

Great Bardfield Primary School



Photography, Video and Digital Images Policy

Approved by:	Elizabeth Crow (Headteacher)
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Ratified by Governors:	September 2026
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Next review due by:	September 2028
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1. Purpose of this policy

Great Bardfield Primary School recognises that photographs and videos are an important part of school life. They enable us to celebrate children's achievements, record special events, support learning and share the life of our school with our community.

However, photographs and videos of identifiable individuals are personal data and must be handled appropriately. The school must balance the benefits of photography and recording with the privacy, dignity and safeguarding of pupils, staff, parents, carers and visitors.

This policy sets out the school's expectations regarding:

- photographs and videos taken by the school;
- photographs and videos taken by parents, carers, governors and visitors;
- the use of school photographs and videos on the school website, social media and other publications;
- the storage, sharing and deletion of digital images;
- the use of personal devices;
- external photographers and the media;
- safeguarding restrictions;
- the use of artificial intelligence and manipulated images.

This policy should be read alongside the school's Safeguarding and Child Protection Policy, Online Safety Policy, Acceptable Use Policy, Data Protection Policy, Privacy Notice and Records Retention Schedule.

2. Our principles

Great Bardfield Primary School operates according to four key principles.

Safeguarding

The overriding priority is to ensure that photography and video recording does not, directly or indirectly, place a child or any member of the school community at risk.

Particular care will be taken where there are safeguarding concerns, court orders, family circumstances or other reasons why a child's identity or location should not be disclosed.

Privacy

Children, parents, carers and staff have a right to privacy. The school will use photographs and videos fairly, transparently and proportionately and will respect appropriate requests to opt out of their use.

Dignity and respect

Photographs and videos should represent children, staff and the school appropriately. Images must not embarrass, humiliate, demean or otherwise compromise the dignity of an individual.

Celebrating children's achievements

The school recognises that photographs and videos are an important way for children and families to celebrate achievements and special moments. We will enable this wherever it can be done safely and appropriately.

3. Legal and regulatory framework

This policy is informed by the following legislation and guidance:

- UK General Data Protection Regulation (UK GDPR);
- Data Protection Act 2018;
- Data (Use and Access) Act 2025;
- Children Act 1989 and 2004;
- Keeping Children Safe in Education 2026;
- relevant Department for Education guidance on data protection in schools;
- Information Commissioner's Office (ICO) guidance;
- the school's safeguarding and data protection procedures.

The school will review this policy when relevant legislation or statutory guidance changes.

4. Data protection and lawful basis

Photographs and videos of identifiable individuals are personal data. Where the school takes, stores, uses or publishes photographs or videos for school purposes, it must have an appropriate lawful basis for processing the information.

The school will determine the appropriate lawful basis for each purpose. Depending on the circumstances, this may include:

- public task;
- legitimate interests; or
- consent.

The school will not assume that consent is automatically required for every photograph or video taken in school.

Where consent is used as the lawful basis, it will be:

- freely given;
- specific;
- informed;
- unambiguous;
- recorded appropriately; and
- capable of being withdrawn.

Where another lawful basis is used, the school will provide appropriate information and, where applicable, an opportunity to opt out. The school's Privacy Notice will explain how photographs and videos are used, the relevant lawful bases, who they may be shared with, how long they are retained and the rights of individuals.

5. Parental and pupil preferences

When a child joins the school, parents or carers will be provided with information about the school's use of photographs and videos and will be given the opportunity to indicate their preferences where appropriate. The school will maintain an up-to-date record of relevant permissions, consent and restrictions.

Parents and carers can contact the school at any time to:

- withdraw consent where consent is the lawful basis;
- request that their child does not appear in particular types of publication;
- raise concerns about the use of an image; or

- notify the school of a change in circumstances that may affect the use of images.

Where consent is withdrawn, the school will stop future processing where there is no other lawful basis for continuing to use the image. Where an image has already appeared in a printed publication that has been distributed, the school cannot reasonably recall copies already distributed but will not use the image in future publications where this is required. The school will consider each request carefully, particularly where the use of an image is necessary for safeguarding, identification or another legitimate school purpose.

6. Children's views and rights

The school recognises that children have their own rights in relation to their personal data. The age, maturity and understanding of an individual child will be considered when deciding how photographs and videos should be used and when discussing their preferences. For older pupils, the school will seek to ensure that they understand how their image may be used and will take their views into account alongside parental or carer views and the school's legal and safeguarding responsibilities.

7. Safeguarding restrictions

The school will maintain appropriate records of pupils who must not be photographed, recorded or publicly identified for safeguarding, legal or other reasons.

This may include, for example:

- children subject to safeguarding concerns;
- children who are subject to court orders or other legal restrictions;
- children whose whereabouts or identity must not be disclosed;
- children whose circumstances create a particular risk if their image is published.

If a member of staff is unsure whether a child can appear in a photograph or video, they must seek advice from the Designated Safeguarding Lead and/or the person responsible for data protection before the image is used. Safeguarding considerations will always take priority over the convenience of using an image.

8. Photographs and videos taken by the school

Staff may take photographs or videos of pupils using school-owned or school-approved equipment for legitimate educational, safeguarding, administrative, celebratory or communication purposes.

Examples may include:

- classroom activities;
- educational visits;
- sporting events;
- performances;
- assemblies;
- celebrations and awards;
- displays of children's work;
- school newsletters;
- the school website;
- school social media;
- school prospectuses or promotional materials;
- local press coverage;

- records of school activities.

Images must only be used for appropriate purposes and in accordance with the relevant lawful basis, permissions, safeguarding requirements and privacy information.

9. School website and social media

The school may publish photographs and videos on its website and official social media accounts where this is permitted by the relevant lawful basis and school procedures.

Before publication, staff must consider:

1. whether the image is appropriate;
2. whether any child shown has restrictions on the use of their image;
3. whether the image could identify a child who should not be publicly identified;
4. whether the image could cause embarrassment, distress or safeguarding concerns;
5. whether the accompanying text provides unnecessary identifying information;
6. whether the image is being used for the purpose for which it was collected.

The school will avoid unnecessarily identifying individual pupils by full name alongside photographs. Images should not be accompanied by unnecessary information such as a child's full name, home address, personal details or information that could disclose their location. Access to official school social media accounts will be restricted to authorised staff.

10. Photography and video at school events

The school recognises that parents and carers often wish to photograph or record their children taking part in performances, sports days and other special events.

Before each event, the school will inform parents and carers whether photography and/or video recording is:

- **permitted;**
- **restricted to a particular time or location;** or
- **not permitted.**

The Headteacher may restrict or prohibit photography or filming where this is necessary for safeguarding, privacy, practical or other legitimate reasons.

Where photography is permitted, parents and carers must:

- follow instructions given by school staff;
- remain in designated areas;
- avoid disrupting the event;
- not move around the venue to obtain photographs;
- not photograph or film in toilets, changing areas or other private areas;
- not deliberately photograph children who are not their own;
- not use photography or recording in a way that could cause distress or embarrassment;
- comply with any specific safeguarding instructions given by the school.

The school may ask parents or carers to stop recording if these conditions are not followed.

11. Photographs of other people's children

As a school safeguarding requirement:

Photographs or videos containing other people's children must not be shared publicly or on social media without appropriate permission.

Parents and carers should take particular care when posting images from school events, as other children may appear in the background. Parents and carers should check images carefully before sharing them. The school may ask a parent or carer to remove an image if its publication creates a safeguarding, privacy or welfare concern. These restrictions are school safeguarding and conduct requirements. They should not be interpreted as stating that data protection law automatically applies to every photograph taken by a parent for purely personal or household use.

12. Photographs featuring only a parent's own child

Where a photograph or video genuinely features only a parent's or carer's own child, the parent or carer may generally use it for personal purposes. However, parents and carers remain responsible for ensuring that the image does not inadvertently include other children who can be identified. Parents and carers should also consider whether the image contains other sensitive information, such as school information, children's names or locations.

13. Personal devices

Staff must not use personal mobile phones, tablets, smartwatches, cameras or other personal recording devices to photograph or record pupils unless specifically authorised by the Headteacher in exceptional circumstances. Where school photography is required, staff should use school-owned or school-approved equipment. School images must not be automatically backed up to a member of staff's personal cloud storage, personal email account or personal device. If an exceptional situation requires the use of a personal device, the image must be transferred securely to an approved school system as soon as possible and deleted from the personal device and any personal backup.

14. Storage and security

Photographs and videos taken for school purposes must be stored securely.

Images may only be stored on:

- school-owned devices;
- approved school servers;
- approved school cloud storage;
- approved school learning platforms; or
- other systems authorised by the school.

Staff must not store school photographs or videos on personal cloud storage or personal accounts. Access to photographs and videos must be restricted to staff who have a legitimate reason to access them. Images should be transferred from cameras or other recording equipment to the school's secure system as soon as reasonably practicable. Memory cards, cameras and other equipment must be stored securely when not in use.

15. Retention and deletion

Photographs and videos will only be retained for as long as they are required for the purpose for which they were collected and in accordance with the school's Records Retention Schedule. The fact that a child has left the school does not automatically mean that every photograph must be deleted. Equally, photographs should not be retained indefinitely simply

because they may be useful in the future. When images are no longer required, they must be securely deleted or disposed of. Where photographs or videos are held by a third-party provider, the school will ensure that appropriate arrangements are in place for retention and deletion.

16. Sharing photographs and videos

School photographs and videos may only be shared where there is a legitimate school purpose and an appropriate lawful basis.

Images may be shared, where appropriate, with:

- parents and carers;
- pupils;
- staff;
- governors;
- the local press;
- approved educational partners;
- professional agencies where necessary and lawful;
- approved technology or media providers.

Images must not be shared with staff friends, family members or other individuals for personal purposes. Where images are shared with an external organisation, the school will consider the appropriate data protection arrangements, including whether a contract or other formal arrangement is required.

17. External photographers and media

External photographers, professional photographers and members of the press may only photograph or record pupils on school premises with the prior agreement of the Headteacher or an authorised member of staff.

Before allowing an external photographer or organisation to take photographs or videos, the school will consider:

- the purpose of the photography;
- the organisation's identity;
- safeguarding arrangements;
- data protection responsibilities;
- where images will be published;
- how images will be stored;
- how long images will be retained;
- whether images will be transferred to another organisation;
- whether appropriate contractual arrangements are required.

Where an external photographer is acting on behalf of the school, the school will ensure that appropriate data protection responsibilities are clearly established. Members of the press will be expected to comply with appropriate safeguarding and school arrangements while on school premises.

18. Staff taking photographs for observations or safeguarding purposes

On occasion, staff may need to record a child through a photograph or video to support:

- an educational observation;

- assessment;
- behaviour or pastoral support;
- safeguarding;
- monitoring of an injury or concern;
- communication with parents or carers;
- professional advice or assessment.

Such recordings must have a legitimate purpose and must only be shared with those who have a genuine need to see them.

Where an image or video is being used to support a safeguarding concern, staff must follow the school's Safeguarding and Child Protection Policy.

Where information needs to be shared with external professionals, staff must follow the school's information-sharing procedures and seek appropriate advice where necessary.

19. Pupils taking photographs or videos

Pupils may sometimes take photographs or videos as part of lessons, educational activities, clubs, trips or other school-organised activities. Where pupils are taking photographs or videos as part of a school activity, staff must ensure that appropriate safeguarding and data protection arrangements are in place.

Pupils must not use photographs or videos to:

- bully, embarrass or humiliate another person;
- record someone without appropriate permission where this is prohibited by the school;
- create inappropriate or harmful content;
- share another child's image inappropriately;
- upload school-related images to unauthorised social media accounts.

The school's Online Safety and Acceptable Use Policies apply.

20. Artificial intelligence and manipulated images

Photographs and videos of pupils must not be uploaded to unauthorised artificial intelligence (AI) tools or image-generation services. Staff must not use pupil photographs to create AI-generated or manipulated images unless this has been specifically authorised by the school and appropriate safeguarding and data protection considerations have been completed.

Pupils must not use photographs or videos of other pupils or staff to create:

- deepfakes;
- misleading or altered images;
- humiliating or embarrassing images;
- sexualised or otherwise inappropriate images;
- AI-generated content intended to bully, threaten or harass another person.

Any concern about an inappropriate or manipulated image involving a pupil must be reported immediately in accordance with the school's safeguarding and online safety procedures.

21. School trips and educational visits

The same principles apply to photographs and videos taken during school trips and educational visits. Staff must use school-approved equipment and systems wherever possible. Where photographs are taken by a member of staff for school purposes, they must

be stored and shared in accordance with this policy. Where parents or carers accompany a trip as volunteers, they must follow the instructions given by the school regarding photography and recording.

22. Photography in private areas

Photography or video recording is strictly prohibited in areas where individuals have a reasonable expectation of privacy, including:

- toilets;
- changing rooms;
- medical or first-aid areas, except where specifically required for an authorised medical or safeguarding purpose;
- staff changing areas;
- other areas identified by the Headteacher.

This applies to staff, pupils, parents, carers, governors, visitors and contractors.

23. School displays and printed materials

Photographs may be used in classrooms, corridors, displays, newsletters, annual reports, prospectuses and other school publications where this is appropriate and permitted under the school's data protection arrangements. Particular care will be taken with photographs displayed in publicly accessible areas. The school will avoid displaying unnecessary personal information alongside photographs.

24. Withdrawal or restriction of photography privileges

The Headteacher may withdraw an individual's permission to photograph or record at school events if they:

- fail to follow this policy;
- photograph or record children in prohibited areas;
- deliberately photograph children other than their own without permission;
- publish images inappropriately;
- ignore instructions from school staff;
- behave in a way that creates a safeguarding or welfare concern.

In serious cases, the school may ask an individual to leave the event or school premises.

25. Concerns and complaints

Any concern about the inappropriate use, publication or sharing of a photograph or video should be reported to the Headteacher or Designated Safeguarding Lead as soon as possible. Where the concern relates specifically to data protection, it should also be referred to the school's Data Protection Officer.

The school will investigate concerns appropriately and will take safeguarding action where necessary.

Parents and carers are encouraged to contact the school promptly if they believe an image of their child has been used inappropriately.

26. Staff responsibilities

All staff are responsible for:

- following this policy;
- using school-approved equipment and systems;
- checking relevant restrictions before publishing images;
- protecting photographs and videos from unauthorised access;

- reporting concerns promptly;
- deleting images when they are no longer required;
- following safeguarding and data protection procedures;
- seeking advice where they are unsure.

The Headteacher is responsible for ensuring that the policy is implemented and reviewed.

The Designated Safeguarding Lead is responsible for advising on safeguarding-related photography concerns.

The Data Protection Officer provides advice regarding data protection and privacy requirements.

27. Review

This policy will be reviewed annually and sooner if there are significant changes to:

- legislation;
- Department for Education guidance;
- ICO guidance;
- safeguarding requirements;
- school technology or systems;
- the way the school uses photographs, videos or digital images.

The school will ensure that staff are made aware of significant changes to this policy.

Appendix 1 – Quick guide for parents and carers

You CAN:

- take photographs of your own child when the school has said photography is permitted;
- record your own child at a designated event where recording has been permitted;
- keep photographs for your own personal use;
- share photographs of your own child privately with family and friends.

Please DO NOT:

- photograph or film in toilets, changing rooms or other private areas;
- deliberately photograph or film other people's children;
- post photographs containing other children on social media without appropriate permission;
- disrupt performances or sporting events while taking photographs;
- move into restricted areas to obtain photographs;
- ignore instructions from school staff;
- use school photographs to create inappropriate or manipulated content;
- use photographs to embarrass, bully or harm another child.

The school reserves the right to restrict or prohibit photography at individual events where this is necessary for safeguarding, privacy or other legitimate reasons.