Coniston Primary School

Use of Images Policy

Review Details:

Next review due:	April 2028
Committee responsible:	Staffing & Curriculum Committee
Document location	Teachers Shared J:Drive – Policies – GDPR

Reviewed and Adopted April 2026

Equality Impact Assessment (EIA) Part 1: EIA Screening

EIA CARRIED OUT BY: C Stabb	**DATE:** 27/4/2026
EIA APPROVED BY: Staffing & Curriculum Committee	DATE: 28/04/2026

Groups that may be affected: N/A

Are there any concerns that the policy could have a different impact on any of the following groups? (please tick the relevant boxes)	Existing or potential adverse impact	Existing or potential for positive impact
Age (young people, the elderly: issues surrounding protection and welfare, recruitment, training, pay, promotion)		X
Disability (physical and mental disability, learning difficulties; issues surrounding access to buildings, curriculum and communication).		X
Gender Reassignment (transsexual)		X
Marriage and civil partnership		X
Pregnancy and maternity		X
Racial Groups (consider: language, culture, ethnicity including gypsy/traveller groups and asylum seekers		X
Religion or belief (practices of worship, religious or cultural observance, including non-belief)		X
Gender (male, female)		X
Sexual orientation (gay, lesbian, bisexual; actual or perceived)		X

Any adverse impacts are explored in a Full Impact Assessment.

Approved by

Signed:		Signed:	
Chair of Staffing & Curriculum Committee – Glen Mills	Date	Head Teacher – Alan Walters	Date

1. Scope and Definitions

1.1 The purpose of this policy is to set out general rules about the capture and distribution of images and photographs of children and to give staff and parents guidelines on the subject. It applies to activities on school premises or as part of off-site events or trips.

1.2 "Image capture", "photography" and "videoing" refer to any kind of image capture, still or moving, obtained by any photographic device including still image cameras, video cameras, webcams and photographic enabled mobile telephones, and any other type of image capture device not specified here, whether digital or not, using technology existent at this time or in the future. The storage of such images includes film negative, film positive (e.g. transparencies and slides, movies, etc.), photographic paper, digital media, magnetic tape and any other kind of storage method able to be used for the storage of images, still or moving, available now or in the future.

1.3 This relatively short policy is part of our strategy for safeguarding children within our care. It complies with Keeping Children Safe in Education and should be read in conjunction with our other policies, notably:

- Online Safety policy
- Safeguarding
- Anti-bullying Policy
- Social Media Policy

2. General Principles for Staff

2.1 Every reasonable effort must be made to minimise risk of inappropriate capture and distribution of photo images. This includes:

- Securing parental consent for the use of images for their children
- Not using photographs of children or staff who have left the school without their consent
- Ensuring that children and staff are appropriately dressed
- Ensuring that children's names are not used alongside images in publicly available material
- Not using an image of any child who is subject to a court order
- Storing images securely and accessible only by those authorised to do so
- Storing images securely (whether physical or digital) with appropriate access controls
- Ensuring staff are appropriately informed about this policy

3. Safeguarding

3.1 There may be a risk to the welfare of children when individual children can be identified in photographs. For that reason, we have developed this policy to make every effort to minimise risk.

3.2 Where the capture or distribution of images of children raises a safeguarding concern, the Designated Safeguarding Lead (DSL) must be contacted immediately. Further details on safeguarding procedures are available in our safeguarding policy.

4. General Data Protection Regulation

4.1 Photographs and video images of pupils and staff are classed as personal data under the terms of GDPR. Therefore, using such images for school publicity purposes requires the consent of either the individual concerned or in the case of pupils, their legal guardians. In line with the GDPR regulations, everyone responsible for using data has to follow strict rules called "data protection principles". They must make sure the information is:

- Used fairly and lawfully
- Used for limited, specifically stated purposes
- Used in a way that is adequate, relevant and not excessive
- Accurate
- Kept for no longer than is absolutely necessary
- Handled according to the peoples data protection rights
- Kept safe and secure
- Not transferred outside of school without adequate protection and permission

5. Photography and image capture in school

5.1 Images of children may be captured as part of the educational process. Recordings of pupils for school purposes will only ever be taken using official school equipment or by a designated external professional. Staff should also be aware that taking photographs of colleagues using personal devices should only happen with the permission of that member of staff.

5.2 Images of pupils or staff must be not displayed on websites, in publications or in a public place without specific consent. The definition of a public place includes areas where visitors to the school have access. Where photographs are taken at an event attended by large crowds, this is regarded as a public area so it is not necessary to get permission of everyone in the crowd shot.

5.3 On occasions, commercial video films may be made of children on educational visits and performing in school productions. The school will inform parents where arrangements have been made for a commercial photographer to film such an event.

5.4 Parent's media permissions must be kept on file.

6. Photography and image capture by parents

6.1 As a general rule no parent or visitor is permitted to use a camera (including a mobile phone's camera facility) whilst on school premises. However, the GDPR does not apply to photos or films taken for personal use by family and

friends and it is usual for parents/carers to want to take photographs and videos of children at school events.

6.2 Exceptions to this rule are therefore made for some* specific events such as plays, recitals, concerts, sporting events, open days or other promotional events. Parents/carers are instructed against the publication of any such photographs on the internet (e.g. on social media), and we will request parents/carers to remove any such material if we deem it illegal, harmful or inappropriate in any way.

6.3 Where appropriate, our policy regarding this matter should be explained clearly to parents/carers by a member of staff before difficult situations arise.

7. Photography and image capture by pupils

7.1 Staff will supervise and maintain control over any photographing or recording that pupils do during on-school or off-site activities.

8. Publicity

8.1 Schools need and welcome publicity. Children's photographs add colour, life and interest to articles promoting school activities and initiatives. Making use of photographs for publicity materials and to promote the school in the press can increase pupil motivation and staff morale, and help parents and the local community identify and celebrate the school's achievements. However, photographs must be used in a responsible way. Schools need to respect children's and parent's rights of privacy and be aware of potential child protection issues.

9. Monitoring

9.1 It is the responsibility of all school staff to support and monitor this policy. Any concerns should be brought to the attention of the head teacher.

**We reserve the right to prohibit the use of cameras for some events if deemed inappropriate by staff*