



SARUM HALL SCHOOL

TAKING, STORING AND USING IMAGES AND RECORDINGS POLICY

Date:	September 2026
Next Review Due:	September 2027
Reviewed by:	Deputy Head (Academic & Innovation)

1. This Policy

- This policy provides guidance to staff and information to pupils and their parents about how photographs, video recordings and audio recordings of pupils are normally used by Sarum Hall School (“the School”). It also covers the use of cameras, video, audio and filming equipment at school events and on school premises by parents and pupils themselves, and by the media.
- For the purposes of this policy, references to pupils include all children attending the School, including those in the Early Years Foundation Stage.
- References to images and recordings include photographs, videos, livestreams and audio recordings that identify or relate to a pupil. This includes content that has been digitally altered or wholly generated using artificial intelligence so that it represents, appears to represent or uses the likeness or voice of a pupil or member of staff, including deepfakes, “deep nudes” and voice clones.
- References to recording devices include cameras, mobile phones, tablets, laptops, smart watches, smart glasses and any other device capable of capturing photographs, video or audio recordings.
- It applies alongside any Image Consent Form completed by parents and pupils, the School’s Privacy Notice, Data Protection Policy, CCTV Policy and Retention of Records Policy.
- Safeguarding and online safety matters are more specifically addressed in the school’s Safeguarding and Online Safety Policies.
- Staff must also follow relevant staff guidance and training, including the Staff Handbook.

2. General Principles of Image Use

- We hope parents will feel able to support the School in using pupil images and recordings to celebrate the achievements, support learning, promote the work of the School, and fulfil important administrative and safeguarding purposes.
- Photographs, video recordings and audio recordings may constitute personal data where an individual can be identified. They will be processed in accordance with applicable data protection legislation, including the UK GDPR, Data Protection Act 2018 and Data (Use and Access) Act 2025.
- Parents are asked annually to review and update their image preferences through the School’s [Image Consent Form](#).
- Certain uses of images and recordings are necessary for the ordinary running of the School, including administration, identification, safeguarding, security, teaching and learning. These uses may not require consent, although concerns will always be considered.
- Other uses, including celebrating pupil achievements, informing the School community and promoting the School, may be carried out under the School’s legitimate interests. Parents may object, and the School will consider and respect reasonable requests wherever possible.
- Consent may be withdrawn at any time by contacting the School Office in writing.

- Where remote learning or remote participation is required, the School will provide guidance regarding recording, monitoring, retention, supervision and appropriate conduct.
- Images, recordings, likenesses or voices of pupils or staff must not be used to create misleading, humiliating, sexualised, abusive or otherwise harmful manipulated or synthetic content. Any such content will be treated as a safeguarding concern, regardless of whether it was created on or off the School premises.

3. Educational Use of Images and Recordings

- Images and recordings may be used as part of the educational provision of the School.
- This may include classroom activities, assessment evidence, learning journals, digital portfolios, displays of pupil work, curriculum projects, performances, presentations and educational visits.
- Examples include the use of platforms such as Tapestry, Seesaw, Google Classroom and other approved educational systems.
- Such use is considered a normal part of teaching, learning and assessment and will be carried out in accordance with this policy and the School's data protection obligations.
- Staff must not upload pupil photographs, video recordings or voice recordings to generative AI, face-swapping, avatar, image-manipulation or voice-cloning services unless the exact tool, account type, purpose and data processing have been expressly approved by the School.

4. Use and Publication of Certain Pupil Images

School's approach:

- Legitimate interests will normally be relied upon for routine and internal uses, including internal displays, school communications, secure parent platforms, newsletters, magazines and class photographs.
- Where a pupil is the clear focus of an image intended for external publication, particularly on publicly accessible websites, social media platforms or promotional materials, the School will normally seek parental consent in advance.
- An Image Consent List is maintained and updated regularly to ensure staff are aware of any restrictions.
- The School will take reasonable steps following any objection or withdrawal of consent but cannot recall or destroy materials already printed, distributed or published by third parties.
- Any particular safeguarding concerns, vulnerabilities or family circumstances should be brought to the School's attention. The welfare and best interests of pupils will remain the School's primary considerations at all times.

5. Use of Pupil Images for Identification and Security

- All pupils are photographed on entry and annually thereafter for internal identification. These photographs, including pupil name and year group, are securely stored in iSAMS and accessible only to academic, pastoral, and school office staff.
- CCTV operates across the School site and may capture pupil images. All footage is managed in accordance with the School's Privacy Notice and CCTV Policy.

6. Use of Pupil Images by External Media

- Parents will be notified where practicably possible when the media are expected to attend school events. The School will make every reasonable effort to ensure that pupils without consent are not photographed or filmed.
- The media may ask for the names of the relevant pupils to go alongside the images. It is not the School's policy to provide full or first names in this scenario, and these will only be provided where 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.

7. Third-Party Providers

- The School may engage approved third-party providers to process, store, print or publish images and recordings on the School's behalf.
- Such providers may include photographers, educational software providers, learning platforms, printers, website providers and marketing agencies.
- The School will take reasonable steps to ensure that all third-party providers process personal data securely and in accordance with UK GDPR and contractual data protection requirements.

8. Use of Images and Recordings by Staff

- Staff may use recording devices to capture photographs, video recordings or audio recordings of pupils only for legitimate educational, administrative, safeguarding, identification, security or promotional purposes approved by the School.
- Staff should use school-owned devices, approved school applications or authorised systems when creating, storing or sharing images and recordings.
- Images and recordings must be stored only on approved School systems and must not be retained on personal devices beyond any temporary transfer necessary for School purposes.
- Staff must not share pupil images or recordings through personal email accounts, social media accounts or personal messaging services.
- Any loss, unauthorised disclosure, misuse or accidental sharing of pupil images or recordings must be reported immediately in accordance with the School's Data Protection and Safeguarding procedures.
- Staff must not use personal devices to take photographs, video recordings or audio recordings of pupils unless expressly authorised by the Headmistress or the Deputy Head (Academic & Innovation).

9. Security, Retention and Archiving

- The School takes appropriate technical and organisational measures to ensure that images and recordings of pupils are stored securely and protected against loss, misuse, unauthorised access or disclosure.
- Access to images and recordings will be restricted to staff who require access for legitimate School purposes.
- Images and recordings are retained in accordance with the School's Retention of Records Policy and are reviewed periodically to ensure that they are not retained for longer than necessary.
- Photographs, recordings and other materials relating to former pupils may be retained where they continue to serve the purpose for which they were originally collected or where they have historical or archival value.
- Such materials may be preserved within the School archive to record and celebrate the history and traditions of Sarum Hall School.

10. Use of Recording Devices by Parents

- For the purposes of this section, recording devices include cameras, mobile phones, tablets, smart watches, smart glasses and any other device capable of capturing photographs, video or audio recordings.
- Parents are welcome to take photographs or film their own children at school events in accordance with this policy.
- When an event is held indoors, such as a play or concert, parents should use recording devices with consideration and courtesy towards performers and other audience members. Flash photography must not be used indoors as it may distract performers and disturb others.
- The School may restrict or prohibit photography or recording at a particular event where this is necessary to protect the safety, privacy or welfare of pupils or staff.
- 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.
- Images taken by parents at school events are for personal use only. Photographs or videos that identify other pupils must not be shared online, through social media, messaging services or any other public platform without appropriate permission.
- Parents must not upload images or recordings identifying pupils other than their own child to generative AI or image-manipulation services, or use them to create manipulated or synthetic representations of pupils or staff.
- 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 must not use recording devices in toilets, changing rooms, backstage areas during school productions, or in any circumstances where recording may embarrass, distress or invade the privacy of pupils.

- Where parents wish to create shared collections (e.g. Year 6 Leavers' albums), they must seek approval from the School, sign the [Parent Agreement for Use of School-Owned Images](#), and ensure compliance with GDPR (e.g. using secure platforms and approved printers). The School will also take into account whether other parents of the year group have given consent for their child's images to be included. If consent has not been granted, those pupils' images must not appear in the collection.
- Where remote learning or participation is facilitated by the School, specific guidance will be provided regarding privacy, appropriate conduct, dress and the recording of sessions.
- To safeguard the privacy and confidentiality of pupils, parents and staff, parents must not make audio, video or photographic recordings during meetings, consultations or other discussions with school staff, or elsewhere on school premises where recording would compromise the privacy of others, using recording devices unless expressly authorised by the School for a specific purpose.

11. Use of Recording Devices by Pupils

- All pupils are encouraged to support one another and to report any concerns about the misuse of technology or any worrying online issues to a member of staff.
- The school is a mobile phone-free environment for pupils by default. Pupils must not access personal mobile phones, smart watches with communication functions or other personal connected devices during the school day. Exceptions must be authorised by the Headmistress to meet an individual need or exceptional circumstance and must include appropriate safeguarding arrangements.
- Regardless of any authorised use, no device may be used to capture photographs, video or audio in toilets, washing or changing areas, or in any way that may offend, embarrass or upset another person.
- The misuse of images, cameras or filming equipment in a way that breaches this Policy, or the School's Anti-Bullying Policy, Data Protection Policy, Online Safety Policy, IT Acceptable Use Policy, Safeguarding Policy or the School Rules is always taken seriously, and may be the subject of disciplinary procedures or dealt with under the relevant safeguarding policy as appropriate.
- Pupils must not use photographs, recordings, personal information or artificial intelligence to create or share manipulated, synthetic, misleading, sexualised or harmful content depicting or appearing to depict another pupil, member of staff or any other person. This includes deepfakes, "deep nudes," face swaps, impersonations and voice clones.
- Nothing in this policy gives pupils permission to possess or use a personal recording device during the School day. Such use is governed by the School's IT Acceptable Use Policy, Behaviour Policy and rules concerning mobile phones and smart technology.

12. Reporting Concerns and Data Breaches

- Any general concern regarding the taking, storage, sharing or use of images and recordings should be reported to a member of staff, the Data Protection Lead or Designated Safeguarding Lead, depending on the nature of the concern.
- Any concern about the conduct or behaviour of a member of staff, volunteer, contractor or other adult in connection with the taking, use or sharing of images or recordings, including a concern which does not appear to meet the safeguarding harm threshold, must be reported in accordance with the School's Low-Level Concerns Policy via lowlevelconcerns@sarumhallschool.co.uk. Where there is any indication that a child may be at risk of harm, the concern must also be reported immediately to the Designated Safeguarding Lead.
- Any loss, theft, unauthorised access, accidental disclosure or misuse of images or recordings must be reported immediately to the School's Data Protection Lead and/or Designated Safeguarding Lead.
- The School will investigate concerns and incidents promptly and take appropriate action in accordance with its safeguarding, data protection and disciplinary procedures.
- Any concern involving the making or sharing of nude or semi-nude imagery of a child, including digitally altered or AI-generated imagery, must be reported immediately to the Designated Safeguarding Lead or a deputy. All such incidents require a safeguarding response, whether the imagery appears to have been created or shared consensually or non-consensually.
- Staff must not view, copy, print, forward, share, store or save nude or semi-nude imagery of a child. Where imagery has been presented to a member of staff or viewing may be unavoidable, staff must immediately seek guidance from the Designated Safeguarding Lead and follow the School's safeguarding procedures and current UKCIS guidance.

13. Monitoring and Review

- Responsibility for the implementation of this policy rests with all staff, pupils and parents.
- The Headmistress, the Deputy Head (Academic & Innovation) and relevant safeguarding and data protection leads are responsible for overseeing compliance with this policy.
- This policy will be reviewed periodically to ensure it remains effective, compliant and reflective of current practice.