

Photography Policy	GDPR 7
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Responsible for Initiating Review of Policy	SLT
Committee to Review	SLT
Last Review Date	July 2025
Review Period	Annual
Approved by (Committee and Date)	SLT
Approved by Board of Governors	Autumn 2025
Effective Date of Policy	July 2025
Next Review Date	July 2026
Related Policies	32a Data Protection Policy 32d Acceptable Use Policy 7a Safeguarding Policy 32 Online Safety Policy CCTV

POLICY STATEMENT

This policy sets out how the school manages the taking, storage, and use of photographs and video images of pupils, staff, and visitors. It applies to all staff, contractors, parents, and visitors engaged in school activities or events.

The purpose is to ensure compliance with the UK General Data Protection Regulation (GDPR), the Data Protection Act 2018, and ISI regulatory requirements, while safeguarding the privacy and welfare of pupils.

The Data Protection Act gives children rights over their own data when they are considered to have adequate capacity to understand. Most children will reach this level of understanding at around age 12. For this reason, for most pupils in a secondary school, it will normally be up to the individual child to decide whether or not to be photographed. Where the school considers that a pupil does not have the capacity to make such a decision the school will act in what it considers to be in the best interests of the pupil and in doing so will take account of any stated parental preference. If no preferences are expressed, then the school will act in accordance with the principles expressed in this policy.

Legal framework and principles

Under the UK GDPR and the Data Protection Act 2018, photographs and video recordings that identify an individual constitute personal data. The school processes such data lawfully, fairly, and transparently in accordance with the following principles:

- Lawful Basis:
 - *Legitimate interests* for internal use, record-keeping, and educational purposes.
 - *Consent* for publication or use on external media (e.g., website, press, social media).
- Data minimisation: Only necessary images will be captured.
- Storage limitation: Images will be retained only for as long as required for their original purpose.
- Security: Images are stored securely on password-protected systems.
- Rights: Pupils and parents have the right to access, rectify, restrict, or request deletion of images.

Ordinarily the following rules will apply to photographs in this school:

Photographs for internal use

The school may take photographs for educational records, classroom displays, newsletters, or presentations. These are usually unnamed and for internal purposes.

- When photographs are taken, pupils will be informed and given the opportunity to object.
- Named photographs require consent.
- All images are stored securely and deleted when no longer required.

- Images revealing special category data (e.g., disability, religion, ethnicity) will only be used with explicit consent.

External publication and Media use

The school may use photographs in marketing materials, press releases, or on digital platforms.

- The Communications or Marketing Lead must approve all external use.
- External media organisations must comply with this policy and the UK GDPR.
- If the media wish to publish named photographs, specific consent will be required.
- Pupils and parents will be informed when media presence is expected at events.

Family Photographs at School Events

- Families and friends may take photographs for personal, non-commercial use.
- They must avoid sharing identifiable images of other pupils online without consent.
- Staff will remind attendees of these expectations when appropriate.
- The school reserves the right to restrict or prohibit photography at specific events.

CCTV and Surveillance

The school operates CCTV for safeguarding and site security under the lawful basis of legitimate interests.

- The CCTV system is governed by a separate CCTV Policy that sets out retention, access, and subject rights.
- Clear signage is displayed where CCTV operates.
- CCTV is not used for covert monitoring except in exceptional, legally justifiable circumstances.

Data Security and Retention

Images are stored only on approved school systems. Personal devices must not be used for storing or sharing pupil photographs, and photographs are deleted or securely archived once no longer required for their original purpose.

Under the Data Protection policy – Staff (32 a) breaches involving photographic data must be reported immediately to the DPO under the Data Breach Procedure.

Roles and Responsibilities

All staff have a responsibility to ensure images are treated in line with this policy and associated legislation.

- SLT: Oversight of compliance and policy enforcement.
- DPO: Monitors data protection compliance and manages data subject requests.
- Staff: Must follow this policy and complete relevant data protection training.
- Marketing Team: Ensures lawful use of images in publications.
- Parents/Pupils: Responsible for following school guidance at events and notifying consent changes.

Breach of Policy

Any misuse of photographs or unauthorised sharing constitutes a data breach and may be treated as a disciplinary matter.

Expression of Parental or Pupil Preferences

Parents (and pupils aged 12+) may indicate their preferences by completing the school's consent form (as below). Preferences may be changed at any time.

Appendix A – Photography and Images Consent Form**Photography and Images Consent Form***(For parents and pupils aged 12 and over)***Name of pupil:** _____**Form/Year:** _____**Parent/Guardian name:** _____**Relationship to pupil:** _____

Please indicate your preferences by ticking the relevant boxes:

Purpose	Consent Given	Consent Withheld
Use of unnamed photographs for internal school purposes (e.g., displays, newsletters)	<input type="checkbox"/>	<input type="checkbox"/>
Use of named photographs for internal school purposes	<input type="checkbox"/>	<input type="checkbox"/>
Use of unnamed photographs for external purposes (e.g., prospectus, marketing, website)	<input type="checkbox"/>	<input type="checkbox"/>
Use of named photographs for external purposes (e.g., website, social media, press)	<input type="checkbox"/>	<input type="checkbox"/>
Use of images by third parties such as media outlets under school supervision	<input type="checkbox"/>	<input type="checkbox"/>

Consent statement:

I understand that I may withdraw or amend this consent at any time by notifying the school in writing. I understand that photographs and videos are personal data and will be processed in accordance with the UK GDPR and the school's Photography and Images Policy.

Signature of Parent/Guardian: _____**Date:** _____**Signature of Pupil (if aged 12 or over):** _____**Date:** _____