



St Peter's School YORK

Taking, Storing & Using Images of Pupils Policy

St Peter's School, York

November 2025

(Next review Christmas Term 2026)

Introduction:

1. This policy sets out how the School intends to use images of pupils (photographs and videos), how we store and manage them, and how we seek consent. It also covers the use of photography and filming equipment (including mobile phones) by parents/carers, pupils and the media on School premises. It applies across all parts of the School.

2. Policy statement
The School believes that images of pupils can help us to:
 - 2.1.celebrate their achievements and participation in School life;
 - 2.2.promote a sense of belonging and community including with the school;
 - 2.3.keep parents informed of their children's time at school;
 - 2.4.support learning and enrichment activities;
 - 2.5.to market the school (giving prospective parents an idea of what life at St Peter's is like) through social media and our website;
 - 2.6.aid administrative and security processes including statutory record keeping;
 - 2.7.keep archive records for the school.

3. We are committed to doing this in a way which safeguards pupils' rights, dignity, and privacy, and supports their wellbeing. Parents, carers and pupils should feel comfortable with how images are used.

4. The School's Privacy Notice provides detailed information on the ways the school uses your child's personal data including in photographs and videos. While the school is required in some cases to take your child's photograph (for example, to keep on our school's database for safeguarding purposes), there are other circumstances where we may wish to use their name and/or images where we instead ask for your consent to do so.

5. Please note that children aged 13 and over have the maturity to exercise their own data protection rights so are able to complete their own photo consent form. If you have children of that age, we encourage you to share the Privacy Notice and discuss it with them.
6. The uses listed below and on the consent form are intended to give parents/ pupils an example of how we might use pupil's data depending on the choices they indicate, but this is not a completely exhaustive list because our software packages continually evolve over time. We will take reasonable measures to respect the wishes of pupils and parents as outlined below, however, we cannot take responsibility for the way images are used by other websites or publishers or for any consequences arising from publication.
7. If parents choose to allow photography/videography of their child or a pupil over 13 chooses to allow photography/ videography, in all circumstances we will:
 - 7.1. ONLY include the first name and initial of the child, and never their full name unless we have gained specific consent for this in advance.
 - 7.2. ONLY use photographs of children who are suitably dressed.
 - 7.3. ONLY use images that are suitably chosen and not taken out of context.
 - 7.4. If a parent or pupil wishes to limit or withdraw permission for images, the School will respect that wherever reasonably possible. A parent or pupil can change their consent at any time by emailing the school's Data Manager, Jeff Clark at j.clark@stpetersyork.org.uk.

Consent:

8. On admission, parents/carers (and, as appropriate, pupils) will be asked to complete a consent form indicating how images of the pupil may be used by the School. We have three levels of consent:

8.1. Full Permission: School Community, Media , Social Media & Marketing.

If you choose this option, you consent to the use of your child's image and first name for marketing purposes and to share the events of the school week on public platforms. This includes all the ways listed in the "School Community Only" section below, as well as the following additional examples:

- 8.1.2 On the school's external-facing website

- 8.1.3 In our weekly school newsletter
- 8.1.3 social media feeds
- 8.1.4 In traditional print media - for example to celebrate success in team sports or outstanding academic achievement.
- 8.1.5 In marketing material (such as our school's prospectus) used to promote St Peter's to the public.
- 8.1.6 In *The Peterite*, our annual publication
- 8.1.7 Please also be assured that if we wished to use your child's image in any specific, targeted marketing campaign, we would approach you first to gain your specific consent for this.
- 8.1.8 Please also note that we cannot take responsibility for the re-sharing of posts, images or "re-tweets" once they are published.

8.2. School Community Only

If you choose this option, you give your consent for your child's photo and/or video to be shared amongst the school community. Some examples of this would include:

- 8.2.1. Recording your child alongside other pupils in group activities such as team sports, in the classroom and extra-curricular activities
- 8.2.2. In performances such as music concerts or theatre productions.
- 8.2.3. **These recordings might then be used:**
 - 8.2.3.1. as a display in a school hallway or classroom
 - 8.2.3.2. shared with the families of classmates
 - 8.2.3.3. in programmes for concerts, plays and other events which are open to the St Peter's community and members of the public
 - 8.2.3.4. to update the school's Historic Archives, which may choose to keep some of these images for posterity, for example, to be viewed by pupils in future years. (More information on this can be found in the school's Archives Policy.)
 - 8.2.3.5. in the case of sporting events, these may be live-streamed so members of the school community may watch the match.

8.3. No Photography

If you choose this option, the school will only take and share photographs that are required by law, or in situations where photography is an essential part of the delivery of our core curriculum (for example, during a lesson on photography itself, or as part of a drama or PE lesson, etc.). You/ your child would not be included in group photographs such as team photographs, cast photos, or whole-year photographs.

Some examples would include:

8.3.1. Use of pupil images for identification and security

8.3.2. At admission and at regular intervals, the School may take photographs of each pupil for internal identification and security purposes (for example medical identification, registers).

8.3.3. Such images will be stored securely through iSAMS and accessed only by authorised staff.

9. Use of pupil images by the media or external organisations

9.1. Where the media (or an external organisation) is invited to a School event or requests images of pupils for publication, the School will endeavour to ensure that any pupil whose parent/carer has refused permission is **not** photographed or filmed.

9.2. If media requests or publishes an image of a pupil, only first name and year group will normally be provided; any additional personal details will be disclosed only with explicit parental consent.

10. Security of pupil images

10.1. The School uses reputable professional photographers where required, and ensures any external agency complies with appropriate safeguarding, data protection and technical/organisational security measures.

10.2. Images held by the School (digital or printed) will be stored securely: access will be limited to staff who need it, and the School will take reasonable steps to prevent loss, misuse, or unauthorised access.

10.3. St Peter's School does not permit staff and volunteers to use any personal equipment to take photos and recordings of pupils. Only cameras or devices belonging to the school should be used.

10.4. All staff are given guidance/training on this policy and associated practices (for example, safeguarding, data protection, IT acceptable use).

11. External Photographers

From time to time, the school may use external photographers to capture events or promotional materials, and when we do, we ensure they are fully DBS checked and appropriately escorted at all times to maintain the safety and security of our pupils.

Splaat Photo Ltd

- 11.1. Splaat Photo is a professional photography company that specialises in working with independent schools. Each year, they take around half a million photographs across the schools they support.
- 11.2. Through their services, parents of pupils at St Peter's School, York are able to access a secure online gallery containing photographs and videos of their child, capturing a wide range of school life and events.
- 11.3. Splaat Photo takes safeguarding extremely seriously and applies rigorous checks to all of its photographers. Each photographer working at St Peter's holds a dedicated safeguarding statement and has completed all required compliance checks including DBS checks.

- 11.3.1. Photographers are allowed on site around the children once their DBS certificates and IDs have been checked by the St Peter's HR team.
- 11.3.2. Prior to starting with us they are also shown our mandatory safeguarding training video.
- 11.3.3. Splat photographers will still never be left unaccompanied with the children or permitted to be one-on-one with pupils at any time.
- 11.4. Splat Photo will be in school at various times throughout the year to photograph and film a broad selection of activities and occasions, including but not limited to:
 - 11.4.1. Individual and class portraits
 - 11.4.2. School plays and drama performances
 - 11.4.3. Musical recitals and concerts
 - 11.4.4. Sports fixtures and team photographs
 - 11.4.5. Special lessons and classroom learning
 - 11.4.6. Extra-curricular events such as House competitions, festivals and enrichment activities
 - 11.4.7. On some occasions such as school productions or concerts, and where permissions allow, Splat will also record professional videos.
- 11.5. Splat Photo has developed advanced facial recognition software designed to meet the safeguarding and data protection standards required by St Peter's School. Their systems have been independently audited by a data protection solicitor and are fully GDPR compliant.
 - 11.5.1. The facial recognition system ensures that only images and videos featuring your child are placed into your secure, private online gallery. Each gallery is accessible only to registered parents or guardians. Photos of pupils whose parents have not registered or consented are not visible to anyone.

11.5.2. Where more than one child appears in a photograph (for example, Child A and Child B), that image will only be viewable by the parents of Child A if the parents of Child B have also registered and provided consent. Parental permissions are carefully tracked to ensure that all rights and preferences are respected.

11.6. If a parent decides that they do not consent to Splaat taking and processing their image, St Peter's will provide the photographer with enough information to identify the child to ensure no photo is taken of them. **They can opt out of Splaat by emailing them at team@splaat.co.uk.**

11.7. As a failsafe, Splaat photo have also engineered their facial recognition software to ensure that any face that is fed through the system which cannot be positively linked to a child with consent will be automatically deleted without processing that the biometric data of that face.

12. Use of cameras and filming equipment (including mobile phones) by parents/carers at School events

Parents/carers are welcome to photograph/film their own children at School events unless otherwise stated subject to the following guidelines:

12.1. At indoor events (e.g., plays, concerts) parents/carers should use cameras/filming devices with consideration for other audience members and performers. For example, use of flash may disturb others or those with medical conditions.

12.2. Parents/carers should not take images of other pupils unless those pupils' parents/carers have given prior consent; incidental inclusion of others in group shots is acceptable.

12.3. Images taken for personal use should not be published (e.g., via social media) if other pupils are clearly identifiable without the express consent of their parents/carers.

12.4. Parents/carers should not take photographs or film in changing rooms, backstage or in any location where pupils may be vulnerable, embarrassed or upset.

12.5. We reserve the right to refuse permission to photograph/ film anywhere the school deems as inappropriate, such as in religious services.

12.6. The School reserves the right to refuse or withdraw permission to photograph/film at a particular event (or across events) if guidelines are not respected or if safeguarding concerns arise.

12.7. We reserve the right to refuse permission to photograph/ film where there are copyright concerns.

13. Use of cameras and filming equipment by pupils

13.1. Pupils should not be using mobile phones, cameras or filming equipment on school site without prior permission from a member of staff.

13.2. All pupils are encouraged to help maintain a safe and respectful environment: they should report concerns about misuse of cameras, filming equipment or mobile devices to a member of staff.

13.3. Use of cameras/filming equipment (including mobile phones) in toilets, changing areas or other similar locations is strictly prohibited.

13.4. Any misuse of photography or filming equipment which breaches this policy, the School's Safeguarding Policy, Online Safety Policy or Acceptable Use Policy may result in disciplinary measures.

14. Retention of images

14.1. The School will keep digital or printed images of pupils for as long as it considers necessary for the purpose for which they were taken (e.g., promotional materials, historical archive, internal records).

14.2. Where images are used in marketing materials, the School will review periodically whether they remain appropriate for continued use.

14.3. If consent for an image is withdrawn, the School will endeavour to remove the image from future use, though it may not be feasible to remove already-published images from third-party media, and where consent is removed from a printed publication (as long as consent was in place before the publication), the school will ensure that any reprints or digital documents do not contain the images of the pupil.

15. Inclusion & wellbeing considerations

- 15.1. The School ensures that all pupils are represented fairly in photographic materials, avoiding 'tokenism' and ensuring that no pupil is excluded from inclusion on grounds of ability, age, gender, ethnicity or other protected characteristic.
- 15.2. Pupils should never feel pressured to participate in being photographed or filmed at any time; alternative arrangements will be available. This does not have to affect their on ongoing consent level if they do not wish.
- 15.3. The School recognises that images can influence self-image and belonging, therefore photographic practices will be mindful of pupil dignity, context and the promotion of positive wellbeing.
- 15.4. If a pupil is feeling self-conscious about a particular photo that has gone up on social media, they can contact the marketing team to have it removed as soon as possible at marketing@stpetersyork.org.uk.
- 15.5. Photography used within curriculum or enrichment activities should be inclusive, voluntary, and followed by opportunities for reflection and discussion (for example within PSHE lessons).

16. Related policies

This policy should be read alongside the School's:

- 16.1. Safeguarding / Child Protection Policy
- 16.2. Data Protection (GDPR) Policy
- 16.3. Online Safety Policy
- 16.4. IT Acceptable Use Policy
- 16.5. Anti-Bullying Policy
- 16.6. PSHE/Wellbeing Policy