

Oakridge Primary School Photography, Video and Digital Images Policy

Adopted:	July 2026
Chair of Health and Safety Committee:	Mrs K Lincoln
Next review date:	July 2027

1. Statement of Intent

Oakridge Primary School recognises the value of photographs, videos and digital images in celebrating learning, recording achievement, supporting assessment and strengthening communication with families and the wider community.

Photographs and videos are used routinely in school for appropriate purposes, including classroom displays, children's work, assessment evidence, school newsletters, the school website, official school communication channels, educational visits, school events and promotional materials.

At the same time, the school recognises that the use of children's images is an increasingly sensitive area. Advances in technology, including artificial intelligence (AI), facial recognition, image scraping, deepfake technology and digital image manipulation, have changed the safeguarding and privacy risks associated with taking, storing and publishing images of children.

Oakridge Primary School is committed to striking a careful and proportionate balance between celebrating pupils' achievements and protecting their privacy, dignity, safety and digital identity.

The school will ensure that:

- children's welfare remains the primary consideration;
- images are taken, stored and used lawfully and securely;
- parents and carers are able to make informed decisions about consent;
- images are selected carefully before publication;
- identifying information is limited wherever possible;
- staff understand their responsibilities when taking, storing and sharing images;
- emerging safeguarding risks, including those linked to AI image manipulation, are reviewed regularly.

This policy should be read alongside the school's:

- Child Protection and Safeguarding Policy;
- Online Safety Policy;
- Data Protection Policy;
- Staff Code of Conduct;
- Staff Acceptable Use Policy;
- Electronic Devices Policy;
- Social Media Policy;
- Website Compliance Policy;

2. Legal Framework and Guidance

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

- UK General Data Protection Regulation;
- Data Protection Act 2018;
- Education Act 2002;
- Children Act 1989 and 2004;
- Equality Act 2010;
- Keeping Children Safe in Education, current edition;
- Working Together to Safeguard Children, current edition;
- DfE guidance on data protection in schools, including taking and using photos and videos;
- Information Commissioner's Office guidance on personal data and children's information;
- UK Safer Internet Centre guidance on image safety and AI manipulation in education settings.

Photographs and videos of identifiable pupils are personal data. They must therefore be processed lawfully, fairly, transparently and securely.

3. Principles

Oakridge Primary School will apply the following principles when taking, storing or publishing images:

- Images will only be taken for legitimate school purposes.
- Images will be used in a way that is respectful and appropriate.
- Images will not be used in a way that may embarrass, distress or place a child at risk.
- Images will be stored securely on approved school systems.
- Personal devices must not be used to take images of pupils unless specifically authorised by the Headteacher in exceptional circumstances and in line with school procedures.
- Images published online will be selected carefully and proportionately.
- Children will not normally be named alongside their image.
- Where images are published online, unnecessary identifying details will be avoided.
- Parents and carers will be asked to provide informed consent for specified uses of images.
- Consent may be withdrawn at any time.
- Safeguarding concerns will always override publicity or promotional considerations.

4. Types of Image Use

For clarity, the school uses photographs, videos and digital images in the following ways.

4.1 Curriculum and Internal School Use

These are images used within school to support learning, assessment, displays, workbooks, evidence files, classroom activities, school trips, performances and celebrations of achievement.

Examples include:

- photographs of pupils' work;
- displays around school;
- photographs used in class books or learning journals;
- evidence of participation in curriculum activities;
- EYFS assessment evidence;
- images used in assemblies or school presentations.

These images are used internally and are mainly not intended for public publication.

4.2 School Publicity

These are images used to celebrate the life and success of the school, for example through:

- newsletters;
- prospectus-style materials;
- displays for prospective parents;
- printed school publications;
- information shared with the local community.

Where images are used for publicity, the school will ensure that appropriate consent is in place.

4.3 Website and Official School Communication Channels

The school may use images on its website or official school communication channels to celebrate:

- school events;
- curriculum activities;
- educational visits;
- sporting events;
- performances;
- pupil achievements;
- examples of good practice.

When publishing images online, the school will take additional care because online images may be copied, downloaded, shared, manipulated or redistributed beyond the school's control.

The school will, wherever reasonably practicable:

- avoid naming individual pupils alongside photographs;
- avoid publishing class lists with images;
- avoid unnecessary close-up images of individual children;
- avoid combining images with excessive personal information;
- select group, activity-based or wider-angle images where appropriate;
- review published images regularly;
- remove images where a safeguarding or privacy concern arises.

4.4 Press and Media

From time to time, the school may invite members of the press or media to celebrate school achievements or events.

Where this occurs:

- parents and carers will be informed where reasonably practicable;
- pupils will not be included where consent has been refused or withdrawn;
- pupils will not normally be identified by full name;
- press photographers or media representatives will be supervised while on school premises;
- the school will consider whether the proposed publication is appropriate and proportionate.

4.5 School Photographer

The school may arrange for a reputable commercial photographer to take individual, sibling, class or group photographs. Parents and carers will be informed in advance when school photography is taking place. The school will only use reputable providers who are expected to handle images securely and appropriately.

5. Digital Identity and Online Publication

Oakridge Primary School recognises that every photograph or video published online contributes to a child's digital identity. Images published online may remain accessible for many years. Even where the school later removes an image, it may already have been copied, downloaded, cached, shared or stored by others.

The school will therefore consider both:

- the immediate educational or celebratory benefit of publishing the image; and
- the longer-term impact on the child's privacy, dignity and digital footprint.

Publication will always be proportionate. The school will not publish images simply because they are available. Images will be selected carefully and with safeguarding in mind.

6. Artificial Intelligence, Deepfakes and Image Manipulation

Oakridge Primary School recognises that artificial intelligence technologies can now generate, edit, alter, reproduce and manipulate images in ways that were not previously possible.

This includes the potential for publicly available photographs to be:

- copied from websites or social media;
- used to create fake or manipulated images;
- combined with other data;
- used for impersonation;
- used in deepfake or synthetic media;
- misused in ways that may cause distress, embarrassment or safeguarding risk.

The school cannot eliminate these risks entirely. However, it will take reasonable and proportionate steps to reduce them.

These steps include:

- seeking informed parental consent before publishing images;
- avoiding unnecessary close-up images where possible;
- avoiding publication of full names alongside images;
- reducing unnecessary identifying information;
- using official school systems only;
- reviewing images already published online;
- removing images where safeguarding concerns arise;
- ensuring staff are aware of emerging AI-related image risks;
- reviewing national guidance annually.

Staff must not use AI tools to edit, generate, enhance or manipulate pupil images.

Pupil images must not be uploaded to public AI tools, personal accounts or unauthorised online services.

Where the school becomes aware that a child's image has been misused, manipulated or shared inappropriately, the matter will be treated as a safeguarding concern and managed in line with the Child Protection and Safeguarding Policy.

7. Parental Consent

The school will seek parental consent for the use of pupil images.

Consent will be requested in a clear and specific way, allowing parents and carers to make informed decisions about different uses of images, including:

- internal school use;
- school newsletters and printed materials;
- website and official school communication channels;
- press and media;
- school photography;
- images taken at school events by other parents.

Consent is voluntary and may be withdrawn at any time.

Where consent is withdrawn, the school will stop using the child's image as soon as reasonably practicable. The school will remove online images where it is able to do so, but parents should be aware that images already published online may have been copied or shared by others.

If consent has not been granted, the school will take reasonable steps to ensure the pupil is not included in relevant images. However, there may be occasions, particularly during large public events, where complete exclusion from background images is difficult. The school will manage this sensitively and proportionately.

8. Informing Parents About Risk

Oakridge Primary School believes that parental consent should be genuinely informed.

When asking parents and carers to provide consent, the school will explain that:

- photographs and videos help celebrate learning, achievement and school life;
- the school takes reasonable steps to protect children's images;
- images published online may be copied, downloaded or shared by others;
- emerging technologies, including AI, can be used to manipulate images;
- the school limits identifying information wherever possible;
- parents and carers can choose whether or not to give consent;
- consent can be withdrawn at any time.

The school will not present online image publication as risk-free. Instead, it will give parents clear and balanced information so that they can make a decision that is right for their child and family.

9. Staff Responsibilities

All staff are responsible for ensuring that images are taken, stored and used appropriately.

Staff must:

- use school-approved equipment or authorised secure school systems;
- ensure images are appropriate, respectful and necessary;
- avoid taking images of pupils in vulnerable situations;
- avoid taking images of pupils who are distressed, injured, changing or insufficiently dressed;
- avoid one-to-one image-taking situations unless there is a legitimate reason and appropriate safeguards are in place;
- upload images promptly to secure school systems;
- delete images from capture devices once transferred and no longer required;
- check consent arrangements before using images for publication;
- report any concern about image misuse to the Designated Safeguarding Lead.

Staff must not:

- use personal mobile phones to take images of pupils unless expressly authorised;
- store pupil images on personal devices, including removable media drives such as but not limited to USB memory sticks;
- upload pupil images to personal cloud storage;
- share pupil images through personal messaging apps;
- post pupil images on personal social media accounts;
- use AI tools to manipulate pupil images without authorisation;
- use images for any purpose unrelated to school business.

Any breach of this policy may be managed under the Staff Code of Conduct and disciplinary procedures, and referrals to the LADO may be necessary.

10. Assessment Evidence

Photographs and videos are often used within the Early Years Foundation Stage and across school to record children's learning, development and achievements.

Where images are used for assessment or learning evidence:

- images will be appropriate and necessary;
- images will be stored securely;
- images will be accessible only to authorised staff and relevant parents/carers where appropriate;
- images will not be taken in toilets or changing areas;
- images will not show children in undignified or vulnerable situations;
- images will be deleted when no longer required in line with school retention arrangements.

These principles also apply where photographs are taken elsewhere in school to evidence learning.

11. Photography During School Events

The school recognises that parents and carers often wish to photograph or film their own child at school events, including concerts, performances, sports days and celebrations.

The school will usually allow reasonable photography for personal and family use unless there is a specific safeguarding reason to restrict it.

Parents and carers are asked to:

- follow any instructions given by school staff;
- take photographs respectfully and without disrupting the event;
- focus primarily on their own child;
- avoid sharing images publicly where other children are identifiable without appropriate permission;
- respect any request from the school not to take photographs or video;
- understand that restrictions may be needed to protect vulnerable pupils.

The school may restrict or prohibit photography at an event where this is necessary for safeguarding, privacy, copyright, performance licensing or operational reasons.

Where such a restriction applies, the school will explain this clearly wherever possible.

Anyone who refuses to follow the school's instructions may be asked to stop taking photographs or filming and, where necessary, may be asked to leave the event.

12. Parents and Responsible Sharing

Oakridge Primary School recognises that families naturally wish to celebrate their children's achievements. Parents and carers are asked to support the school's safeguarding culture by sharing images responsibly.

Images taken at school events should be for personal and family use wherever possible. Parents and carers should avoid posting images online where children other than their own are identifiable, unless they have appropriate permission from the families concerned.

The school does not accept responsibility for images taken and shared by parents or visitors contrary to this guidance, but it will respond appropriately if concerns are raised.

Where image sharing creates a safeguarding concern, the matter will be referred to the Designated Safeguarding Lead.

13. Educational Visits and Off-Site Activities

The same safeguarding and data protection expectations apply during educational visits, residential visits, sporting events and off-site activities.

Staff must ensure that:

- images are taken only for legitimate school purposes;
- images are stored securely after the visit;
- consent arrangements are checked before publication;
- pupils are not photographed in vulnerable or inappropriate situations;
- images are not shared through personal accounts or unauthorised platforms.

Adults accompanying visits, including volunteers, must follow school guidance on photography and image sharing.

14. Storage, Retention and Deletion

Images will be stored securely on approved school systems.

Access to stored images will be limited to authorised staff.

Images will be retained only for as long as necessary for the purpose for which they were taken.

Images will be deleted securely when no longer required.

The school will take reasonable steps to ensure that:

- image files are not named in a way that unnecessarily identifies pupils;
- images are not stored on personal devices;
- images are not transferred through insecure systems;
- images are backed up and protected in accordance with school data security arrangements;
- images are removed from public platforms where they are no longer appropriate or required.

15. External Photographers, Visitors and Contractors

External photographers, media representatives, visitors or contractors must not take photographs or video of pupils unless this has been authorised by the school.

Where external photography is authorised, the school will ensure that:

- the purpose is clear;
- relevant consent has been considered;
- the photographer is supervised where appropriate;
- images are used only for the agreed purpose;
- safeguarding arrangements are followed.

External photographers must not have unsupervised access to pupils unless appropriate checks and arrangements are in place.

16. Pupil Responsibilities

Pupils will be taught, in an age-appropriate way, about the safe and respectful use of images.

This may include learning about:

- asking permission before taking or sharing images;
- not sharing images that may upset, embarrass or harm others;
- online privacy;
- digital footprints;
- image manipulation and AI;
- reporting concerns to a trusted adult.

This learning will be delivered through the school's PSHE, computing and online safety curriculum.

17. Responding to Concerns or Misuse

Any concern about the inappropriate taking, sharing, editing or manipulation of images will be taken seriously.

This includes:

- unauthorised sharing of pupil images;
- use of images to bully, harass or embarrass;
- AI manipulation or deepfake creation;
- sexualised image manipulation;
- image-based abuse;
- misuse of school-published images;
- concerns about external websites or social media accounts.

Where the concern involves safeguarding risk, it will be referred immediately to the Designated Safeguarding Lead and managed in line with the Child Protection and Safeguarding Policy.

Where appropriate, the school may:

- ask for images to be removed;
- report content to a platform;
- seek advice from the Local Authority;
- contact the police;
- contact the UK Safer Internet Centre, Internet Watch Foundation or other relevant organisation;
- inform parents and carers;
- review its publication practices.

18. Monitoring and Review

The Headteacher is responsible for implementing and monitoring this policy.

Governors will review this policy annually.

The school will continue to monitor guidance issued by the Department for Education, Information Commissioner's Office and UK Safer Internet Centre, particularly in relation to AI image manipulation, online safety and the protection of children's digital identity.

Appendix A: Parent and Carer Consent Form

This form is shared digitally with parents.

Use of Photographs, Video and Digital Images

Oakridge Primary School values celebrating children's learning, achievements and school life through photographs and videos.

Photographs and videos may be used for classroom displays, school newsletters, evidence of learning, the school website, official school communication channels, printed publications and, occasionally, local press coverage.

Before deciding whether to give consent, please note that while the school takes reasonable steps to protect children's images, images published online may be copied, downloaded, shared or manipulated by others. Emerging technologies, including artificial intelligence, can be used to alter or misuse photographs. The school reduces these risks by carefully selecting images, limiting identifying information and reviewing published content.

Consent is voluntary and may be withdrawn at any time.

Use of image	Yes	No
I consent to my child's image being used internally in school, including displays, learning evidence, books, presentations and assessment records.	☐	☐
I consent to my child's image being used in school newsletters, which are created using Canva, shared via Parent Mail with the school community, linked on the school website and are also printed.	☐	☐
I consent to my child's image being used on the school website and official school communication channels.	☐	☐
I consent to my child's image being used in their class password protected SWAY document, which is our chosen method of sharing images with parents.	☐	☐
I consent to my child's image being used by local press or media, where authorised by the school.	☐	☐
I consent to my child being included in photographs or videos taken at school events by other parents/carers for personal and family use.	☐	☐

I understand that:

- the school will not normally publish my child's full name alongside their image;
- the school will take reasonable steps to protect images;
- images published online may be copied or shared beyond the school's control;
- I may withdraw consent at any time by contacting the school office;
- withdrawal of consent will apply from the point at which the school can reasonably action the request.

Appendix B: Staff Quick Guide

Before taking or using a pupil image, staff should ask:

1. Is there a clear school purpose?
2. Is the image appropriate and respectful?
3. Is the child suitably dressed and not vulnerable or distressed?
4. Has consent been checked if the image will be published?
5. Is the image being taken on approved school equipment or systems?
6. Will the image be stored securely?
7. Is identifying information being limited?
8. Could the image create a safeguarding, privacy or AI misuse risk?
9. Does the image need to be published online, or could a less identifiable image be used?
10. Has the image been deleted from the capture device once transferred?

If unsure, staff should seek advice from the Headteacher or a Designated Safeguarding Lead.