



Policy No. 1.6d

APPLEFORD SCHOOL PHOTOGRAPHY AND IMAGES POLICY

This policy, which applies to all staff, volunteers, contractors and visitors working with pupils in education or the boarding provision publicly available on the school website, on the staff share and upon request a copy (which can be made available in large print or other accessible format if required) may be obtained from the School Office.

We have a whole school approach to safeguarding, which is the golden thread that runs throughout every aspect of the school. All our school policies support our approach to safeguarding (child protection). Our fundamental priority is our children and their wellbeing; this is first and foremost.

Scope: This policy applies to all staff, governors, volunteers and contractors, to parents/carers and visitors attending school events, and to approved photographers and suppliers. This policy also reflects current legislation, the new recording/parent-notification duties and emerging DfE/Ofsted/ISI expectations for residential special schools It covers:

- images taken by the school for official purposes (e.g. learning records, displays, marketing, the school website and prospectus, and official social media accounts);
- images taken by parents/carers or visitors at school events on personal devices; and
- images taken by an approved external photographer or supplier engaged by the school.

This policy applies in:

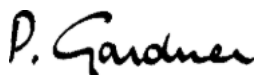
- classrooms and learning spaces;
- residential accommodation and during boarding routine;
- on-site and off-site activities, including trips, transport and work experience.
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Appleford believes that it is important to establish a safe, secure and stable environment to enable pupils to grow, develop and learn. The school understands that behaviour is often a means of communication which may signal that a pupil needs support but does not know how to express this; therefore, the school takes a proactive approach to anticipating, managing and minimising potential triggers of distressed behaviour that may cause harm.

Monitoring and Review: The text of this policy is necessary and proportionate to meet the needs of Appleford School, supporting those who work with our pupils, making clearer the responsibilities of school staff, volunteers, proprietor and the Advisory Board. This policy is designed to support the Appleford School staff who work with our pupils who have special educational needs and disabilities (SEND) making clearer the responsibilities of school staff, and the proprietor. These arrangements are subject to continuous monitoring, refinement, and audit by Dr Peter Gardner (Proprietor and Managing Director), and Mr James Langan (Headmaster) who is the Data Protection Officer.

The Proprietor, Headmaster, and Designated Safeguarding Lead will undertake a full annual review or sooner following a significant incident or change in relevant guidance, of this document, inclusive of its implementation and the efficiency with which the related duties have been implemented. This review will be formally documented in writing. Any deficiencies or weaknesses recognised in arrangements or procedures will be remedied immediately and without delay. All staff will be informed of the updated/reviewed arrangements, and it will be made available to them in writing or electronically.

Signed



Dr Peter Gardner
Proprietor and Managing Director

Mr James Langan
Headmaster

Appleford believes that it is important to establish a safe, secure and stable environment to enable pupils to grow, develop and learn. The school understands that behaviour is often a means of communication which may signal that a pupil needs support but does not know how to express this. Therefore, the school takes a proactive approach to anticipating, managing and minimising potential triggers of distressed behaviour that may cause harm.

Statement of intent: Appleford School recognises that photographs, video and other images of pupils play a valuable part in school life, supporting learning records, celebrating achievement, and helping to promote the school to current and prospective families. At the same time, a photograph or video of an identifiable pupil is personal data, and its capture, use and sharing carries data protection and safeguarding considerations that must be carefully managed.

This policy sets out how Appleford School obtains consent for, uses, stores and shares photographs and images of pupils, and what is expected of staff, parents/carers and visitors in relation to photography and filming connected with the school. It should be read alongside the Safeguarding and Child Protection Policy, Data Protection Policy, Social Media Policy and Online Safety Policy

References to 'images' in this policy include photographs, video and audio-visual recording, and live streamed footage, whether taken on Appleford school owned equipment or personal devices, in any format.

At Appleford we use images and videos for a variety of purposes, including prospectuses, display boards, educational purposes, conferences and the school website. We understand that parents may also wish to take videos or photos of their children participating in school events for personal use. Whilst we recognise the benefits of photography and videos to our school community, we also understand that these can have significant risks for those involved. Under the legal obligations of the UK GDPR and the Data Protection Act (DPA) 2018, the school has specific responsibilities in terms of how photos and videos are taken, stored and retained.

The school has implemented a policy on the safe cameras and recording equipment by staff, pupils and parents to reflect the protective ethos of the school regarding pupils' safety. To ensure that, as far as possible, the use of photography and video is always safe, the policy provided below should be followed. This policy is applicable to all forms of visual media, including film, print, video, DVD and websites.

Legal and regulatory framework: This policy is informed by, and should be read alongside, all relevant legislation and statutory guidance including, but not limited to, the following: This policy has been developed with reference to the current relevant legislation and guidance including, but not limited to, the following:

- the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018, under which a photograph or video of an identifiable individual is personal data, and its use generally requires a lawful basis, most commonly consent;
- the statutory guidance "Keeping Children Safe in Education" (KCSIE 2026), including expectations around the safe use of images of children and the handling of any safeguarding concern relating to an image;
- the Protection of Children Act 1978 and related legislation, under which it is a criminal offence to take, make, possess or distribute an indecent image of a child;

- the Copyright, Designs and Patents Act 1988, in respect of ownership of images taken by staff, parents or commissioned photographers;
- guidance from the Information Commissioner's Office (ICO) on photography and data protection in schools; and
- where applicable, the Independent School Standards and the relevant inspection framework (Ofsted SCCIF/Independent Schools Inspectorate).
- Data protection in school (DfE: 3rd February 2023 and updated 17th June 2026'
- The Freedom of Information Act 2000
- Equality Act 2010
- Human Rights Act 1998
- Voyeurism (Offences) Act 2019

This policy operates in conjunction with the following school policies:

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| • Safeguarding and Child Protection Policy | • Staff Code of Conduct |
| • Online Safety Policy | • Anti-Bullying Policy |
| • Social Media Policy | • Behaviour Policy |
| • Data Protection Policy and Privacy Notices | • Mobile Phone Policy |
| • Cyber Security Policy | |

Roles, Photographs and Images Responsibility Responsibilities

The Proprietor:

- holds strategic oversight of the school's use of photographs and images and approves this policy.

The Headmaster will be responsible for:

- Has overall responsibility for ensuring photographs and images of pupils are taken, used and stored appropriately across the school.;
- submitting consent forms to parents, and pupils where appropriate, at the beginning of the academic year regarding photos and videos being taken whilst at school.;
- ensuring that all photos and videos are stored and disposed of correctly, in line with the UK GDPR and the DPA 2018.;
- deciding whether parents are permitted to take photos and videos during school events and
- communicating this policy to all the relevant staff members and the wider school community, such as parents.

The Designated Safeguarding Lead (DSL) will be responsible for:

- considering the safeguarding implications of photography and image use, including any pupil subject to restrictions on their image, and leads the response to any related safeguarding concern;
- liaising with social workers to gain consent for the use of photos and videos of LAC;
- liaising with the DPO to ensure there are no data protection breaches and
- informing the Headmaster of any known changes to a pupil's security, e.g. child protection concerns, which would mean that participating in photography and video recordings would put them at significant risk.

Parents, carers and pupils will be responsible for:

- Completing a photography consent form on an annual basis.
- Informing the school in writing if they wish to make any changes to their consent.
- Acting in accordance with this policy.

Additionally:

- pupils follow staff instructions regarding photography and filming at school. Key Stage 3 and 4 pupils must not photograph or film other pupils or staff without consent, and must not share images that could embarrass, humiliate or harm another person, in line with the Anti-Bullying and Social Media Policies and
- parents/carers provide and keep up to date their consent preferences for the use of their child's image and follow the school's guidance on personal photography at school events.

Data Protection Officer (DPO) will be responsible for:

- advising on the data protection implications of photography, oversees the consent register, and ensures retention and security requirements are met.

Marketing/Communications Lead will be responsible for:

- managing the use of images in official school publications, the website and social media, and checks consent preferences before any image is used externally.

All staff will be responsible for:

- taking and use photographs of pupils only for authorised school purposes, check consent preferences before using or sharing an image, and report any concern about photography or image use to the DSL or DPO

Approved photographers and suppliers will be responsible for:

- complying with the school's safeguarding and data protection requirements when taking or processing photographs of pupils.

Definitions:

“Camera” is used to refer to mobile phones, tablets, webcams, portable gaming devices, and any other equipment or devices which may be used to take photos.

“Personal use” of photography and videos is defined as the use of cameras to take images and recordings of children by relatives, friends or known individuals, e.g. a parent taking a group photo of their child and their friends at a school event. These photos and videos are only for personal use by the individual taking the photo and are not intended to be passed on to unknown sources. The principles of the UK GDPR and the DPA 2018 do not apply to images and videos taken for personal use.

“Official school use” is defined as photography and videos which are used for school purposes, e.g. for building passes and identity cards. These images are likely to be stored electronically alongside other personal data. The principles of the UK GDPR and the DPA 2018 apply to images and videos taken for official school use.

“Media use” is defined as photography and videos which are intended for a wide audience, e.g. photos of children taken for a local newspaper. The principles of the UK GDPR and the DPA 2018 apply to images and videos taken for media use.

Staff may also take photos and videos of pupils for “educational purposes”. These are not intended for official school use, but may be used for a variety of reasons, such as school displays, special events, assessment and workbooks. The principles of the UK GDPR and the DPA 2018 apply to images and videos taken for educational purposes.

“Personal electronic devices” are defined as devices that are used to store, generate, or transmit information or data in any form, including audio, visual or text. Such devices may include, but are not limited to, the following items:

- Any type of computer or computer-like instrument.
- Portable devices, such as tablets, laptops, mobile phones, personal digital assistants (PDAs), portable hard drives, USBs, pagers, and smart or electronic watches.
- The components of any such devices above.

Consent: Appleford obtains and records parental consent for the use of a pupil's image before that image is used for any purpose beyond the pupil's own personal learning record. Consent is sought when a pupil joins the school, using a clear form that sets out the different ways an image may be used (for example: internal displays and records; the school website; official social media accounts; the prospectus and other marketing materials; and the local press).

Parents/carers may consent to some uses and not others and may withdraw or amend their consent at any time by contacting the school office; the school maintains an up-to-date consent register, checked by staff before any image is used externally. Consent preferences are reviewed with parents/carers at least annually, and whenever a significant new use of images is proposed.

Where consent has not been given or has been withdrawn, the school will take reasonable steps to ensure the pupil is not included in any image used for the relevant purpose, for example by excluding them from a particular shot or choosing an alternative image.

The school maintains a record of any pupil who, for safeguarding or other reasons, must not be photographed or filmed at all (for example, due to a court order, a child protection plan, or a family contact restriction), and this is checked before any photography involving that pupil's class or group.

As pupils get older and develop the maturity to understand the implications of having their image used and shared, the school will increasingly seek the pupil's own view in addition to parental consent, particularly at Key Stage 3 and 4. Where a pupil's own wishes and their parent/carer's consent differ, the school will discuss this with the family and will generally apply the more restrictive preference unless the disagreement is resolved.

Use of Images by Appleford School inclusive of the lawful basis for taking, storing, using and sharing images: Appleford recognises that photographs and videos of identifiable individuals constitute personal data under data protection law. and will ensure that a valid lawful basis is established before any images are taken, used or shared. The school will identify and apply the most appropriate lawful basis depending on the purpose of the image processing. The main lawful bases the school will rely on are public task, consent, and legitimate interests, in line with guidance provided by the ICO

Images used internally: Examples include classroom displays, learning records, or school publications seen only by the school community) and images used externally (for example, on the public website, social media, or in the press) are both subject to the consent requirements in Section 5. Pupils are not named in a way that identifies them alongside their image when used externally, unless specific consent for this has been given.

Images used externally: These are reviewed to avoid including identifying details that could create a safeguarding risk, such as a pupil's home address, exact location, or other identifying information visible in the background. Images are stored only on approved school systems in line with the Data Protection Policy and Cyber Security Policy and are retained only for as long as necessary for the purpose for which they were taken, after which they are securely deleted.

Approved Photographers and Suppliers: Where the school engages an external photographer (for example, for official class or individual photographs), the photographer is vetted appropriately, including a Disclosure and Barring Service (DBS) check where required, and is always supervised by a member of staff while on site.

A written agreement or Data Processing Agreement is in place with any external photographer or supplier, setting out ownership of images, permitted use, data protection obligations, and secure handling and deletion of any images not selected by families for purchase.

Parents/carers are informed in advance when an external photographer will be taking images of pupils. .

Use of a professional photographer: If the school decides to use a professional photographer for official school photos and school events, the Headmaster will:

- provide a clear brief for the photographer about what is considered appropriate, in terms of both content and behaviour;
- issue the photographer with an identification lanyard, which must be always worn;
- let pupils and parents know that a photographer will attend an event and ensure they have previously provided consent to both the taking and publication of videos and/or photos;
- not allow unsupervised access to pupils or one-to-one photo sessions at events;
- communicate to the photographer that the material may only be used for the school's own purposes and that permission has not been given to use the photos for any other purpose;
- ensure that the photographer will comply with the requirements set out in the UK GDPR and the DPA 2018 and
- ensure that if another individual, such as a parent or governor, is nominated to be the photographer, they are clear that the images and/or videos are not used for anything other than the purpose indicated by the school.

Parents, carers and visitors taking photographs: Appleford welcomes parents and carers taking photographs and videos of their own child at school events such as performances, sports day and other celebrations, for personal, non-commercial use. To protect the privacy of all pupils, we ask that:

- images taken at school events are for personal use only and are not posted on social media or shared publicly where they include other pupils, in line with the Social Media Policy;
- parents/carers follow any specific guidance given by staff at individual events, including any request not to photograph or film at particular points (for example, during certain performances, or where a pupil who must not be photographed may be visible); and
- any professional or press photographer wishing to attend a school event must be approved in advance by the school office.

Use of personal devices by parents: Parents or family members will be welcome to take photos of (and where appropriate, film) their own children taking part in school events, subject to the following guidelines, which the schools will expect all parents to follow. Parents will:

- remain seated while taking photos or videos during concerts, performances and other events;
- minimise the use of flash photography during performances;
- in the case of all school events, make the focus of any photos and/or videos their own children;
- avoid disturbing others in the audience or distracting pupils when taking photos or recording videos;
- ensure that any images and recordings taken at school events are exclusively for personal use and are not uploaded to the internet, posted on social networking sites or openly shared in other ways and
- refrain from taking further photos and/or videos when requested to do so by staff.

Pupils and photography: Where pupils use cameras or tablets as part of a lesson (for example, a photography project), this takes place under direct staff supervision, using school-owned equipment, and any resulting images are managed in accordance with this policy. Pupils may have personal mobile phones in line with the Mobile Phone Policy. In relation to photography and images, pupils must:

- not photograph or film other pupils or members of staff without their consent;
- not take or share any image that could embarrass, humiliate, intimidate or harm another person, including images taken in changing rooms, toilets, or other private spaces, which are strictly prohibited;
- not use personal devices to photograph or film during lessons, examinations or assessments, except where explicitly directed by a member of staff for an educational purpose and
- report any image of themselves or another pupil that has been taken or shared without consent, or that makes them feel uncomfortable, to a trusted member of staff.

Breaches of these expectations are addressed under the Behaviour Policy and Anti-Bullying Policy, and any safeguarding dimension is handled in accordance with our safeguarding considerations.

Photos in the school environment relating to education: These photos may be essential for performing the public task of the school, but once the pupil has left the school this argument is insufficient. If the school wishes to display the image beyond the pupil's time at the school, the school will obtain the pupil's permission. If permission is not granted, the image will be removed.

When gaining consent, including when initially taking the photograph or when the purpose of the image has changed, the pupil, or where appropriate their parents, will be informed of the retention period pertaining to the use of the image. If the image is still on display after the retention period stated in the privacy notice used to gain consent, the school will be in breach of data protection obligations and may be subject to a fine.

Safeguarding Considerations: Photographs and images raise specific safeguarding considerations:

- staff should use only school-owned equipment or approved school accounts to photograph pupils, and should not use personal devices to take or store images of pupils;
- images of pupils in swimwear, sports kit, or any other context where a pupil may be more exposed are taken only where necessary for a legitimate purpose (such as a swimming lesson record), are not used externally without specific consent, and are framed and stored with particular care;
- any image that may show a pupil in a distressing, vulnerable or compromising situation must not be shared or used, and any concern about such an image should be raised with the DSL immediately;
- the creation, possession or sharing of a sexualised image of a child or young person, including between pupils, is strictly prohibited, will be treated as a serious child protection matter under the Safeguarding and Child Protection Policy, and may constitute a criminal offence; any concern of this nature must be reported to the DSL immediately;
- if any member of staff becomes concerned that an image of a child may be indecent or otherwise unlawful, they must not view, copy, forward, print or further distribute the image, and must report the concern to the DSL immediately, who will follow the school's safeguarding procedures, which may include referral to the police; and
- any other safeguarding concern arising from photography or image use is reported and handled in accordance with the Safeguarding and Child Protection Policy.

Data Protection: Images of pupils are processed in accordance with the Data Protection Policy and the school's privacy notices, which explain how and why images are used. Where a new or significant use of images is proposed (for example, the introduction of a biometric system such as facial recognition for catering or library access), the school will complete a Data Protection Impact Assessment (DPIA) and obtain explicit consent before proceeding, in line with the Cyber Security Policy and Data Protection Policy. Parents/carers may ask to see what images of their child the school holds, or request that an image be deleted, by contacting the DPO; such requests are handled in line with the Data Protection Policy.

Training and Awareness: Staff receive guidance on this policy, including safeguarding considerations relating to photography, as part of induction and ongoing training. New parents/carers are provided with information about the school's approach to photographs and images, and how to set or update their consent preferences, when their child joins the school. Pupils receive age-appropriate education on the responsible use of cameras and images, including, for Key Stage 3 and 4 pupils, the risks of sharing images without consent and the consequences of misuse, as part of the curriculum and the school's wider online safety education.

Public Task: The school will rely on the lawful basis of public task where images are necessary for carrying out official duties and functions. This may include, but is not limited to:

- ID cards.
- Registers.
- Classroom seating plans.
- PE peg labels.
- Personal storage or drawer labels.

Appleford will use images where they are essential for administration, safeguarding, identification, or the efficient operation of the school. The school will consider any objections from pupils or parents regarding the use of images under public task. While individuals have the right to object, Appleford will assess each request carefully and determine whether there are compelling legitimate grounds to continue processing, particularly where safeguarding or identification is concerned.

Where appropriate, Appleford will offer reasonable alternatives, such as non-photographic identification methods. Additionally, Appleford will clearly explain the use of images within its privacy notice and will ensure that all objections are handled fairly, transparently and in accordance with UK GDPR requirements.

Consent and Legitimate Interests: The school may rely on legitimate interests where image use is necessary for purposes that are reasonable, proportionate, and do not override the rights and freedoms of the individual. In such cases, the school will:

- carry out a legitimate interest assessment to ensure the processing is justified;
- consider the impact on pupils and their families;
- seek permission as a matter of good practice, even where formal consent is not required and
- provide clear and accessible ways for pupils and parents to opt out.

Appleford will make it clear how individuals can:

- opt out at the time images are taken and
- change their preferences later.

The school will act on opt-out requests promptly. This may include removing images from digital platforms and ensuring they are not used in future materials. Where images have already been published in printed materials, the school will ensure they are not reused in subsequent editions.

The school will distinguish clearly between permission and consent, recognising that permission supports transparency and trust but does not replace the requirement for a lawful basis.

General procedures:

- Photos and videos of pupils will be carefully planned before any activity and the DPO will oversee the planning of any events where photos and videos will be taken.
- Where photos and videos will involve pupils who are LAC, PLAC, or adopted, or pupils for whom there are security concerns, the Headmaster will liaise with the DSL to determine the steps involved.

- While the school will not always need permission from a pupil or parent to take a photo or video, the school will check whether any restrictions have been set before using, storing, or sharing images.
- The list of all pupils who have not consented to being photographed or recorded will be checked prior to the activity. Only pupils for whom consent has been given will be able to participate.
- The staff members involved, alongside the Headmaster and DPO, will liaise with the DSL if any pupil who is LAC, PLAC, adopted, or for whom there are security concerns.
- A school-owned digital camera will be used to take photos and videos of pupils.
- Staff will ensure that all pupils are suitably dressed before taking any photos or videos.
- Where possible, staff will avoid identifying pupils by name or any other identifiable data. If names are required, only first names will be used.

The school will not use photos or videos of:

- any pupil who is subject to a court order;
- children who have left the school, without the consent of their parents or, where appropriate, the children themselves and
- staff who have left the school, without their consent and
- photos and videos that may cause any distress or embarrassment will not be used.

Any concern relating to inappropriate or intrusive photography or publication of content will be reported to the DPO.

Additional safeguarding procedures: The school will consider certain circumstances that may put a pupil's security at greater risk and, thus, may mean extra precautions are required to protect their identity. The DSL will, in known cases of pupils who are LAC, PLAC or adopted, liaise with the pupil's social worker, carers or adoptive parents to assess the needs and risks associated with the pupil. Any measures required will be determined between the DSL, DPO, social worker, and carer and/or adoptive parent with a view to minimising any impact on the pupil's day-to-day life. The measures implemented will be one of the following:

- Photos and videos can be taken as per usual school procedures
- Photos and videos can be taken within school for educational purposes and official school use, e.g. on registers, but cannot be published online or in external media
- No photos or videos can be taken at any time for any purposes

Any outcomes will be communicated to all staff members via CPOMS a staff meeting and the list outlining which pupils are not to be involved in any videos or photos, held in the school office, will be updated accordingly.

Use of electronic devices: Staff members and pupils will be issued with school-owned devices to assist with their work, where necessary. Requirements around the use of school-owned devices can be found in the school's Device and Technology User Agreements. Misuse of cameras, filming equipment or other devices in a way that breaches school policy will always be taken seriously and may be the subject of disciplinary procedures or dealt with under the relevant safeguarding policy as appropriate.

Staff use of digital cameras and other electronic devices: Photos and videos will only be taken for educational purposes and in school or educational provision settings. Staff will only be permitted to take photos and videos of pupils using the school's digital cameras; however, they may use other school-owned devices, such as mobile phones and tablets, where the DPO has been consulted and consent has been sought from the Headmaster prior to the activity. Where school-owned devices other than digital cameras are used, images and videos will be provided to the school at the earliest opportunity and then removed from the devices. Photos and videos taken by staff members on school visits may be used for educational purposes, e.g. on displays or to illustrate the work of the school, where an appropriate legal basis has been obtained.

The school-owned devices will be located and stored securely in the filing cabinet. Members of staff will be responsible for making sure that the camera is locked away after use in the filing cabinet at the end of the day. Members of staff will not be allowed to take school cameras or memory cards home

Staff or other adults will not take photos of pupils in vulnerable circumstances, such as when they are upset or inappropriately dressed. Members of staff and the school community will be required to report inappropriate use of digital cameras and images to the Headmaster. If it is found that any incidents raise child protection concerns, immediate action will be taken in consultation with the DSL.

Use of personal devices by staff: Members of staff will not be allowed to take images using personal devices without prior permission. If personal devices are allowed to be brought in due to a specialist requirement or defective equipment, memory cards should be shown to be empty, and images downloaded to the school's server. Any personal electronic device that is brought into school is the responsibility of the user. Staff will not be permitted to use their personal devices during lesson time, other than in an emergency. Staff will not use their personal mobile phones, or any other personal device, to take images and videos of pupils.

Personal devices are not permitted to be used in the following locations:

- Classrooms
- Toilets
- Changing rooms

Use of personal devices by pupils: All pupils will be 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. Unless exceptional circumstances apply, pupils will not be permitted to keep personal mobile devices on their person throughout the school day in accordance with the Mobile Devices Policy.

Pupils' use of school-owned devices will be appropriate for the purpose they are intended for. Any misuse of school-owned devices will be dealt with in accordance with the Behaviour Policy. Inappropriate use of devices will be outlined in the Mobile Devices Policy, while the sharing of indecent images will be detailed in the Child Protection and Safeguarding Policy and Youth-produced Sexual Imagery (YPSI) Policy.

Sharing of images:

When deciding whether it is appropriate to share images, the school will consider:

- any safeguarding implications;
- the lawful basis for doing so;
- whether pupils and parents are aware of the risks and
- whether any parents or pupils have put in place any restrictions on permission to do so.

The school may use images for newsletters, websites, prospectuses, social media, school trips, performances, sports days, or classroom displays. In doing so, legitimate interests may be appropriate as a lawful basis. However, the school will consider whether the use is necessary, fair and respects the rights of pupils and staff.

- The school will take particular care when sharing images to social media and will make pupils and parents aware that social media involves wider sharing and may carry higher privacy risks. The school may collect specific consent for posting on social media platforms.
- If images are shared with third-party platforms, social media or cloud services, the school will check that the lawful basis and privacy settings comply with data protection law.
- If parents share photos or videos of other pupils publicly, the school may ask them to remove the image if it raises privacy or safeguarding concerns.

Storage and retention: As per the UK GDPR and the DPA 2018, images obtained by the school will not be kept for longer than necessary.

Digital photos and videos held on the school's drive are accessible to staff only. Photos and videos are stored in labelled files, annotated with the date, and are only identifiable by year group or class number – no names are associated with images and videos. Files are password protected and only staff members have access to these passwords – these are updated [termly](#) to minimise the risk of access by unauthorised individuals.

Paper documents will be shredded or pulped and electronic memories scrubbed clean or destroyed once the retention period has ended. The DPO will review stored images and videos on a [termly](#) basis to ensure that all unwanted material has been deleted. Where a parent or pupil has withdrawn their consent, any related imagery and videos involving their child/the pupil will be removed from the school drive immediately. When a parent withdraws consent, it will not affect the use of any images or videos for which consent had already been obtained. Withdrawal of consent will only affect further processing.

Where a pupil's security risk has changed, the DSL will inform the Headmaster immediately. If required, any related imagery and videos involving the pupil will be removed from the school drive immediately. Hard copies will be removed by returning them to the parent/pupil or by shredding, as appropriate.

Official school photos will be held on SIMS alongside other personal information and retained for the length of the pupil's attendance at the school, or longer, if necessary, e.g. due to a police investigation.

Images taken on school cameras will be downloaded as soon as possible on to a school computer or laptop, ideally once a week. Members of staff will maintain responsibility for ensuring that images are safely stored, particularly on memory sticks and hard drives. They will take reasonable measures to ensure that they do not come into the possession of unauthorised persons.

No digital image will be altered or enhanced in any way by any member of staff, unless given prior permission by the Headmaster to do so. The school may require images to be deleted or edited as appropriate and may choose to use images taken by members of staff or volunteers for other purposes, provided the processing conditions and consent requirements of this policy are met. Staff members are responsible for ensuring that edited images do not mislead or misrepresent. They must not edit images which result in their subject being vulnerable to embarrassment, teasing, bullying or abuse.

If the memory card for individual school cameras needs to be replaced, then the replaced memory card will be destroyed to ensure that no images can be recovered. Members of staff must remember that, even when images are physically deleted from a camera or memory card, the camera or the memory card must be appropriately disposed of to ensure that no imprint remains.

Appropriate use of images under UK GDPR and the DPA 2018: Photos will be used in school for many reasons and the different uses for the same image should be considered separately, as each photograph and use will potentially have different conditions for processing. As a public body, the school will consider whether the processing is taking place in the performance of its duties as a public authority. Where this is the case, the legal basis for processing will be recorded as 'public task', not 'legitimate interests' – public authorities cannot use legitimate interests as a lawful basis if the processing is in the performance of their tasks as a public authority.

The school will use privacy notices with declarations attached to inform staff, pupils and parents about how their personal data may be collected and as one method of gaining consent. To judge whether legitimate interest can be used as the basis for processing data, the school will carry out three different tests. These are:

- a purpose test – establishing the reasons for using the data, what will be achieved and whether the benefits are justifiable.
- a necessity test – establishing whether the processing of pupils' data will be useful and whether there is a less intrusive way of reaching a means to an end.
- a balance test – establishing the impact it will have on the data subject by processing the data for said reason.

These three tests make up a 'legitimate interest assessment' (LIA) – the school will carry out an LIA prior to obtaining the data and it will be recorded in a physical copy in compliance with the UK GDPR and the DPA 2018.

- Photos used in identity management
- These are likely to be essential for performing the public task of the school, but they will be deleted once the child is no longer in attendance – as they are no longer needed for the purpose for which they were held.
- Photos used for marketing purposes
- Photos will not be used for marketing purposes unless the school has specific informed consent for the images and the images are only used in line with the consent provided.
- The school will recognise that when images are posted on the school website anyone may view the images, and consequently this may result in a greater risk of misuse of images. The school will therefore give specific consideration to the suitability of images for use on the school's website.

STAFF AGREEMENT FORM

I will not use digital cameras, camera phones or any other device to take and/or transfer images of pupils or staff without permission and will not store images at home without permission.

I understand that it is my responsibility to ensure that I have read and understood the school's policy regarding the use of cameras and electronic devices in school, and I agree to follow by the above requirements.

Signature _____ Date _____

Full name _____ (printed)

Job title at Appleford School _____

Authorising signature

Signature _____ Date _____

Full name _____ (please print)

PHOTOGRAPHY AND VIDEO PARENTAL CONSENT FORM:

This form explains the reasons why and how Appleford may use images and videos of your child. Please read the form thoroughly and outline your agreement as appropriate.

Name of pupil	
Name of parent	
Year group and class number	

Why do we need your consent? We request the consent of parents annually to use images and videos of their child for a variety of different purposes. Without your consent, the school will not use images and videos of your child. Similarly, if there are only certain conditions under which you would like images and videos of your child to be used, the school will abide by the conditions you outline in this form.

Why do we use images and videos of your child?

- We use images and videos of pupils as part of school displays to celebrate school life and pupils' achievements; to promote the school on social media and on the school's website; and for other publicity purposes in printed publications, such as newspapers.
- Where the school uses images of individual pupils, the name of the pupil will not be disclosed. Where an individual pupil is named in a written publication, a photograph of the pupil will not be used to accompany the text.
- If, for example, a pupil has won an award and their parent would like their name to be published alongside their image, separate consent will be obtained prior to this.

We may take images or videos of individual pupils and groups of pupils to use on social media, the school website, in school prospectuses and other printed publications, such as a newsletter.

What are the conditions of use?

- This consent form is valid for the current academic year.
- It is the responsibility of parents to inform the school, in writing, if consent needs to be withdrawn or amended.
- The school will not use the personal details or full names of any pupil in an image or video on our website, in our school prospectuses or any other printed publications.
- The school will not include personal emails, postal addresses, or telephone or fax numbers on images or videos on our website, in our school prospectuses or any other printed publications.
- The school may use pictures of pupils and teachers that have been drawn by pupils.
- The school may use work created by pupils.
- The school may use group or class images or videos with general labels, e.g. 'sports day'.
- The school will only use images and videos of pupils who are suitably dressed, i.e. it would not be suitable to display an image of a pupil in swimwear.
- The school will take class images of your child which are available to purchase annually.

Providing your consent: Please read the following conditions thoroughly and provide your consent as appropriate by ticking either 'Yes' or 'No' for each criterion. The school will only publish images and videos of your child for the conditions that you provide consent for.

I provide consent to:	Yes	No
The school photographing my child.		
The school videoing my child.		
The school using images of my child on the school website.		
The school using videos of my child on the school website.		
The school using images of my child on social media, including the following: • Facebook • Instagram		
The school using videos of my child on social media, including the following: • Facebook • Instagram		
The school using images of my child in marketing material, e.g. in the school brochure and prospectus.		
The school sharing my child's data with a school-appointed external photography company for official school images. This includes the following: • Name • Class • Roll number		

Refreshing your consent

This form is valid for the entire academic year. It will be updated on an annual basis. Parents are required to fill in a new form for their child every academic year.

Consent will also be refreshed where any changes to circumstances occur – this can include, but is not limited to, the following:

- New requirements for consent, e.g. an additional social media account will be used to share pupil images and videos
- Changes to a pupil's circumstances, e.g. safeguarding requirements mean a pupil's image cannot be used
- Changes to parental consent, e.g. amending the provisions for which consent has been provided.

Where you would like to amend the provisions for which consent has been provided, you must submit your request in writing to the Headmaster. A new form will be supplied to you to amend your consent accordingly and provide a signature.

Withdrawing your consent: Parents have the right to withdraw their consent at any time. Withdrawing your consent will not affect any images or videos that have been shared prior to withdrawal. If you would like to withdraw your consent, you must submit your request in writing to the Headmaster.

Declaration

I, _____ (name of parent), understand:

Why my consent is required.

- The reasons why Appleford School uses images and videos of my child.
- Which other organisations may use images and videos of my child.
- The conditions under which the school uses images and videos of my child.
- That I have provided my consent above as appropriate, and the school will use images and videos of my child in line with my requirements.
- Consent is refreshed on an annually and I must re-provide consent if I consent to images and videos of my child being used in other academic years.
- That I will be required to re-provide consent where any circumstances change.
- That I can amend or withdraw my consent at any time and must do so in writing to the Headmaster.

Name of parents	
Signature	
Date	

If you have any questions regarding this form, please do not hesitate to contact the Headmaster

PHOTOGRAPHY AND VIDEO PUPIL CONSENT FORM

This form explains the reasons why and how Appleford School may use images and videos of you. Please read the form thoroughly and outline your agreement as appropriate.

Name	
Year group and class number	

Why do we need your consent?

- We request your consent on an annual basis to use images and videos of you for a variety of different purposes.
- Without your consent, the school will not use images and videos of you. Similarly, if there are only certain conditions under which you would like images and videos of you to be used, the school will abide by the conditions you outline in this form.
- Why do we use images and videos of you?
- We use images and videos of pupils as part of school displays to celebrate school life and pupils' achievements; to promote the school on social media and on the school's website; and for other publicity purposes in printed publications, such as newspapers.
- Where the school uses images of individual pupils, the name of the pupil will not be disclosed. Where an individual pupil is named in a written publication, a photograph of the pupil will not be used to accompany the text.
- If, for example, you have won an award and would like your name to be published alongside your image, separate consent will be obtained prior to this.
- We may take images or videos of individual pupils and groups of pupils to use on social media, the school website, in school prospectuses and other printed publications, such as a newsletter.
- Who else uses images and videos of you?

What are the conditions of use?

- This consent form is valid for the academic year.
- It is your responsibility to inform the school, in writing, if consent needs to be withdrawn or amended.
- The school will not use your personal details or full name in an image or video, on our website, in our school prospectuses or any other printed publications.
- The school will not include your personal email, postal address, or telephone or fax number on images or videos on our website, in our school prospectuses or any other printed publications.
- The school may use pictures of pupils and teachers that have been drawn by pupils.
- The school may use work created by you.
- The school may use group or class images or videos with general labels, e.g. 'sports day'.
- The school will only use images and videos of you when you are suitably dressed, i.e. it would not be suitable to display an image of you in swimwear.
- The school will take class images of you which are available to purchase annually.

Providing your consent: Please read the following conditions thoroughly and provide your consent as appropriate by ticking either 'Yes' or 'No' for each criterion. The school will only publish images and videos of you for the conditions that you provide consent for.

I provide consent to:	Yes	No
The school photographing me.		
The school videoing me.		

The school using images of me on the school website.		
The school using videos of my child on the school website.		
The school using images of me on social media, including the following: • Facebook • Instagram		
The school using videos of me on social media, including the following: • Facebook • Instagram		
The school using images of me in marketing material, e.g. in the school brochure and prospectus.		
The school sharing my data with a school-appointed external photography company for official school images. This includes the following: • Name • Class • Roll number		

Refreshing your consent: This form is valid for **the entire academic year**. It will be updated on an **annually**. You are required to fill in a new form **every academic year**. Consent will also be refreshed where any changes to circumstances occur – this can include, but is not limited to, the following:

- New requirements for consent, e.g. an additional social media account will be used to share pupil images and videos
- Changes to your circumstances, e.g. safeguarding requirements mean your image cannot be used
- Changes to your consent, e.g. amending the provisions for which consent has been provided.

Where you would like to amend the provisions for which consent has been provided, you must submit your request in writing to the Headmaster. A new form will be supplied to you to amend your consent accordingly and provide a signature.

Withdrawing your consent: You have the right to withdraw your consent at any time. Withdrawing your consent will not affect any images or videos that have been shared prior to withdrawal. If you would like to withdraw your consent, you must submit your request in writing to the Headmaster.

Declaration;

I, _____ (name), understand:

- Why my consent is required.
- The reasons why the school uses images and videos of me.
- Which other organisations may use images and videos of me.
- The conditions under which the school uses images and videos of me.

- That I have provided my consent above as appropriate, and the school will use images and videos of me in line with my requirements.
- Consent is refreshed on annually and I must re-provide consent if I consent to images and videos of me being used in other academic years.
- That I will be required to re-provide consent where any circumstances change.
- That I can amend or withdraw my consent at any time and must do so in writing to the Headmaster.

Name	
Signature	
Date	

If you have any questions regarding this form, please do not hesitate to contact the Headmaster

PHOTOGRAPHY AND VIDEO STAFF CONSENT FORM

This form explains the reasons why and how Appleford School may use images and videos of you. Please read the form thoroughly and outline your agreement as appropriate.

Name	
Job role	

Why do we need your consent? We request your consent on an annual basis to use images and videos of you for a variety of different purposes. Without your consent, the school will not use images and videos of you. Similarly, if there are only certain conditions under which you would like images and videos of you to be used, the school will abide by the conditions you outline in this form.

Why do we use images and videos of you? We use images and videos of staff members as part of school displays to celebrate school life; to promote the school on social media and on the school's website; and for other publicity purposes in printed publications, such as newspapers. We may take images or videos of individual staff members and groups of staff members to use on social media, the school website, in school prospectuses and other printed publications, such as a newsletter.

What are the conditions of use?

- This consent form is valid for the academic year.
- It your responsibility to inform the school, in writing, if consent needs to be withdrawn or amended.
- The school will not use your personal details or full name in an image or video, on our website, in our school prospectuses or any other printed publications.
- The school will not include your personal email, postal address, or telephone or fax number on images or videos on our website, in our school prospectuses or any other printed publications.
- The school may use group or class images or videos with general labels, e.g. 'sports day'.

Providing your consent: Please read the following conditions thoroughly and provide your consent as appropriate by ticking either 'Yes' or 'No' for each criterion. The school will only publish images and videos of you for the conditions that you provide consent.

I provide consent to:	Yes	No
The school photographing me.		
The school videoing me.		
The school using images of me on the school website.		
The school using videos of my child on the school website.		
The school photographing me for my staff ID badge.		
The school using images of me on social media, including the following: • Facebook • Instagram		
The school using videos of me on social media, including the following: • Facebook		

• Instagram		
	*	
The school using images of me in marketing material, e.g. in the school brochure and prospectus.		

Refreshing your consent: This form is valid for the entire academic year. It will be updated annually. You are required to fill in a new form every academic year. Consent will also be refreshed where any changes to circumstances occur – this can include, but is not limited to, the following

- New requirements for consent, e.g. an additional social media account will be used to share images and videos
- Changes to your circumstances, e.g. safeguarding requirements mean your image cannot be used
- Changes to your consent, e.g. amending the provisions for which consent has been provided.
- Where you would like to amend the provisions for which consent has been provided, you must submit your request in writing to the Headmaster. A new form will be supplied to you to amend your consent accordingly and provide a signature.

Withdrawing your consent: You have the right to withdraw your consent at any time. Withdrawing your consent will not affect any images or videos that have been shared prior to withdrawal. If you would like to withdraw your consent, you must submit your request in writing to the Headmaster.

Declaration: (insert your name): I, _____ understand:

- Why my consent is required.
- The reasons why the school uses images and videos of me.
- Which other organisations may use images and videos of me.
- The conditions under which the school uses images and videos of me.
- That I have provided my consent above as appropriate, and the school will use images and videos of me in line with my requirements.
- Consent is refreshed on an annually and I must re-provide consent if I consent to images and videos of me being used in other academic years.
- That I will be required to re-provide consent where any circumstances change.
- That I can amend or withdraw my consent at any time and must do so in writing to the Headmaster.

Name	
Signature	
Date	

If you have any questions regarding this form, please do not hesitate to contact the Headmaster