



ROBERT CLACK SCHOOL

PHOTOGRAPHY POLICY

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

Controlled Document

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Version	Date	Author	Description of Change
1	February 2025	Data Protection Enterprise Ltd www.dataprotectionenterprise.co.uk	New Policy
2	August 2026	Data Protection Enterprise Ltd www.dpenterprise.co.uk	Policy review. Updated to include guidance on AI, smart glasses, social media, live streaming, wearable technology and changes arising from the DUAA 2025

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1. INTRODUCTION

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

It applies to all students, staff, parents, visitors and contractors involved in school-related photography.

This policy also applies to emerging technologies capable of capturing or processing images or video, including artificial intelligence (AI), wearable technology such as smart glasses, body-worn cameras, and any other device capable of recording audio, images or video.

2. PURPOSE

The purpose of this policy is to:

- Clarify the legal basis under which the school uses photography (primarily public task)
- Protect the privacy rights of students and staff.
- Set out how photographs may be used for educational, promotional and administrative purposes.
- Promote transparency and accountability in the School's photography practices.
- Provide clear guidance on the use of artificial intelligence and wearable recording technology to ensure that images are used safely, lawfully and ethically.

The School's use of photographs or video recordings is governed by the UK General Data Protection Regulation (GDPR) and the Data Protection Act 2018 and relevant statutory guidance.

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

The School will normally rely on the lawful basis of Public Task where photography is necessary to carry out its educational functions. Where photographs are used for purposes that fall outside those functions, or where the processing is genuinely optional, the School will consider whether consent or another lawful basis is appropriate depending on the intended use of the images.

In cases where photography is not strictly necessary for the school's tasks, such as, marketing materials distributed externally or featuring individual students prominently, specific, informed consent will be sought from parents or carers in advance where necessary.

4. SCOPE

Photographs may be taken during the following school activities:

- **Internal Use:**
Photographs or videos taken for internal educational purposes (e.g., classroom activities) will only be shared with students, parents, and staff. Photographs and videos may also be used within the School for educational displays, classroom resources, celebration boards, examination coursework (where appropriate), safeguarding records, behaviour investigations, accident reporting and other legitimate educational or administrative purposes.
- **Public Use:**
Public use includes the School website, newsletters, prospectuses, social media channels (including Facebook, Instagram, X, LinkedIn, YouTube and similar platforms) and other promotional publications produced by or on behalf of the School e.g prospectuses, school magazines, governors' reports, leaflets, display boards and recruitment literature.

Parents, carers and other spectators are welcome to take photographs or videos of their own children during school events for personal use. They are requested to respect the privacy of other pupils, staff and visitors. Images or recordings containing other identifiable individuals should not be published on social media or shared publicly without their knowledge or permission. The School cannot prevent parents or carers from taking photographs at public events but expects all attendees to act responsibly and respectfully.

- **Media Outlets:**
If a student is featured in a story that is being covered by external media (television, news websites, newspapers etc.), the school may seek parental agreement where appropriate, taking into account the lawful basis relied upon and the nature of the publication.
- **Live Streaming and Online Events:**
Where school events are live streamed or recorded using platforms such as Microsoft Teams, Zoom or YouTube, appropriate safeguards will be implemented. Recordings will only be made where authorised by the School and retained only for as long as necessary.
- **School Apps:**
Images may also be shared through approved school communication systems such as parent apps, learning platforms or virtual learning environments where this is necessary for educational purposes, e.g Arbor, Bromcom, Class Dojo, Seesaw, Google Classroom, Teams

5. GUIDELINES FOR PHOTOGRAPHY

- Only authorised personnel may take photographs during school events. They must ensure that photographs are taken respectfully and within the context of the school's educational purposes.
- Photographs must not capture students in compromising or private situations. Images should reflect the dignity of all students and staff.
- 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 photographs.
- Staff must not use personal phones or personal cloud accounts to capture, store or transfer school photographs unless expressly authorised by the Headteacher and appropriate safeguards are in place.
- Staff must ensure that photographs are only taken using school-approved equipment or authorised devices
- Photographs should not be uploaded to personal cloud storage, messaging platforms or social media accounts.
- Photographs must not be copied onto personal USB storage devices, external hard drives or any other personal storage media unless specifically authorised by the School.
- Staff must not edit, manipulate or enhance photographs in a manner that could misrepresent events or individuals, except for legitimate adjustments such as cropping, resizing or improving image quality.

6. ARTIFICIAL INTELLIGENCE (AI)

Artificial Intelligence (AI) tools are increasingly capable of editing, enhancing, analysing or generating images. While these tools can provide educational and administrative benefits, they also present data protection, safeguarding and copyright risks.

Staff must not upload photographs or videos containing pupils or staff into publicly available AI platforms unless:

- the School has approved the AI service;
- a Data Protection Impact Assessment (DPIA) has been completed where required;
- the provider offers appropriate contractual and security safeguards;
- there is a lawful basis for the processing.

Images must not be used to train AI models unless specifically authorised by the School. AI-generated or manipulated images must never be used in a way that could misrepresent events or individuals or cause distress.

Where AI is used to improve photographs (for example removing backgrounds, adjusting lighting or cropping images), only approved software should be used.

AI systems must not be used for facial recognition, biometric analysis or behavioural profiling unless specifically authorised, legally compliant and supported by an appropriate DPIA.

Staff must ensure that all photographs, graphics and AI-generated images used by the School comply with copyright and licensing requirements.

Where AI services process personal data outside the UK, appropriate international transfer safeguards must be in place before photographs are uploaded.

7. SMART GLASSES AND WEARABLE RECORDING DEVICES

Wearable technology capable of recording images, video or audio (including Meta Smart Glasses and similar devices) presents additional safeguarding and privacy risks within schools. Staff, visitors, contractors and volunteers must not wear recording-enabled smart glasses whilst undertaking school duties unless specifically authorised by the Headteacher for an identified educational or operational purpose.

Pupils must not use smart glasses or similar wearable recording devices on school premises unless authorised as part of an agreed educational programme or accessibility requirement.

Visitors wearing smart glasses may be asked to remove or disable recording functionality before entering areas where pupils or confidential information may be present.

Any unauthorised recording may be treated as a safeguarding concern and managed under the School's Behaviour, Safeguarding and Data Protection policies.

This includes devices where recording may not be immediately obvious. Users of wearable technology should be aware that members of staff may request that devices are removed or powered off whilst on school premises.

Staff should report any suspected unauthorised recording to the Designated Safeguarding Lead or Headteacher as soon as reasonably practicable.

8. STORAGE AND SECURITY

All photographs and video recordings created or held by the school will be securely stored in compliance with GDPR and school data protection policies. Access to stored photographs will be limited to staff who require access as part of their role and will be subject to appropriate access controls.

- **Digital Images:** Stored in encrypted folders or systems managed by the School or its authorised providers.
- **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. The School's Records Retention Schedule will determine the retention period applicable to photographs.

Photographs must not be stored indefinitely. The School will periodically review stored images and securely delete those no longer required.

Where photographs are stored by third-party providers (for example cloud storage or educational software providers), appropriate contracts and security measures must be in place.

9. OPTING OUT PROCESS

While the School generally processes images under the lawful basis of public task, parents/carers may request that their child is excluded from photography in certain contexts (e.g., website or social media).

Requests to opt out should be submitted in writing to the School Office. The School will maintain a register of students who are not to be photographed or whose images must not be shared publicly. This register will be made available to relevant staff and event organisers and reviewed regularly.

The School will make reasonable efforts to ensure that pupils who have opted out are not intentionally included in photographs intended for publication. However, it may not always be possible to avoid incidental inclusion in large group or public event photographs.

Where a pupil is subject to safeguarding measures, court orders or other restrictions preventing publication of their image, the School will ensure appropriate controls are in place following consultation with the Designated Safeguarding Lead.

10. 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.

Professional photographers, media organisations and contractors will be supervised where appropriate and only permitted access to areas necessary for the agreed purpose.

Where third-party photographers process images on behalf of the School, appropriate contractual arrangements will be implemented where required to ensure compliance with UK GDPR.

11. POLICY REVIEW

The Data Protection Officer 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.

The DUAA 2025 may require updates to this policy, especially in relation to rights of access, reuse of data and transparency provisions. The DPO will ensure this policy remains aligned with any statutory codes or ICO guidance issued under the DUAA.

12. LINKS WITH OTHER POLICIES

This policy is linked to the School:

- Data Protection Policy
- Security Incident and Data Breach Policy
- CCTV Policy
- Information Security Policy
- Safeguarding and Child Protection Policy
- UK GDPR Privacy Notices
- Records Retention Policy
- Artificial Intelligence (AI) Policy
- Acceptable Use Policy
- Bring Your Own Device (BYOD) Policy
- Online Safety Policy
- Staff Code of Conduct

The Information Commissioner provides a free helpline and a wide range of guidance and resources relating to information rights and data protection. Further information is available from: [Information Commissioner Office \(ICO\)](#)