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Owner: Bursar / Network Manager
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Heath Mount School

Digital Media for External Use Policy

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Introduction

This Digital Media Policy ("Policy") sets out how Heath Mount School ("we", "our", "us") uses digital media containing images of individuals at our school. Through this policy, we aim to protect individuals' right to privacy and minimise the risks to which children can be exposed through the misuse of digital media

The use of digital media can make valuable contributions to the daily life of our school. We wish to responsibly use digital media in a manner consistent with applicable data protection laws, child protection laws, and be respectful of privacy concerns.

The Governance Committee is responsible for approving this Policy. Our Bursar is responsible for reviewing this Policy on a regular basis. You can contact our Bursar by emailing owenso@heathmount.org.

Definitions

Contractor means any individual other than an employee who is paid by the school to deliver services.

Digital Media shall mean all photographs, videos, audio recordings, images, animations, depictions or representations of an identifiable individual, including any associated sound of identifiable people whether recorded or created.

Employee shall mean any applicant, individual who is currently employed by Heath Mount School.

Official school use shall mean the processing of personal data in the context of formal, approved or sanctioned school operations or activities.

Personal Data means any information relating to an individual who can be identified from that information or from any other information we may hold. Personal Data can include names, identification numbers, addresses (including IP addresses), dates of birth, financial or salary details, education background, job titles and images. It can also include an opinion about an individual, their actions or their behaviour. Personal Data may be held on paper, in a computer or any other media whether it is owned by the organisation or a personal device.

Photograph (also referred to as "picture" or "image" in this Policy) shall mean a photograph of an identified or identifiable individual or group of individuals. Photographs which do not capture the image or likeness of any identifiable individual are excluded from this policy.

Student shall mean a pupil enrolled at our school. Additionally for the purposes of consent, "student" will also mean the student's parent (this being the case for pupils in Year 7 and Year 8).

Video shall mean a video of an identified or identifiable individual or group of individuals. Videos which do not capture the image or likeness of any identifiable individual are excluded from this policy.

Volunteer shall mean any individual who has executed a volunteer agreement with the school.

General Provisions

This Policy shall only apply whenever employees, contractors, or volunteers process digital media for official school use. Digital media used/processed purely for personal use by parents and children are usually exempt from data protection laws and thus do not fall under this Policy.

Any evidence of the use of any digital media not permitted by this policy by any employee, contractor or volunteer of our school will be reported to the line manager and, as necessary, to appropriate authorities.

This policy applies to all Staff working at the School, whether paid or unpaid, whatever their position, role or responsibilities and Staff includes employees, governors, trustees, contractors, students, and volunteers (Staff).

Violations of this Policy by Staff are subject to disciplinary action in accordance with our Staff Code of Conduct.

Violations of this Policy by contractors are subject to consequences up to and including termination of the school's contract with the contractor, in accordance with our contract with each contractor which stipulates that contractors have to comply with school policies and procedures.

Violations of this policy by volunteers are subject to consequences up to and including termination of the volunteer arrangement and prohibition from entering school grounds.

Upon enrolment in our school, parents will be provided with a Photography Disclaimer letter. The disclaimer outlines the ways in which the School uses pupil images and provides details as to how the parent can opt out of this way of using pupil data. Prior to the beginning of each school year, parents will be provided with a new disclaimer statement.

The School relies on legitimate interests when photographs and videos of students are captured at school events. We may use this media on social media and the School website. All "auto-tagging" and facial recognition settings within social media sites shall be disabled when processing any digital media.

If the School requires use of a student's image for a more privacy intrusive purpose, such as for public-facing marketing, then the School will obtain consent from the student and parent prior to use. At any time, students are able to withdraw previously-provided consent through communication with the school's Bursar. Withdrawing consent does not affect the lawfulness of any use of the image that occurred before the withdrawal. However, we will stop using the image from the point you notify us, as described below.

If a parent opts out of their child's image being used, whether by withdrawing previously given consent or by objecting to the School's use of images based on its legitimate interests, the school shall take the following actions:

- For a School prospectus, you can opt out at any time and the images will be replaced at the next annual publication of the prospectus.
- For the School website, the images will be replaced within seven days
- For the School managed social media accounts, you can opt out at any time and the School will immediately cease to continue using images in this way.

You may request that we withdraw images or videos from our social media platforms at any time. We will take them down within three days, unless we find that the request is unreasonable or that handling it would be too difficult or costly compared to the request itself.

All digital media shall be "For Official Use Only." All digital media shall be taken either with school-owned equipment (e.g. cameras or video cameras) or with school-contracted

professional photographers/videographers. Use of personal (i.e. not school) mobile devices as cameras is prohibited.

Employees, contractors, and volunteers shall not download, print, or otherwise physically retain or digitally retain copies of digital media without authorisation.

Employees, contractors, and volunteers shall not manipulate any digital media (such as by creating "deep fake" videos) without prior written authorisation from the Bursar.

All digital media shall be stored in appropriate and approved storage (e.g. file cabinets, external hard drives, approved cloud storage, etc.) owned by Heath Mount School. Access to such storage shall be limited to those employees and contractors who have been approved to have access.

Where a professional photographer/videographer is used, there should be clear understanding about what is considered appropriate, in terms of both content and data processing. Furthermore, if a professional photographer/videographer is utilised, there will be no unsupervised access to any student nor any one-on-one photography/videography sessions unless authorised and agreed to by a parent/guardian.

Our Bursar shall be consulted prior to instances where digital media are captured. That individual shall ensure there is a lawful basis for processing the digital media. That individual shall also consider whether the processing of photographs or videos is necessary in a particular situation, or if alternative means may accomplish the same purpose without processing personal data. For example:

- Impersonal representations (e.g. pictures of photos of students' work rather than the individuals themselves)
- Use of graphics (e.g. line drawings or artistic impressions)
- Blurring of individuals, particularly of faces
- Use of non-identifiable images (e.g. over the shoulder shots
- Use of stock images

Our school shall retain all digital media in accordance with our Record Retention Schedule. If digital media contains images of individuals less than 12 years old and are stored electronically, the file name shall not include the full name(s) of the individual(s) and surnames will be provided as initials only. Digital media may have different retention requirements depending upon their use (i.e. schools may have to retain photographs used for identity management, such as student ID cards, for a different amount of time from other photographs).

All digital media are subject to applicable data subject rights.

All digital media by closed circuit televisions shall be processed in accordance with our school's CCTV Policy.

No digital media shall be used which could be considered to put an individual at increased risk.

We shall not use any digital media of a child who is subject to a court order.

Only images and videos of children in suitable dress shall be taken or used by our school and our employees (e.g. no images or videos of children in a state of undress such as swimwear shall be taken or used).

How Our School Uses Digital Media

Although the following is not an exhaustive list, some of the main purposes for which our school may use digital media include:

- For educational and welfare reasons (e.g. to help staff recognise pupils with allergies, the Boarding Manual, for teaching purposes)
- On displays around the School (e.g. in classrooms and in corridors)
- On the School's website (http://www.heathmount.org/)
- In promotional materials, including our School video, our Speech Day Book and the Nursery Booklet
- On social media, including Instagram, Facebook and LinkedIn
- In our weekly newsletter to parents
- In the School magazine
- With marketing partners

Monitoring and Review

Governors Committee Reviewing	Buildings and Infrastructure Committee
Period of review	September 2026
Person responsible for implementation and monitoring	Bursar / Network Manager
Related policies	Cookie Policy CCTV Policy IT acceptable Use Policy Data Protection Policy Privacy Policy Photography Disclaimer Notice