Photograph and Images Policy

Agreed by the Governing Board: September 2021

Reviewed: November 2026

Next review: November 2029

***Note**: Wherever photographs are mentioned in this document, this should be read to include; still, video and electronic images.*

Introduction

1. St. Luke's CE Primary School believes that the responsible use of children's images can make a valuable contribution to the life and morale of the school. The use of photographs in school publicity materials can increase pupil motivation and help parents and the local community identify and celebrate the school's achievements.
2. We only use images that the Executive Head Teacher and/or the Governing Body consider suitable, and which appropriately represent the range of activities the school provides and the values it adheres to. No images will be used which could be considered to put any child at increased risk.
3. Through this policy we aim to respect young people's and parents' rights of privacy and minimise the risks which young people can be exposed to through the misuse of images. The policy takes account of both data protection and child protection issues.

Data Protection and Consent

4. Photographs and video images of pupils and staff are classed as personal data under the terms of the Data Protection Act 1998. **https://ico.org.uk/media/for-organisations/documents/1136/taking_photos.pdf** We will not use images of identifiable individuals for school publicity purposes without the consent of either the individual themselves, or in the case of pupils, their parent or guardian. For pupils, this consent will be obtained through the Pupil Contact Details sheet which is completed when the child begins at the school and through the Child Photograph Consent Form letter.

5. In seeking consent we will ensure that parents are clear why we are using a child's image, what we are using it for, and who might want to look at the pictures. Our consent form makes clear the period for which consent applies.

6. All images will be stored securely and used only by those who are authorised to do so. We will not re-use images of children after they have left the school; these images will be destroyed as soon as possible and within the academic year of departure.

7. The school has determined its own policy on the use of cameras and videos by parents / guardians attending school events. (See paragraphs 29 – 32).

8. When a parent does not agree to their child being photographed, the Head of School will inform staff and make every effort to comply sensitively. For example, if a child whose parents have refused permission for photography is involved with a sports event e.g., a football match, it may not be appropriate to photograph the whole team. Careful liaison with parents is therefore essential. With discussion it may be possible to agree other options. The parent may accept a team photograph if names are not published, or they may be prepared to consent if it affects the whole team.

9. When photographic images are transmitted or shared beyond the establishment e.g., television broadcasts, or film making, specific permission will be obtained.

Child Protection

10. We will only use images of children in suitable dress. The Executive Head Teacher will decide if images of some activities – such as sports or arts – are suitable without presenting risk of potential misuse. This is of relevance when the image is digital and therefore at risk of being manipulated. The Executive Headteacher will take responsibility for seeking to ensure that no published image, if manipulated, would carry a risk.

11. Any evidence of the use of inappropriate images, or the misuse of images, will be reported to the school's Designated Safeguarding Leader (DSL), the Local Authority, Social Services and/or the police as appropriate.

12. Individual pupils will not be named in conjunction with their image, and we will never use an image of a child who is subject to a court order.

Internet to include: School Website / School Apps and Microsoft Teams

13. We will adopt the same principles as outlined above when publishing images on the internet as we would for any other kind of publication or publicity material. However, the school recognises that there is no control over who may view the images, and consequently a greater risk of misuse of images, via the internet. We will therefore consider the suitability of images for use on the school's website very carefully.

14. Images, and accompanying details, will only be used in line with government guidance: https://www.gov.uk/government/publications/copyright-notice-digital-images-photographs-and-the-internet/copyright-notice-digital-images-photographs-and-the-internet

15. Parents who are considering setting up a private/family website with details relating to a particular school in their community, should first seek permission from the Executive Head teacher or Head of School if they intend using images of other children or young people from the school or a specific setting.

Inter-School Events including sports fixtures

16. The aforementioned guidelines will be applied to inter-school events. If a vulnerable child is involved, it will be necessary to liaise with a member of staff from the other establishment so that they are aware of the wishes of the parents or guardian of the child, and as far as practicable to seek the co-operation of the parents of the opposing team.

17. Sports facilities which are available for public usage often have strict policies restricting the use of video, mobile and still cameras. It is important therefore to check with the facility concerned as there may also be a registration process to comply with.

Teacher Training and Portfolios of Evidence

18. During teacher training and with newly qualified staff, colleagues may be required to compile portfolios with photographs of children during lessons. Staff should act responsibly in compiling these images. A member of the leadership team will oversee the compiled images as part of the management process and consider their appropriateness.

Children Photographing Each Other

19. This practice can occur extensively particularly during offsite activities or residential activities. Staff should maintain the supervision and management control specified in the school's guidelines for Educational Visits.

20. There may be incidents where children take inappropriate photographs, perhaps showing friends and other students inappropriately dressed. Staff should endeavor to discourage this practice, but ultimately parents are responsible for monitoring their child's use of cameras and subsequent use of their images involved. (See also paragraph 21 below).

Mobile Phones

21. The use of mobile phones which contain cameras of photographic and or video capabilities are not permitted in changing rooms, toilets etc.

Consent Forms

22. The consent requested on an annual basis from parents and guardians is general consent for the school to take and use photographs within its own publicity (newsletters or on the website) and for the recording of children's work in their workbooks or in the school building. This general consent is time-limited, for one school year. If the photograph is to be used for a purpose other than highlighted here, parents and guardians will be asked to give a separate consent on a case-by-case basis within which the intended use of that photograph will be explicitly explained – see below.

General Consent

23. The school can predict in advance how it will use photographs / videos e.g., annual nativity plays. Warning of such activities is given as part of our general consent form so that consent can be obtained in advance from parents and guardians. This consent is renewed every school year and can be withdrawn at any time. Each year as part of a standard communication, parents are asked if they wish to change their permission. (For general consent form, see Appendix 1.)

Event-Specific Consent

24. It is not always possible to predict events and projects in advance. Sometimes the school will want to use a photograph of a pupil or group and find that it doesn't have consent. In these cases, the school will write to parents/ guardians and get consent on a case-by-case basis.

25. For every instance when photographs are to be used or taken by the press and media the school will get separate consent. This is because their circulation and coverage may be local, national or sometimes international and the associated storylines may be so varied as to make them unpredictable.

26. The exception to this is when the school can safely predict the press and media coverage for a particular long-term project or event. Then consent can be sought explaining in some detail what the photographs will be used for. The consent can then stand as valid for all associated media coverage if it is not incompatible with the purposes for which the consent was originally given. For example, if the school is undergoing building works, this may attract a fair amount of media attention. Parents and guardians will be written to with an explanation of what is happening, the likely media coverage and the purposes for which their child's photograph may be used. Consent can then be sought for the life of the project or for one school year (whichever is the lesser). (See appendix 2.)

Diversity Issues

27. Even though consent may be granted by a parent/ guardian, the school will exercise caution and common sense when using photographs as there may be valid religious or moral grounds for objecting to a particular activity. For instance, a parent/ guardian might object to their child's picture appearing:

- On a leaflet about bullying in school (it may imply their child is a bully/or being bullied)
- On posters advertising a Christmas play (may object on religious grounds).

If there is any doubt whether the parent/guardian would object, a member of school's leadership will always double check with them and get specific consent for the activity.

Safer Images Checklist

28. The following are guides for the creation of safer images. As a school, we will:

- Avoid close-up pictures of individual pupils, making use of classroom or group activities instead.

- Consider the use of drawings of pupils or staff or items made by pupils, as opposed to photographs, as a means of exemplifying good work or publicising the school.
- Ensure that pupils are dressed appropriately – see again, point 10 above.
- State clearly whether an image is to be retained for further use and, if so, explain how the image is stored securely so that they are accessed and/or used only by those with authority to do so. Our photographs will be stored electronically but only within a secure area.
- Generally, not amend or manipulate images. (Exceptions may be where a badge has been removed or 'brushed' to protect identity or where an image needs to be 'cropped' to fit)

Photographs taken by Parents / Carers for Personal Use

29. There will be school events when parents / carers will want to take photographs for their own personal use.

30. At each event the school will announce that photographs may be taken on the basis that they are for private retention and not for publication in any manner, including use on personal websites or in some circumstances that photographs may not be taken.

31. Additionally, the school will identify designated areas where cameras may be used and make it clear that these are the only areas where photographs may be taken e.g., in a hall where an event is taking place, and not back-stage.

32. In some circumstances the school may provide official copies of videos or photographs that parents / guardians can purchase instead of allowing parents and guardians to take their own images. This may be the case when the school is aware of any child who should not be photographed as consent has not been given.

Deletion Policy for Images

33. St. Luke's CE Primary School has a centralised area on the school's network for storing digital images of pupils, with suitable security for accessing the images, along with a deletion policy for when images are no longer required, or the pupil has left the school.