



WESTMINSTER
SCHOOL

PUPIL IMAGES POLICY

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Date: September 2026
Review Date: December 2028



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OVERVIEW

Westminster School is proud of the work and achievement of its pupils.

Photographs and short video clips (collectively referred to as “images”) play a large part in how the School shares and celebrates the life of the School, both for the benefit of the community, and for future Westminsters.

These images help the School not only to capture the daily life and key moments at School, but also to celebrate achievements and to promote the School to future families. As such, these images are incredibly important to the School’s work in:

- Communications (keeping the School community connected and informed).
- Marketing (showing prospective families what the School is actually like).
- Admissions (helping families decide to join us).
- Development (attracting donors to help increase the bursary fund).

This policy sets out Westminster School’s approach to the creation, use, storage, and sharing of pupil images. It ensures that the School:

- Acts in accordance with safeguarding legislation and data protection law.
- Respects pupils’ and parents’ rights regarding the use of personal data.
- Maintains clear and consistent standards for staff, contractors, volunteers, and external partners, as well as other adults associated with Westminster School.

WESTMINSTER SCHOOL BELIEVES THAT:

- Children and young people should never experience abuse of any kind.
- All staff, volunteers, parents and other adults have a responsibility to promote the welfare of pupils and to take, share and use images of pupils safely.
- The welfare of the pupils taking part in the School’s activities is paramount.
- Pupils and their parents have a right to decide whether their images are taken and how these may be used, regardless of any protected characteristics.
- Consent to take images of children is only meaningful when potential risks associated with the use and distribution of these images is understood by all.
- There are potential risks associated with sharing images of children online.

SCOPE

This policy applies to:

- All pupils of Westminster School (aged 13-19).
- All staff, volunteers, governors, and contracted photographers or videographers.
- All School-managed environments including trips, events, lessons, performances, sports fixtures, and digital / virtual activities, therefore including events at which parents are in attendance.

LEGAL AND REGULATORY FRAMEWORK AND GUIDANCE

This policy has been created to allow for the safe and ongoing use of pupil images, and has been guided by legislation, policy and guidance that seek to protect children and young people in England.

This policy reflects and should be read alongside:

- Data Protection Act 2018 (UK GDPR)
- Keeping Children Safe in Education (KCSIE)
- NSPCC guidance on online safety and image use
- The School's Safeguarding Policy
- The School's Data Protection Policy
- The School's Acceptable Use of Computer Networks policies
- The School's AI Policy
- The School's Online Behaviours Policy.

CONSENT

General principles

- The School is confident that its use of images is balanced, respectful and proportionate, and that the community expects the life of the School to be recorded and shared. As a result of this, the School operates an "opt-out" system, rather than an opt-in system.
- At the start of each academic year, all pupils (13-19) are given full information and asked to consider whether they wish to opt out.
- Consent is specific, informed, and revocable at any time.
- The School use images under the lawful basis of "Legitimate Interests" (UK GDPR Article 6(1)(f)) in that the School has a clear interest in showing the real life of the School.
- The School handles all images carefully, fairly, and respectfully.

Recording and managing consent

- The School maintains a register of pupils who may not be photographed or filmed.
- The register of pupils who may not be photographed or filmed is updated in real time.

Withdrawal of consent

- Consent may be withdrawn at any time by contacting the Marketing and Communications team.
- Withdrawal will apply prospectively; previously published materials cannot always be withdrawn from circulation but will be removed from School-controlled channels where feasible.

HOW AND WHERE IMAGES ARE TAKEN

Photographs and short video clips are mainly taken by members of School staff (principally images are taken by the Marketing and Communications Team, but also sometimes by department staff [e.g.: Sports, Drama, Music, etc.]).

There are two common types of image-taking:

1. Planned (e.g.: a trophy-winning sports team gathered for a photo).
2. General coverage (e.g.: attending events and capturing moments as they happen).

Images are largely taken on School-owned cameras and mobile phones. Occasionally, staff may use personal devices, but only if necessary, and all images are transferred to secure School systems and then deleted from personal devices.

Each department with its own social media account (e.g. Sports, Economics, Archives) must follow the same rules as the main School accounts. Any issues or concerns can be raised with the Communications team (communications@westminster.org.uk) at any time.

On occasion, the School employs professional external photographers for general photoshoots or specific events. These photographers are accompanied by members of the Marketing and Communications Team at all times, and all images are transferred securely to the School.

SAFE AND RESPECTFUL IMAGERY

The School will never:

- Use what it would consider to be unflattering or embarrassing images.
- Publish personal information.
- Use images of pupils in contexts where the School believes that there is a heightened risk of misuse.

The School will always:

- Choose images thoughtfully.
- Prioritise positive, respectful content.

EVENTS WITH OTHER SCHOOLS PRESENT

At many such events, especially competitive fixtures, pupils from other schools will be present.

- Members of staff taking images of the event should seek to capture only Westminster School pupils insofar as that is possible.
- Ideally, the consent of the person responsible for the non-Westminster pupils should be sought for the fixture to be photographed, although it is acknowledged that this is likely often to be impractical.
- Certainly, any shots of fixtures including non-Westminster pupils should be crowd shots only.

PURPOSES FOR WHICH IMAGES MAY BE USED

Broadly, consent for the taking and use of images is restricted to publications and channels directly controlled by the School.

Images may be used for:

- The School's website.
- Official School social media (e.g.: Instagram, Facebook, LinkedIn and YouTube).
- School publications (e.g.: the School's prospectus, the Elizabethan Magazine and posters).

If the School wishes to:

- Use a pupil image in external media (e.g.: a newspaper or website not run by the School);
or
- Use a pupil image for a paid advert;

then it will always ask for specific consent first.

PRINCIPLES FOR SAFE AND APPROPRIATE USE

The School:

- Prioritises pupil welfare when creating or using images.
- Uses first names only, or no names at all, unless full identification is essential and consent explicitly covers this requirement.
- Never publishes personal contact details, addresses, academic data, or safeguarding information alongside images.
- Ensures imagery is respectful, contextually appropriate, and dignified (e.g.: no images of pupils in swimwear).
- Avoids creating or using images that are likely to be misconstrued, manipulated (including by AI), or used inappropriately.
- Ensures images reflect the diversity and inclusivity of the School community.

STAFF CONDUCT

All staff, volunteers and contractors must:

- Follow this policy and related safeguarding policies.
- Upload images only to approved School systems (e.g.: secure servers, designated digital asset libraries).
- Never store pupil images on personal devices or cloud services.
- Only share images via authorised communication channels.
- Report immediately any safeguarding concerns relating to imagery to the Designated Safeguarding Lead.

EXTERNAL PHOTOGRAPHERS, VIDEOGRAPHERS AND MEDIA

When external professionals or media organisations are engaged:

- They must comply with all safeguarding requirements.
- They may only capture images of pupils for agreed purposes and under staff supervision.
- They must transfer images to the School securely once the assignment is complete.

STORAGE, SECURITY AND RETENTION

- Images are transferred to secure, password-protected School systems.
- Electronic image files are not tagged with pupil names.
- Images are saved by event name and date, and can only be manually linked to individuals, if necessary, by a member of staff
- Images are actively used (social media, publications etc) for a maximum of two academic years, after which they are sorted and archived. This sorting process will see many images permanently deleted, but others which show important moments in the life of the School (events, performances etc.) will be sent to the School's Archive.
- Archived images are stored securely and may be kept in perpetuity as part of the School's historical record – especially for publications, group photographs, or yearbooks.
- Pupil images are not stored on unencrypted USB sticks, laptops, or personal cloud storage.

PUPIL AND PARENTAL IMAGE-TAKING AT EVENTS

Image-taking by parents at events is not encouraged, but it is recognised that parents do wish to capture these important moments in their children's lives.

When pupils themselves, parents or spectators are taking photographs or filming at the School's events and the images are for personal use, the School will notify in the event programmes and / or make an announcement before the start of the event, reminding participants they should only take and / or share images of their own children, and that full policy details (pertaining to this policy) are available on the School's website.

The wording might include the following:

If you want to take images or videos, then please ensure that they are of your own children and that those images or videos should not be shared publicly. Further information is available on the School's website.

It is generally accepted that at major events (concerts, plays, sports fixtures, services), parents may take images for private use only, provided that:

- Parents have checked the rules around image taking at the specific event and venue (usually published on any relevant programme).
- Images are for personal use only.
- Images are not shared online if they feature other pupils.

Parents may be asked to cease image-taking at any time by School staff or hosts at the venue where the event is taking place.

MONITORING, COMPLIANCE AND BREACHES

- The Director of Marketing and Communications and the DSL monitor compliance with this policy.
- All members of staff have a duty to ensure safe image-taking.
- Any actual or suspected breach (e.g., use of non-consented imagery, data mishandling) must be reported immediately to the Director of Marketing and Communications and the DSL.