



CHELTENHAM CHELTENHAM
COLLEGE PREP SCHOOL



Staff Photography Guidance for Cheltenham College

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'Cheltenham College' refers to Cheltenham College Senior School *and* Cheltenham College Preparatory School (including Cheltenham College Pre-Prep and Nursery School)

'College' refers to Cheltenham College Senior School

'Cheltenham Prep' refers to Cheltenham College Preparatory School

'Nursery and Pre-Prep' refers to Cheltenham College Nursery School and Pre-Prep

- a. **Taking Images**
- b. **Use of Images**
- c. **Use of Images by Third Parties**
- d. **Storage of Images**
- e. **Mobile Phones and Cameras in Pre-Prep including EYFS**

Good photography reflecting the entire breadth of Cheltenham College life and our pupils is essential in showcasing Cheltenham College to best effect. Safeguarding our pupils and supporting their right to privacy by complying with the relevant data protection legislation remains the key priority, however, as does reflecting our co-educational ethos and ensuring consistency of language and style in accompanying text. There are, therefore, a few simple rules to follow when taking and publishing photos or video material of pupils.

This guidance is also intended to reflect current UK data protection law (UK GDPR and the Data Protection Act 2018), the Data (Use and Access) Act 2025 and the children's online safety regime under the Online Safety Act 2023, as in force from Summer 2025.

a. Taking Images

Official Cheltenham College photographers, videographers and staff may take photographs themselves, with the following guidance in mind:

- Appropriateness of imagery:
 - o Avoid any sexualisation of the pupils. Be particularly careful of shots of pupils in sports attire that could be perceived as revealing or provocative.
 - o Photographs of pupils should not be taken at the swimming pool.
 - o Staff must follow the latest ICO guidance on taking photographs in schools and the use of children's images. The ICO has recently reprimanded schools that shared class photographs including children whose adoptive parents had refused consent; staff should be particularly cautious when planning group photographs where some pupils must not be identifiable and must seek advice from the Data Protection Manager if there is any doubt.
- Wherever possible keep a co-educational context to the photos, i.e. boys and girls in a single frame shot.

- Do not ask parents who are supporting events to take photographs on your behalf or on behalf of Cheltenham College. Parents may take photographs for personal use only.

b. Use of Images

Images – including photography and film - may be taken of **all** pupils and shared with their parents and/or guardians. Cheltenham College is committed to document our whole community for the benefit of pupils, parents and returning alumni and Cheltonian Society members. However, the following sections indicate in which circumstances images may be shared with wider audiences:

Under UK data protection law, most photography and filming for College Purposes will involve processing pupils' personal data, and in some cases special category data (for example, where an image reveals disability, religion or ethnicity). The College will only take and use images of pupils where it has identified a lawful basis, documented the purposes and retention periods, and (where appropriate) has recorded the outcome of a data protection impact assessment (DPIA) covering high-risk uses of images, including publication on websites and social media.

Consent:

Where we have photography consent for a pupil, their image may be published on Cheltenham College's:

- External media platforms including Instagram, Twitter, Facebook and our website; and
- Printed publications including The Cheltonian Floreat, The Year, College News, Prep Connected and prospective parent literature.

For information regarding when forenames and surnames may be attached to the image, please refer to the Photography & Film Policy (Section 2d). If in doubt, please contact the Marketing Department or Data Protection Lead. The College will keep under review the risk of images being re-used, manipulated or combined with AI or deepfake technology. Where risks cannot be mitigated to an acceptable level, the image will not be used.

No Consent:

Images may only be published to a public audience if the pupil is very difficult or impossible to identify (for example, back-of-head or distant group shots taken so that individual faces cannot reasonably be recognised). Staff must not rely on technical tools such as blurring as a substitute for following the underlying consent position, particularly for pupils whose circumstances present heightened safeguarding risk (for example, looked-after or adopted children).

Exceptions (i.e. images may be used irrespective of consent):

- Images may be shared via communications with the Cheltenham College community (parents, pupils, staff, Council members and alumni), including email, via Cheltenham College's internal portals and by post.
- Images may be published on internal displays (with **first names only** with first letter of surname if necessary) on digital and conventional notice boards within Cheltenham College's premises; and
- Formal group photographs with **full names** (of year groups, houses, the full school and/or teams) will be made available for pupils and their families to purchase but will not be published externally without consent.

An up-to-date list of pupil image consent can be located within the Policy Portal, and a log of consent can be found on each pupil's iSAMS profile. Pupils and their parents on the **no consent** list may still be contacted for permission to publish (as a one-off) an image to celebrate a specific achievement or occasion, but this must never be treated as blanket consent to all images.

Staff must also be alert to the wider online risks covered by the Online Safety Act 2023, including non-consensual sharing of intimate or manipulated images and deepfake pornography. Any concern that an image of a pupil has been, or may be, used in this way must be treated as a safeguarding issue and reported immediately in line with the College's Safeguarding and Child Protection Policy.

Always avoid reference to times and places so that pupils cannot be located by external parties, except for sports fixtures where timings and location are necessary. These events are always staffed so the risk to pupil welfare is minimal.

c. Use of Images by Third Party Organisations

Requests for Images

Before providing images to another organisation, consent must be gathered from the pupil(s)' parents or guardians. Where third parties intend to publish images online (including on social media, streaming platforms or other services in scope of the Online Safety Act 2023), staff must consider whether this is consistent with the College's DPIA for pupil images and, where necessary seek assurance that the organization has appropriate age-assurance and child-safety measures in place. If such assurance cannot be obtained, images of pupils must not be shared. The only exception will be for schools, academies and colleges with whom College has entered a formal, signed partnership arrangement (for example, All Saints Academy and St John's Primary School). In these instances, photographs of pupils, for whom we have consent, which are taken at jointly attended events may be published by both organisations. Each organisation is responsible for identifying pupils of whom photographs may not be published.

For more information regarding which organisations we are in **formal** partnership with, please contact the Senior Management Teams.

Images taken by Third Party Organisations

Third party organisations include schools, academies, colleges, universities, news outlets and organisations beyond the Education Sector (e.g. a charity). Parents should be made aware that it may not be possible to prevent other organisations or external attendees from taking photographs of our pupils at publicly attended fixtures or events. Where staff become aware that an external individual is filming or photographing pupils in a way that appears intrusive or causes distress, this should be treated as a safeguarding concern and escalated immediately in accordance with the Safeguarding and Child Protection Policy.

Staff commit to informing third party organisations that, if they would like to use images which focus on our pupils, specific consent must be requested from said pupils and/or their parents.

d. Storage of Images

Long term storage of photographs of children on laptops or personal devices is strongly discouraged and photograph and film storage is still under review. In line with current ICO expectations and the data (Use and Access) Act 2025, the College maintains a record of where pupil images are stored, who has access to them and for how long they are retained. Staff must not copy or store images of pupils on personal accounts (including personal cloud storage, messaging apps or social media) and must delete any images

of pupils from personally-owned devices as soon as they have been securely uploaded to the appropriate College system.

- Cheltenham Prep: Please save all photos (highest possible resolution) to the relevant secure area in The Prep Digizone. The editor of 'Prep Connected' is permitted to hold photographs on their MAC desktop.
- College: Please save all photos (highest possible resolution) to the departmental/House SharePoint sites.

When naming folders please include the date (do not use symbols or signs or long names), name of the activity/sport/lesson and year groups involved. Please be selective so that you only save the minimum number necessary. These may be used by our Archive Department in the future, so please consider this when you choose to upload these images.

For 'How-to' Video Guides to uploading images from a mobile device please refer to the following links:

- Android Devices: <https://web.microsoftstream.com/video/814a54cb-f3e0-4ea4-abf4-5620d44598e3?channelId=b4d9dbd4-a208-4aca-af7b-50844250b26e>
- iOS Devices: <https://web.microsoftstream.com/video/f65e7221-b1db-4582-96c9-5b871c40a209?channelId=b4d9dbd4-a208-4aca-af7b-50844250b26e>

Retention

Retention periods for different categories of images (for example marketing, internal newsletter, assessment/Learning Journey and security images) are set out in the College's Retention Schedule. Staff must only keep images for as long as they are needed for the documented purpose, after which they must be securely deleted.

e. Mobile Phones and Cameras in Pre-Prep including EYFS

The following acceptable use procedures for mobile phones and cameras have been put in place across all years in Pre-Prep.

Staff in Pre-Prep are allowed to bring mobile phones to work for their own personal use. However, they must be kept locked in cupboards or in lockers during teaching time. Mobile phone calls may only be taken during staff breaks.

Mobile phones may not be used in classrooms, toilets, play areas or any other place where children are present, at any time. Mobile phone technology may not be used to take photographs anywhere in Pre-Prep. Staff must not use personal messaging or social media applications (for example WhatsApp, iMessage, Snapchat or similar) to send or receive images of pupils under any circumstances. Any request from a parent to share images of their child via such channels should be declined and redirected to the appropriate College communication systems.

If staff need to make an emergency call, they may do so on the school phone, either in Common Room or in Head of Pre-Prep's office. Families of staff should be made aware of how to contact them in an emergency, i.e. by ringing the school office. The school office should also have an emergency contact number for if a member of staff should become ill or have an accident. This is the responsibility of the individual staff member.

When children undertake a school trip or journey, mobile phone use by adult leaders should be limited to contact with the school office or venues being visited, except in emergencies.

Cheltenham Prep recognises that photographs taken for the purpose of recording a child or group of children participating in activities, or celebrating their achievements, is an effective form of recording their progression in the Early Years Foundation Stage and beyond. However, it is essential that photographs are taken and stored securely and appropriately to safeguard the children in our care. Images will only be taken on devices provided by Cheltenham College and that are also protected by passwords. Photographs included in the Learning Journeys may be kept on these devices for a reasonable period prior to printing.

Parents' written consent will be sought to take photographs for assessment purposes.

Any loss or suspected unauthorized access to devices holding pupil images (including College-owned tablet and cameras) must be reported immediately as a potential data breach to the Data Protection Manager and in line with the College's Data Breach Procedure.