St Paul's Catholic Junior School

Photography and Images Policy 2026 - 2027

School Details

Head teacher:	Mrs C O'Callaghan (Interim)
Designated Safeguarding Lead:	Mrs C O'Callaghan
Deputy Designated Safeguarding Lead(s):	Mrs Lynd, Mrs Clay, Mr Connolly
Link Governor for Safeguarding:	Ms Lisa Kirwen
Chair of Governors:	Mr M Evans
Policy Date:	1st Sep 2026
Policy Review Cycle:	Annual
Next Review Date:	1st Sep 2027

Be Kind. Be Respectful. Be Resilient.

Learning from the example of Jesus, our school will be a place where everyone feels loved, valued and encouraged to be and do the best they can.

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Statement of intent

At St. Paul's Catholic Junior School, we use images and videos for a variety of purposes, including prospectuses, display boards, educational purposes, conferences and the school website. We understand that parents may also wish to take videos or photos of their children participating in school events for personal use.

Whilst we recognise the benefits of photography and videos to our school community, we also understand that these can have significant risks for those involved. Under the legal obligations of the UK GDPR and the Data Protection Act (DPA) 2018, the school has specific responsibilities in terms of how photos and videos are taken, stored and retained.

The school has implemented a policy on the safe cameras and recording equipment by staff, pupils and parents to reflect the protective ethos of the school with regard to pupils' safety.

In order to ensure that, as far as possible, the use of photography and video is safe at all times, the policy provided below should be followed. This policy is applicable to all forms of visual media, including film, print, video, DVD and websites.

Legal framework

This policy has due regard to all relevant legislation and guidance including, but not limited to, the following:

- The Data Protection Act 2018
- The UK General Data Protection Regulation (UK GDPR)
- The Freedom of Information Act 2000
- Equality Act 2010
- Human Rights Act 1998
- Voyeurism (Offences) Act 2019
- DfE 'Keeping children safe in education'
- DfE 'Data protection in schools'

This policy operates in conjunction with the following school policies:

- Data Protection Policy
- Anti-bullying policy
- Social Media Policy
- Device and Technology Acceptable Use Agreement
- Staff Code of Conduct
- Pupils Personal Electronic Devices Policy

- Online Safety Policy
- Child Protection and Safeguarding Policy
- Behaviour Policy

1. Roles and responsibilities

The headteacher will be responsible for:

- Submitting consent forms to parents, and pupils where appropriate, at the beginning of the academic year with regard to photos and videos being taken whilst at school.
- Ensuring that all photos and videos are stored and disposed of correctly, in line with the UK GDPR and the DPA 2018.
- Deciding whether parents are permitted to take photos and videos during school events.
- Communicating this policy to all the relevant staff members and the wider school community, such as parents.

The DSL will be responsible for:

- Liaising with social workers to gain consent for the use of photos and videos of LAC.
- Liaising with the DPO to ensure there are no data protection breaches.
- Informing the headteacher of any known changes to a pupil's security, e.g. child protection concerns, which would mean that participating in photography and video recordings would put them at significant risk.

Parents and pupils will be responsible for:

- Completing a photography consent form on an annual basis.
- Informing the school in writing if they wish to make any changes to their consent.
- Acting in accordance with this policy.

2. Definitions

Camera is used to refer to mobile phones, tablets, webcams, portable gaming devices, and any other equipment or devices which may be used to be take photos.

Personal use of photography and videos is defined as the use of cameras to take images and recordings of children by relatives, friends or known individuals, e.g. a parent taking a group photo of their child and their friends at a school event. These photos and videos are only for personal use by the individual taking the photo and are not intended to be passed on to unknown sources. The principles of the UK GDPR and the DPA 2018 do not apply to images and videos taken for personal use.

Official school use is defined as photography and videos which are used for school purposes, e.g. for building passes and identity cards. These images are likely to be stored electronically alongside other personal data. The principles of the UK GDPR and the DPA 2018 apply to images and videos taken for official school use.

Media use is defined as photography and videos which are intended for a wide audience, e.g. photos of children taken for a local newspaper. The principles of the UK GDPR and the DPA 2018 apply to images and videos taken for media use.

Staff may also take photos and videos of pupils for **educational purposes**. These are not intended for official school use, but may be used for a variety of reasons, such as school displays, special events, assessment and workbooks. The principles of the UK GDPR and the DPA 2018 apply to images and videos taken for educational purposes.

Personal electronic devices are defined as devices that are used to store, generate, or transmit information or data in any form, including audio, visual or text. Such devices may include, but are not limited to, the following items:

- Any type of computer or computer-like instrument.
- Portable devices, such as tablets, laptops, mobile phones, personal digital assistants (PDAs), portable hard drives, USBs, pagers, and smart or electronic watches.
- The components of any such devices above.

3. Lawful bases for taking, using and sharing images

The school recognises that photographs and videos of identifiable individuals constitute personal data under data protection law. The school will ensure that a valid lawful basis is established before any images are taken, used or shared.

The school will identify and apply the most appropriate lawful basis depending on the purpose of the image processing. The main lawful bases the school will rely on are public task, consent, and legitimate interests, in line with guidance provided by the ICO.

Public task

The school will rely on the lawful basis of public task where images are necessary for carrying out official duties and functions. This may include, but is not limited to:

- ID cards.
- Registers.
- Classroom seating plans.
- PE peg labels.
- Personal storage or drawer labels.

The school will use images under public task where they are essential for administration, safeguarding, identification, or the efficient operation of the school.

The school will consider any objections from pupils or parents regarding the use of images under public task. While individuals have the right to object, the school will assess each request carefully and determine whether there are compelling legitimate grounds to continue processing, particularly where safeguarding or identification is concerned.

Where appropriate, the school will offer reasonable alternatives, such as non-photographic identification methods.

The school will clearly explain the use of images under public task within its privacy notice and will ensure that all objections are handled fairly, transparently and in accordance with UK GDPR requirements.

Consent

Where the school relies on consent, it will ensure that consent is:

- Freely given.
- Specific.
- Informed.
- Unambiguous.

The school will obtain consent from parents, and from pupils themselves where they are of an age and maturity to understand how their images will be used.

When deciding whether a pupil can give valid consent, the school will consider safeguarding factors and whether the risks are fully understood by the pupil.

When using consent as a lawful basis, the school will:

- Clearly explain how images will be used at the point of collection.
- Keep accurate records of consent, including who gave it, when, how, and what information was provided.
- Regularly review and refresh consent on an annual basis at the beginning of the school year.
- Seek new consent where images are to be used for a different purpose than originally agreed.

The school will respect the right to withdraw consent at any time. Upon withdrawal, the school will stop using the image and will delete it unless another lawful basis applies.

The school will handle withdrawal requests sensitively, particularly where they relate to safeguarding or changes in personal circumstances.

Legitimate interests

The school may rely on legitimate interests where image use is necessary for purposes that are reasonable, proportionate, and do not override the rights and freedoms of the individual.

In such cases, the school will:

- Carry out a legitimate interests assessment to ensure the processing is justified.
- Consider the impact on pupils and their families.
- Seek permission as a matter of good practice, even where formal consent is not required.
- Provide clear and accessible ways for pupils and parents to opt out.

The school will make it clear how individuals can:

- Opt out at the time images are taken.
- Change their preferences at a later date.

The school will act on opt-out requests promptly. This may include removing images from digital platforms and ensuring they are not used in future materials. Where images have already been published in printed materials, the school will ensure they are not reused in subsequent editions.

The school will distinguish clearly between permission and consent, recognising that permission supports transparency and trust but does not replace the requirement for a lawful basis.

4. General procedures

Photos and videos of pupils will be carefully planned before any activity and the DPO will oversee the planning of any events where photos and videos will be taken.

Where photos and videos will involve pupils who are LAC, PLAC, or adopted, or pupils for whom there are security concerns, the headteacher will liaise with the DSL to determine the steps involved.

While the school will not always need permission from a pupil or parent to take a photo or video, the school will check whether any restrictions have been set before using, storing, or sharing images.

The list of all pupils who have not consented to being photographed or recorded will be checked prior to the activity. Only pupils for whom consent has been given will be able to participate.

The staff members involved, alongside the headteacher and DPO, will liaise with the DSL if any pupil who is LAC, PLAC, adopted, or for whom there are security concerns.

A school-owned digital camera will be used to take photos and videos of pupils.

Staff will ensure that all pupils are suitably dressed before taking any photos or videos.

Where possible, staff will avoid identifying pupils by name or any other identifiable data. If names are required, only first names will be used.

The school will not use photos or videos of:

- Any pupil who is subject to a court order.
- Children who have left the school, without the consent of their parents or, where appropriate, the children themselves.
- Staff members who have left the school, without their consent.

Photos and videos that may cause any distress or embarrassment will not be used.

Any concern relating to inappropriate or intrusive photography or publication of content will be reported to the DPO.

5. Additional safeguarding procedures

The school will consider certain circumstances that may put a pupil's security at greater risk and, thus, may mean extra precautions are required to protect their identity.

The DSL and/or Designated Teacher (DT) will, in known cases of pupils who are LAC, PLAC or adopted, liaise with the pupil's social worker, carers or adoptive parents to assess the needs and risks associated with the pupil.

Any measures required will be determined between the DT, DSL, DPO, social worker, and carer and/or adoptive parent with a view to minimising any impact on the pupil's day-to-day life. The measures implemented will be one of the following:

- Photos and videos can be taken as per usual school procedures
- Photos and videos can be taken within school for educational purposes and official school use, e.g. on registers, but cannot be published online or in external media
- No photos or videos can be taken at any time for any purposes

Any outcomes will be communicated to all staff members via staff meetings and Arbor and the list outlining which pupils are not to be involved in any videos or photos, held in the school office, will be updated accordingly.

6. Use of electronic devices

Staff members and pupils will be issued with school-owned devices to assist with their work, where necessary. Requirements around the use of school-owned devices can be found in the school's Device and Technology User Agreements.

Misuse of cameras, filming equipment or other devices in a way that breaches school policy will always be taken seriously and may be the subject of disciplinary procedures, or dealt with under the relevant safeguarding policy as appropriate.

Staff use of digital cameras and other electronic devices

Photos and videos will only be taken for educational purposes and in school or educational provision settings.

Staff will only be permitted to take photos and videos of pupils using the school's digital cameras; however, they may use other school-owned devices, such as mobile phones and tablets, where the DPO has been consulted and consent has been sought from the headteacher prior to the activity.

The school-owned devices will be located and stored securely in locked drawers in classrooms. Members of staff will be responsible for making sure that the camera is locked away after use at the end of the day. Members of staff will not be allowed to take school cameras or memory cards home.

Staff or other adults will not take photos of pupils in vulnerable circumstances, such as when they are upset or inappropriately dressed. Members of staff and the school community will be required to report inappropriate use of digital cameras and images to the headteacher. If it is found that any incidents raise child protection concerns, immediate action will be taken in consultation with the DSL.

Where school-owned devices other than digital cameras are used, images and videos will be provided to the school at the earliest opportunity and then removed from the devices.

Photos and videos taken by staff members on school visits may be used for educational purposes, e.g. on displays or to illustrate the work of the school, where an appropriate legal basis has been obtained.

Use of personal devices by staff

Members of staff will not be allowed to take images using personal devices without prior permission. If personal devices are allowed to be brought in due to a specialist requirement or defective equipment, memory cards should be shown to be empty, and images downloaded to the school's server.

Any personal electronic device that is brought into school is the responsibility of the user. Staff will not be permitted to use their personal devices during lesson time, other than in an emergency. Staff will not use their personal mobile phones, or any other personal device, to take images and videos of pupils.

Personal devices are not permitted to be used in the following locations:

- Classrooms
- Toilets

Use of personal devices by pupils

All pupils will be encouraged to look after each other, and to report any concerns about the misuse of technology, or any worrying issues to a member of the pastoral staff.

Unless exceptional circumstances apply, pupils will not be permitted to keep personal mobile devices on their person throughout the school day in accordance with the Mobile Devices Policy.

Pupils' use of school-owned devices will be appropriate for the purpose they are intended for. Any misuse of school-owned devices will be dealt with in accordance with the Behaviour Policy.

Inappropriate use of devices will be outlined in the Mobile Devices Policy, while the sharing of indecent images will be detailed in the Child Protection and Safeguarding Policy and Youth-produced Sexual Imagery (YPSI) Policy.

Use of personal devices by parents

Parents or family members will be welcome to take photos of (and where appropriate, film) their own children taking part in school events, subject to the following guidelines, which the schools will expect all parents to follow. Parents will:

- Remain seated while taking photos or videos during concerts, performances and other events.
- Minimise the use of flash photography during performances.
- In the case of all school events, make the focus of any photos and/or videos their own children.
- Avoid disturbing others in the audience or distracting pupils when taking photos or recording videos.
- Ensure that any images and recordings taken at school events are exclusively for personal use and are not uploaded to the internet, posted on social networking sites or openly shared in other ways.
- Refrain from taking further photos and/or videos if and when requested to do so by staff.

7. Sharing of images

When deciding whether it is appropriate to share images, the school will consider:

- Any safeguarding implications.
- The lawful basis for doing so.
- Whether pupils and parents are aware of the risks.
- Whether any parents or pupils have put in place any restrictions on permission to do so.

The school may use images for newsletters, websites, prospectuses, social media, school trips, performances, sports days, or classroom displays. In doing so, legitimate interests may be appropriate as a lawful basis; however, the school will consider whether the use is necessary, fair and respects the rights of pupils and staff.

The school will take particular care when sharing images to social media and will make pupils and parents aware that social media involves wider sharing and may carry higher privacy risks. The school may collect specific consent for posting on social media platforms.

If images are shared with third-party platforms, social media or cloud services, the school will check that the lawful basis and privacy settings comply with data protection law.

If parents share photos or videos of other pupils publicly, the school may ask them to remove the image if it raises privacy or safeguarding concerns.

8. Storage and retention

As per the UK GDPR and the DPA 2018, images obtained by the school will not be kept for longer than necessary; retention periods for the different types of personal data are outlined in the school's **Records Management Policy.**

Hard copies of photos and video recordings held by the school will be annotated with the date on which they were taken and will be stored in the school office. They will not be used other than for their original purpose, unless permission is sought from the headteacher and parents of the pupils involved and the DPO has been consulted.

Digital photos and videos held on the school's drive are accessible to staff only. Photos and videos are stored in labelled files, annotated with the date, and are only identifiable by year group or class number – no names are associated with images and videos. Files are password protected and only staff members have access to these passwords.

Paper documents will be shredded or pulped and electronic memories scrubbed clean or destroyed once the retention period has ended.

Where a parent or pupil has withdrawn their consent, any related imagery and videos involving their child/the pupil will be removed from the school drive immediately. When a parent withdraws consent, it will not affect the use of any images or videos for which consent had already been obtained. Withdrawal of consent will only affect further processing.

Where a pupil's security risk has changed, the DSL will inform the headteacher immediately. If required, any related imagery and videos involving the pupil will be removed from the school drive immediately. Hard copies will be removed by returning them to the parent/pupil or by shredding, as appropriate.

Official school photos will be held on Arbor alongside other personal information and retained for the length of the pupil's attendance at the school, or longer, if necessary, e.g. due to a police investigation.

Members of staff will maintain responsibility for ensuring that images are safely stored, particularly on memory sticks and hard drives. They will take reasonable measures to ensure that they do not come into the possession of unauthorised persons.

No digital image will be altered or enhanced in any way by any member of staff, unless given prior permission by the headteacher to do so. The school may require images to be deleted or edited as appropriate and may choose to use images taken by members of staff or volunteers for other purposes, provided the processing conditions and consent requirements of this policy are met. Staff members are responsible for ensuring that edited images do not mislead or misrepresent. They must not edit images which result in their subject being vulnerable to embarrassment, teasing, bullying or abuse.

If the memory card for individual school cameras needs to be replaced, then the replaced memory card will be destroyed to ensure that no images can be recovered. Members of staff must remember that, even when images are physically deleted from a camera or memory card, the camera or the memory card must be appropriately disposed of to ensure that no imprint remains.

9. Appropriate use of images under UK GDPR and the DPA 2018

Photos will be used in school for many reasons and the different uses for the same image should be considered separately, as each photograph and use will potentially have different conditions for processing.

As a public body, the school will consider whether the processing is taking place in the performance of its duties as a public authority. Where this is the case, the legal basis for processing will be recorded as 'public task', not 'legitimate interests' – public authorities cannot use legitimate interests as a lawful basis if the processing is in the performance of their tasks as a public authority.

The school will use privacy notices with declarations attached to inform staff, pupils and parents about how their personal data may be collected and as one method of gaining consent.

To judge whether legitimate interest can be used as the basis for processing data, the school will carry out three different tests. These are:

- A purpose test – establishing the reasons for using the data, what will be achieved and whether the benefits are justifiable.
- A necessity test – establishing whether the processing of pupils' data will be useful and whether there is a less intrusive way of reaching a means to an end.
- A balance test – establishing the impact it will have on the data subject by processing the data for said reason.

These three tests make up a 'legitimate interest assessment' (LIA) – the school will carry out an LIA prior to obtaining the data and it will be recorded in a physical copy in compliance with the UK GDPR and the DPA 2018.

Photos used in identity management

These are likely to be essential for performing the public task of the school, but they will be deleted once the child is no longer in attendance – as they are no longer needed for the purpose for which they were held.

Photos used for marketing purposes

Photos will not be used for marketing purposes unless the school has specific informed consent for the images and the images are only used in line with the consent provided.

The school will recognise that when images are posted on the school website anyone may view the images, and consequently this may result in a greater risk of misuse of images. The school will therefore give specific consideration to the suitability of images for use on the school's website.

Photos in the school environment relating to education

These photos may be essential for performing the public task of the school, but once the pupil has left the school this argument is insufficient. If the school wishes to display the image beyond the pupil's time at the school, the school will obtain the pupil's permission. If permission is not granted, the image will be removed.

When gaining consent, including when initially taking the photograph or when the purpose of the image has changed, the pupil, or where appropriate their parents, will be informed of the retention period pertaining to the use of the image. If the image is still on display after the retention period stated in the privacy notice used to gain consent, the school will be in breach of data protection obligations and may be subject to a fine.

10. Use of a professional photographer

If the school decides to use a professional photographer for official school photos and school events, the headteacher will:

- Provide a clear brief for the photographer about what is considered appropriate, in terms of both content and behaviour.
- Issue the photographer with an identification badge or card, which must be worn at all times.
- Let pupils and parents know that a photographer will be in attendance at an event and ensure they have previously provided consent to both the taking and publication of videos and/or photos.
- Not allow unsupervised access to pupils or one-to-one photo sessions at events.
- Communicate to the photographer that the material may only be used for the school's own purposes and that permission has not been given to use the photos for any other purpose.
- Ensure that the photographer will comply with the requirements set out in the UK GDPR and the DPA 2018.
- Ensure that if another individual, such as a parent or governor, is nominated to be the photographer, they are clear that the images and/or videos are not used for anything other than the purpose indicated by the school.

11. Monitoring and review

This policy will be reviewed on an annual basis by the headteacher and the DPO. The next scheduled review date for this policy is 1st September 2027.

Any changes to this policy will be communicated to all staff, parents and, where appropriate, pupils.