addition to the Foundation's terms and conditions, and any other information the Foundation may provide about a particular use of pupil images, e.g. signage about the use of CCTV; and more general information about use of pupils' personal data, e.g. the Foundation's Parent and Student Privacy Notice. Images of pupils in a safeguarding context are dealt with under the Foundation's relevant child protection and safeguarding policies
- 1.3. Safeguarding and online safety issues are more specifically deal with under the Foundations relevant safeguarding policies.
- 1.4. Staff are additionally subject to their own training (in accordance with their role) and the Foundation policies in this area.

2. General points to be aware of

- 2.1. Certain uses of images are necessary for the ordinary running of the Foundation; other uses are in the legitimate interests of the Foundation and its community and unlikely to cause any negative impact on children. The Foundation is entitled lawfully to process such images and take decisions about how to use them, subject to any reasonable objections raised.
- 2.2. Parents who accept a place for their child within the Foundation are invited to indicate agreement to the Foundation using images of their son/daughter as set out in this policy, via the Acceptance Form attached to the Foundation's terms and conditions and/or from time to time if a particular use of the pupil's image is requested. 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).
- 2.3. We hope parents will feel able to support the Foundation in using pupil images to celebrate the achievements of pupils, both academic and extra-curricular; to promote

the work of the Foundation; and for important administrative purposes such as identification and security. However, for any uses of images which might be considered more intrusive or unexpected – example of which are set out further in Policy – we will seek specific consent from parents and as appropriate, pupils.

- 2.4. Any parent who wishes to limit the use of images of a pupil for whom they are responsible should contact the Data Protection Officer (dataprotection@lsf.org) in writing. The Foundation will respect the wishes of parents (and indeed pupils themselves) wherever reasonably possible, and in accordance with this policy.
- 2.5. Parents should be aware that, from Year 7 and upwards, the law recognises pupils' own rights to have a say in how their personal information is used – including images.
- 2.6. Where remote video provision for pupils (via e.g. Teams or Zoom) is necessary, whether for lessons or other functions, the school will notify its policies in respect of monitoring, recording and retention of such sessions (along with policies on appropriate dress and supervision).

3. Use of Pupil Images in Foundation Publications

- 3.1. Unless the relevant pupil or their parent has requested otherwise, the Foundation will use images of its pupils to keep the Foundation community updated on the activities of the Foundation, and for marketing and promotional purposes, including:
 - 3.1.1. on internal displays (including clips of moving images) on digital and conventional notice boards within the Foundation premises;
 - 3.1.2. as part of the school's email system and intranet, and in communications with the Foundation community (parents, pupils, staff, Governors and alumni) including by email, on the Foundation intranet and by post;
 - 3.1.3. as part of the school curricular activities, for example, physical education or drama, or as a teaching aid, or as part of official activities using school devices and applications;
 - 3.1.4. in printed material, such as school magazines and printed marketing materials, including the school prospectus;
 - 3.1.5. on the Foundation's website and, where appropriate, via the Foundation's social media channels, e.g. X (formerly Twitter), Instagram and Facebook; and
 - 3.1.6. exceptionally, in the press and other external advertisements for the school.
- 3.2. The school's policy in respect of the above uses is as follows:
 - 3.2.1. **Legitimate interests** will be relied upon for any uses which are either essential (for example, security, administration and education) or which fall within a scope of reasonably expected uses. Reasonably expected uses include internal school or parent communications, on the intranet or in other closed community groups, in printed material such as a school magazine or prospectus, or any uses whereby an individual child cannot reasonably be identified by someone outside the school community: for example, where their face cannot clearly be seen.

3.2.2. The key effect of the school relying on legitimate interests is that parents and pupils may be entitled to object to such uses, although their specific consent will not be sought beforehand. Any objections will be duly considered by the school, but objections can be overridden by other factors: for example, uses which the school considers essential; or uses which create little or no risk of harm (including where children are not at risk of outside identification).

3.2.3. **Consent** will be sought for all other external uses of pupil images online. In particular, where any intended use is more intrusive or unexpected – for example, if a child is the focus of the image and their face can clearly be seen – the school will discuss the use with the pupil or parents (as appropriate) in advance and seek a specific, *ad hoc* consent.

3.3. The school will take reasonable steps following any objection or withdrawal of consent but may not be able to recall or destroy printed materials. Any particular concerns or vulnerabilities relating to a pupil or their family should be drawn to the school's attention in advance. The safeguarding and best interests of pupils will remain the school's priorities at all times.

3.4. Use of Pupil Images for Identification and Security

3.5. All pupils are photographed upon entry to the Foundation and, thereafter, at regular intervals, for the purposes of internal identification. These photographs identify the pupil by name, year group and form/tutor group.

3.6. CCTV is in use on Foundation premises, and will sometimes capture images of pupils. Images captured on the Foundation's CCTV system are used in accordance with the Foundation's Privacy Notice and CCTV Code of Practice / any other information or policies concerning CCTV which may be published by the Foundation from time to time. Use of CCTV is clearly notified by signage on campus.

4. Use of Pupil Images in the Media

4.1. Where practicably possible, the Foundation will always notify parents in advance when the media is expected to attend an event or Foundation activity in which Foundation 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 by the media, nor such images provided for media purposes.

4.2. The media often asks for the names of the relevant pupils to go alongside the images; It is not the Foundation's policy to provide full or first names in this scenario, and these will only be provided where the parents have been informed about the media's visit and either parent or pupil has specifically consented to the sharing of their name, for an appropriate and necessary purpose.

5. Security of Pupil Images

5.1. Professional photographers and the media are accompanied at all times by a member of staff when on Foundation premises. The Foundation 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 Foundation's instructions.

- 5.2. The Foundation takes appropriate technical and organisational security measures to ensure that images of pupils held by the Foundation are kept securely on Foundation systems, and protected from loss or misuse. These images will be retained for as long as they are required for the purpose for which they are taken and according to the Foundation's internal Retention policy. The Foundation will take reasonable steps to ensure that members of staff only have access to images of pupils held by the Foundation where it is necessary for them to do so.
- 5.3. Any external processors of pupils images are engaged only for lawful purposes consistent with those set out in this policy, and subject to proper due diligence and contractual protections.
- 5.4. All staff are given guidance on the Foundation'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 Foundation purposes, and in accordance with Foundation policies and the law.
- 5.5. Pupils are also given mandatory and age-appropriate training on their own privacy online and with their peers, including image use and social media safety.

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

- 6.1. Where the Foundation permits parents, guardians or close family members (hereafter, parents) are welcome to take photographs of (and where appropriate, film) their own children taking part in Foundation events, subject to the following guidelines, which the Foundation expects all parents to follow:
 - 6.1.1. When an event is held indoors, if a senior staff member has informed the audience that pictures and recordings can be taken, such as at 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 Foundation therefore asks that it is not used at indoor events.
 - 6.1.2. Parents are asked not to take photographs or videos of other pupils, except incidentally as part of a group shot, without the prior agreement of that pupil's parents.
 - 6.1.3. 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.
 - 6.1.4. Parents are reminded that copyright issues may prevent the Foundation from permitting the filming or recording of some plays and concerts. The Foundation will always display/ print a reminder in the programme of events or in the room, where issues of copyright apply.

- 6.1.5. Parents may not film or take photographs in changing rooms during Foundation fixtures or backstage during Foundation productions, nor in any other circumstances in which photography or filming may embarrass or upset pupils.
- 6.2. The Foundation 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.
- 6.3. The Foundation sometimes record plays and concerts professionally (or engages 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. Parents of pupils taking part in such plays and concerts will be consulted if it is intended to make such recordings available more widely.
- 6.4. Should remote video provision at home (by Teams, Zoom or otherwise) be required or facilitated by the school in any context, specific guidelines and instructions will be provided to ensure privacy and safety, including around appropriate dress and recording.

7. Use of Cameras and Filming Equipment by Pupils

- 7.1. 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.
- 7.2. 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.
- 7.3. The misuse of images, cameras or filming equipment in a way that breaches this Policy, or the Foundation's rules and/or policies on Anti-Bullying, Online Safety, Acceptable Use of IT, or the Foundation's Child Protection and Safeguarding policy, Data Protection policy or Privacy Notices is always taken seriously, and may be the subject of disciplinary procedures or dealt with under the relevant safeguarding policy as appropriate.

8. Legislation

- 8.1. The main legislation in this area is the GDPR (as related in the UK following the withdrawal of the UK from the European Union), the Data Protection Act 2018 and the Education (Independent Foundation Standards) Regulations 2014. Relevant guidance which has informed this Policy includes:
 - 8.1.1. The ICO Code of Practice on Privacy Notices
 - 8.1.2. The ICO sector-specific guidance for Foundations, universities and colleges
 - 8.1.3. The ICO's GDPR resources concerning education
 - 8.1.4. The ICO Code of Practice on CCTV
 - 8.1.5. The ICO's Guide to Data Protection
 - 8.1.6. The NSPCC's Using photographs of children for publication

9. Review

This policy will be reviewed every two years or when significant changes occur in the data protection landscape to ensure ongoing compliance.