



Culford School

Use of Images Policy

1. Introduction

This policy provides information about how images are normally used by Culford School. It also covers the school's approach to the use of mobile phones, cameras and filming equipment at school events, commercial activities and on and off school premises by staff, parents and pupils and commercial customers themselves, and the media.

The aims of this policy are to promote safety, welfare and respect for others, to ensure a sensible balance between privacy and the use of images to celebrate Culford School's and its pupils' achievements whilst safeguarding them against harm.

It applies, alongside any individual parent, pupil or commercial customer consent form, the school's terms and conditions, the parent contract, where this includes terms around image use and marketing, and should be understood in the context of any other information the school may provide from time to time about a particular use of pupil images, including e.g. signage about the use of CCTV; and more general information about use of pupils' personal data in the school's Privacy Notice.

School Staff should use the protocols detailed in this policy to ensure they follow best practice and are not exposed to risk as a result of their actions.

The use of the word Staff includes any employees, volunteers, governors and approved contractors.

2. General Principles of Image Use

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.

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 make decisions about how to use them, subject to any reasonable objections raised. For example, images captured for pupil access badges or images held against in the pupils school record for identification purposes.

Where remote video provision for pupils (via e.g. google classroom) is necessary, whether for lessons or e.g. counselling, the school will notify its policies in respect of monitoring, recording and retention of such sessions (along with policies on appropriate dress and supervision).

Parents who accept a place for their child at the school are invited to indicate agreement to the school using images of their child as set out in this policy, by signing a consent form. 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, a photograph or for security access or identification purposes within the school management systems.

Any parent who wishes to limit the use of images of their child should contact the admissions office at admissions@culford.co.uk . Alternatively parents can manage their consent for each child within their Involve account. The School will respect the wishes of parents (and indeed pupils themselves) wherever reasonably possible, and in accordance with this policy. Parents

should be aware that, from 13 and upwards, the law recognises pupils' own rights to have a say in how their personal information is used, including images.

The school strictly forbids the use of wearable technology, (active or turned off) such as smart glasses or wearable recording devices by staff, volunteers, pupils, parents, visitors and contractors on the school site at all times.

3. Use and Publication of Certain Images

Unless the relevant pupil or their parent has requested otherwise, the school will use images of its pupils to keep the school community updated on its activities, supporting the provision at Culford and for marketing and promotional purposes, including:

- exceptionally, in the press and other external advertisements for the school.
- external streaming of live recordings of pupils and coaches during specified sports performance lessons. Viewing of these recordings are restricted on a case by case basis by the school;
- 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, governors and alumni) including by email, on the school intranet and by post;
- as part of school activities, for example for sport, physical education, drama, dance, or as a teaching aid, as part of official activities using school devices, tablets and applications, Staff may need to video pupils for performance reviews or for providing evidence for exams;
- on the school's website and, where appropriate, via the school's social media channels. Such images would not normally be accompanied by the pupil's full name and without permission;
- in the school's prospectus, online press and other external advertisements for the school. Such external advertising would not normally include the pupil's names and in some circumstances, the school will seek the parent or pupil's specific consent, depending on the nature of the image or the use.

The source of these images will predominantly be from staff or a professional photographer contracted by the school, or occasionally pupils and parents, and used for marketing and promotional purposes.

The school's policy in respect of the above uses is as follows:

- **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 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.
- **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.

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.

4. Use of Images for Identification and Security

All pupils are photographed on entering the school and, thereafter, when moving to the Prep or Senior School for the purposes of internal identification. These photographs identify the pupil by name, year group, house and tutor group and are held on the school pupil management systems and Culford email. They are used for identification and security badges.

All staff, governors and approved contractors are photographed upon starting work at Culford. The images are used for identification, security badges, emails, where applicable, and safer recruitment records..

CCTV is in use on school premises for certain notified purposes, including security, and in certain cases is likely to capture images of pupils, parents, staff, commercial customers and visitors to the school site. Images captured on the school's CCTV system are used in accordance with the School Privacy Notices and CCTV Policy. Signage is present at entrances to the school site to notify individuals of its use and signposting to the school website for the related privacy notices.

5. Use of Images by External Media

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 school 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.

The media often asks for the names of the relevant pupils to go alongside the images, and these will be provided where parents have been informed about the media's visit and either parent or pupil has consented as appropriate.

6. Security of Images

Professional photographers, who are not approved contractors and the media are accompanied at all times by a member of staff when on school premises. The school 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 school's instructions.

Any external processors of images are engaged only for lawful purposes consistent with those set out in this policy, and subject to proper due diligence and contractual protections.

The school takes appropriate technical, organisational and safeguarding measures to ensure that images of pupils 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 pupils held by the school where it is necessary for them to do so.

All staff are given guidance on this policy including taking, storing and using images and on the importance of ensuring that images of children are made and used responsibly, only for school purposes, and in accordance with school policies and the law.

Pupils are also given age-appropriate training on their own privacy online and with their peers, including image use and social media safety.

The school is careful in our use of images and digital media, however there is always a risk that content shared online may be copied, altered or shared by others outside the school's control. This includes the online misuse and manipulation of digital content for potentially unlawful purposes. The school has robust procedures in place to mitigate the risk of this happening but it cannot be completely eliminated.

7. Image Taking by Parents (including mobile phones and wearable technology)

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 school expects all parents to follow:

- At indoor events such as a play or a concert, parents should be considerate and courteous for cast members or performers on stage and the comfort of others. We ask that flash photography is not used to prevent any disturbance or distress to those with medical conditions.
- Parents should not take photographs or videos of other pupils, except incidentally as part of a group shot, without the prior agreement of that pupil's parents.
- 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 online platforms, instant messaging platforms or social media, or published in any other way without the parent or child's consent.
- 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, sports events nor in any other circumstances in which photography or filming may embarrass or upset children.
- The school 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.
- The school sometimes records plays and concerts professionally (or engages a professional photographer or film company to do so), in which case 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.
- Should remote video provision at home be required or facilitated by the school in any context, specific guidelines and instructions will be provided to ensure privacy and safety, including around dress and recording of video.

8. Image Taking by Pupils and Commercial Customers (Children)

All pupils and children 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 staff.

The use of cameras for filming equipment (including on mobile phones) is not allowed in toilets, bedrooms, washing or changing areas or poolside, nor should photography or filming equipment be used by pupils in a manner that may offend or cause upset. The material must be appropriate and not used in an inappropriate manner. Pupils and children must not take, use, share, publish or distribute images, video or sound of others without their permission.

Images must be taken, stored and shared in a way that does not breach this Policy, or the school's Anti-Bullying, Data Protection, IT Acceptable Use and Safeguarding Policy. Breach of these policies is always taken seriously, and may be the subject of disciplinary procedures or dealt with under the relevant safeguarding policy as appropriate.

9. Early Years Foundation Stage (EYFS) – Mobile Phones, Cameras, and Filming Equipment

Mobile phones

- Mobile phone use is prohibited in the EYFS buildings, playground or on school trips at any time when children are present. This applies whether the mobile phone belongs to the staff or the school.
- Staff who work in the EYFS setting should ensure that their phones are switched off and kept out of sight in a securely locked drawer. If any person is seen accessing a mobile phone at any time when EYFS children are present this will be reported to the Nursery Manager or Deputy Head.
- Anyone who wishes to have access to their mobile phone can be given a quiet space where they can use their phone where no children are present. In the event of an emergency personal mobile phones may be used in the School office or staff room.
- During off site visits, nominated staff will have access to the EYFS nominated mobile phone, which can be used.

Cameras and Filming Equipment

Members of staff, volunteers, contractors, peripatetics, pupils, parents and any other visitor to the School must not bring their own camera, iPad, or other type of camera/filming equipment into the EYFS buildings or playground. No camera, iPad or other type of camera/filming equipment is allowed in the EYFS setting except those that are the property of the School. Photographs, film, or recordings of the children are only taken on School equipment if there is written parental consent to do so. Any such images are stored on School premises on the School computer network and must not be copied or shared on social media unless by Culford's Marketing Department.

10. Image Taking by Culford Employees, Volunteers or Governors (excluding EYFS and Commercial Customers)

Culford has a strong social media presence that uses images to celebrate the achievements of pupils, staff and its commercial activities. School staff are given permission to promote the work of the school, and for important administrative purposes such as identification and security.

Culford Staff are not permitted to use their own devices, such as mobile phones and cameras to record pupils or children; this includes when on school trips unless they have read and agree to abide by this policy.

Staff in Early Years are not permitted to use their own devices in any circumstance. They are provided with school devices in order to take images that are used in pupil records or uploaded onto the school network.

Protocol of taking images of staff or pupil

- Check that you have consent to take photographs of the pupil or children. The marketing department, or sport centre for commercial customers, holds the list of pupils where consent to photograph has been declined.
- Pupils must be fully clothed.
- Photographs taken in the swimming area where pupils or children are out of the water, their swimwear must be covered with appropriate clothing, such as T-shirts and shorts.
- No pupil or child should be photographed bare chested outside the water.
- Seek permission from the other schools prior to any photographs being taken. They should be aware of any children from their school who do not consent to photographs.
- Photos must be uploaded to the Staff Photography folder on Google Drive
- For school trips, photos must be uploaded to a trip specific Culford dropbox account only, that can also be accessed by parents.

Protocol for using own device

- Academic and boarding staff, with the exception of EYFS, have permission to take photographs using their own device following confirmation that they have read and understood this policy.
- Staff in the Sports, Commercial and Operational areas of the school must seek permission from their line manager and sign a declaration before using their own device.
- Photographs must be uploaded to the central photographs folder on Google drive.(Staff should create folder with their pictures)
- For school trips, photos must be uploaded to a trip specific Culford dropbox account that can also be accessed by parents.
- Photos must be deleted from the device and cloud storage as soon as possible after uploading.
- Email marketing to let them know you have uploaded new photographs to the folder.
- Those members of staff who do not wish to use their own devices may contact IT Services or marketing to access a school device.

Commercial Images Protocol for staff

- Before any photos or video content is taken staff must liaise and seek approval from the Commercial Office.
- On approval staff must get written consent from the user if over 18 or from the parent if under 18.
- Staff must use Culford's photo consent document.
- Once permission has been granted all content must be taken using a Culford device and stored in the Staff Photography folder on Google drive. Once stored photos must be removed from school devices.
- Staff must consult the Commercial Office before publishing.

9. Publication of Images

Understanding the risks

The proliferation of advanced AI image generation platforms, such as xAI's Grok, introduces significant risks regarding the privacy and safety of children. These models can be manipulated to create highly realistic "deepfake" imagery. The primary concern lies in the potential for generating non-consensual or

harmful content by utilising real children's likenesses, often scraped from public social media profiles or websites.

This technological leap outpaces current legal protections, leaving minors vulnerable to digital identity theft and psychological harm. Threat actors are exploiting this software to hold schools or individuals, including pupils, to ransom with the threat of releasing manipulated images taken from social media posts or websites.

The school's policy for images used on the School website and social media platforms are as follows:

- Pupils will only reference first name and initial
- Images will be taken from a distance, blurred or fewer eyes to the camera shots.

Related policies

- CCTV, Dashboard Cameras and Sports Performance Cameras Policy
- Social Media and Media Management Policy
- All Culford School Privacy Notices