Photography of Pupils Policy

Owner:	**Data Compliance Lead**	**Date reviewed:**	**July 2025**
Review Period:	**1 Year**	**Next Review Date:**	**July 2026**

1 INTRODUCTION

1.1 Radley Schools Group ("the Group") is obliged to comply with data protection law when it takes, uses or publishes images of its pupils, and specifically to comply with obligations set out in the UK General Data Protection Regulation ("UK GDPR"), the Data Protection Act 2018 ("DPA 2018") and other legal and regulatory requirements as applicable.

1.2 In this policy, the term 'school(s)' means Barfield, Beeston Hall, Chandlings Prep, Cothill House, Kitebrook Preparatory, Mowden Hall and West Hill Park. For the avoidance of doubt, the Group is the data controller for all the schools governed and administered by the Group and this policy is therefore intended to be written on behalf of all the schools in the Trust.

1.3 In this policy the term 'images' includes photographs, digital photographs, film, webcam/video conferencing recordings, CCTV, and photographs and videos captured by mobile/camera phones or other devices such as tablets.

1.4 The aim of this policy is to provide guidance for staff on the taking of, and storage of, pupil images.

1.5 This policy should be used in conjunction with the Use of Images Policy, Staff BYOD Policy and Privacy Notices which can be found on the Radley Schools Group intranet here. Staff should also ensure that they refer to any other relevant school/Group policies, e.g Safeguarding, Staff Code of Conduct, Acceptable Use of Technology.

2 GUIDANCE FOR STAFF ON TAKING PHOTOS

2.1 Before taking any images of pupils, staff should always be mindful of why they are taking images and what the images will be used for.

2.2 Staff should only take photos where necessary and appropriate, for example, to create a portfolio of a child's learning journey, to record events and achievements, at appropriate moments during residential trips to share with parents etc.

2.3 Photos should either be taken using a school-owned device or if using your own device, photos should be taken in Google Spaces (please check with your Marketing Manager to gain access to the relevant Google Space). NB See 2.7 and 2.8 regarding staff in EYFS.

2.4 Photos should never be stored on your own mobile device.

2.5 WhatsApp groups should not be used for the sharing of pupil photos.

2.6 Staff should be familiar with the Use of Pupil Images Policy and be aware that there may be pupils whose parents have not given permission for the use of their child's photograph in certain formats e.g. social media.

2.7 EYFS staff - staff working in EYFS should not use personal mobile phones or any personal devices in the setting. These should be stored out of sight and only used when not with children e.g. in the staffroom at break time.

2.8 EYFS staff - photos should only be taken using a school-owned device and these should not leave the premises unless for use on a school trip.

2.9 All staff are encouraged to report any concerns about the misuse of technology, or any worrying issues to their line manager and/or the School Data Compliance Lead.

2.10 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 staff covertly or otherwise in a manner that may offend or cause upset.

2.11 The misuse of images, cameras or filming equipment in a way that breaches this policy, or the Trust's data protection and data subject rights policy for staff, safeguarding policy or the behaviour policy is always taken seriously and may be the subject of disciplinary procedures or dealt with under the relevant policy as appropriate.

For any further advice on taking and storage of pupil photos, please contact your school Marketing Manager, DSL or Katharina Roelofsz at Group Office KSR.Roelofsz@radleyschoolsgroup.org.uk

Policy first introduced February 2024