

Policy on Taking Images/Video Students

Scope of this policy

This policy aims to provide controls on the taking of images of the students in our care by staff, contractors or agents. The aim of the policy is to provide a framework for using photography for business use i.e. marketing purposes, though the principles apply to the use of images in an activity environment.

This policy doesn't apply to the taking of images by students i.e. holiday snaps, but any abuse/misuse of images will not be tolerated; please see the anti-bullying policy and e-Safety posters.

Policy General Statement

Staff are not allowed to take photographs or keep photographs of students for personal use. Nor should staff use their own photographic equipment/storage media for business use.

However, there are several circumstances where staff may have a legitimate business need for taking photographs of students (such as marketing or activities/project work), in which cases this policy must be followed.

Security onsite

As our schools are secure areas, anyone taking photos unescorted will be immediately challenged, either by our own staff or the venue's. Visitors must always present themselves to the Centre Manager or reception staff in the main school before attempting to take any photos and wear a visitor badge whilst on site.

Procedures for taking /managing photographs of students

- A staff member may take photos on behalf of a student, using the student's camera/phone e.g. if they want a picture of themselves with their friends while on excursion.
- Only staff members with prior permission from the Centre Manager are allowed to take photos. Anyone suspected of taking or storing photos for personal use should be reported to the DL immediately.
- Other responsible adults must be present when the photo is taken e.g. GLs/other staff
- Students/staff must be dressed appropriately e.g. never in swimming costume/night wear
- Students must give their permission to have their photo taken and we cannot use any photos that the student objects to; Churchill House staff have the same right to refuse to be photographed as students do, and they cannot be photographed without their permission.
- Photographs should show groups (3 or more) of students rather than individual students
- Photographs should be anonymous; no information about the student should be discernible e.g. check that the ID card isn't visible
- Photos should not portray the students upset/distressed in any way, nor should they cause upset, distress or embarrassment

- The Centre Manager or DSL has the right to ask to see any resulting photos and can ask for inappropriate ones to be deleted immediately.
- Photographs should be taken using company equipment wherever possible. If this is not possible, staff may use their own equipment by prior arrangement only – the Centre Manager/DSL must agree in advance. In these circumstances, the images may only be stored on company media, and the personal camera equipment should be checked to ensure that no copies of the images remain
- In Summer Head Office staff visiting the centre to take photos will report to the Centre Manager before starting work. All visiting staff will wear company ID.
- Any images taken by staff on the company's behalf are the intellectual property of Churchill House, therefore before any photos are posted/printed, Churchill House must be asked for final permission.

Staff Being Photographed with Students

Students often ask to have a picture taken with summer school staff. If a staff member chooses to allow this, they must follow these guidelines:

1. Remember that the photo will be viewed out of context e.g. a 3rd party might be concerned to see a photo of an adult with a minor on Facebook, which could have professional repercussions.
2. The photo must be taken in public and should never just show the staff member and the student – always have more people in the shot so that it is clearly taken under supervision. For instance, have your backs to a group of people.
3. Be aware of how the pose might look – e.g. keep your hands in plain view (2 handed waving is the safest approach)

Photos/videos that can be taken

- Wide shots of buildings/activities that do not identify students
- Interior shots of accommodation areas where no students are present
- Group shots of activities in progress where there is no focus on any particular students

Restrictions

- Photos or videos cannot be taken of students in bedrooms or bathrooms
- Students/staff must be dressed appropriately e.g. never in swimming costume/night wear. No photography/videoing is allowed in the swimming pool while swimming is taking place
- Images (photography or moving) should show groups (3 or more) of students rather than individual students if possible.
- Images should show students at mid/long range and in groups, no images or videos of students are allowed to be in close-up/mid shot.
- Photography/filming in the classroom must be organised in advance with the Director of Studies so that students and Group Leaders have the opportunity to object
- Photographs/moving images should be anonymous; no information about the student should be discernible e.g. check that the ID card isn't visible.
- Photos/videos should not portray the students upset/distressed in any way, nor should they cause upset, distress or embarrassment.

- They can't disrupt the day-to-day activities of the school e.g. they can't stop the activities to take a posed photo/video shot, they can't be intrusive to a class and can only take images at long range and not in close-up.

Consent

Under UK and European law images are considered personal data and consent must be sought before processing (capturing/using/storing) that data. If the subject does not allow their consent, any image must be removed immediately.

Students over 16 years old can give their consent to use their images but any students under 16 may not and we must seek the parents' consent. This consent must be given in writing and the individual must understand the way the images are to be used e.g. there is a difference between the image being used on social media or in a printed trade brochure. Note that Group Leaders or agents cannot give that permission.

Consent letters must be stored securely securely at Head Office. Consent can be withdrawn at any moment by the subject or their parents.

Last review date: September2025 Sarah Adjani