



Images of Children Policy

Last reviewed: 1st September 2026
Owner: Headteacher

Due for review: September 2029
Reviewed by: Safeguarding governors

This policy is informed by UK Safer Internet Centre image guidance, DfE guidance on taking and using photos and videos in schools (2026) and ICO guidance on photographs in schools.

1. Purpose

- 1.1. St Mary's CE Primary School recognises that photographs and videos are an important way of celebrating pupils' achievements, recording school life, communicating with families and showcasing the work of the school.
- 1.2. At the same time, images of children are personal data when an individual can be identified. Images published online can also be copied, downloaded, manipulated or redistributed beyond the school's control. Advances in artificial intelligence (AI) have created additional risks, including the manipulation of ordinary photographs to create harmful or abusive material.
- 1.3. The purpose of this policy is therefore to enable the school to continue using images positively while taking proportionate steps to protect pupils' privacy, dignity and safety.
- 1.4. The school will follow a safeguarding-first, proportionate and risk-based approach. The existence of a risk does not mean that photographs of pupils should never be used; rather, the school will consider whether an image is necessary, how identifiable the child needs to be, where the image will appear and what safeguards can reasonably be applied.

2. Scope

- 2.1. This policy applies to:
 - 2.1.1. photographs and videos taken by or on behalf of the school;
 - 2.1.2. photographs and videos taken by school staff for school purposes;
 - 2.1.3. images supplied to the school by parents, carers, pupils, professional photographers or other organisations;
 - 2.1.4. images published on the school website, social media accounts, newsletters, prospectuses and other publications;
 - 2.1.5. images displayed within school premises or on password-protected school platforms;
 - 2.1.6. images used in presentations, promotional material, press releases and other communications;
 - 2.1.7. professional photography commissioned by the school;
 - 2.1.8. livestreaming or recording of school events.
- 2.2. It does not generally govern photographs taken by parents or visitors solely for their own personal or household use, although the school may establish reasonable rules for photography at particular events for safeguarding, privacy or practical reasons.

3. **Our principles**

The school will apply the following principles whenever it considers taking or publishing an image of a child or young person:

3.1. **Celebrate children without unnecessary exposure**

The school will continue to celebrate pupils' achievements, participation and school life.

However, before publishing an image, staff should consider:

Do we need to show a child's face or identity to achieve what we are trying to communicate?

Where the answer is no, the school should consider using an image that shows children from a distance, from behind or side-on, during an activity, or otherwise minimises identifiable features.

3.2. **Use the minimum information necessary**

3.2.1. Where possible, the school will avoid combining an identifiable image with information that makes a child particularly easy to identify or locate. In particular:

3.2.1.1. children's full names will not normally be published alongside photographs;

3.2.1.2. photographs will not normally be accompanied by information such as a child's full name, class, regular timetable, precise location or routine;

3.2.1.3. staff should avoid publishing images that reveal unnecessary information about where a child lives, trains, travels or regularly spends time;

3.2.1.4. captions should contain no more personal information than is necessary.

3.2.2. The school may name pupils where there is a clear and appropriate reason to do so and the relevant consent, permission or other lawful basis is in place. For example, a pupil receiving a named award may be appropriately identified in a school newsletter.

3.3. **Consider the audience**

3.3.1. The school will distinguish between:

3.3.1.1. internal use, such as displays or password-protected platforms;

3.3.1.2. school community use, such as newsletters or parent portals;

3.3.1.3. restricted online use, such as closed or private social media groups;

3.3.1.4. public online use, including the school's public website and public social media accounts;

3.3.1.5. third-party or media use, where images may be published outside the school's direct control.

3.3.2. The wider the potential audience, the greater the level of caution required.

3.4. **Images should be secure by design**

3.4.1. For images published publicly online, the school will, where reasonably practicable:

3.4.1.1. remove EXIF and other unnecessary metadata before publication;

3.4.1.2. use appropriately low-resolution versions rather than original/high-resolution files;

- 3.4.1.3. avoid publishing images that unnecessarily show a child's face clearly and directly;
 - 3.4.1.4. use privacy settings and access controls where available;
 - 3.4.1.5. limit downloading and sharing where the platform allows this;
 - 3.4.1.6. use appropriate watermarking or other protective measures where proportionate;
 - 3.4.1.7. ensure that original photographs are stored securely and are accessible only to authorised staff.
- 3.4.2. The school recognises that no online image can be made completely immune from copying, screenshots or misuse.
- 3.5. **Children should have a voice**
 - 3.5.1. The school recognises children's developing autonomy and will take account of their views.
 - 3.5.2. Where a child is sufficiently mature to understand how an image will be used, the school will, as good practice, seek their agreement in addition to any parental or carer consent that is required.
 - 3.5.3. A child's objection to the use of their image should be taken seriously. Staff should discuss any disagreement with the Designated Safeguarding Lead (DSL) and/or Data Protection Officer (DPO) where appropriate.

4. **Consent and lawful basis**

- 4.1. The school will identify an appropriate lawful basis under UK data protection law before taking, using or publishing identifiable images.
- 4.2. Consent is one possible lawful basis but is **not automatically required for every photograph**. Depending on the circumstances, another lawful basis may apply, including public task or legitimate interests.
- 4.3. Where consent is relied upon, it will be:
 - 4.3.1. freely given;
 - 4.3.2. specific;
 - 4.3.3. informed;
 - 4.3.4. unambiguous;
 - 4.3.5. recorded;
 - 4.3.6. capable of being withdrawn at any time.
- 4.4. The school will explain the relevant lawful basis and intended use clearly to pupils and parents/carers.
- 4.5. Where the school relies on a **lawful basis** other than consent, it will nevertheless normally provide parents/carers and pupils with a meaningful opportunity to express their preferences or opt out of non-essential publicity uses.

5. **Levels of parent / carer consent**

- 5.1. To make choices clear and meaningful, the school will offer separate permissions rather than a single blanket "photography consent". See Appendix 1 for levels of consent.
- 5.2. Parents/carers will be given sufficient information to understand what they are agreeing to.
- 5.3. Informed consent is obtained via the [Consent for use of images](#) Google Form. A separate form is required for each child in the school; families cannot put siblings on the same form.

6. Consent from children

- 6.1. Under the [Information Commissioner's Office \(ICO\)](#), children **aged 13 or older** can lawfully provide their own consent for online information services. In primary school therefore, parent / carer consent is required.
- 6.2. The school recognises that parental responsibility does not remove a child's right to have their views considered.
- 6.3. As a matter of good practice, the school will seek the child's agreement in addition to parental/carers consent where the child has sufficient understanding and it is reasonable to do so. This will usually be done by verbal consent to take a photograph, and verbally informing the child what it will be used for.
- 6.4. If a child does not wish their image to be used for a non-essential purpose, the school will normally respect that preference unless there is a compelling reason not to.

7. Consent is not permanent

- 7.1. Consent will not be treated as irrevocable. Parents/carers and pupils may withdraw consent at any time by contacting the school office in writing.
- 7.2. Where consent is withdrawn, the school will:
 - 7.2.1. update its consent records;
 - 7.2.2. stop using the image for the relevant consent-based purpose;
 - 7.2.3. remove images from school-controlled websites and social media where reasonably practicable;
 - 7.2.4. avoid using the image in future publications;
 - 7.2.5. amend or replace digital material where practicable.
- 7.3. The school cannot guarantee the removal of copies that have already been downloaded, shared or republished by third parties.
- 7.4. The school will review image permissions regularly, normally at least annually and/or at significant transition points.

8. Safeguarding exceptions and heightened-risk cases

- 8.1. The school will never publish an image simply because permission has previously been given if doing so would create a safeguarding concern.
- 8.2. Images **must not be published** where doing so could place a child at risk, including where there are relevant:
 - 8.2.1. safeguarding concerns;

- 8.2.2. court orders or legal restrictions;
 - 8.2.3. adoption or care-related confidentiality requirements;
 - 8.2.4. domestic abuse concerns;
 - 8.2.5. risks arising from family circumstances;
 - 8.2.6. risks identified by the DSL or another appropriate professional.
- 8.3. If staff are unsure whether a pupil can safely appear in an image, they must consult the DSL before publication.
- 8.4. A safeguarding concern takes priority over an existing photography preference or consent.

9. Taking photographs

- 9.1. Staff taking photographs on behalf of the school must:
- 9.1.1. use school-approved equipment or systems wherever reasonably practicable;
 - 9.1.2. follow the school's data protection and safeguarding procedures;
 - 9.1.3. take photographs only for an appropriate school purpose;
 - 9.1.4. avoid photographing children unnecessarily;
 - 9.1.5. avoid inappropriate or potentially embarrassing images;
 - 9.1.6. ensure that children are appropriately dressed and presented;
 - 9.1.7. avoid images that could expose personal information or routines;
 - 9.1.8. check relevant restrictions before using photographs.
- 9.2. Staff should always consider whether a photograph can achieve its purpose without showing a child's face or without making the child identifiable.

10. Publication standards

- 10.1. Before an image is published publicly, the responsible member of staff should consider:
- 10.1.1. Is the image necessary?
 - 10.1.2. Is there a less identifiable image that would achieve the same purpose?
 - 10.1.3. Does the child have the appropriate permission or lawful basis?
 - 10.1.4. Are there any safeguarding restrictions, or reasons the image should not be published at this time?
 - 10.1.5. Does the image reveal unnecessary information?
 - 10.1.6. Does the caption contain unnecessary identifying information?
 - 10.1.7. Has metadata been removed? Does it need removing?
 - 10.1.8. Is the image appropriately low resolution?
 - 10.1.9. Is the audience appropriate?

10.2. The school will normally favour:

- 10.2.1. group or activity photographs rather than close-up portraits;
- 10.2.2. photographs taken from a distance;
- 10.2.3. photographs taken from behind or side-on;
- 10.2.4. photographs where facial features are not prominent;
- 10.2.5. images showing participation or achievement rather than posing directly for the camera.

10.3. This does not mean that identifiable photographs are prohibited. There will be circumstances where a clear photograph of an individual pupil is appropriate, particularly where the pupil is being recognised for an achievement and the relevant permission and safeguarding considerations have been addressed.

11. Names and captions

- 11.1. The school will usually avoid pairing a child's photograph with their full name online.
- 11.2. Where naming a pupil is appropriate, the school will seek informed consent from parents to do so and will consider whether a first name or other limited description is sufficient.
- 11.3. Captions should not disclose unnecessary information that could increase a child's vulnerability.

12. Website and Social media

- 12.1. Because of the additional risks, the school will exercise particular caution when publishing images online.
- 12.2. Only authorised staff may publish on the school website or social media accounts.
- 12.3. Images published on the school website will not show children's faces or other identifying information.

13. Professional photographers and external organisations

- 13.1. Where an external photographer or organisation takes photographs on behalf of the school, the school will ensure that appropriate contractual, data protection and safeguarding arrangements are in place.
- 13.2. The school will establish:
 - 13.2.1. what images are being taken;
 - 13.2.2. why they are being taken;
 - 13.2.3. where they may be used;
 - 13.2.4. who will have access;
 - 13.2.5. how long they will be retained;
 - 13.2.6. how images will be securely transferred;
 - 13.2.7. how images will be deleted or returned;
 - 13.2.8. whether the photographer or organisation may use images for its own purposes.

- 13.3. External organisations will not be permitted to use pupils' images for unrelated purposes without an appropriate lawful basis and, where required, specific consent.

14. School events

- 14.1. The school may establish reasonable photography rules for performances, sports days, assemblies, trips and other events.
- 14.2. Parents and carers may generally take photographs of their own child for their own personal use where the school permits this.
- 14.3. However, parents/carers will be asked not to:
 - 14.3.1. photograph or record children where the school has specifically prohibited photography;
 - 14.3.2. deliberately photograph children whose privacy needs have been identified;
 - 14.3.3. publish images of other children publicly without appropriate consideration;
 - 14.3.4. disrupt an event through photography or recording;
 - 14.3.5. use images to identify, locate or contact children other than their own.
- 14.4. The school may prohibit photography at particular events where this is necessary and proportionate for safeguarding, privacy or practical reasons.

15. Storage and retention

- 15.1. Original photographs and videos will be stored securely and accessed only by staff who require access for legitimate school purposes.
- 15.2. The school will not retain large collections of photographs indefinitely simply because they may be useful in the future.

16. Reviewing existing content

- 16.1. The school will periodically audit images already published on:
 - 16.1.1. the school website and school social media accounts;
 - 16.1.2. newsletters and digital publications;
 - 16.1.3. other public-facing platforms.
- 16.2. As part of the audit, the school will consider:
 - 16.2.1. whether the image is still needed;
 - 16.2.2. whether the child remains at the school;
 - 16.2.3. whether permission remains appropriate;
 - 16.2.4. whether the image contains unnecessary identifying information;
 - 16.2.5. whether metadata has been removed or needs removing;
 - 16.2.6. whether the image should be replaced with a lower-resolution or less identifiable version.
- 16.3. The school will aim to conduct an image audit at least annually.

17. Use of artificial intelligence

- 17.1. The school will not use generative AI or image-manipulation tools to create, alter or enhance images of pupils in a way that could misrepresent them or increase safeguarding risks unless there is a clearly defined, approved educational or operational purpose and an appropriate risk assessment has been completed.
- 17.2. Staff must not upload identifiable pupil photographs to public AI tools or other unauthorised services.
- 17.3. Where new technology is proposed that involves pupil images, the school will consider data protection, safeguarding, confidentiality and security implications before use and complete a Data Protection Impact Assessment (DPIA) where appropriate.

18. If an image is misused

- 18.1. If the school becomes aware that an image of a pupil has been misused, manipulated or shared in a way that contravenes this policy and/or relevant consents, the matter must immediately be reported to the DSL and/or senior leadership.
- 18.2. The school will follow the school's safeguarding and data breach procedures. This may involve seeking advice from the police or other appropriate agencies where a criminal matter may have occurred.
- 18.3. The school will consider whether the Information Commissioner's Office or another regulator needs to be notified.
- 18.4. Once procedures have been followed, the school will review how the incident occurred and take steps to prevent recurrence.
- 18.5. Staff should not negotiate with or pay individuals who threaten the school with the publication of harmful material. Threats involving sexual imagery of children should be escalated immediately through safeguarding and police procedures.

19. If consent is withheld

- 19.1. If a parent has not consented for a child's photograph to be used, the school will either ensure the child is not in a photograph taken, remove the child from the photograph (e.g. by cropping the photograph before it is used) or will obscure their face / identifying information if it is not possible to remove them altogether.
- 19.2. If a parent has withheld consent for their child to appear in shared photographs, the school is **not** able to provide parents with photographs of their child on an individual basis.

20. Roles and responsibilities

20.1. Governing body / Trust Board

The governing body or Trust Board will ensure that appropriate arrangements are in place for the safe and lawful use of pupil images.

20.2. Headteacher

The Headteacher is responsible for ensuring that this policy is implemented and that staff understand their responsibilities.

As DSL, the Headteacher is responsible for advising on safeguarding concerns relating to pupil images and for ensuring that known restrictions are appropriately communicated to relevant staff.

20.3. Data Protection Officer

The DPO provides advice on lawful bases, consent, transparency, data subject rights, retention, security and data protection incidents.

20.4. Staff

All staff must ensure they have read this policy and follow it at all times. This includes checking relevant image restrictions, seeking verbal consent before taking photographs of children and ensuring pupils are verbally informed how their photographs will be used.

20.5. Parents / carers

All parents are required to agree with school guidelines about taking and sharing photos, as part of the parent photo consent form.

Appendix 1 – Levels of Informed Consent for parents and carers

Level 1 – Internal school use

This permits photographs or videos to be used for limited internal purposes, such as:

- classroom displays;
- school noticeboards;
- assemblies;
- internal presentations;
- school records or educational activities not shared publically;

Images at this level will not be published publicly on the internet. Where appropriate, children's first names may be shared alongside a photograph (e.g. to celebrate an achievement.)

Level 2 – School communications

This permits the use of photographs or videos in communications primarily intended for circulation to the existing school community, such as:

- password-protected learning platforms such as **Class Dojo** and **Google Classroom**;
- printed school publications including end-of-year publications;
- displays at school events.

Images at this level will not be published publicly on the internet. Names will not be shared alongside photographs.

Level 3 – School photographer

This permits the school photographer to take your child's annual 'school photo' and for your child to be included in their annual 'class photo' or (for Year 6) class leavers' photo.

- Annual professional portraits taken by the contracted school photographer and offered to the child's parents for purchase.
- Annual class photographs taken by the contracted school photographer and offered to the parents of children in the class for purchase.

The school uses trusted photographers who undertake safeguarding checks. Parents who wish to opt for one but not both of the above clauses should contact the school office by email and put their specific consent in writing. Your child's name is shared with the photographer for purposes of identification.

Level 4 – Local newspaper group photo features

This permits the school to send photographs to the local newspaper which include your child. Typically, this is class or group photos for local school features such as (but not limited to):

- Starting School
- School Leavers
- Christmas Nativity
- World Book Day

If consent is not given, your child will be kept out of the class / group photograph taken for the newspaper. We will not share names or other identifying information with the newspaper.

Please be aware that photos with consent at this level may also appear on the online version of the newspaper.

Level 5 – Other press, external publications and third-party use

This permits the school, where appropriate, to provide or permit photographs or videos to be used by external organisations, such as:

- local newspapers for articles or stories other than photo features;
- educational publications;
- partner organisations;
- organisations involved in school competitions or events.

The school will only share photographs with trusted organisations, and only if there is a good reason for doing so.

Please be aware that photos with consent at this level may also appear online, for example in online newspaper articles or on company websites or social media. We will not share names alongside photographs.

Where practicable, the school will provide additional information to parents about the particular external use before it takes place. The principles of this policy apply to all cases where the school will consider sharing photographs at this level.

The school will make every effort to remove Meta and EXIF data from photographs before sharing with other organisations.

A separate consent process may be sought where the nature or extent of the proposed use is materially different from the permission originally given.

Specific consent will be sought for individual instances where other details (such as a pupil's name, if recognising an individual achievement) may be shared alongside a photograph. This is a higher level of identifiability and will only be used where there is a clear and appropriate reason, and only with consent from parents.
