CRANLEIGH
SCHOOL
EX CULTU ROBUR

Photography and video of pupils policy

Version control

Owner	Deputy Head, Deputy Head (Pastoral), Deputy Head (Pastoral, Prep)
Last Updated	July 2026
Next Review	July 2027
Circulation	Website

Policy table of contents

	Page		Page
Purpose	2	Data protection issues	2
Data protection and lawful use of images	2	Pupil use of images	4
School use of pupil images	2	Storage, retention and deletion	4
Promotional and public-facing use	2	Data protection issues	5
Consent and withdrawal	3	School promotional material	5
Safeguarding and appropriate images	3	Safeguarding implications	5
Staff use of cameras and devices	3	Related material	6
Parent and visitor photography	4		

Purpose

This policy sets out Cranleigh School's (the School) approach to the taking, use, storage and publication of photographs and video recordings of pupils.

Photographs and video are an important part of school life. They may be used to celebrate achievement, record events, support teaching and learning, maintain records, promote the School, and communicate with parents and the wider community. Pupil images must, however, be used lawfully, respectfully and safely.

This policy applies to photographs, video recordings, livestreams and digital images taken or used by the School, staff, pupils, parents, visitors, external photographers or media organisations acting with the School's permission.

Data protection and lawful use of images

Photographs and video recordings of pupils will usually constitute personal data where a pupil is identifiable. The School will therefore take and use pupil images in accordance with UK GDPR, the Data Protection Act 2018, and the School's Privacy Notices.

The School may use pupil images for educational, administrative, safeguarding, security, communication and promotional purposes, provided that there is an appropriate lawful basis and that the use is fair, proportionate and transparent.

In some circumstances, the School may rely on legitimate interests or the proper administration of the School. In others, particularly external publicity, marketing, named pupil profiles, media features or commercial purposes, specific consent may be required.

School use of pupil images

The School may take and use pupil images for ordinary school purposes, including classroom activities, internal displays, newsletters, events, trips, fixtures, performances, identification, administration, safeguarding records, welfare records, celebration of pupil achievement, publications, website and social media.

Images should always be respectful, proportionate and consistent with the dignity and welfare of pupils. Staff should avoid images which could embarrass pupils, stereotype them, expose personal vulnerability, or be open to misuse.

Promotional and public-facing use

The School may use appropriate images of pupils in promotional and public-facing material, including the website, prospectus, newsletters, displays, social media, films, press releases and other external communications.

Particular care must be taken where images are used publicly. The School will avoid pairing a pupil's full name with an identifiable image unless there is a clear reason and / or appropriate permission. Portrait-style images, named pupil profiles, and media features will require additional consideration and, where appropriate, specific consent.

Images intended for website, social media or external publicity must be selected carefully and checked by the Head of Marketing, or another authorised member of staff. Where there is any safeguarding sensitivity, the Designated Safeguarding Lead should be consulted before publication.

Consent and withdrawal

Parents may withdraw consent by contacting the School. Where a pupil is of sufficient age and understanding, the pupil's own wishes should also be taken into account.

Withdrawal of consent will apply to future use wherever reasonably practicable. It may not always be possible to remove images from printed materials already produced or publications already in circulation, but the School will take reasonable steps to prevent further use.

Safeguarding and appropriate images

All staff must be alert to the safeguarding risks associated with pupil images, including the risks of images being copied, shared, digitally altered, manipulated through AI, used to create deepfakes, or used to identify or contact pupils inappropriately.

Images used by the School must not show pupils in inappropriate dress, undignified situations, vulnerable circumstances or poses that could be misused. Particular care must be taken with images involving swimwear, dance, drama, sport, or any context in which pupils may be more vulnerable.

Any concern about inappropriate, intrusive, covert, sexualised or unsafe photography or filming must be reported to the Designated Safeguarding Lead at the earliest opportunity. Incidents involving nude or semi-nude images, image-based abuse, AI-generated sexualised images, deepfakes or non-consensual sharing must be treated as safeguarding matters and handled in accordance with the School's Safeguarding and Child Protection Policy.

The School will take sensible precautions without creating an atmosphere of unnecessary suspicion. The aim is to preserve the positive use of photography in school life while protecting pupils from foreseeable risk.

Staff use of cameras and devices

Staff should use School devices and approved School systems when taking, storing or sharing images of pupils.

Staff must not routinely take or store images of pupils on personal phones, personal cameras, personal cloud storage, personal email accounts or personal social media accounts. Where temporary use of a personal device is unavoidable, for example during a trip, fixture or urgent school activity, the image must be transferred to an approved School system as soon as reasonably practicable and deleted from the personal device and any personal backup.

Staff must not share pupil images through personal messaging apps or social media except where expressly authorised for a specific School purpose and in accordance with School policy.

Parent and visitor photography

Parents and visitors may usually take photographs or video at School events for personal and family use, unless the School has indicated otherwise.

The School may restrict or prohibit photography or filming at particular events for reasons of safeguarding, copyright, licensing, data protection, pupil welfare or as a courtesy to others. This may apply, for example, to plays, concerts, performances, swimming events, boarding events or activities involving pupils whose image permissions require particular care.

Parents and visitors should take images sensitively and respectfully. They should not publish images or videos of other people's children online without the permission of those children's parents or carers.

If a member of staff has concerns about the way in which a parent, visitor or other person is taking images, the matter should be referred promptly to a senior member of staff or the Designated Safeguarding Lead.

Pupil use of images

Pupils must not take, store, edit, share or publish images or recordings of other pupils in a way that is unkind, intrusive, bullying, harassing, sexualised, humiliating, dishonest or contrary to School rules.

Pupils must not take, share or publish images or recordings of members of staff at any time. Any breach of this would likely result in disciplinary sanctions.

Pupils must not take photographs or video in private or sensitive areas, including toilets, changing rooms, showers, bathrooms, dormitories or medical areas.

Pupils must not use AI tools, editing software, filters or other technology to create or share false, humiliating, sexualised or harmful images of another person. Such behaviour may be treated as a serious disciplinary and safeguarding matter.

Storage, retention and deletion

Pupil images must be stored securely and accessed only by those who need them for a proper School purpose.

Images should not be retained for longer than necessary. Marketing and publicity image libraries should be reviewed periodically so that outdated or unnecessary images are removed. Particular care should be taken when using images of former pupils.

Images held for safeguarding, welfare, disciplinary, medical or legal reasons should be retained in accordance with the School's relevant records-retention procedures.

Data protection issues

Data protection issues related to taking photographs of pupils in School are governed by the requirements of the Data Protection Act 2018 and can be summarised by the following general principles and guidelines:

- The law does not restrict the general right of individuals to take photographic or video images of other people. The restrictions that exist relate to wrongful exploitation or using them for an unspecified purpose.
- Independent schools are not required by law to impose restrictions on the use of cameras or videos on school premises. However, sensible restrictions are appropriate if they are based on considerations of courtesy and good manners or if the nature of the photographs is inappropriate in any way. It is in order for parents and other visitors to the School to be asked to use their cameras with consideration and confine their photography to specified events.
- If circumstances demand, for instance if it is suspected that photographs are being taken for commercial reasons, the photographer can be reminded that publication of the resulting material would potentially be an offence under the Data Protection Act.
- Different considerations arise with regard to plays or concerts which may be subject to a number of different copyrights. As a general rule, parents should be discouraged from taking photographs or video film of plays or concerts unless acting in a semi-official capacity at the request of the School and on the basis that the pictures or tape will belong to the School. It is reasonable to apply the normally accepted rules forbidding photography in theatres and concert halls. However, a reasonable common-sense approach is to be adopted where a parent wishes to film a performance involving their own child.

School promotional material

- There are legal implications in the use of photographs of pupils for the School Prospectus, in promotional videos, on our website or under commercial sponsorship arrangements.
- It is an implied term of the contract for educational services which exists between the School and the parents of a pupil that photographs of the pupil may be taken and used by the School in accordance with normal custom and practice. Such custom and practice would probably include set-piece photographs of the School, house, team, theatre cast, and snapshots of School activities. It has also been custom and practice for independent schools to use images of their pupils for marketing purposes such as in prospectuses and promotional videos or displays on their websites.
- Different terms apply regarding portrait-style images of pupils or the use of a pupil's image with commercial sponsors or in any circumstances where the School might receive payment or tangible benefit for allowing the use of the photograph, such as providing a photograph to the media where a pupil has come to public attention. In these circumstances, it is important that unequivocal parental consent is obtained. It may also be necessary to get pupil consent in some circumstances, largely dependent on the age of the pupil.

Safeguarding implications

- All staff must be aware of the risks involved in pupil photographs being digitally altered for indecent purposes and in the use of names on the website leading to inappropriate, unsolicited attention from people outside the School.
- To avoid such attention, care must be taken to ensure that photographs used on the website or for publicity purposes do not involve pupils who are inappropriately dressed and in postures that can be exploited. Website photographs where the pupil is specifically named should be used with caution.
- As a matter of routine, photographs of children intended for the School's website must be vetted by the Designated Safeguarding Lead, or the Head of External Relations on his/her behalf, to ensure that opportunities for modifying the image to produce inappropriate or indecent images are minimised. Also, all staff are to be aware of the need to take immediate and positive action if anybody is seen taking inappropriate images in unacceptable settings, for example in the swimming pool or in changing rooms. Such incidents must be reported to the Designated Safeguarding Lead at the earliest practicable opportunity.
- Notwithstanding the need to be aware and to take precautions, an atmosphere of suspicion and fear must be discouraged. Rationality and common sense should prevail, and this can be achieved by taking some basic precautions based on the guidelines described in this policy.

Related material

This policy should be read alongside the School's Safeguarding and Child Protection Policy, Staff Code of Conduct, Data Protection Policy and Privacy Notices, Online Safety Policy, Acceptable Use Policy, Behaviour and Discipline Policy, Anti-Bullying Policy, Mobile Devices Policy, Trips and Educational Visits Policy, and Boarding policies and procedures where relevant. Staff should also refer to the current Employment Handbook for fuller guidance on the photography of pupils.