Photographing of Children and Adults Policy

(General Data Protection Regulation - GDPR)

2026 - 2027

(updated September 2025)

Aims and Objectives of the Policy

The aim of this policy is to ensure the school has clear procedures which outline

- the equipment we use to take photographs or video footage
- which children we can take photographs or video footage of
- how we can use the photographs or video footage we take
- safeguards
- considerations for Looked after children
- parents taking photographs or video footage of children
- permission procedure for the use of images of adults
- the legal position

Equipment to be used and storage of photographs

Staff should only ever use school cameras or video cameras to take photographs or record video footage of the children. Under no circumstances should staff use their own equipment, cameras or phones, to record the children. In addition staff should only edit material on school equipment.

Where photographs are to be saved, they should **only** be stored in the designated folder on the staff drive of the school network. Photographs should **not** be stored on any other device or in any other area of the school network, classroom computer or staff laptop.

Where hard copies of photographs exist they should either be stored in a central location or destroyed after use.

Children we can take photographs or video footage of

We will only take photographs or make video recordings of children if we have written permission from their parents. This permission will be initially sought on entry to the school and then re requested every subsequent September using the an agreed letter (See Appendix 1)

We will request separate permission for the inclusion of photographs or video footage in publications outside of school including newspapers or the school newspaper and for inclusion on the school website. (See Appendix 1)

Permission will be recorded on the school management information system. From this a report will be generated for each class teacher clearly stating which children can, and which children cannot be photographed. Staff should ensure the list is available to any adult who will be working with the children and they become familiar with it to ensure those children whose parents have not granted permission, are neither photographed nor recorded.

How we can use the photographs or video footage we take

General Use

In most cases pictures or video footage taken of a child is either used as evidence to be kept in pupil's books or class records or it is displayed around school in classrooms, corridors or in the school halls. Photographs and video footage will take the form of:

- Individual/group photographs for classroom display
- Individual/group photographs for evidence profiles
- general photographs of children working in classrooms or around the school
- photographs of school events (eg class productions, sports day, choir, football matches etc)
- awards ceremonies (eg Praise assemblies)
- photographs of external events (eg sports events)

- educational visits
- photographs/videos of school productions (pantomimes etc)

Newsletters and Newspapers
We welcome positive publicity and on some occasions we will take photographs or video footage to be published and distributed outside of school in newsletters or local or national newspapers. Our policy in the case of school newsletters is that pictures will not include the full name of the child and will only be included with the permission of parents. Newspapers have their own code of conduct, with strict guidelines, regarding the photographing of children and naming them. Our policy is to allow newspapers to use pupils' names with their photographs as long as parents and carers have given their consent.

School web site
Occasionally we will take pictures or video footage to be included on the school website. The images taken will reflect the work of the school and include children taking part in daily activities.
Our policy is that pictures and video footage will only be included with the permission of parents.

Safeguards
If parents have any concerns about inappropriate or intrusive photography or video making, they should report the matter to the Head Teacher, who will make a note of the incident in the same manner as when recording any issue of child protection.

We will only use images of pupils who are suitably dressed (ie no individual full length photographs of pupils in PE kit or swimming kit etc) in order to reduce the risk of those images being used inappropriately by others.

Considerations for Looked After children
The following guidance was issued by a Walsall Child Safeguarding officer in November 2012.
The welfare and protection of our children is paramount and consideration should always be given to whether the use of photography will place our children at risk. For this reason consent is always sought when photographing children and additional consideration given to photographing vulnerable children, particularly children who are Looked After by the Local Authority or those known to be fleeing domestic violence. Consent must be sought from those with parental responsibility.

Where children are Looked After by the Local Authority, the issue of consent must be discussed in the first instance with the social worker.

Where children are accommodated with the agreement of parents/carers with parental responsibility, (S 20 CA 1989), those parent/carers retain parental responsibility and their agreement must be sought either directly with them in the first instance or through the social worker.
Where the child is subject to a Care Order, the Local authority hold parental responsibility, but do share this in law with the parent. The social worker will consider/advise whether the parent(s) should be consulted (dependant on the individual circumstances) but the final position in relation to consent will rest with the social worker on behalf of the Local Authority.

However, if consent is not given it is not acceptable for a child or young person to be excluded from activities such as Christmas productions etc.

All schools and settings who have children Looked After by the local authority should risk assess how the children and young people can be safeguarded taking into account new technologies (i.e. parents having cameras on their mobile phones).

Good practice would be for the school/setting to take all photographs and videos and giving/selling these to parents after they have been vetted to ensure protection of all children including those who are Looked After.

Parents taking photographs or video footage of children
The school's policy is to allow parents and carers to take photographs and videos of school events. These events are important to the school, to pupils and to parents and carers and as long as parents and carers follow the following guidance:

- Parents or carers focus any photographs or video footage on their own child
- Parents or carers do not publish any images which include other children on the internet including social networking sites such as Facebook or Twitter
- Parents or carers do not share photographs or video footage unless they have the permission of all the parents or carers of all the children in the image

Permission procedure for the use of images of adults
In line with GDPR 2018 which includes adults permission a consent form will be offered for completion for all adults as part of their induction process. (See appendix 2)
Consent forms will be kept in each individual's personnel record.

The Legal Position – GDPR 2018
Photographs and video images of pupils and staff are classed as personal data under the terms of the GDPR
Therefore, using such images requires the consent of the member of staff or in the case of pupils, their parent, carer or legal guardian.
Photographs of pupils (and staff) should not be displayed on websites, in newspapers or in the school's publications, without parental (or that member of staff's) consent.
Adults and children need to be aware that their photograph is being taken and what its purpose is.
Taking photographs of events attended by large crowds, are considered under the GDPR to be a public event and do not require the permission of everyone in the photograph.
However the permission of any identifiable people, usually in the foreground, does need to be granted before the photograph is put on public display.

Signed: **Print:** **Date:** **Head teacher**	**Signed:** **Print:** **Date:** **Chair of Governors**

APPENDIX 1

School Photography (child) – Parental Letter

Dear parent/carer

At Palfrey Junior School we sometimes take photographs or videos of our pupils for a variety of reasons. In order to comply with the GDPR Regulations 2018, we are required to seek the permission of parents and carers before we can take and use images of our pupils. We really value using photos of pupils, to be able to showcase what pupils do in school and show what life at our school is like to others.

Below are listed the types of photographs/images which we make take:

- Individual/group photographs for classroom display
- Individual/group photographs for evidence profiles
- general photographs of children working in classrooms or around the school
- photographs of school events (eg class productions, sports day, choir, football matches etc)
- awards ceremonies (eg Praise assemblies)
- photographs of external events (eg sports events)
- educational visits
- photographs/videos of school productions (pantomimes etc)

Generally these pictures are either used in pupil books or records or displayed around school in classrooms, corridors or in the school halls. However, on some occasions, we may submit photographs for publication in the school newsletter, local or national newspapers. On these occasions the name of your child and the name of the school may appear with the photograph. We also have a school website which we like to be up to date and reflect the work of the school. This website will include pictures of some children taking part in daily activities. If you change your mind at any time, you can let us know by reporting at the school office or emailing: postbox@palfrey-j.walsall.sch.uk

Please complete the attached form indicating the permission you are prepared to give. Once you have completed the form, please and return it to school as soon as possible.

(Appendix A)

School Photography (child) – Parental Consent Form

Childs name: **Class No:**

Please tick the relevant box(es) below and return this form to school.

As a school we take photos of the children for internal displays, the school web page and for use in the school newsletter and have a professional photographer in school. Please read our school photography policy and complete the following:

I am happy for the school to take photographs of my child	{Y} {N}
I am happy for photos of my child to be used on the school website	{Y} {N}
I am happy for photos of my child to be used in the school newsletter	{Y} {N}
I am happy for photos of my child to be used in internal displays	{Y} {N}

School Photographer

On occasions, the school photographer comes in to school and we also need to ensure that you consent to the photographer taking a photo of your child that you can buy.

- **I give consent to the school photographer to take an individual or sibling photo of my child/ren for me to purchase. This will not be published, however I will have secure access to the photographers website to order the photograph package that I would like.**

- **I give consent to the school photographer to take a class group photo of my child for me to purchase. This can be displayed around school and will also be available for other parents to purchase.**

- **I do not give consent to the school photographer to take an individual or sibling photo of my child/ren for me to purchase.**

- **I do not give consent to the school photographer to take a class group photo of my child for me or other parents to purchase.**

Parent or carer's signature:

Print name: **Date:**

(Appendix B)

School Photography (Staff/Governor/adult) – Letter

At Palfrey Junior School we occasionally take photographs or video footage of Staff, volunteers, parents and governors. In order to comply with the Data Protection Act 1998, we are required to seek the permission of those adults whose photographs might be used by the school for displays or in school publications. If adults could give their consent in advance, the whole process would be made more manageable.

Below are listed the types of photographs/images which we make take::

- Individual/group photographs for classroom display
- Individual/group photographs for evidence profiles

- general photographs of adults and children working in classrooms or around the school
- photographs of school events (eg class productions, sports day, choir, football matches etc)
- awards ceremonies (eg Praise assemblies)
- photographs of external events (eg sports events)
- educational visits
- photographs/videos of school productions (pantomimes etc)

Generally these pictures are either used in pupil books or records or displayed around school in classrooms, corridors or in the school halls. However, on some occasions, we may submit photographs for publication in the school newsletter, local or national newspapers. We also have a school website which we like to be up to date and reflect the work of the school. This website may include pictures of some adults and children taking part in daily activities.

School Photography (adult) – Consent Form

Name:

Please tick the relevant box(es) below and return this form to school.

School Photographer

On occasions, the school photographer comes in to school and we also need to ensure that you consent to the photographer taking a photo of you

- ☐ **I give consent to the school photographer to take an individual photo of me**
- ☐ **I give consent to the school photographer to take a class group photo of me. This can be displayed around school and will also be available for parents to purchase.**
- ☐ **I do not give consent to the school photographer to take an individual photo of me**
- ☐ **I do not give consent to the school photographer to take a class group photo of me**

Signature:

Print name: **Date:**