Photo Policy

The Park Schools Federation

Version 1

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This document will be reviewed annually by the Data Protection Officer, and sooner where significant changes to the law occur. The school should also review this document annually, and earlier if legal changes are made to the law.

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1. Introduction

The following section is courtesy of the NSPCC guidance but has been adapted to reflect the needs and practices of the school.

Photographs and videos play an important role in celebrating pupils' achievements and capturing special moments across school life. Whether taken during lessons, performances, trips, or other school -led activities, images help children and their families reflect positively on their experiences.

However, it is essential that any use of images is managed safely and responsibly. Without appropriate processes in place, photos or videos may be shared outside the or posted online without the necessary consent, which can create significant safeguarding risks, including:

- images being altered, misused, or taken out of context
- a child being identified for the purpose of grooming or abuse
- a vulnerable child being located by someone who poses a risk to them

By understanding these risks and adopting clear, robust procedures, schools can greatly reduce the potential for misuse. This policy sets out the measures in place to protect pupils while still enabling the school to capture and celebrate their achievements. Schools must also consider their responsibilities under data protection legislation when creating, storing, publishing or sharing images of children.

Images of identifiable individuals are personal data. This means all photos, videos and recordings must be processed in line with UK GDPR and the data protection principles, including fairness, transparency, purpose limitation, minimisation, security and storage limitation.

2. Scope

This policy sets out the school's approach to the use of photography, filming, and, where relevant, audio recordings taken in the school or during school organised activities. It does not cover the use of CCTV; for information on CCTV and surveillance systems, please refer to the school's CCTV Policy.

This policy applies to all members of the school community, including staff, pupils, governors, volunteers, parents and carers, visitors, and community users who may take photographs or record footage on school premises or at school events.

School related policies:

- Data Protection Policy
- Record Retention
- IT Acceptable Use Policy
- CCTV Policy
- Social Media Policy
- Bring Your Own Device (BYOD) Policy

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- Online Safety Policy
- Staff Code of Conduct
- Pupil Code of Conduct
- Child Protection/Safeguarding Policy
- Behaviour Policy
- Artificial Intelligence Policy

2.1 Definitions

For the purposes of this policy, the following definitions apply:

“Images” refers to any visual representation of an individual, including photographs, digital images, video recordings and livestreams captured on mobile devices, cameras, school devices, or external equipment.

“Recording/Video” refers to any moving image or audio-visual recording captured through cameras, video recorders, school devices, or external equipment. This includes livestreaming where applicable.

“Audio Recording” refers to sound-only recordings captured as part of school activity or assessment. Audio recordings are treated as personal data where an individual can be identified.

“Personal Use” refers to images or recordings taken by parents, carers, relatives, or other known individuals exclusively for private, family purposes (see Section 4). These are not subject to UK GDPR or school retention requirements when used privately.

“Official Use” refers to images or recordings taken for operational school purposes (see Section 5), including identification, MIS use, reports, safeguarding, or compliance with legal obligations.

“Educational Use” refers to images or recordings captured to support teaching, learning, or assessment (see Section 6), such as evidence for coursework, lesson activities, or practical subject requirements.

“Publication Use” refers to Images or recordings intended for sharing with a wider audience (see Section 7), such as school websites, media outlets, social media, newsletters, marketing materials, or the school prospectus.

3. Roles and Responsibilities

The safe, lawful, and appropriate use of photographs, videos, and audio recordings relies on all members of the school community understanding and meeting their responsibilities. The following outlines the key roles involved in implementing this policy.

The Governing Body is responsible for:

- ensuring that the school has appropriate policies in place for the safe and lawful use of images
- monitoring compliance with statutory duties, including data protection and safeguarding
- supporting the school to allocate adequate resources to staff training and secure systems

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The Headteacher is responsible for:

- Implementing and ensuring that all staff understand and follow the requirements of the policy
- ensuring that consent processes are in place, maintained, and actioned appropriately
- authorising publication use of images where required
- ensuring that any data breach involving images is reported and managed in line with the school's Data Breach Procedure
- ensuring that school systems and equipment used for storing images are secure and compliant

The Designated Safeguarding Lead (DSL) is responsible for:

- advising staff on safeguarding concerns relating to images
- authorising and overseeing any safeguarding-related photography or recordings where appropriate
- ensuring images relating to safeguarding are stored securely, restricted to relevant staff, and retained in line with safeguarding record requirements
- ensuring any restrictions for individual pupils (e.g., Looked-After Children, withheld consent, specific risk factors) are communicated clearly to staff

All school staff are responsible for:

- following the requirements of this policy and related policies (e.g., Staff Code of Conduct, Online Safety, Data Protection, Acceptable Use, BYOD)
- only using school -approved devices, platforms, and storage locations when capturing, storing, or sharing images
- ensuring they check consent status for pupils before taking or publishing images
- reporting any concerns, misuse, or data breaches involving images to the Headteacher or DPO immediately
- ensuring that pupils with restricted permissions are not photographed or included in images inadvertently

Parents, carers and visitors are responsible for:

- following staff instructions about when and where photography is permitted at school events
- ensuring any images taken for personal use are not shared on public platforms or used in any way that identifies other pupils (see Section 4: Personal Use)
- respecting restrictions placed on photography in sensitive areas (e.g., changing rooms, backstage)
- ensuring they do not interfere with safeguarding restrictions for pupils with non-publication agreements

Pupils are responsible for:

- following school rules on taking or sharing images (see Pupil Code of Conduct and Mobile Phone Policy if applicable)
- respecting the privacy of others and not recording or photographing individuals without permission
- reporting any misuse of images or online concerns to a trusted adult

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External agencies, contractors and school photographers are responsible for:

- complying with this policy and any instructions provided by the school
- entering into appropriate contractual or data-processing agreements where required
- using images only for the purpose authorised by the school
- securely deleting images once, the agreed purpose is complete
- ensuring that all staff involved are appropriately vetted where necessary

The Data Protection Officer (DPO) is responsible for:

- advising the school on lawful bases for processing images, including consent, public task, and legal obligation
- supporting the school in maintaining records of processing activities relating to images
- reviewing third-party processing arrangements (e.g., school photographers, EdTech platforms)
- advising on retention, deletion, and digital continuity in line with the Record Retention Policy
- supporting the school in managing any DPIAs related to photography and video

4. Personal Use

For the purposes of this policy, personal use refers to photographs or videos taken by relatives, friends, or other known individuals for their own private and family purposes. Examples include a parent taking a photo of their child (and their friends) during Sports Day for a family album, or a grandparent recording part of a school performance to keep as a memory.

Images taken strictly for personal use are not intended to be shared with unknown third parties or published more widely, including on social media. In line with UK data protection law, including the UK GDPR, images captured purely for personal use are not subject to data protection legislation.

4.1 Parents/Carers

Parents and carers may take photographs or videos of their own children at school events for personal, non-commercial use only, such as during:

- plays and concerts
- sports days
- celebration events

To safeguard all pupils, the following rules apply:

- These images must not be posted on public websites, social media platforms, or shared in any way that makes them accessible to individuals outside your family or personal circle.
- They must not be used for commercial purposes or published in any other public format.
- Parents/carers must follow staff instructions regarding when and where photography or filming is permitted to avoid disrupting activities.
- Filming or photography is not allowed in changing areas, backstage spaces, or any other situation where taking images may cause embarrassment, distress, or raise safeguarding concerns.

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- Copyright or performance licensing restrictions may prevent recording of certain events; the school should notify parents and carers whenever this applies.

The school reserves the right to refuse or withdraw permission to take photos or recordings if an individual does not follow school guidelines or is reasonably believed to be capturing inappropriate or unsafe images.

4.2 Pupils

Pupil use of personal devices to take photographs or videos in school is governed by the following policies:

- Pupil Code of Conduct
- Mobile Phone Policy
- Online Safety Policy

5. Official Use

Official use refers to photographs or videos captured for school -related purposes. This includes, for example, images taken for identification purposes or for use on the school management information system (MIS). Many of these images are likely to be stored electronically with other personal data, therefore they are subject to data protection legislation, including the UK GDPR.

For images and recordings captured for official use, the school primarily on Article 6(1)(e) (public task) processing that is necessary for the performance of a task carried out in the public interest, in the exercise of the school's official functions. Where processing is required to meet a legal obligation (for example, specific health and safety, safeguarding, or insurance requirements), the lawful basis will be Article 6(1)(c) (legal obligation). Consent is not the default basis for official use, unless any official use extends to communications and marketing.

5.1 General Principles for Sharing Images

When sharing images, the school must apply the same data protection principles that apply when capturing and storing them. This includes ensuring that sharing is lawful, necessary, proportionate, transparent, and limited to the minimum amount of personal data required. Images must only be shared with individuals or organisations where a lawful basis exists, and where appropriate safeguards are in place to protect pupil privacy.

5.2 School Photographer

Contracted or external school photographers will visit the school at set points during the academic year to take photographs of pupils and staff. These images are used for official school purposes, which may include:

Pupil photographs may be used for:

- Management Information System (MIS) and linked EdTech platforms e.g. Insight
- Examination identification
- School reports

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Staff photographs may be used for

- Management Information System (MIS)
- Staff identification
- ID passes (e.g. site access, printers)
- Display in school reception
- School website or internal directory

Parents, carers, and relatives may be offered the opportunity to purchase school photographs for personal use. As these images are bought for private purposes, they fall outside data protection legislation (see Section 4: Personal Use).

5.3 Communications and Marketing

School staff may capture photographs or videos of pupils throughout the academic year for communications and marketing purposes. This may include content for:

- the school prospectus (online, electronic, or printed)
- newsletters
- promotional materials

Where images are intended for these purposes, consent must be obtained from the parent, carer, or appropriate individual(s). If consent is later withdrawn, the school must make reasonable efforts to remove the image from future use. However, it may not be possible to remove images from materials that have already been printed or published. In such cases, consent will cover the full duration of the current print run, and the image will not appear in any future editions.

Photographs of school staff may also be used for marketing and communications purposes. Consent for this is typically requested as part of the staff induction or new-starter process.

5.4 Other Official Use

From time to time, the school may capture photographs or videos to fulfil statutory and regulatory duties or to evidence compliance with school policies and procedures. Typical examples include:

- Health & Safety compliance and incident management - e.g., documenting hazardous conditions, near misses, accident scenes, or safety drills, where images form part of the incident record or risk assessment.
- Safeguarding - limited, proportionate recording were directed by the Designated Safeguarding Lead (DSL) to support a safeguarding concern, referral, or multi-agency process (never as a routine practice).
- Insurance and legal claims - evidencing injury, loss, damage, theft, or vandalism, including on trips and visits.
- Premises and asset management - documenting facilities issues, contractor works, or security incidents where images are required for audit or compliance.
- Assessment arrangements and access needs - where necessary to evidence reasonable adjustments or examination arrangements (non-publication, strictly need-to-know).

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- Health and medical conditions - in limited circumstances, photographs may be used to support the management of known medical needs, allergies, dietary requirements, or health-related safety alerts.

The school processes images for these official purposes under the same lawful bases outlined in Section 5. Article 6(1)(e) – public task. Where photographs are required to meet a legal requirement, such as safeguarding, health and safety, or insurance, the lawful basis is Article 6(1)(c) – legal obligation. These images are not taken on the basis of consent but are used only where necessary and proportionate.

The school must always inform pupils and/or parents of the specific purpose for which images are being taken and how they will be used, in accordance with transparency requirements under UK GDPR.

6. Educational Use

Educational use refers to photographs and videos taken to support teaching, learning, assessment, or curriculum-related activities. These images are not intended for official use but may appear in classroom displays, workbooks, portfolios, or during special curriculum events. Data protection law and the principles of UK GDPR apply to photos and videos taken for educational purposes.

When images or recordings are taken for internal educational purposes, the school does not request consent. The lawful basis is Article 6(1)(e) UK GDPR (public task) processing is necessary for the performance of a task carried out in the public interest. Where the school engages an external photographer/videographer for educational purposes, such as filming a school production that forms part of assessed work, consent must be obtained from the relevant parent, carer, or pupil, as appropriate.

6.1 Staff Images for Educational Use

School staff may be photographed or filmed for educational or professional purposes, such as teacher training, lesson observations, or performance management. Any pupils who appear in the background of these images will do so incidentally.

6.2 Pupil Images for Educational Use

Photographs or videos of pupils may be taken for a range of educational purposes, including but not limited to:

- internal or external assessment evidence
- Subject specific activities (e.g. drama, sport, music, languages, photography)
- skills demonstrations or practical coursework

The school must not publish photographs or videos of pupils captured for educational purposes on open channel communication functions within EdTech platforms (i.e., areas visible to all users who have access to the app). Educational-use images remain internal and are only shared where necessary and appropriate.

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7. Publication Use

Publication use refers to photographs, videos, or audio recordings intended to be shared with a wider audience beyond the school community. This may include, for example, images used in local media to celebrate school achievements or promote school events. Because these images are used publicly and form part of an individual's personal data, they are subject to the requirements of data protection law, including the UK GDPR.

Before capturing any images or recordings intended for publication in these circumstances, the school must obtain consent from the relevant parent, carer, or individual(s). Consent must be specific and informed to the intended publication channels and can be withdrawn at any time; on withdrawal, the school must remove images from future use wherever practicable, noting that removal from materials already printed or published may not be possible, as set out in Section 5.2.

Where publication images are retained for archival/historical purposes, this must be handled in line with Section 8 and the Record Retention Policy, ensuring any continued use remains fair, proportionate, and respectful.

7.1 How Publication Images May Be Used

The school must clearly explain the intended publication channels whenever requesting consent for publication images. This ensures parents and pupils understand how and where images may be used before providing consent.

Photographs or videos taken for publication purposes may appear on:

- the school website
- the school's social media accounts
- school displays
- local or national newspapers or media outlets

7.2 Review and Retention of Published Content

Where possible, images or videos published on the school's website or social media platforms should be reviewed, refreshed, and updated at the end of the academic year following the event or activity in which they were taken.

Images captured for publication use must be stored in line with the schools. Record Retention Policy. Typically, images of pupils are deleted within one year after the pupil leaves the school, unless there is a specific reason to retain them for longer.

In some cases, photographs or videos may be kept for a longer period because they hold historical or archival value for the school. Examples include:

- notable sporting events
- visits from high-profile individuals (e.g. a member of the Royal Family)
- significant school displays or commemorations

Such archival material must be stored securely and used in a way that continues to respect pupil and family privacy.

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7.3 Risks Relating to AI Scraping and Misuse of Childrens Images

Advances in artificial intelligence mean that photos of children shared online can be copied ("scraped") from websites, social media, and blogs and reused without permission. Large AI datasets used to train image-generation tools have been shown to include identifiable photos of children gathered through automated scraping methods, often without the knowledge of families.

Once images are captured into these datasets, they may be used to generate realistic manipulated images (sometimes called "deepfakes"), increasing risks of exploitation, bullying, or other harms. Research shows that malicious actors are increasingly collecting school photographs and images from official school websites to create synthetic or manipulated media.

Scraped photos may also expose sensitive personal information. Some datasets have been found to include children's names, locations, and other identifying details embedded within image URLs or metadata, which can put children at further risk.

AI technologies are also becoming capable of reconstructing blurred or redacted faces, meaning traditional protective measures may not always prevent re-identification.

For these reasons, the school takes a cautious approach to the publication of children's photographs. Parents and carers are asked to consider the long-term digital footprint created when images are shared publicly. The school must limit online publication of children's images, follow strict consent procedures, and review all uses of photography in light of emerging AI-related risks.

8. Housekeeping and Retention

Effective management of photographs and videos is essential to ensure compliance with data protection legislation, maintain digital continuity, and protect the privacy and safety of pupils and staff. This section outlines the school's approach to the secure storage, retention, archiving, and deletion of all images captured in line with this policy.

8.1 Storage and Security

All photographs, videos, and recordings taken for official, educational, or publication use (as outlined in Sections 5, 6, and 7) must be stored securely in accordance with the:

- Data Protection Policy
- Record Retention Policy
- Online Safety Policy
- IT Acceptable Use Policy

Key principles include:

- Images must be stored only on school -approved systems, devices, or secure cloud platforms.
- Personal devices (e.g., staff mobile phones) must not be used to store or retain images unless explicitly authorised and subject to strict controls.
- Access to images must be restricted to staff who require it for their professional role.

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- Where images are stored electronically, appropriate technical safeguards must be applied (passwords, access controls, encryption where required).

8.2 Digital Continuity and File Management

To maintain reliable access to digital images over time, the school should ensure that:

- images are saved in commonly supported formats (e.g., JPEG, PNG, MP4)
- storage locations are reviewed regularly to prevent loss or corruption of files
- systems used to store images remain supported and secure
- outdated or duplicate files are removed as part of routine housekeeping
- any transfers of images between systems follow secure transfer procedures (e.g., encrypted storage, approved school platforms)

The school must not use temporary or unapproved storage solutions (such as personal email accounts or unapproved apps) to prevent unmanaged or untraceable data.

8.3 Retention and Deletion

Images must be retained only for as long as is necessary for the purpose for which they were taken, in line with the school's Record Retention Policy.

Some images may be retained for archive purposes where they hold long-term historical, cultural, or community value for the school.

These archival materials must:

- be stored securely in a designated archive location
- be kept separate from day-to-day operational records
- not be published or shared without consideration of current consent, safeguarding, and data protection requirements

Where images include former pupils or staff, the school must always consider whether continued retention is fair, proportionate, and respectful.

8.4 Disposal and Secure Deletion

When images are no longer required, they must be securely destroyed to prevent accidental recovery or misuse. Secure disposal methods may include:

- permanent deletion from electronic storage
- shredding of printed photographs

The school must ensure that external providers (e.g., school photographers, marketing companies, EdTech providers) comply with equivalent secure deletion standards.

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Annexe 1: Images Matrix

Lawful Basis key	Consent	Legal Obligation	Legitimate Interest	Public Task

Scenario	Use				Considerations
	Internal		External		
	Student	Staff	Student	Staff	
Photo on MIS system	Legal Obligation	Legal Obligation	N/A	N/A	
Visit by local celebrity	Internal use Historical	Internal use Historical	Social Media Marketing publication Media Website	Social Media Marketing publication Media Website	
Photos for display in the classroom	Displays in classrooms*** Celebratory display***	Displays in classrooms*** Celebratory display***	N/A	N/A	***Ensure no display puts a child/staff member at risk
Photos for display in public school areas	Displays in classrooms*** Celebratory display***	Displays in classrooms*** Celebratory display***			***Ensure no display puts a child/staff member at risk
Photographs in classroom of children/staff working	In Classroom Internal use/record of activity	In Classroom Internal use/record of activity	Social Media Marketing publication Media Website	Social Media Marketing publication Media Website	
Performance related subjects i.e., course assessment	Internal and external assessment	Internal and external assessment	Social Media Marketing publication Media Website	Social Media Marketing publication Media Website	
Video of teacher for assessment/CPD purposes	Internal use/record of activity	In Classroom Internal use/record of activity	Not Appropriate	Not Appropriate	
Performances for assessment	Internal and external assessment Personal use	Internal and external assessment Personal use			
Performances not for assessment	Internal historic use Personal use	Internal historic use Personal use	Sale to parents etc Social Media Marketing publication Media Website	Sale to parents etc Social Media Marketing publication Media Website	

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Sports Day	Celebratory display*** Historic	Celebratory display*** Historic	Social Media Marketing publication Media Website	Social Media Marketing publication Media Website	***Ensure no display puts a child/staff member at risk
School prospectus	N/A	N/A	Social Media Marketing publication Media Website	Social Media Marketing publication Media Website	
Leaflets etc	Internal Leaflets	Internal Leaflets	External Leaflets	External Leaflets	
Banners	Internal posters/banners	Internal posters/banners	External posters/banners	External posters/banners	
Images for H&S purposes i.e., children with allergies for caterers/lunch staff	Legal Obligation***	Consent	N/A	N/A	***should be in a discrete area and put away when not in use
Photos on edtech platforms					
Team Photos	Internal display	Internal display	Social Media Marketing publication Media Website	Social Media Marketing publication Media Website	

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