John Perry Primary School

PHOTOGRAPHY POLICY

If printed, copied, or otherwise transferred from this website this document must be an uncontrolled copy.

Policy amendments may occur at any time. Please consult the policies page on the website for the latest update.

Approved by: School Governing Body **Date:**

Last reviewed on: February 2025

Next review date: August 2027

Controlled Document

Title	Photography Policy
Document Type	Approved
Author	Data Protection Officer
Owner	Headteacher
Document Version	Version 1
Created	February 2025
Approved by	Governing Board
Review Date	August 2028 or earlier where there is a change in the applicable law affecting this Policy Guidance

Version Control:

Version	Date	Author	Description of Change
1	February 2025	Data Protection Enterprise Ltd www.dataprotectionenterprise.co.uk	New Policy

Contents:

1. Introduction
2. Purpose
3. Lawful Basis
4. Scope
5. Guidelines
6. Storage and Security
7. Opting out
8. External Visitors and Media
9. Policy Review
10. Links to other policies

1. INTRODUCTION

This policy outlines the use of photography within the school setting It is intended to provide clear guidance on when and how photographs may be taken, stored, and shared in the school environment, ensuring compliance with data protection laws, safeguarding requirements, and best practices.

2. PURPOSE

The purpose of this policy is to:

- Clarify the legal basis for the school's use of photography (public task) in school activities.
- Ensure the protection of student and staff privacy.
- Provide a clear framework for how photos may be used for school-related purposes.
- Promote transparency regarding the school's photography practices.

The use of photographs or images in schools is governed by several legal principles, including the General Data Protection Regulation (GDPR) and the Data Protection Act 2018. Under GDPR, the lawful basis for processing personal data can be based on several grounds. For most school activities, photographs may be taken as part of the school's lawful basis - public task, particularly in relation to educational and administrative functions.

3. LAWFUL BASIS

The school's use of photography will be considered under the lawful basis public task where the taking and use of images are necessary for the fulfilment of the school's educational or administrative duties, such as:

- Candid photos during school events (assemblies, sports, plays)
- Photos or videos for school brochures, websites, promotional materials
- Classroom or educational activities (for internal use or presentations)
- Group photos (class photos, team photos, etc.)

The School does not rely on specific consent from individuals, as long as the photographs are taken and used in accordance with the school's educational mission and responsibilities.

4. SCOPE

Photographs may be taken during the following school activities:

- **Internal Use:**
  Photos or videos taken for internal educational purposes (e.g., classroom activities) will only be shared with students, parents, and staff.
- **Public Use:**
  Photos or videos used for public purposes (e.g., school website, social media) will include minimal identifying information (e.g., first name only or no name at all). In the

case of group photos or event highlights, students will not be singled out without explicit prior consent.

- **Media Outlets:**
  If a student is featured in a story that is being covered by external media (television, news websites, newspapers etc.), the school will seek parental permission before allowing the student to be interviewed or photographed, unless the student is part of a public event or gathering.

5. GUIDELINES FOR PHOTOGRAPHY

- **Staff Responsibility:** Only authorised personnel may take photographs during school events. They must ensure that photos are taken respectfully and within the context of the school's educational purposes.
- **Privacy and Dignity:** Photos must not capture students in compromising or private situations. Images should reflect the dignity of all students and staff.
- **Sensitive Issues:** Where certain groups of students may be vulnerable (e.g., students with special educational needs or safeguarding concerns), additional considerations should be taken before taking or using photos.
- **No Personal Use:** Photographs taken by staff must be used solely for the school's educational and promotional purposes, and not for personal or non-school-related uses.

6. STORAGE AND SECURITY

All photographs taken by the school will be securely stored in compliance with GDPR and school data protection policies. Access to photographs will be restricted to authorised school staff only.

- **Digital Images:** Stored securely on school-managed servers or cloud storage that complies with data protection regulations.
- **Physical Images:** Stored in a secure location within the school premises.
- **Retention Period:** Photographs will be kept for a period deemed necessary for educational or archival purposes and disposed of securely once no longer required.

7. OPTING OUT PROCESS

While the school does not require individual consent for photographs taken under the lawful public task basis, parents and guardians have the right to raise concerns or request restrictions on the use of their child's image. Parents can opt out of having their child's photo being taken.

Parents who wish to opt out of having their child photographed for specific purposes must notify the school in writing. If agreed by the School, the School will maintain a register of students whose images are not to be used for such purposes and ensure these preferences are respected.

8.EXTERNAL MEDIA AND VISITORS

If external media or photographers are invited to the school for an event, parents and guardians will be notified in advance, and the school will obtain permission where necessary. Visitors may be asked to sign an agreement that outlines the permissible uses of photographs and videos.

9.POLICY REVIEW

The DPO is responsible for monitoring and reviewing this policy. In addition, changes to legislation, national guidance, codes of practice or commissioner advice may trigger interim reviews.

11. LINKS WITH OTHER POLICIES

This Information Sharing policy is linked to the School:

- Data Protection Policy
- Security Incident and Data Breach Policy
- CCTV Policy
- Information Security Policy
- Safeguarding policy
- UK GDPR Privacy Notices

The Information Commissioner also provides a free helpdesk that can be used by anyone and a website containing a large range of resources and guidance on all aspects of Information Law for use by organisations and the public. See www.ico.org.uk