



# SHERBORNE SCHOOLS GROUP

## Taking, Storing and Using Images of Children (including EYFS) Policy

**Approving body:** Executive Committee

**Owner:** Head of Sherborne Girls

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### **Executive Summary**

This policy is intended to provide information to pupils, their parents and staff about how images of Sherborne Schools Group (the Group) pupils are used by the Group. “Images” includes photographic images and multimedia content (including moving images and sound). It covers the Group’s approach to the use of cameras and filming equipment (including drones) at Group events and on Group premises by parents and pupils themselves, visitors and the media.

This policy applies in addition to any contract between parents and Schools within the Group, and any other information the Schools may provide about a particular use of pupil images, including signage about the use of CCTV and more general information about use of pupils’ personal data covered in the Group’s General Privacy Notice.

**Date of Review:** Lent 2026

**Date of Approval:** 13 April 2026

**Issue Number:** 1

**Review Due:** Lent 2027

**Document Number:** GRP\_DPL\_004

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## This Policy

This Policy is intended to provide guidance to staff and information to pupils and their parents, carers or guardians (referred to in this policy as "parents") about how images<sup>1</sup> of pupils are normally used by the Sherborne Schools Group<sup>2</sup> ("SSG" or "the Group"). It also covers the Group's approach to the use of cameras, video and filming equipment at school events and on school premises by parents and pupils themselves, and the media or any external contractor (e.g. photographers hired by the Group).

It applies alongside any individual parent or pupil consent forms provided, and the relevant SSG School's terms and conditions/ parent contract, where this includes terms around image use and marketing. This policy should be understood in the context of any other information the Group may provide from time to time 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 in the Group's Privacy Notice.

Safeguarding and online safety issues are more specifically dealt with under the Group's relevant safeguarding policies.

Staff are additionally subject to their own training (in accordance with their role) and individual school policies in this area.

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<sup>1</sup> Throughout the policy "images" may refer to photographic images, and multimedia content such as video footage.

<sup>2</sup> The Sherborne Schools Group includes Sherborne Boys, Sherborne Girls, Sherborne Prep, Hanford Prep, Sherborne International and their trading subsidiaries.

## General Principles of Image Use

Certain uses of images, including pupil images, are necessary for the ordinary running of the Schools within the Group for example, for administration, identification, educational, medical, curricular and co-curricular purposes, and security. It may not be possible as a parent or pupil to object to such uses, although any concerns in this regard will be duly considered by the relevant School.

Other uses are considered to be in the legitimate interests of the Group and its community and unlikely to cause any negative impact on children. The Group is entitled lawfully to process such images and take decisions about how to use them, although objections may be raised and the Group will seek to accommodate any reasonable concerns. Examples are given in this policy.

We hope parents will feel able to support the Group in using pupil images to celebrate their child's achievements, sporting, music and academic and to promote the work of the Schools. However, for any uses of images which might be considered more intrusive or unexpected – examples of which are set out further in this Policy – we will seek specific consent from parents and, as appropriate, pupils.

Parents who accept a place for their child at a School within the Group are invited to indicate that they agree to the Group using images of their child as set out in this policy, via the relevant 'new pupil' form attached to the school's terms and conditions and/or from time to time if a particular use of the pupil's image is requested. However, parents should be aware that certain uses of their child's images may continue to be necessary for example, administration, education or security, or will be unavoidable (for example if they are included incidentally in CCTV or as a part of a whole-school photograph).

Any parent who subsequently wishes to limit the use of images of a pupil for whom they are responsible should contact the Data Protection Lead in writing:  
[dataprotection@sherborneschools.group](mailto:dataprotection@sherborneschools.group).

The Group will respect the wishes of parents (and indeed pupils themselves) wherever reasonably possible, and in accordance with this policy.

Parents should be aware that, from around 12 years old, the law recognises pupils' own rights to have a say in how their personal information is used – including images. Starting from Year 7, this right will be explained to all pupils at the start of each academic year by their tutor<sup>3</sup> or Head of Year. Pupils will also be made aware of how they can exercise their right. Parents are also encouraged to talk with their child about the use of personal information to ensure that they are as informed as possible

Where remote video provision for pupils (via e.g. Zoom or Teams) is necessary, whether for lessons or e.g. counselling, the School will notify parents and pupils of its policies in respect of monitoring, recording and retention of such sessions (along with policies on appropriate dress and supervision).

Further information and advice is available from the [Information Commissioner's Office](#) and the [NSPCC](#).

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<sup>3</sup> At Sherborne Prep this would be their Form Tutor or in PSP sessions.

## Use and Publication of Certain Pupil Images

In accordance with any consents, notices or objections as may be applicable from time to time, the Schools will use images (including video footage) of their pupils to keep the school communities updated on School activities, and for marketing and promotional purposes, including:

- on internal displays and notice boards within the relevant School premises;
- as part of the Group's email system and intranet, and in appropriate communications by whatever means with the Group community (parents, pupils, staff, Governors and alumni);
- as part of School academic and co-curricular activities, for example for physical education or drama, or as a teaching aid, as part of official activities using school devices, tablets and applications;
- in printed material, such as School or Group magazines and printed marketing material, including the School's prospectus;
- on the School or Group's website and, where appropriate and in line with relevant policies, via the Group's outward facing social media channels e.g. Instagram, Facebook and LinkedIn; and
- exceptionally, in the press and other external advertisements for the Group.

The Group's policy in respect of the above uses is as follows:

- Legitimate interests will be relied upon for any uses which are either essential (for example, security, administration, medical and education) or which fall within a scope of reasonably expected uses. Reasonably expected uses include via internal Group or parent communications, on the intranet or in other closed community groups, in printed material such as a School or Group magazine or prospectus, in digital marketing channels (e.g. social media) or any uses whereby an individual child cannot reasonably be identified by someone outside the School community: for example, where their face cannot clearly be seen. To protect the identity of pupils, their full name is never provided alongside an image in external marketing material unless in exceptional circumstances where prior consent is always obtained.
- The key effect of the Group relying on legitimate interests is that parents and pupils may be entitled to object to such uses, although their specific consent will not be sought beforehand. Any objections will be duly considered by the Group, but objections can be overridden by other factors: for example, uses which the Group considers essential; or uses which create little or no risk of harm (including where children are not at risk of outside identification).
- Consent will be sought for all other external uses of pupil images online and in print (including those by the wider Sherborne Schools Group family overseas). In particular, where any intended use is more intrusive or unexpected. We would seek specific consent, for example, if a third-party provider wants to photograph/video an event for their own marketing purposes where there is a link with the School(s) (an example might be the School's catering provider).
- The Group will take reasonable steps following any objection or withdrawal of consent but may not be able to recall or destroy printed materials. Any particular concerns or vulnerabilities relating to a pupil or their family should be drawn to the relevant School's attention as early as possible and at point of entry to the School. The safeguarding and best interests of pupils will remain the Group's priorities at all times.

## Use of Pupil Images for Identification and Security

All pupils are photographed on joining the School and, thereafter, at yearly intervals, for the purposes of internal identification. These photographs, which are accessible only to staff, identify the pupil by name, year group, house and form/tutor group.

CCTV is in use on some Group premises for certain notified purposes, including security, and in certain cases is likely to capture images of pupils. Images captured on the Group's CCTV systems are used in accordance with the General Privacy Notice and the relevant CCTV Policy. The location of cameras will be clearly notified, including by signage.

## Use of Pupil Images by External Media

Where practicably possible, the Group will always notify parents in advance when the media is expected to attend an event or Group activity in which School pupils are participating. The Group 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 may ask for the names of the relevant pupils to go alongside the images. It is not the Group's policy to provide full names in this scenario, and these will only be provided where parents have been informed about the media's visit and either parent or pupil has specifically consented to the sharing of their name, for an appropriate and necessary purpose.

## Security of Pupil Images

Professional photographers and the media are managed in accordance with the Group's Supervision of Contractors and Visiting Professionals Policy. The Group uses only reputable professional photographers and makes every effort to ensure that any images of pupils are in suitable dress and held by such persons securely, responsibly and in accordance with the Group's instructions.

The Group takes appropriate technical and organisational security measures to ensure that images of pupils held by the Group are kept securely on the Group's media storage systems, and protected from loss or misuse.

Any external processors of pupil images are engaged only for lawful purposes consistent with those set out in this policy, and subject to proper due diligence and contractual protections.

All staff are given guidance on the Group'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 Group purposes, and in accordance with Group policies and the law.

Pupils are also given mandatory and age-appropriate training on their own privacy online and with their peers, including image use and social media safety.

## Image Lifecycle Review

The Group will undertake a periodic review of the lifecycle of pupil images, including those stored in archives or marketing materials, to assess whether retention remains necessary. Particular attention will be given to images of pupils who have left the school, with a view to minimising unnecessary data retention and ensuring compliance with data protection principles.

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

Parents are welcome to take photographs of (and where appropriate, film) their own children taking part in Group events, subject to the following guidelines, which the Group 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 Group therefore asks that it is not used at indoor events.
- Parents are asked not to take photographs of other pupils, without the prior agreement of that pupil's parents.
- Parents are reminded that images they take of their children participating in Group events are for personal use only.
- Images which may, expressly or not, identify other pupils should not be made accessible to others online (for example on Facebook, Instagram, TikTok or by text or WhatsApp), or published in any other way.
- Parents are reminded that copyright issues may prevent the Group from permitting the filming or recording of some plays and concerts. The relevant School will always include a reminder in the programme of events where issues of copyright apply.
- Parents may 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, by reference to their dress or activity or any other factor.

The Group reserves the right to refuse or withdraw permission to film or take photographs at a specific event or more generally, either for all attendees/parents (e.g. where a safeguarding risk to an individual child has been identified) or from any individual parent who does not follow these guidelines, or is otherwise reasonably felt to be making inappropriate images.

The Group sometimes records plays and concerts professionally (or engages a professional photographer or film company to do so), in which case physical or digital copies may be made available to parents. Parents of pupils taking part in such plays and concerts may be consulted if it is intended to make such recordings available more widely.

Should remote video provision at home (by Zoom, Teams or otherwise) be required or facilitated by the school in any context, specific guidelines and instructions will be provided to ensure privacy and safety, including around dress and recording of video.

## 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 staff.

The use of cameras or filming equipment (including on mobile phones<sup>4</sup>) is not allowed in toilets, washing or changing areas, nor should photography or filming equipment be used by pupils in a manner that may offend or cause upset. Pupils are not permitted to bring drones to School.

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<sup>4</sup> Please refer to the individual School rules concerning on the access to and use of mobile devices for pupils.

The misuse of images, cameras or filming equipment in a way that breaches this Policy, the SSG Data Protection Policy, SSG Safeguarding and Child Protection Policy, or the relevant School's Anti-Bullying Policy, E-Safety / Online Safety Policy, IT Acceptable Use Policy, or the relevant School Rules is always taken seriously, and may be the subject of disciplinary procedures or dealt with under the relevant safeguarding policy as appropriate.

## Use of Cameras and Filming Equipment by Staff

Teaching staff may regularly capture images of pupils for educational purposes and as part of the recording and assessment of pupil progress and achievement. This is particularly relevant to Art, Drama, Sports and the Early Years Foundation Stage (EYFS). Teaching, pastoral and support staff, may also do so for the purposes described above (see [Use and Publication of Certain Pupil Images](#)). The use of personal devices including mobile phones is not permitted within the EYFS setting under any circumstances.

The Group owns filming equipment and cameras including mobile phones which have been purchased for use in taking film and photographs for school marketing purposes. The Marketing department uses this equipment to film and photograph pupils, and other staff can borrow this equipment to take photographs and film (e.g. when running an event on or offsite which has potential for publicity, including a school trip). School Trip mobile phones also have cameras which can be used for this purpose and are allocated to staff leads taking any trips.

Where photographs are taken by staff to evidence a child's progress, such photos should only be taken on Group/ School issued devices. They must then be downloaded onto a Group/ School computer. Photos cannot be used or passed on outside the Group without the relevant permissions.

There may be some limited occasions where circumstances dictate that staff capture images of a public event such as a sports match using a personal device. In those circumstances the member of staff acts at their own risk and the following provisions apply. Any image of pupils taken by staff on personal devices must be taken:

- With the full knowledge and consent of pupils, in a public and appropriate setting with due regard to the principles laid out in the SSG Safeguarding and Child Protection Policy.
- Through the Group's Microsoft Teams application so that the image is automatically saved to the Group's secure platform rather than the device itself.

All images and film taken using Group/ School-owned equipment are downloaded and stored securely on the Group's password protected systems. All staff, including volunteers, must ensure that any images of pupils in their possession are available for review and can be clearly justified. Any images and film shared online or offline are shared in accordance with the consent of parents and pupils and with this Taking, Storing and Using Images and Film of Pupils Policy.

Breach of this policy will be treated as a disciplinary matter.

## Use of Images and Film and the Risks Associated with Artificial Intelligence (AI)

The Group acknowledges the growing impact of Artificial Intelligence (AI) and related technologies on digital image use and potential misuse. While the Group takes every reasonable precaution to publish and store images securely, it is important to recognise that

any image placed in the public domain may be subject to manipulation or unauthorised reproduction, including by AI-based tools.

Although we implement safeguards such as image resolution control, content moderation and consent checks, no online image is ever entirely immune from misuse. In light of this, the Group will continue to:

- Minimise the use of high-resolution, close-up images, individual images where a single pupil is the clear subject. Where possible, we will prioritise group shots, action-based compositions, or images where pupils are less identifiable. This helps reduce the risk of AI-driven misuse while still allowing us to visually celebrate school life.
- Use creatively framed, action-based, or environmental images to naturally obscure pupil identity where possible and increase the use of branding, graphic overlays and watermarking to limit reusability.
- Regularly review image usage and publishing practices in line with emerging AI and data protection risks.
- Prohibit third parties from using pupil images for AI training, synthetic image generation, or any promotional purpose not directly authorised by the Group.

While the Group takes all reasonable steps to minimise risks associated with the use of digital images, including those arising from emerging technologies such as AI, it cannot guarantee that images published in good faith will not be misused by external parties. Parents and guardians should be aware of this limitation when granting consent.

We remain committed to balancing the celebration of school life with the protection of pupil identity and digital privacy.

## Additional Safeguards

In line with evolving best practices and guidance from law enforcement and safeguarding authorities, the Group is committed to strengthening its approach to the responsible use of pupil images.

Initial consents relating to the use of pupil images will be obtained in writing. Consent forms will be reviewed from time to time to ensure clarity and accessibility for parents and pupils.

## Appendix 1: Summary of Changes

- This is the first issue of this policy for the Sherborne Schools Group and supersedes the relevant pre-existing policies for individual schools in the Group.

## Appendix 2: Policy on the Use of Drones

This policy should be read in conjunction with the Sherborne Schools Group (SSG) Health & Safety Policy, and SSG Safeguarding and Child Protection Policy.

The purpose of this document is to define and record the arrangements made in terms of flying drones, or unmanned, remotely controlled flying models, within or around the premises of any school within the Group. It will be made available to staff, parents and other interested parties.

The requirements for the use of flying drones or unmanned, remotely controlled flying models within or around Group premises are laid out below. In general, all flying undertaken by the Group is risk assessed and adheres to the principles and requirements outlined in the SSG Health & Safety Policy and the CLEAPSS document *Drone flying in schools*.

### Rationale for allowing flying of drones in or around School premises

From time to time, the SSG Estates team may use drones to survey the condition of buildings. The flying of unmanned vehicles or drones for other purposes, is to be allowed, following written consent from the relevant Head or Chief Operating Officer for the Group. Permission for the flying of drones may be granted for the following activities:

- Staff to record school events and activities to support the Curriculum and School events.
- Commercial flying for recording school events
- Commercial flying for civil engineering activities

### Controls to be in place when flying is taking place

In order to adhere to the Civil Aviation Authority (CAA) drone code:

- All flights must take place within line of sight of the pilot
- All outdoor flights must remain below 400ft/120m
- The drone manufacturer's instructions must be followed at all times
- Flights must only take place within the designated Safe Flying Zone (SFZ)
- Pilots are responsible for each flight
- No flying is permitted in restricted areas

Before organising any event which will have flying drones, the person responsible must present a proposal to **the relevant Head via the Operational Lead**<sup>5</sup> and get written permission to run the event/activity using the proforma in [Appendix 3](#). A copy of the successful proposal must be kept on record. Following the activity, a short evaluation should be completed by the Operational Lead to inform future activity planning.

Any potential safeguarding issues presented by having a camera on a drone, must be addressed before permission to fly is granted. The risks particularly associated with pictures taken from a drone are:

- Children may be identifiable when a photograph is shared with personal information.
- Sharing photographs on websites and in publications accompanied with personal information.

Further information and advice is available from the [Information Commissioner's Office](#) and the [NSPCC](#). Pilots and their equipment must comply with these guidelines, the SSG Safeguarding and Child Protection Policy and the SSG Taking, Using and Storing Images of Pupils policy.

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<sup>5</sup> For Sherborne Boys and Sherborne Girls, this is the relevant Operations Bursar, for Hanford Prep this is the Operations Manager, and for Sherborne Prep this is the Bursar.

## Appendix 3: Model Event Proforma

Event name					
Person responsible for running the event					
Date and time of the event					
Planned location of the event				Has the SFZ been checked for suitability?	
Short description of the event including the role of drones					
Number of pilots expected				Number of drone flights expected	
Test flight		Training flight			
Event recording flight					
Date of submission for permission				Signed	
Permission given/not given				Signed	
Changes to proposal					
Final agreement of activity		Signed		Date	
Evaluation of activity (to be completed within 10 days following the date of the activity)					