



# ST PETER'S

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## PREPARATORY SCHOOL

# Taking, Storing and Using Images of Adults Policy

Updated on 20 September 2025  
by Mr Dan Morris  
(Director of Operations & Compliance)

Approved by Head: *Charlotte P Jones*.

Date: 23rd September 2025

## 1. This Policy

- This Policy is intended to provide information to staff (employed, contracted or peripatetic) and volunteers (referred to in this policy as "adults") about how any images taken of them are normally used by St Peter's Preparatory School ("the school"). It also covers the school's approach to the use of cameras and filming equipment at school events and on school premises by parents and children, and the media.

Purpose	Legal Basis (GDPR)
ID Badges / CCTV	Legal obligation / legitimate interest
Event documentation	Legitimate interest
Marketing	Consent
Media publication	Consent (explicit if named)

- It applies in addition to the school's contract with staff and staff handbook, and any other information provided about a particular use of images of adults; including the use of CCTV; and more general information about use of adults' personal data as outlined in the school's Privacy Notice. Images of adults in a safeguarding context are dealt with in our safeguarding policy.

## 2. General points to be aware of

- Certain uses of images are necessary for the ordinary running of the school; other uses are in the legitimate interests of the school and its community and unlikely to cause any negative impact on adults. The school is entitled lawfully to process such images and take decisions about how to use them, subject to any reasonable objections raised.
- Where the school relies on legitimate interests as the legal basis for using adult images (e.g., internal communications, newsletters), it conducts a Legitimate Interest Assessment (LIA) balancing the school's needs with individual privacy rights.
- Staff who accept a position or role at St Peter's Preparatory School are invited to agree to the school using images of themselves as set out in this policy, by signing at the end of this document, and from time to time if a particular use of the adult's image is requested. However, you should be aware of the fact that certain uses of your image may be necessary or unavoidable for example if they are included incidentally in CCTV or a photograph.

- We hope adults will feel able to support the school in using images of themselves if they enable the school community to celebrate the achievements of pupils,
- sporting and academic; to promote the work of the school; and for important administrative purposes such as identification and security.
- Any adult who wishes to limit the use of their image should contact the Marketing Team in writing and to further indicate their preferences. The School will respect the wishes of the adults wherever reasonably possible, and in accordance with this policy.

### **3. Use of Adult Images in School Publications**

Unless the relevant adult has requested otherwise, the school will use images that contain photographs of its adults to keep the school community updated on the activities of the school, 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, adults, staff, Board of Reference and alumni) via email or post.
- on the school's website and, where appropriate, via the school's social media channels, Twitter and Facebook.
- in the school's prospectus and other such publications, as well as online, in press and other external advertisements for the school. Such external advertising would not normally include adult's names. In some circumstances the school will seek the adult's specific consent, depending on the nature of the image or the use.

The source of these images will predominantly be other school's staff, or a professional photographer used for marketing and promotional purposes. The school will only use images of adults in suitable dress and the images will be stored securely and centrally as indicated in our data protection policy.

The copyright of all material must be held by the school, or be attributed to the owner where permission to reproduce has been obtained.

### **4. Use of Adult Images for Identification and Security**

- Employed adults and regular adult visitors to School are photographed on entering the school and, at annual intervals, for the purposes of internal identification. These photographs identify the adult by name and role.
- CCTV is in use on School premises, and will sometimes capture images of adults. Images captured on the School's CCTV system are used in accordance with the Privacy Notice and the school's CCTV Policy.

## **5. Use of Adult Images in the Media**

- Where practicably possible, the School will always notify adults in advance when the media is expected to attend an event or school activity in which school adults are involved, and will make every reasonable effort to ensure that any individual who has refused permission for their images to be used 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 individuals to go alongside the images, and these will be provided where consent has been granted.

## **6. Security of Images**

- Professional photographers 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 are held by them securely, responsibly and in accordance with the school's instructions. The Head or nominee will take overall editorial responsibility and ensure that content is accurate and appropriate.
- The school takes appropriate technical and organisational security measures to ensure that images of adults 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 adults held by the school where it is necessary for them to do so.
- As with pupils, staff are given guidance in the school's Policy on Taking, Storing and Using Images and on the importance of ensuring that images of all individuals are made and used responsibly, only for school purposes, and in accordance with school policies and the law.

## **7. Use of Cameras and Filming Equipment (including mobile phones) by Parents**

Parents, guardians or close family members are welcome to take photographs of (and where appropriate, film) their own pupils taking part in school events, subject to the following guidelines, which the school expects all parents to follow:

- When an event is held indoors, such as 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 school therefore asks that it is not used at indoor events.

- Parents are asked not to specifically take photographs of other pupils or adults, except incidentally as part of a group shot, without the prior agreement of that pupil's parents and the adult concerned.
- Parents are reminded that such images are for personal use only. Images which may, expressly or not, identify other pupils or adults should not be made accessible to others via the internet (for example on Facebook), or published in any other way.
- 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.
- There may not be any filming or taking of photographs in changing rooms or backstage during school productions, nor in any other circumstances in which photography or filming may embarrass, upset or compromise those involved.
- Parents should be aware that The Head or nominee can take overall editorial responsibility and ensure that content is accurate and appropriate.
- 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 CD, DVD or digital copies may be made available to parents for purchase. Adults 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**

- 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.
- 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 adults in a manner that may offend or cause upset.
- The misuse of images, cameras or filming equipment in a way that breaches this Policy, or the school's Safeguarding, Data Protection Policy, eSafety Policy or IT Use Policy is always taken seriously, and may be the subject of disciplinary procedures or dealt with under the relevant safeguarding policy as appropriate.

## Consent

By signing this form, you confirm that you have read this policy along with the School's Privacy Notice and Data Protection Policy, and that you understand how the School may use your image in various contexts.

The School may use your image for marketing or publicity purposes, whether in print or online (including social media), by signing this form you give consent for your image to be used. This includes use in:

- Promotional brochures or prospectuses
- The school website and social media channels
- External press releases or advertisements

Purpose	Legal Basis (GDPR)
ID Badges / Security Use	Legal obligation / legitimate interest
CCTV Recordings	Legal obligation / legitimate interest
Newsletters and internal updates	Legitimate interest
Marketing / promotional use	Consent

Where consent is not granted, your image will not be used for the relevant purpose. However, please note that the School may still lawfully process your image in limited situations where another legal basis applies. For example:

- You may appear incidentally in group photographs used for internal or administrative purposes
- Your image may be captured on CCTV for safeguarding or site security
- Photographs may be required in relation to legal obligations or safeguarding protocols

You may withdraw your consent at any time by contacting the Director of Admissions & Marketing or the Director of Operations & Compliance (see the School's Privacy Notice for contact details). Withdrawal of consent will not affect the lawfulness of image use based on consent prior to its withdrawal.

All image use will be conducted in accordance with the School's Data Protection Policy, and we will ensure appropriate technical and organisational safeguards are in place to protect personal data.

☐ Sharing images of you taken at St Peter's, or as part of St Peter's business for School publicity and marketing purposes, in printed publication or online (including social media) (please tick the box)

Name:.....

Date.....

Signature: .....

Revision History		
Date Revised	Changes	Reviewed By
29 Apr 2025	Redrafted the consent form, clarity on legitimate interest.	Dan Morris (Dir. of Operations)