Play, Learn and Grow...Together!

Ordsall Primary School

Photography and Images Policy

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Approved by: Governing Body

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Statement of intent

At Ordsall Primary School, photographs and videos help us celebrate achievements, record learning and share school life with families. We recognise the importance of balancing these benefits with protecting children's privacy, dignity and safety.

Our approach reflects our vision to Play, Learn and Grow Together and our commitment to ensuring that every child feels included and valued.

We recognise that publicly available images can be copied, shared, altered or misused, including through artificial intelligence. We therefore take a protective approach to public photography, normally using photographs taken from behind, side-facing images and group photographs taken from a distance.

These approaches reduce exposure but do not guarantee anonymity or prevent misuse. Permissions, safeguarding restrictions and the suitability of each image must still be checked before publication.

This policy applies to photographs, videos and other visual recordings taken or used for school purposes by staff, governors, volunteers, contractors and professional photographers. It also sets out expectations for photography by pupils, parents, carers and visitors.

1. Legal framework

This policy has regard to relevant legislation and guidance, including:

- The UK General Data Protection Regulation.
- The Data Protection Act 2018, as amended.
- The Data (Use and Access) Act 2025, where applicable.
- Keeping Children Safe in Education.
- Department for Education guidance on data protection in schools.
- Information Commissioner's Office guidance on photography, children's information and lawful processing.

2. Roles and responsibilities

Governing Body

The Governing Body will approve this policy and oversee its implementation through the school's safeguarding and data protection arrangements.

Headteacher

The Headteacher is responsible for:

- Ensuring staff understand and follow this policy.
- Authorising school photography arrangements and designated publishers.
- Ensuring suitable arrangements for recording permissions, secure storage and retention.
- Deciding whether photography or filming is permitted at school events.
- Considering proposed exceptions to the school's public photography approach, in consultation with the Designated Safeguarding Lead.
- Ensuring concerns are referred promptly to the appropriate safeguarding or data protection lead.

Designated Safeguarding Lead

The Designated Safeguarding Lead will:

- Identify individual safeguarding restrictions affecting photography or publication.
- Liaise with families, carers, social workers and other relevant professionals where necessary.
- Ensure relevant restrictions are communicated securely to staff who need to know.
- Review concerns about inappropriate photography, image sharing or image manipulation.
- Work with the Headteacher and Data Protection Officer where safeguarding and data protection issues overlap.

Data Protection Officer

The Data Protection Officer will advise on:

- Appropriate lawful bases for processing images.
- Privacy information and consent arrangements.
- Security, retention, sharing and individual rights.
- Proposed services or technologies used to process pupil images.
- Suspected personal data breaches and any reporting requirements.

Designated publishing lead

The member of staff authorised to publish school images will:

- Review photographs, videos, captions and backgrounds for identifying or sensitive information.
- Ensure publication follows the school's agreed photography approach.
- Use only authorised school accounts and systems.
- Refer uncertainty to the Headteacher or Designated Safeguarding Lead.

Staff, governors and volunteers

Anyone taking or using images on behalf of the school must:

- Have an authorised purpose.
- Use approved equipment and systems.
- Check relevant permissions and restrictions.
- Respect children's wishes and dignity.
- Store and transfer images securely.
- Report concerns or mistakes promptly.

Parents and carers

Parents and carers are asked to:

- Record their photography preferences accurately.
- Inform the school of changes to permissions or relevant circumstances.
- Follow the school's expectations when taking photographs or videos at events.
- Avoid publishing images of other children without the appropriate permission.

3. Definitions and scope

Images include photographs, video recordings, screenshots and other visual recordings. Videos may also contain personal information through voices, spoken names and background conversations.

Personal data includes images of people who are identified or identifiable, either from the image itself or when combined with other available information.

A photograph taken from behind, from the side or from a distance is not automatically anonymous.

Internal school use includes authorised use for teaching, assessment, learning records, school displays, identification, administration and safeguarding.

Public use includes publication on the school website, public social media accounts, publicly accessible newsletters, prospectuses, promotional materials and external media.

Restricted sharing includes sharing through approved school systems with a defined audience, such as parents or carers. Restricted access does not remove the need for appropriate permissions, security and safeguarding checks.

Personal use means photography by families for their private family purposes. It does not include acting as an official school photographer.

4. Permissions and lawful processing

The school will identify an appropriate lawful basis for each purpose for which identifiable images are taken, stored or shared.

Consent is not the only lawful basis available for school photography. Some internal educational, administrative or safeguarding uses may rely on another appropriate lawful basis.

For optional publicity and promotional use of identifiable pupil images, the school will seek specific, informed parental consent.

Recording permissions

Photography permissions will normally be collected through Arbor when a child joins the school. Parents and carers will be reminded regularly to review their preferences and notify the school of changes.

Permissions will distinguish between relevant uses, including:

- Internal displays and celebrations.
- Sharing through approved systems with families.
- School website and public social media.
- Printed publicity materials.
- External media.

Permission for one purpose will not automatically authorise another.

The school will retain a record of the choices made, when they were recorded and any subsequent changes. Current Arbor records, together with any additional safeguarding restrictions, must be checked before images are used.

Where consent is required, silence, an unanswered request or an unclear response will not be treated as agreement.

Children's wishes

Children will receive an age-appropriate explanation of why an image is being taken and how it may be used.

A child will not be required to pose for optional photography if they are uncomfortable, even where parental permission has been given. Staff will remain sensitive to verbal and non-verbal indications that a child does not wish to participate.

Changing or withdrawing consent

Parents and carers may change or withdraw consent by contacting the school office. The school will update its records promptly and notify relevant staff.

Withdrawal does not make previous lawful processing unlawful. However, continued storage, display or publication is ongoing processing. Where consent is the lawful basis, the school will stop that use and remove or delete relevant images from systems and publications within its control, unless another lawful reason requires retention.

Printed materials already distributed and copies made by third parties may not be recoverable. These limitations will be explained clearly.

The school will not retrospectively change its lawful basis simply to avoid respecting a withdrawal of consent.

5. General photography procedures

Photography and filming must have a clear school purpose and be planned to minimise unnecessary collection of images.

Before taking or using images, staff must:

- Check relevant permissions and individual safeguarding restrictions.
- Consider whether an image is necessary and whether a less identifying alternative would serve the purpose.
- Ensure children are appropriately dressed and comfortable.
- Check the setting and background.
- Use approved school equipment.
- Consider everyone visible or audible, including those in the background.

Children without photography permission must still participate fully in school activities. Staff will arrange photography so that these children are not included in images for purposes that have not been authorised.

Images must not:

- Humiliate, embarrass or undermine a child.
- Show children in a state of distress or in vulnerable circumstances.
- Include unnecessary personal, medical or safeguarding information.
- Be taken in toilets, changing areas or during personal care.
- Contravene an applicable court order or individual safeguarding restriction.

Any necessary recording for a specific safeguarding or other authorised professional purpose must be managed separately through the relevant procedure and secure system.

Photographs used within school

Photographs used internally, including on classroom and corridor displays, in children's workbooks and learning records, may include front-facing individual and group photographs, subject to the relevant permissions and individual safeguarding restrictions.

The protective approach set out in Section 6 applies to images used in public communications, rather than internal school displays. Internal photographs must still respect children's wishes, privacy and dignity.

If an internal display or learning record is subsequently photographed or filmed for public sharing, staff must check that all visible pupil images and personal information meet the requirements of Section 6 before publication.

6. Public photographs and videos

Our normal approach

For public school communications, we will normally use:

- Photographs taken from behind, showing the backs of children's heads.
- Side-facing photographs, where the relevant parental permission is recorded.
- Group photographs taken from a distance, including front-facing groups, where the relevant parental permission is recorded.

Photographs of activities, resources, displays and children's work may also be used where identifying information has been checked and removed where necessary.

Close-up, front-facing photographs of individual pupils will not normally be used in public communications.

Any proposed exception must be approved by the Headteacher. The purpose, permissions, intended audience and individual risks must be considered before approval.

Parental consent alone does not require the school to publish an image or override safeguarding restrictions.

Identifiability and accompanying information

Angle and distance do not guarantee anonymity. Staff must consider whether a child could be recognised from their profile, distinctive clothing, hairstyle, location or other contextual information.

Public images will not normally be accompanied by pupils' names. Any proposed use of a name alongside an image requires specific consideration.

Images and captions must not disclose sensitive information, including a child's care status, SEND, medical needs or family circumstances.

Videos

The same principles apply to videos. Staff must check the full recording, including changing camera angles, background faces, voices, spoken names and conversations.

Live broadcasts involving pupils must not take place without specific Headteacher authorisation, appropriate permissions and a safeguarding review.

Publication approval

Staff must submit proposed public images and accompanying text to the designated publishing lead.

Only authorised staff may publish through school accounts. Images must not be published directly by other staff without authorisation.

7. Additional safeguarding arrangements

The school will consider individual circumstances that may require additional restrictions, including:

- Court orders or restrictions on disclosure.
- Risks associated with domestic abuse, stalking or family circumstances.
- Children in care or previously in care where particular risks have been identified.
- Other child protection or security concerns.

Care experience or adoption does not automatically mean that photography is prohibited. Decisions will reflect the individual child's circumstances.

The Designated Safeguarding Lead will establish appropriate arrangements with those who have parental responsibility or other relevant authority, consulting social workers or other professionals where necessary.

Arrangements may include:

- Photography under the school's normal procedures.
- Internal use only.
- No public or external sharing.
- No photography except for specified essential purposes.

Restrictions will be recorded securely and made available only to staff who need the information to carry out their responsibilities. Sensitive reasons for restrictions must not be circulated unnecessarily.

8. School devices and personal equipment

Staff must use school-owned or explicitly approved devices for school photography.

Approved devices must have appropriate security settings and must not automatically upload pupil images to personal cloud storage or accounts.

Staff must not use personal mobile phones, personal cameras or personal recording devices to photograph pupils unless an exceptional arrangement has been authorised in advance by the Headteacher.

Images must not be retained for private use.

Loss, theft or suspected unauthorised access involving equipment holding pupil images must be reported immediately.

9. Storage and retention

Images must be stored on approved school systems with access restricted to authorised users.

Images must be transferred from cameras and other capture devices promptly. Copies on those devices must be removed once transfer has been confirmed and there is no continuing authorised need to retain them.

Images must not be stored in personal email accounts, personal cloud storage or unapproved messaging applications.

The school will:

- Retain images only for as long as necessary for their stated purpose.
- Apply its records retention arrangements.
- Review public image collections periodically.
- Remove images that are outdated, unnecessary or no longer authorised.
- Use appropriate secure deletion or disposal procedures.

A child leaving the school will trigger consideration of whether continued use or retention remains necessary and authorised. Any continuing promotional use must remain within the permission and retention information provided.

10. Image editing and artificial intelligence

Routine editing, such as cropping, resizing or obscuring identifying information, may be undertaken by authorised staff for an approved purpose.

Edited images must not misrepresent events, embarrass a child or create a misleading impression. Staff must check that cropping or obscuring has effectively removed the intended information.

Pupil images must not be uploaded to publicly available or unapproved artificial intelligence services, face-swapping applications, image generators or editing tools.

Any proposed use of an AI-enabled service to process pupil images requires prior Headteacher approval.

The review must consider the purpose, necessity, security, retention, provider access and whether images could be reused for training or other purposes.

Staff must not create or circulate manipulated images of pupils that could cause harm, ridicule or distress.

Suspected AI misuse involving pupil images must be reported immediately through the school's safeguarding procedures.

11. Sharing images securely

Images may be shared only:

- For an authorised school purpose.
- With an appropriate recipient or audience.
- Through approved school accounts and systems.
- In accordance with relevant permissions and safeguarding restrictions.

Staff must check recipients, attachments, access permissions and background content before sending images.

A parent's request for an image does not authorise sharing through a staff member's private account or personal messaging service. Staff must also consider whether the image contains other children.

School images must not be posted on staff members' personal social media accounts.

External organisations must not receive or reuse images without an authorised arrangement covering the intended purpose and relevant data protection responsibilities.

12. Photography by parents and carers

The Headteacher will decide whether photography and filming are permitted at each event. Restrictions will be communicated before the event or at its start.

Where photography is permitted, parents and carers must:

- Focus on their own child wherever possible.
- Follow staff instructions and any designated photography arrangements.
- Avoid disrupting performances, distracting children or obstructing others.
- Avoid flash photography where requested.
- Respect other children's privacy and individual safeguarding needs.

- Stop taking photographs or filming when asked.

Images and recordings containing other children must remain for private family use and must not be uploaded to social media, public websites or openly shared.

The school may prohibit photography or filming where necessary to protect children or manage the event safely.

A parent acting as an official school photographer must follow the requirements applying to staff and volunteers rather than the arrangements for private family photography.

13. Photography by pupils

Pupils may use school devices to take photographs or videos where this forms part of an authorised learning activity.

Staff will explain:

- The purpose of the activity.
- How to seek and respect others' agreement.
- Where images may be stored or shared.
- How to report concerns.

Pupils must not photograph or film others in toilets, changing areas, during personal care or in a way that could cause distress.

Pupil devices must be used in accordance with the school's rules and Acceptable Use Agreements.

Misuse will be addressed through the relevant behaviour, anti-bullying, online safety or safeguarding procedures.

14. Professional photographers and external media

The Headteacher will authorise visits by professional photographers and external media.

Before photography takes place, the school will:

- Provide a clear brief covering purpose, conduct and image use.
- Check relevant permissions and safeguarding restrictions.
- Confirm storage, access, retention and sharing arrangements.
- Ensure appropriate supervision and identification.
- Establish the photographer's data protection responsibilities.

Photographers must not have unsupervised access to pupils. Individual portrait sessions must take place within agreed, supervised arrangements.

Individual and class photographs supplied privately to families may include front-facing images. These are separate from public promotional photography and must follow the relevant permissions and secure distribution arrangements.

Photographs intended for public promotion must follow Section 6.

Photographers must not use pupil images in their own advertising, portfolios, social media or AI systems without a separate, explicitly authorised arrangement and the relevant permissions.

External media requests involving pupil names or identifiable images require specific Headteacher approval and safeguarding checks.

15. Concerns and incidents

Staff must report immediately:

- Publication of an image without the required permission.
- Images shared with an incorrect recipient.
- Lost or stolen devices containing pupil images.
- Inappropriate, intrusive or unauthorised photography.
- Suspected copying, manipulation or harmful use of pupil images.
- Any image-related concern affecting a child's safety.

The Headteacher, Designated Safeguarding Lead and Data Protection Officer will coordinate the response according to the nature of the incident.

Actions may include:

- Removing or restricting access to images.
- Contacting the recipient, platform or external organisation.
- Preserving evidence securely where needed.
- Supporting affected children and families.
- Assessing whether notification to the ICO, police or another agency is required.
- Reviewing procedures and staff training.

Removal of content must be coordinated with any need to preserve evidence of a safeguarding concern.

16. Monitoring and review

This policy will be reviewed annually and sooner following a significant incident, a change in practice or relevant changes to legislation or guidance.

The Headteacher will ensure that Arbor permissions, privacy information, staff guidance and parent communications remain consistent with this policy.