



POLICY ON TAKING, USING AND STORING IMAGES OF PUPILS

This policy will be reviewed annually or in response to changes in legislation		
Created	March 2024	Head of Compliance, Director of Marketing
Reviewed	April 2025	Head of Compliance, Chief Marketing Officer
Approved	May 2025	Operations Board, Education Board

This Policy applies to all year groups at Thomas's Schools, including the EYFS. Thomas's London Day Schools operates as a united group of Schools with a similar ethos and values and as such is referred to as a singular body.

This Policy should be read in conjunction with the ICT Acceptable Use Agreements, Privacy Notice for Parents and Pupils, Privacy Notice for Pupils, Staff Photography Policy, CCTV Policy and Terms and Conditions.

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 Thomas's ("the Group"). It also covers the Group'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.
- 1.2. It applies alongside any individual parent or pupil consent forms provided, our privacy notices, the Group's Terms and Conditions, and any other information the Group may provide about a particular use of pupil images, including e.g. signage about the use of CCTV.
- 1.3. Staff are additionally subject to their own training (in accordance with their role) and school policies in this area, including the Staff Code of Conduct.

2. PURPOSE

- 2.1. Certain uses of images are necessary for the ordinary running of the School for example, for administration, identification, educational and curricular purposes, and security. It may not be possible to object to such uses, although any concerns in this regard will be duly considered by the school.
- 2.2. Other uses are in the legitimate interests of the Group and its community and unlikely to cause any negative impact on children. The Group is entitled lawfully to process such images and take decisions about how to use them, subject to any reasonable objections raised. Where objections are raised, the school will seek to accommodate any reasonable concerns.
- 2.3. We hope parents will feel able to support the Group in using pupil images to celebrate the achievements of pupils, sporting and academic; to promote the work of the Group; and for important administrative purposes such as identification and security. For any uses of images which might be considered more intrusive or unexpected – examples of which are set out further in this 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 School Admissions team in writing. The Group will respect the wishes of parents/carers (and indeed pupils themselves) wherever reasonably possible, and in accordance with this policy.
- 2.5. Parents should be aware that, from around 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.

3. **USE OF PUPIL IMAGES IN PUBLICATIONS**

- 3.1. In accordance with any consents, notices or objections as may be applicable from time to time, the Group will use images of its pupils to keep the Group community updated on the activities of the Group, 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, proprietors and alumni) including by email, on TomCom and by post;
 - as part of school curricular activities for example for physical education or drama, or as a teaching aid, as part of official activities using school devices, tablets and applications;
 - in printed material, such as school magazines and printed marketing material, including the school's prospectus;
 - on the Group's website and, where appropriate, via the Group's social media channels, e.g. Instagram, LinkedIn and Facebook.; and
 - exceptionally, in the press and other external advertisements for the school where consent is granted.
- 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 via internal school or parent communications, on TomCom, 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.
- 3.2.4. 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
- 3.3. The source of these images will predominantly be the Group'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.

- 3.4. The Group will only use images of pupils in suitable dress and the images will be stored securely and centrally. Staff should refer to the Staff Photography Guidance for further details.

4. USE OF PUPIL IMAGES FOR IDENTIFICATION AND SECURITY

- 4.1. All pupils are photographed on entering the School and, thereafter, annually, for the purposes of internal identification. These photographs identify the pupil by name, year group and form/tutor group.
- 4.2. CCTV is in use on School premises and vehicles and will sometimes capture images of pupils. Images captured on the Group's CCTV system are used in accordance with the Privacy Notice and CCTV Policy.

5. USE OF PUPIL IMAGES IN EXTERNAL MEDIA

- 5.1. Where practicably possible, the Group 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 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.
- 5.2. The media often asks 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 and/or pupil has specifically consented for an appropriate and necessary purpose.

6. SECURITY OF PUPIL IMAGES

- 6.1. External photographers and the media are accompanied at all times by a member of staff when on School premises. Where an external photograph is used, the Group 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 Group's instructions.
- 6.2. The Group takes appropriate technical and organisational security measures to ensure that images of pupils held by the Group are kept securely on IT systems, and protected from loss or misuse. The Group will take reasonable steps to ensure that members of staff only have access to images of pupils held by the Group where it is necessary for them to do so.
- 6.3. 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 in the Staff Photography Policy, which includes the importance of ensuring that images of pupils are made and used responsibly, only for appropriate purposes on work devices, and in accordance with Group policies and the law.
- 6.4. As part of the PSHE curriculum 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.

7. USE OF CAMERAS AND FILMING EQUIPMENT (INCLUDING MOBILE PHONES) BY PARENTS

- 7.1. 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 Group expects all parents to follow:
 - 7.1.1. Photography is not permitted at formal events such as School productions or Church or carol concerts.
 - 7.1.2. Photography is permitted at informal events unless notified otherwise.
 - 7.1.3. When an event is held indoors, parents should be mindful of the need to use their cameras and filming devices with consideration and courtesy for pupils and 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.
 - 7.1.4. 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.
 - 7.1.5. 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 Instagram), or published in any other way.
 - 7.1.6. Parents are reminded that copyright issues may prevent the Group from 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.
 - 7.1.7. Parents may not film or take photographs in changing rooms, at swimming galas or backstage during School productions, nor in any other circumstances in which photography or filming may embarrass or upset pupils.
- 7.2. The Group reserves the right to refuse or withdraw permission to film or take photographs (at a specific event or more generally), either for all attendees/parents (e.g. where a safeguarding risk to an individual child has been identified) from an individual parent who does not follow these guidelines, or is otherwise reasonably felt to be making inappropriate images.
- 7.3. The Group sometimes records plays and concerts professionally (or engages a professional photographer or film company to do so), in which case digital copies may be made available to 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

- 8.1. 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 teacher or member of the safeguarding team.
- 8.2. The use of cameras or filming equipment (including on mobile phones or any other device with image sharing capabilities) 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.

- 8.3. The misuse of images, cameras or filming equipment in a way that breaches this Policy, Behaviour Policy or any another policy is always taken seriously, and may be the subject of disciplinary procedures or dealt with under the relevant Safeguarding policy as appropriate.