

The Richard Pate School



Policy on Taking, Storing and Using Images of Children

Reviewed by JMH Sept 2026

This policy should be read alongside the School's Safeguarding and Child Protection Policy, Online Safety / E-Safety Policy, Child-on-Child Abuse and Harmful Sexual Behaviour Policy, Data Protection Policy, Privacy Notices, CCTV Policy, Staff Code of Conduct, Behaviour Policy and Mobile Phone arrangements.

Safeguarding is everyone's responsibility. All staff must read Keeping Children Safe in Education 2026 Part One in full and follow the School's safeguarding procedures. Images, video and digitally created or altered imagery can form part of online abuse, child-on-child abuse, sexual harassment or harmful sexual behaviour; any safeguarding concern must be reported to the DSL or Deputy DSL without delay.

At the Richard Pate School, we are an open and inclusive community that is very proud of all of the achievements of all of our pupils in their academic, artistic and sporting endeavours. We celebrate our diversity and give all of our many visitors a warm welcome.

We particularly welcome parents to our concerts, plays and sporting events, as well as to more formal occasions during the school year. The school walls are decorated with examples of pupils' work, team photographs and photographs of trips and expeditions in which our pupils have participated. We make full use of electronic notice boards inside the school to enhance our displays. Our website is updated regularly and all parents are sent our e-newsletters in order to keep them fully abreast with the news of our active community. We also use social media as a way to share news, celebrate achievements of pupils and promote the work of the School.

1. General points to be aware of

- The School will identify and document an appropriate lawful basis for each use of pupil images under UK data protection law. Consent will be used where consent is the appropriate lawful basis; where another lawful basis applies, the School will provide appropriate privacy information and respect relevant rights and objections.
- Where the School relies on consent, consent must be freely given, specific, informed and capable of being withdrawn. Withdrawal will not affect processing already lawfully carried out, but the School will take reasonable steps to stop future use where consent is withdrawn.
- The School will take account of the child's wishes and feelings in an age-appropriate way. A child's objection to being photographed, filmed or having an image used will be taken seriously, even where parental consent has been provided, and safeguarding or welfare considerations will take priority.
- Particular care will be taken with images of children who may be vulnerable, including looked-after or previously looked-after children and children where publication of an image or identifying information could create a safeguarding risk. The DSL should be consulted where there is uncertainty.

- Certain uses of images are necessary for the ordinary running of the school; other uses are in the legitimate interests of the school and its community and unlikely to cause any negative impact on children. The school is entitled lawfully to process such images and take decisions about how to use them, subject to any reasonable objections raised.
- Parents who accept a place for their child at the school are invited to indicate that they agree to the school using images of him/her as set out in this policy, by signing the School's consent forms and from time to time if a particular use of the pupil's image is requested. However, parents should be aware of the fact that certain uses of their child's images may be necessary or unavoidable (for example if they are included incidentally in CCTV or a photograph).
- We hope parents will feel able to support the school in using pupil images to celebrate the achievements of pupils, sporting and academic; to promote the work of the school; and for important administrative purposes such as identification and security.
- Any parent who wishes to limit the use of images of a pupil for whom they are responsible should contact the Headteacher in writing or request a new consent form from the School Office. The school will respect the wishes of parents/carers (and indeed pupils themselves) wherever reasonably possible, and in accordance with this policy.
- Parents should be aware that, from around the age of 12 and upwards, the law recognises pupils' own rights to have a say in how their personal information is used – including images.

2. Use of Pupil Images in School Publications

Before publication, staff will check that the proposed image and accompanying information do not reveal unnecessary personal information or create an avoidable safeguarding risk, including through location information, uniform, metadata, captions, tags or other identifying details.

Images used on public websites, social media or external promotional material will be selected with particular care. Full names and images will not normally be combined without an identified purpose and appropriate lawful basis/permission.

The School will not use generative AI to create, alter or manipulate a recognisable pupil image for publication or marketing unless the use has been specifically risk-assessed, is lawful, transparent and appropriate, and any necessary consent has been obtained. AI tools must not be used in a way that sexualises, humiliates, misrepresents or otherwise places a child at risk.

Unless the relevant pupil or his or her parent has requested otherwise, the school will use images and video of its pupils to keep the school community updated on the activities of the school, and for marketing and promotional purposes, including:

- on internal displays (including clips of moving images) on digital and conventional notice boards within the school premises;
- in communications with the school community (parents, pupils, staff, Governors and alumni) including by email, on the school intranet and by post;
- on the school's website and, where appropriate, via the school's social media channels (currently Instagram). Such images would not normally be accompanied by the pupil's full name without permission; and
- in the school's prospectus, and in online, press and other external advertisements for the school. Such external advertising would not normally include pupils' names and in some

circumstances the school will seek the parent or pupil's specific consent, depending on the nature of the image or the use.

The source of these images will predominantly be the school's staff (who are subject to policies and rules in how and when to take such images), or a professional photographer used for marketing and promotional purposes, or occasionally pupils' parents. The school will only use images of pupils in suitable dress and the images will be stored securely and centrally.

3. Use of Pupil Images for Identification and Security

- Access to identification, medical and safeguarding images will be restricted to staff who need the information for their role. The School will periodically review whether displays containing identifiable medical or dietary information remain necessary, proportionate and appropriately located.
- Images used for identification, safeguarding, medical or security purposes will be retained only for as long as necessary in accordance with the School's retention schedule, privacy notices and data-protection obligations.
- All pupils are photographed every year by the school photographer and a small thumbnail image from this photo set is stored by the School in its management information system for the purposes of internal identification.
- Small thumbnails of children identified with special medical or dietary requirements are displayed in the staff room, medical room, dining room, main school kitchen and Nursery kitchen to ensure that all staff are aware of their special circumstances and to protect from any serious medical emergency. Included with this information may be specific medical action plans in case of a medical emergency such as an allergic reaction, fit or other episode.
- The management information system, is password protected to allow access and is restricted to academic, pastoral and school office staff. Any parent who so requests will be sent a copy of his or her son or daughter's photograph.
- CCTV is not in use on school premises.

4. Use of Pupil Images in the Media

- Where external media or photographers are involved, the School will agree in advance the permitted purpose, scope, handling and onward use of pupil images. Any safeguarding restrictions or pupils for whom images must not be taken or published will be communicated to the responsible staff member in a secure and proportionate way.
- The School will not permit media activity where it considers that photography, filming, naming, geolocation or publication could place a pupil at risk or conflict with the pupil's welfare or safeguarding needs.
- Where practicably possible, the school will always notify parents in advance when the media is expected to attend an event or school activity in which school pupils are participating, and will make every reasonable effort to ensure that any pupil whose parent or carer has refused permission for images of that pupil, or themselves, to be made in these circumstances are not photographed or filmed by the media, nor such images provided for media purposes.
- The media often asks for the names of the relevant pupils to go alongside the images, and these will be provided where parents have been informed about the media's visit and either parent or pupil has consented as appropriate.

5. Security of Pupil Images

- Pupil images are personal data and must be handled in accordance with UK GDPR, the Data Protection Act 2018, the School's privacy notices, retention arrangements and information-security procedures.
- School images must be captured, transferred, edited, stored and shared only using School-approved devices, accounts, systems and applications. Staff must not use personal cloud storage, personal messaging accounts or unapproved apps to store or transmit pupil images.
- Where an external photographer, platform, social-media service or other processor handles images on the School's behalf, the School will undertake appropriate due diligence and put in place the necessary contractual and data-protection arrangements.
- Retention periods for images will be documented and reviewed. The School will not retain images for longer than necessary merely because storage is available; where a longer archival or historical retention period is justified, this will be documented and managed appropriately.

Artificial intelligence, deepfakes and intimate imagery

- KCSIE 2026 recognises that self-generated intimate images may include images generated or manipulated using artificial intelligence, for example deepfakes. Any incident involving nude, semi-nude, intimate, sexualised, digitally altered or AI-generated imagery of a child must be treated as a safeguarding matter and referred to the DSL/Deputy DSL immediately.
- Staff must not routinely view, copy, print, forward, save or share suspected intimate imagery of a child. The DSL will follow current safeguarding guidance on responding to sharing of nude/semi-nude or intimate imagery and will consider police or children's social care involvement where appropriate.
- The School will assess the safeguarding, privacy, security and data-protection risks of any generative AI product used to create, edit, analyse or store images. Pupil images or other personal data must not be uploaded to an AI service unless the School has approved that service and the intended use following appropriate risk and data-protection assessment.
- Professional photographers and the media are accompanied at all times by a member of staff when on school premises. The school uses only reputable professional photographers and makes every effort to ensure that any images of pupils are held by them securely, responsibly and in accordance with the school's instructions.
- The school takes appropriate technical and organisational security measures to ensure that images of pupils held by the school are kept securely on school systems, and protected from loss or misuse. The school will take reasonable steps to ensure that members of staff only have access to images of pupils held by the school where it is necessary for them to do so.
- Our images are stored in the password-protected management information system, or on the password-protected internal school computer network. Photos of past pupils are removed from the management information system as they leave.
- On our website there are images on the permanent area of the website and the galleries, which are being constantly updated. Our website gallery of photos is reviewed to ensure that the photos conform to the requirements of this document, and galleries are removed from the website after 7 years.

- On Instagram, the photos we use to share news, celebrate achievements of pupils and promote the work of the School for marketing purposes, all conform to the requirements of this document. Our Instagram account is constantly monitored and photographs are removed after 7 years.
- All staff are given guidance on the school's Policy on Taking, Storing and Using Images of Pupils, and on the importance of ensuring that images of pupils are made and used responsibly, only for school purposes, and in accordance with school policies and the law.
- Photographs/videos taken by members of staff should only be taken on a school camera (or device) and only downloaded onto school computers, never onto personal computers. (This is detailed in our Staff Handbook.)
- Staff must not take any photographs/videos from the site without permission from the Headmaster.

6. Use of Cameras and Filming Equipment (including mobile phones) by Parents

The School may impose additional restrictions or prohibit photography/filming at a particular event where this is necessary to protect children, comply with safeguarding arrangements or respect the rights of pupils and families. Any such restriction will be communicated clearly.

Parents/carers must not use School-event images to create, request or share AI-generated or digitally manipulated content that sexualises, humiliates, impersonates or otherwise harms a child. Any concern about such use should be reported to the School and will be considered under safeguarding procedures.

Where images of other children are captured incidentally, parents/carers are expected not to tag, name or otherwise identify those children when sharing material online and to respect any request from the School or another family to remove material where there is a safeguarding concern.

- Parents, guardians or close family members (hereafter, parents) are welcome to take photographs of (and where appropriate, film) their own children taking part in school events, subject to the following guidelines, which the school expects all parents to follow:
- When an event is held indoors, such as a play or a concert, parents should be mindful of the need to use their cameras and filming devices with consideration and courtesy for cast members or performers on stage and the comfort of others. Flash photography can disturb others in the audience, or even cause distress for those with medical conditions; the school therefore asks that it is not used at indoor events.
- Parents are asked not to take photographs of other pupils, except incidentally as part of a group shot, without the prior agreement of that pupil's parents.
- Parents are reminded that such images are for personal use only. Images which may, expressly or not, identify other pupils should not be made accessible to others via the internet (for example on Facebook or Instagram), or published in any other way.
- Parents are reminded that copyright issues may prevent the school from permitting the filming or recording of some plays and concerts. The school will always print a reminder in the programme of events where issues of copyright apply.
- Parents may not film or take photographs in changing rooms or backstage during school productions, nor in any other circumstances in which photography or filming may embarrass or upset pupils.

- The school reserves the right to refuse or withdraw permission to film or take photographs (at a specific event or more generally), from any parent who does not follow these guidelines, or is otherwise reasonably felt to be making inappropriate images.
- The school sometimes records plays and concerts (or engages a professional photographer or film company to do so), in which case CD, DVD or digital copies may be made available to parents for purchase. Parents of pupils taking part in such plays and concerts will be consulted if it is intended to make such recordings available more widely.

7. Use of Cameras and Filming Equipment by Pupils

From 1 September 2026 the School will have regard to the statutory DfE Mobile Phones in Schools guidance. The School is mobile-phone-free by default throughout the school day. Any permission for a pupil to bring a phone or other personal smart/communication device is an exception and the device must remain inaccessible to the pupil during the school day unless the authorised exception specifically permits access.

Pupils will be taught that creating, requesting, possessing or sharing nude, semi-nude, intimate, sexualised, digitally manipulated or AI-generated imagery of a child is a safeguarding concern. This includes deepfake or wholly synthetic imagery which represents or appears to represent a real child.

Pupils must report concerns about images, filming, image-sharing, impersonation, deepfakes or other misuse of technology to a trusted adult. The School will respond in a child-centred way and will not require a pupil to reproduce or forward intimate imagery in order to make a report.

- All pupils are encouraged to look after each other and to report any concerns about the misuse of technology, or any worrying issues to a member of the pastoral staff.
- The use of cameras or filming equipment (including on mobile phones) is not allowed unless fully supervised by a member of staff. Pupils are not allowed to bring any phone or other device to School other than in exceptional circumstances and with the permission of the Headteacher.
- The misuse of images, cameras or filming equipment in a way that breaches this Policy, is always taken seriously, and may be the subject of disciplinary procedures or dealt with under the relevant safeguarding policy as appropriate.