

Taking, Storing and Using Images of Children Policy
(this "Policy")

Authorised by:	The Board of Governors of CFBL
Date:	WR 21 January 2026
Review frequency:	<u>Annually</u> or sooner following any updates to national and local guidance and procedures
Next review:	January 2026
Circulation:	Governors/all staff/volunteers, automatically Staff: on shared drive > Staff > Policies Parents: per request + School Website

1. This Policy

This Policy is intended to provide information to pupils and their parents, carers or guardians (referred to in this policy as "**parents**") about how images of pupils are used by CFBL. It also covers the School's approach to the use of cameras and filming equipment at School events and activities and on School premises by parents and pupils themselves.

It applies in addition to the School's Terms and Conditions and any other information the School may provide 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, e.g. the School's Privacy Notice. Images of pupils in a safeguarding context are dealt with under the School's relevant safeguarding policies. The School's Privacy Notices, this Policy and the School's CCTV policy are available on CFBL's website.

This policy does not form part of a contract between parents and the School and may be amended by the School at any time.

2. Internal/External Uses

Certain images (photographs and videos) are taken and processed for internal use whilst others are taken and processed for external use.

By "internal use", we mean that the images will be processed (taken, used, stored) by the School as described in 2.1 below, which includes sharing images of pupils with School parents (also referred to as the School community).

By "external use", we mean that the images will be published beyond the School's community, as described in 2.2 below.

2.1 Images Processed for Internal Use

Certain uses are necessary for the ordinary running of the School, whilst other uses are in the legitimate interest of the School and its community and unlikely to cause a negative impact on children.

These include images taken and processed by the School for important administrative purposes such as identification and security, or to celebrate the achievements of pupils or to promote the work of the School within the School community.

Certain uses of children's images may be necessary or unavoidable (for example if they are included incidentally in CCTV or a photograph).

2.1.1 Use of Pupil Images for Identification and Security:

All pupils are photographed when they start to attend the School and, thereafter, at regular intervals, for the purposes of internal identification. These photographs identify the pupil by name, year group, class and group, and are shared internally with teaching, administration and management teams.

Student images are utilized to identify students on photo directories (*trombinoscopes*) and account information pages for Pronote, Eduka and, when they will be in place, their catering card.

CCTV is in use on School premises and will sometimes capture images of pupils. Images captured on the School's CCTV system are used in accordance with the Privacy Notices and the School's CCTV Policy which may be published by the School from time to time.

2.1.2 Use of pupil images on School publications:

The School will use images of its pupils to keep the School community updated on the activities of the School, 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, pupils, staff, governors and alumni) including by email, Pronote, Google drive, Google Classroom, Eduka, through the yearbook and the parents' handbook.

We expect the School community not to further share photos or videos of other people's children, for example on social media.

Our protocol for taking and using images and videos of students is sent out to staff on a regular basis, and includes the following important rules:

- Prefer group photos
- Use wide shots / photos from behind where possible
- Avoid close-ups unless essential
- Avoid visible names, labels or identifying signage
- Use lower resolution if high quality is not needed
- Images must be removable if requested.

2.1.3 School trips and outings

The taking, storage and sharing of pupil images during school trips and outings is subject to enhanced safeguarding requirements, as set out in the School's "Photo Use Charter - School Trips and Outings".

In summary:

- Photographs may be taken by staff solely to document activities, inform families, or illustrate educational moments.
- Non-identifiable images must be prioritised, including group photos, wide shots, photos taken from behind or at a distance, and images focused on activities rather than faces.
- Individual, close-up or face-on photographs of pupils should be avoided, and photos must never be associated with pupils' names.
- Pupils must be in appropriate clothing.
- No photographs of pupils' bodies in swimwear may be taken, and images of water-based activities must be limited to non-identifiable wide shots or environmental views.
- Staff must use school-issued devices wherever possible. Personal devices are prohibited for Early Years and otherwise permitted only exceptionally, with immediate secure transfer and deletion.

- Images must be stored only within the School's secure digital systems and must not be saved or shared via personal cloud services or messaging applications.
- Photo sharing with families must be limited and controlled, with no more than one curated update per day, shared only via approved School platforms (usually Google Classroom or Google Photos).
- All images must be deleted from devices once they have been securely transferred, and no pupil images may be uploaded to artificial intelligence tools.

These measures are designed to protect pupils' privacy and dignity, minimise the risk of misuse of images, and ensure compliance with safeguarding and data protection obligations.

2.2 Images Processed for External Use

External use refers to publication beyond the School community, including marketing materials, the public website, advertising, press and public-facing social media. Risks associated with using images of pupils have gone up significantly with the advent of AI-generated deepfakes, and the School is adapting its image use policy to reflect this.

From January 2026, no identifiable images of pupils may be used in new external marketing materials. The School will instead use AI-generated images, stock photography or child models. Parental consent is therefore no longer required for new external marketing purposes.

For external marketing material produced by or on behalf of the School prior to January 2026, the School relied on parents' or pupils' consent for using images of pupils in the School's prospectus/brochures/cards/banners etc, on its website, on third parties' websites (eg AEFE and FSF) or on the School's media channels (eg LinkedIn, Instagram, Facebook) or in (on line) press or other external advertising for the School. Parents and pupils may withdraw their consent at any time by contacting the School's Communications and Marketing Department at communications@cfbl.org.uk.

Use of pupils' images in the media: Where practicably possible, the School will always notify parents and ask permission 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 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 only be provided where parents have been informed about the media's visit and either parent (or pupil if above 13) has consented as appropriate.

3. Class pictures

Class pictures, organised, taken, stored and sold to parents every year by the parents' association or its appointed photographer, do not fall within the scope of this Policy. The School however ensures that only pupils for whom consent was granted as part of a consent (attached as Annex 1) sent every year to parents via EDUKA (or directly to pupils of 4e or 3e) are included on the class pictures.

4. Source and Security of Pupil Images

The source of pupil images will predominantly be the School's staff (who are subject to CFBL's Staff behaviour Policy), a professional photographer, the School's PTA, or occasionally pupils. When the School or the PTA occasionally uses a professional photographer, this photographer will be 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.

The School takes appropriate technical and organisational security 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 the School's Policy on Taking, Storing and Using Images of Pupils and on the importance of ensuring that images of pupils are made and used responsibly, only for School purposes, and in accordance with School policies and the law.

The School requests all staff to use the School's devices (iPhones, iPads, cameras ...) to record pupils' images. Only when this is not feasible and except in the Early Years (where this is never authorised), staff may use their personal device provided that they immediately send the photos by email to the School's drive and delete all copies on all their personal devices (including cloud).

The School will only take images of pupils in suitable dress, and the images will be stored securely.

It is strictly prohibited for staff to upload any pupil images into AI tools, except by the Communications Department using authorised closed systems ensuring data privacy and protection, as described in CFBL's AI policy.

5. Use of Cameras and Filming Equipment (including mobile phones) by Parents

Parents 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 requires all parents to follow:

- o When an event is held indoors, such as a play or a concert, parents must 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.
- o Parents are asked not to take photographs of other pupils, except incidentally as part of a group shot, without the prior agreement of that pupil's parents.
- o 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 the internet (for example, on Facebook or other social media), or published in any other way.
- o 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.
- o Parents must not film or take photographs in changing rooms or backstage during School productions, nor in any other circumstances in which photography or filming may embarrass or upset pupils.
- o For Early years, parents are generally prohibited from taking any photographs of children in the early years setting, but for special events such as school performances, they may do so on the understanding that the images are not posted onto social media sites or otherwise shared.

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 the film may be privately made available to parents by posting it privately to Youtube (unlisted). Parents of pupils taking part in such plays and concerts will be consulted if it is intended to make such recordings available more widely. Parents must refrain from sharing the private link with others, or posting the video or parts thereof on social media.

6. 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 the School (except if for a particular school project, using the School's equipment under the supervision of a teacher)

The misuse of images, cameras or filming equipment in a way that breaches this Policy or any other School policy is always taken seriously, and may be the subject of disciplinary procedures or dealt with under the relevant safeguarding policy as appropriate.

RELATED POLICIES

- Privacy notice for pupils
- Privacy notice applicable to all members of the School Community (Past and Present)
- CCTV Policy
- Consent for audio or visual recordings and photographs (Annex 1)
- Safeguarding and Child Protection Policy
- E-safety and Use of Internet Policy (pupils)
- Anti-bullying Policy
- Behaviour and Discipline Policy
- Staff Behaviour Policy
- Retention Policy

Last review by management and safeguarding trustees: January 2026

Previous version 07.03.23

Current version 21.01.26

Document Owner and Approval

The Head teacher is the owner of this document and is responsible for ensuring that it is reviewed in line with the School's policy review schedule.

Annex 1 - Consent for school photographs organised by
Association des Parents du CFBL

Please tick all the relevant boxes, fill and sign this form. If the child named below is 13 years old or over (pupils in 4e and 3e), consent will be requested separately from the child directly.

FUNDRAISING PHOTOS: I give my consent for individual and class photos of the pupil named below to be taken by a photographer appointed by the School's parents teacher association (APC - Association des Parents du CFBL) and for the School to share the name, class and year group of the pupil with this photographer for the performance of the contract between APC with the photographer. The images will be available for sale from the photographer under the terms and conditions agreed between APC and the photographer, to which CFBL is not a party.

I note that this consent can be withdrawn at any time by writing to communications@cfbl.org.uk.

I will be informed in advance of the visit of the photographer and be given the opportunity to withdraw my consent by writing to communications@cfbl.org.uk.

YES NO

Pupil's name:

Pupil's date of birth:

Date:

Signed (Parent /Carer).....