Woodlea Primary School

Safe Use of Children's Photographs and Videos

Being Reviewed by	Governing Body and Head Teacher
Review in	Autumn 2026
Status & Review Cycle	2-year cycle
Next Review date	Autumn 2028

Rationale

This policy outlines the purpose, nature and management of photographing children in school. (The term "photograph" includes video and live streaming, where appropriate, throughout the policy).

Capturing images in a variety of formats is now an integral part of everyday life in our society. This policy aims to balance the wish to use photographs to celebrate the progress and achievements of the school and its pupils, whilst addressing the possible risks to individuals captured in the images.

The implementation of this policy is the responsibility of all members of the school community, and visitors.

Staff will explain proposed photography or filming to pupils in age-appropriate language and will take account of their wishes, understanding and best interests. A pupil who indicates that they do not wish to be photographed or filmed will not ordinarily be required to participate in an optional image, even where a parent or carer has given permission. Where an image is necessary for safeguarding, identification, teaching or another official purpose, staff will explain this sensitively and use the least intrusive approach.

Principles and School Practice

The school identifies and records an appropriate lawful basis for each use of photographs and videos. Images used for teaching, assessment, safeguarding, identification and school administration will normally be processed under public task or another applicable lawful basis. For optional promotional uses, the school will provide clear information and a genuine opportunity to opt out. Where consent is relied upon, it must be specific, informed, freely given, recorded and capable of withdrawal without detriment. Parents and carers will receive clear information about each proposed use, including curriculum and assessment records, internal displays and secure platforms, the school website, school-controlled social media, printed publications, external organisations and news media. Arbor will record each permission or objection separately, together with any subsequent change, and relevant staff will check the current record before taking, using or sharing an image (see Annex 1).

- It is the responsibility of parents/carers to inform the office if they wish to change their permission.
- Before an external organisation or professional photographer takes, receives or stores pupil images, the school will identify whether that organisation acts as a processor or an independent controller and will document the arrangement accordingly. Where it is a processor, a written contract must set out the subject matter, duration, purpose, security requirements, confidentiality, approved sub-processors, assistance with rights and breaches, return or deletion of images, and audit assurances. Where it is an independent controller, families must receive clear privacy information about the organisation's purposes, lawful basis, retention, sharing and contact details.
- Images published by the school will not normally be accompanied by a pupil's name or other information that enables identification. Any proposed exception, including use by news media, must be considered separately, explained in advance and supported by the appropriate lawful basis or valid specific consent. The school will also assess whether combining the image with contextual details such as class, location, uniform, event or achievement could identify or increase risk to the pupil.

- Children will only be photographed in suitable dress
- Before taking, using or sharing images, staff must check and follow any recorded safeguarding restriction, court order, family request or other known risk. Decisions must be based on the terms of the restriction and an individual, child-centred risk assessment led by the designated safeguarding lead, with advice from the data protection officer where appropriate. Restrictions and protective measures must be communicated securely only to staff who need to know.
- Parents/carers are informed every year regarding official school photographs taken by a commercial photographer
- A list of children without permission to be photographed will be issued to teachers annually and updated regularly when new pupils are admitted during the year.
- It is the head teacher's responsibility to decide whether the publication of a photograph might pose a risk to a child.
- Any inappropriate use of images will be treated in the same way as any other child protection issue and in line with the Safeguarding Policy.
- Images of children and adults are kept in albums and electronically on the school's administrative system as part of the school's records
- School albums will be kept in school and will not leave the school premises
- No member of school staff is permitted to put photographs of colleagues or pupils on social media sites.
- Parents/carers are not permitted to put photographs of any child other than their own on social media sites.
- Photographs and videos will be retained only for as long as they are needed for the recorded purpose and in accordance with the school or trust retention schedule. At least annually, the school will review image collections, secure platforms, shared drives, devices, publications and public-facing services; images that are no longer required will be securely deleted, anonymised or archived where there is a documented lawful reason to retain them. A pupil leaving the school will trigger a review rather than automatic deletion of every image.
- Photographs of individual staff and governors will be removed from the 'picture board' once they have left the school
- Photographs of pupils taken to support evidence of their development will be stored according to our Data Protection policies and GDPR.
- Photographs and videos used as EYFS evidence must be captured only on school-managed devices and transferred promptly to an approved school system. They must not be copied to personal devices, personal accounts or removable media, or taken home unless a documented exceptional arrangement has been approved by the headteacher and data protection officer with appropriate security controls. Local copies must be securely deleted after successful transfer in accordance with the retention schedule.
- Similarly, older children's exercise books or class folders may contain photographic evidence of their learning. Staff follow the same guidelines as EYFS staff.
- EYFS records and older children's exercise and/or topic books, may contain images of other children. These records are given to parents/carers on the understanding that they will comply with this policy.
- Before publishing an image on a public-facing website or social media account, the school will minimise identification and assess the child's best interests and any

safeguarding risk. Measures may include avoiding names and unnecessary contextual details, using group or activity-focused images where appropriate, removing location metadata, limiting resolution and checking that the image does not reveal sensitive information. These controls reduce risk but do not guarantee that an image cannot be copied, altered or reused, including through artificial intelligence.

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Individual/group pupil photographs

Professional photographers are used to take individual/group pupil photographs. This is to ensure compliance with the data protection legislation and that:

- material is used only for the school's own purposes
- photographs are not used for any other purpose without seeking consent first
- the photographer does not share the photographs with any other party unless specifically required to do so under the contract with the school or where written permission has been given by the school
- the photographer/agency retains evidence that they have followed the steps set out above

Woodlea use the individual student portraits for security purposes and for use on child's Arbor profile.

Photographing & Videoing of Events by Parents/carers

Woodlea school recognises that parents/carers who attend school events like to capture special moments in photos or on video. In our school community, it is acceptable for parents/carers to video and photograph school events, where they have been invited to the setting, providing they comply with the guidelines set out in this policy and are in line with production copyright guidelines. The guidelines together with the points below are designed to enable parents/carers to gather and keep memories of their child's time at school without adversely affecting the safety and right to privacy of other families.

Parents/carers must always adhere to the following guidance when using photographic/videoing equipment at Woodlea school events:

- Photographs and videos captured at school events by parents/carers are for personal use only.
- Parents/carers wishing to take photographs or videos do not disrupt the children or affect the enjoyment of other parents/carers.
- Parents/carers respect the 'right to privacy' of other individuals.
- Images will be accessed and enjoyed by family members only.
- Photographs and videos taken by parents or carers for purely personal or household use generally fall outside data protection law. The school may nevertheless restrict or prohibit photography at an event for safeguarding, privacy, copyright, operational or

venue-related reasons. Parents and carers must follow the instructions given for each event and must not publish images containing other children or staff on a public account or share them more widely without considering the rights, reasonable expectations and safety of everyone shown.

- Parents/carers should not sell or distribute by any other means photographs or video taken at Woodlea school events.

- Members of staff at Woodlea school reserves the right to challenge any person using photographic/video equipment at a school event who they do not recognise or where they do not know that person's connection to pupils. The member of staff also reserves the right to ask the person to stop taking photographs/video if this cannot be established and to ask them to leave if they do not comply with this request.

- Parents/carers should only take photographs/video in the designated areas as set out by the school.

- Parents/carers should not take photographs in sensitive areas such as toilets or changing rooms at any time.

- At a swimming gala, parents/carers should not take photographs of children at all

- Parents/carers should be mindful of the appropriateness of the photographs/videos they are taking at all times. While Woodlea school will ensure that pupils are appropriately dressed while in the designated areas at the school event parents/carers should ensure that any photographs or footage taken is sensitive and appropriate.

- Parents/carers follow the policies of external venues (ie. other schools, sports halls, swimming pools etc.)

- Woodlea school reserves the right to ask a parent/carer to leave if they are observed taking inappropriate photographs/video or if they are observed covertly using photographic/video equipment. Where this occurs Woodlea school will follow necessary safeguarding procedure.

- Parents must abide by the copyright restrictions set out within any production rights which the school might have purchased for a school production. The school will inform parents if this applies.

- Woodlea school reserves the right to remove consent to take photographs/video at any time.

- Parents/carers are required to follow additional guidance in event programmes or announcements from school staff as to when photography and videoing is permitted.

Roles and Responsibilities

The school or trust is the data controller for image processing where it determines the purposes and means. The governing body or trustees remain accountable for compliance; the headteacher oversees implementation; the designated safeguarding lead advises on child-protection risks; and the data protection officer provides independent advice and monitoring. The school will maintain records of processing activities, privacy information, lawful-basis decisions, retention periods, third-party arrangements and staff training. A data protection impact assessment will be completed before introducing processing likely to create a high risk to children, including new surveillance, biometric, facial-recognition or artificial-intelligence uses, systematic monitoring, or large-scale online publication or sharing.

The head teacher will oversee the day-to-day implementation of the policy.

All staff will be familiar with and follow the policy.

Parents will ensure that the school is kept informed about their wishes and will comply with the policy if they wish to photograph or video school events.

Note: For off-site activities, staff will take reasonable, planned steps to respect recorded image restrictions. These may include briefing organisers and media representatives, identifying restricted areas, adjusting positioning and supervising photography. The school will not promise control over every independent third party, but it will assess foreseeable risks with the designated safeguarding lead, explain the available safeguards to parents and pupils, and seek an inclusive arrangement wherever reasonably possible rather than placing the decision solely on whether the child attends.

Monitoring, Evaluation and Legislation

This policy will be reviewed in accordance with the governing body's review cycle and sooner where there is a material change in law, statutory guidance, technology, risk or school practice. It should be read with:

- the Governors' Policy Review Cycle (two years);
- the UK General Data Protection Regulation and Data Protection Act 2018;
- the Data (Use and Access) Act 2025 and relevant commencement provisions;
- the Department for Education's Data protection in schools guidance, including Taking and using photos and videos, and using CCTV in schools, updated 9 July 2026; Keeping Children Safe in Education 2026, in force from 1 September 2026; Working Together to Safeguard Children; current Information Commissioner's Office guidance on taking photographs in schools, children and the UK GDPR, lawful bases, consent, security, retention and data sharing; and the school or trust safeguarding, data protection, privacy, acceptable-use, online-safety, retention and breach-management policies.

Any loss, unauthorised disclosure, mistaken publication or inappropriate use of an image must be reported immediately through the school's personal data breach and safeguarding procedures. The school will document the incident, take prompt steps to contain it and consult the data protection officer and designated safeguarding lead. Privacy information will explain how pupils and parents may exercise applicable data protection rights, including requesting access, correction, restriction, objection or erasure, and how to raise a concern with the school or the Information Commissioner's Office.

Annex 1

WOODLEA PRIMARY SCHOOL
PHOTOGRAPHIC IMAGES OF CHILDREN CONSENT FORM

Name of Parent or Guardian_____

Child's Name: _____

Sometimes we take photographs or videos of children at school or during organised activities away from the school site. We may use these images for teaching and assessment, school administration, internal displays, school publications, the school website or other clearly stated purposes. Images from which a child can be identified are personal data and will be handled in accordance with the UK General Data Protection Regulation, the Data Protection Act 2018 and the school's privacy information. The school will explain the purpose, lawful basis, intended audience, retention period and any third-party sharing for each use.

Occasionally, the school may be visited by the news media (usually local newspapers) to take photographs or film of an event at the school. Pupils will often appear in these images, which will be published in local newspapers or even broadcast on television. A copy of the school's policy on Photographic Images of Children is available from the school office.

Please answer all 4 questions below, then sign and date the form.

1. May adults working in school and Woodlea children take photographs and videos of your child for use in school as part of our curriculum?

Please circle your answer: Yes / No

2. Please record a separate choice for each optional use of your child's image:

- in school publications — Yes / No;
- on the school's public website or school-controlled social media — Yes / No;
- in video, live-streamed or other digital recordings for optional publication — Yes / No.

Please note that websites can be viewed throughout the world and not just in the United Kingdom, where UK law applies.

3. Do you consent to your child being photographed by local newspapers and other news media, on the basis that their full names will be published along with the picture?

Please note that:

(a) newspapers will be asked to avoid using the child's name if their image is put on the newspaper's own website;

(b) this consent will also be taken to apply to television images, provided that your child is not named except with your specific agreement.

Please circle your answer: Yes / No

4. Where a pupil has anaphylaxis or another condition for which a photograph is necessary to support an emergency response, the school will process the image as health-related special category data under an identified Article 6 lawful basis and Article 9 condition. The image will be limited to authorised staff and displayed or stored only where necessary, secure and proportionate. Parents and pupils will receive specific privacy information about this use. This safety arrangement will not be bundled with optional consent for promotional photography.

No response is required here. Where this applies, the school will provide separate privacy information and discuss the safety arrangement with the parent or carer and pupil.

Declaration: The school will record my choices and will explain how I can change them. Where the school relies on consent, I may withdraw it at any time without detriment by contacting the school office. Withdrawal will apply

to future use and sharing; it may not always be possible to remove material that has already been lawfully printed, distributed or published by an independent third party. If I or members of my family take photographs or video recordings at a school event, we will follow the event instructions and this policy.

Signed _____ **(Parent/Guardian)** **Date** _____