THE TIFFIN GIRLS' SCHOOL

PHOTOS AND VIDEOS POLICY

ADOPTED September 2026

Approved by: Governing Board

1. The Tiffin Girls' School (the School) routinely takes and uses photos, videos and CCTV to support teaching and learning and to help keep students, staff and visitors safe.

2. This Policy is intended to provide information to students and their parents and/or carers (referred to in this policy as "parents") about how we take, use and store images of students at the School.

3. It also covers the use of cameras and filming equipment at School events and on School premises by parents, students and staff, and the media.

4. This policy should be read in conjunction with the following School policies:

    - Anti-Bullying
    - Behaviour for Learning
    - CCTV
    - Data Protection
    - Online Safety
    - Safeguarding
    - Student Privacy Notice
    - Staff Code of Conduct
    - Staff ICT Acceptable Usage Agreement
    - Student ICT Acceptable Usage Agreement

5. This policy will be reviewed annually.

6. The School is committed to using all student images responsibly and sensibly in our external and internal communications and marketing activity. We hope that parents will provide consent for their children's images to be used to celebrate their achievements, extra-curricular and academic, and to promote the vision, values and ethos of the School.

7. During a student's time at the School photos and videos will be taken of activities which involve students. This may be during educational activities, trips, sports events and performances. The photos may be used for all usual School purposes, including displays (digital and conventional notice boards), school publications, advertising and marketing, on the School website, the School's social media presence (for example Bluesky, Instagram and LinkedIn), and in yearbooks. Staff will follow the guidelines from the Designated Safeguarding Lead when taking photos, examples of which are included in paragraph 48.

8. The source of these images will predominantly be the school's staff (who are subject to policies and rules in how and when to take such images), or a professional photographer for student photos required for safeguarding purposes. The school may also engage a professional photographer to take photos for marketing and promotional purposes. The school will only use images of students in suitable dress and the images will be stored securely and centrally.

9. Certain uses of images are necessary for the ordinary running of the School, including for important safeguarding purposes such as identification and security. The legal basis for this is public task as

the School is exercising its legal duties to safeguard students. All students are photographed on entering the school at Year 7 and at the start of Year 10 and Year 12 for the purposes of internal identification.

10. Some teaching departments, including PE, Music and Drama, may film students during the course of their lessons for the purpose of teaching and learning. The legal basis for this is public task as the School is fulfilling its core purpose in education. Such images will be stored securely and centrally; they may be shown to students but not shared with them, their parents or anyone else digitally.

11. CCTV is in use on the School site and will sometimes capture images of students. Images captured are used in accordance with the CCTV Policy.

12. Consent is required for photos of students to be shared on the School's social media channels, website or elsewhere online, for example, the alumnae website.

13. Consent is required for other uses of images in, for example, communication, marketing and promotional materials. This may include printed materials such as yearbooks, and/or displays within the school.

14. Consent for images being used in the ways set out in paragraphs 12 and 13 above is sought in the online enrolment forms for Year 7 and Year 12 students joining the school.

15. Parents should be aware that, from the age of 13 and upwards, the law recognises students' own rights to have a say in how their personal information is used, including images. In practice, in relation to photos, this means consent is needed from both parents and students when the student is aged 13, 14 or 15 years old and from students only once they reach the age of 16.

16. Parents or students aged 13 years and over who wish to alter their consent regarding the use of images should email the Data Protection Officer at dataprotection@tiffingirls.org.

17. In most circumstances, consent for photography cannot be withdrawn retrospectively. For example, photos of a student that have already been taken and published in print cannot be recalled if permission for photography is withdrawn after publication. For digital/online photos, we shall, where possible, endeavour to remove photos if consent is withdrawn.

18. Where a specific photography or video shoot is planned to take place and nominated students are selected to take part, parents will be contacted separately to ensure consent is given.

19. Photos of students may also be taken during trips, visits and events that involve third parties, such as a competition organiser. Parents will be contacted separately to ensure consent is given.

20. Individual students will not be identified or their names matched to their photo.

21. All images will depict students appropriately dressed for the activity in which they are engaged.

22. Students will always be made aware that photography is taking place, and the purposes for which the images will be used. They will always be given the opportunity to decline consent for any photography that is taking place.

Use of Student images in the Media

23. Where practicably possible, the school will always notify parents in advance when the media is expected to attend an event or school activity in which students are participating, and will make every reasonable effort to ensure that any student whose parent or carer has declined consent for images of

that student, or themselves, to be made in these circumstances are not photographed or filmed by the media, nor such images provided for media purposes.

24. The media often asks for the names of the relevant students to go alongside the images, and these will be provided where parents have been informed about the media's visit and consent has been given.

Security of Student images

25. Photos and videos will be appropriately and securely stored and disposed of when no longer required.

26. School staff should check the photo and video register for a list of current students where either a parent or the student themselves has not provided consent.

27. Professional photographers and the media are always accompanied by a member of staff when on school premises. The school uses professional photographers and makes every effort to ensure that any images of students are held by them securely, responsibly and in accordance with the School's instructions.

28. The School takes appropriate security measures to ensure that images of students are held securely on school systems and protected by loss or misuse. The School will take reasonable steps to ensure that members of staff only have access to images of students held by the School where it is necessary for them to do so.

29. All staff are made aware and given guidance of this policy, and on the importance of ensuring that images of students are made and used responsibly, only for school purposes, and in accordance with other school policies and the law.

Use of cameras and filming equipment (including mobile phones) by parents

30. There will be occasions during the school year when parents will wish to take photos or video recordings of students taking part in a school activity. Permission will be given under the following conditions:

- That any images (photographic or video) are taken for personal use and will not be shared with other adults whose children are not included in the photo/video, including sharing via social media.
- The photos/video will not be sold to other parents or children or used for other commercial activities.
- Parents are reminded that copyright issues may prevent the School from permitting the filming or recording of some plays and concerts. Please ensure that any commercial rights of a performance are adhered to.
- Parents may not film or take photos in changing rooms or backstage during School productions, nor in any other circumstances in which photography or filming may embarrass or upset students.

31. The School reserves the right to refuse or withdraw permission to film or take photos (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.

32. Parents also have a responsibility to monitor the photos that their children take and support the School in ensuring that they fulfil their responsibilities below, for example at celebration or awards evenings.

33. Parents may not take photographs or videos of members of staff unless they have given their prior consent. They should ensure that staff do not feature in any recording or photo of their child.

Use of cameras and filming equipment (including mobile phones) by students

34. All students 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.

35. Students must not create, record or use in any way digital information relating to an individual whether it be a member of staff, student, volunteer or any member of the school community without explicit permission and clarity as to how the data will be used. This may include imagery, voice or any other personal data.

36. Students must be sensitive when taking photos of other students. They are reminded:

- To use devices that are provided by the school for all school-based activities.
- If it is agreed that photos can be taken on a school trip, this must be with a standard camera rather than a smart device. Any exceptions to this rule will be communicated to students in advance of the trip.
- Do not take a photo/video of another student without their consent.
- Do not post images online, including social media, WhatsApp and other messaging services, without the consent of the person who has been photographed.
- Do not pass photos/ videos onto others without the consent of the person who has been photographed.
- Do not use photos/videos to humiliate or embarrass.
- The posting of images that are considered to be offensive or which bring the school into disrepute is a serious breach of discipline and will be subject to sanctions as per the Behaviour for Learning Policy
- No photos are to be taken in any changing rooms or toilets.
- Sending indecent images of themselves or others may constitute a criminal offence.
- They must allow staff (in relation to a conduct, pastoral or safeguarding concern) access to images stored on their cameras or other devices, with them present, and must delete images if requested to do so.

37. The School has disabled the camera functionality on student Chromebooks. This may be reinstated in limited, supervised circumstances for educational purposes.

38. Students must comply with the ICT Acceptable Usage Agreement for Students and the rules regarding the use of mobile phones in the Online Safety Policy.

39. Students must not take photos or videos of staff or volunteers.

Use of cameras and filming equipment by staff

40. Where possible, staff should only use School-owned devices or cameras to take photos or videos of students.

41. If this is not possible, staff may use personal devices to take photos or videos of students with the express permission of the Headteacher or SLT link e.g. in order to upload an image to one of the school's social media accounts. Access to one of these social media accounts includes permission to upload photos to it. These permissions are re-set on an annual basis.

42. Any photo or image taken by an authorised member of staff on a personal device must be transferred to the School's network drive as soon as is reasonably practicable and/or then deleted from the personal device, both locally and on any cloud based storage where the image may have been automatically backed up.

43. Photos or videos of students must not be uploaded to personal social networking sites.

44. Staff will not use personal devices directly with students and will only use work-provided equipment during lessons/educational activities. The only exception to this rule is the use of number divert to personal phones for school trips.

45. No photos are to be taken in changing rooms or toilets, and any photos taken in a gymnastics environment must have express permission from parents first.

46. Staff must not take photos or videos (including live streaming) of students which:

- Might cause distress or embarrassment
- Are associated with distressing or sensitive issues
- Are taken during one-to-one situations
- Are unnecessarily intrusive

47. Staff must comply with the ICT Acceptable Usage Agreement for Staff.

48. Staff should follow the guidance issued by the Designated Safeguarding Lead in relation to minimising the potential for automated AI processing of images. This includes, for example:

- When possible, capture students actively engaged in events or in group settings, where individual faces are less prominent
- Encourage natural poses where faces might be partially turned, looking down, or slightly obscured by equipment related to the activity.
- Avoid full length body images where photos are close up
- Critically assess each image for potential misinterpretation or misuse before posting online

49. Concerns regarding a posted image should be reported to the safeguarding team (dsl@tiffingirls.org) as soon as possible.

APPENDIX 1: Most Recent DSL Guidelines for Photography

- Consider whether a student's image is required at all. Is the use of the image in the best interests of the child and their family?

- Avoid directly showing a student's face individually and ensure that they are not readily recognisable. For example, photographs can be taken from a distance, from behind, over the shoulder, or with faces obscured.

- Consider using lower-resolution photographs, as this can make sophisticated image manipulation more difficult.

- Prioritise action shots and group photographs where students are actively engaged in an activity and individual faces are not identifiable.

- Incorporate context by including wider shots and background elements that place students within the environment of the activity, making it more difficult to isolate and manipulate individuals.

- Consider angles and framing that add complexity to prevent automated AI processing.

- Remove metadata (such as EXIF data) that may reveal locations, device details or timestamps. Such information can unintentionally disclose routines, schedules or locations.

- Review all images carefully before posting and consider any potential for misinterpretation or misuse.

- Report any concerns immediately. If you have worries about a posted image or notice anything suspicious, please contact the safeguarding team at dsl@tiffingirls.org.