



Greenhaugh Primary School

Policy on the use of images of pupils: Photography, videos and other creative arts in school

Introduction

Many school activities involve the taking and use of images. These may be undertaken as part of the curriculum, extra school activities, for publicity or to celebrate achievement. However, this interest also brings dangers. The publication of students' images, especially where they are accompanied by the individual's name, could attract the wrong sort of interest.

Photographs and video images of students and staff are classed as personal data under the terms of the General Data Protection Regulation (GDPR) 2018. Therefore, the use of such images by schools requires the consent of the individual concerned as well as their parent/guardian.

This policy details how **Greenhaugh Primary School** captures, stores, publishes, and safeguards digital images and videos of pupils. This policy operates strictly in line with:

- **[Statutory Guidance]** Keeping Children Safe in Education (KCSIE) 2026.
- **[Data Protection Legislation]** The UK General Data Protection Regulation (UK GDPR) and Data Protection Act 2018.
- **[Regulatory Bodies]** The [Information Commissioner's Office \(ICO\) Guidance for Schools on Photos](#).

In alignment with **Keeping Children Safe in Education (KCSIE) 2026** statutory updates, this school explicitly recognises that digital harms are no longer restricted to physical photography.

- **Expanded Definition of Nudes:** The phrase "youth-produced sexual imagery" is replaced by "**making or sharing nudes and semi-nudes**".
- **Inclusion of Synthetic Media:** This definition explicitly encompasses images that are wholly generated, manipulated, or altered using Artificial Intelligence (AI), commonly known as deepfakes.
- **Mandatory Safeguarding Response:** **Any** incident involving the creation, possession, or distribution of pupil images under this definition—**whether shared consensually or non-consensually**—will trigger an immediate safeguarding response from the DSL. Synthetic/AI-generated media will be handled with identical urgency to physical images.

Rules for Public-Facing Image Publication

To prevent malicious external entities from scraping pupil images to train AI models or target individuals, the following rules apply to our public website and public social media platforms:

- **The Anonymity Shot Default:** Images published on public platforms must prioritise **unidentifiable angles** (e.g., side profiles, rear views, over-the-shoulder perspectives, or blurred backgrounds).
- **Focus on Activity:** Photos must focus on the task, work, or hands of the child rather than high-resolution direct facial features.
- **The Separation Protocol:** Full names and identifiable pupil images must **never** appear together. If a pupil is named in an article celebrating an award, their photograph must not be attached.
- **Resolution and Metadata Control:** Prior to any public upload, the file must run through the school IT compression portal to:
 1. **Strip all EXIF data** (removing hidden GPS coordinates, times, and device data).
 2. **Downscale file resolution** to prevent high-quality image manipulation.

Permitted Channels for Identifiable Images

Identifiable images (front-facing shots where consent is active) are restricted to secure, internal channels:

- **Internal School Use:** Classroom displays, physical corridor notices, and internal teacher tracking systems.
- **Secure Parent Portals:** Access-controlled, password-protected communication apps (e.g. **ClassDojo**) where accounts are verified manually by school administrators. Public access to these repositories is strictly forbidden.
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Staff Conduct and Personal Devices

Staff digital standards comply strictly with the removal of supervision exemptions under the [DBS 2026 criteria for regulated activity](#).

- Staff **must never** use personal mobile phones, smartwatches, or personal digital devices to photograph or film pupils.
- Staff must only use school-sanctioned, school-allocated hardware (e.g., school iPads or digital cameras).
- Images must be moved to the secure school network server ([e.g., **SharePoint / internal drive**]) immediately following the event. No images may remain on the local storage of a portable school device overnight.

To ensure the safety of all children at Greenhaugh Primary School, we have the following procedures in place regarding the use of photography/videos:

- **The school will obtain parental consent before any photograph or video of a pupil is taken where these are likely to be used in a publication, e.g. the School Prospectus.**
A consent form is circulated in September, at the beginning of each school academic year for parents to complete showing their wishes. This is then returned to school (see copy below). Parents can withdraw consent at any time in writing.
- **Greenhaugh School Website-** an audit of the site has been undertaken and we have removed any front facing images. We will only post no face fronting images on the public area of the website. We are investigating creating a private area for parents/carers within the school website.
- **When photographic images are transmitted or shared beyond the establishment, e.g. Hexham Courant or a specific project involving the media, consent is also needed.** Occasionally, establishments other than school will require their own specific consent forms to be completed throughout the year.
- **Inter-School Events, such as shared curriculum days or sporting events – Greenhaugh staff will liaise with a member of staff from the other establishment so that they are aware of the wishes of the parent/guardian who have not given consent for photographs to be taken.**
- **Pupil Mobile phones – these are not permitted in school.**
- **Photography at school events, e.g. Christmas plays. Following consultation with parents/carers we have agreed that parent/carers are able to take photos at school events. To do so Parents and Carers and wider family must sign a form to clarify that they will not share any photos of the event on any Social Media site.**

- **Greenhaugh Primary School has a Facebook page to promote the school. The Governors have taken the decision that we will not be linking the Facebook page with Instagram. We are investigating how we can make an area private for parents to securely post photos linked with school. No names or Faces will be used in any posts.**

Management of Commercial or External Photography

When organising formal school photographs, Greenhaugh Primary will ensure:

- **School Portrait Photographers:** External commercial photographers (e.g., individual or class portraits) will undergo full safer recruitment checks. They will sign a data processor agreement ensuring no images are retained on their company databases after the prints are fulfilled.

Policy Breaches and Enforcement

- **Staff Breaches:** Any member of staff found capturing or storing pupil media in violation of this policy will face disciplinary investigation under the *Staff Code of Conduct*, which may lead to escalation to the Local Authority Designated Officer (LADO).
- **External Breaches / Cyber Incidents:** If the school discovers its digital assets have been scraped or manipulated via AI, the Headteacher will activate its **Cyber Security Safeguarding Response Protocol**, report the event to the police, and notify affected parents immediately.

Greenhaugh Primary School's Safer Images checklist

- Always ensure that students are dressed appropriately.
- Face forward photos will not be uploaded or shared
- Ensure that it is stated clearly whether an image is to be retained for further use and, if so, what.
- Ensure that images are stored securely and that they are accessed and/or used only by those with authority to do so (photographs can be stored electronically but this must be within a secure area). Class teachers store images on their PC which is password protected. Photographs on mobile devices (school cameras or ipads) must be downloaded weekly and the device cleared on the same basis.

Consent Form Conditions of use

- The form is valid for the period of one school year. Your consent will automatically expire after this time.
- The school will not re-use any photographs or recordings of your child/ren after they have left our school unless a request is made and specific consent is given.
- The school will not include personal e-mail / postal address or telephone number on a video, on our website, in our school prospectus or in other printed publications.
- If we use photographs of individual children, we will only use their name in any accompanying text or caption if permission has been given.
- We may include pictures of pupils and teachers that have been drawn by pupils. We may use group or class photographs or footage with very general labels, such as "a science lesson".
- We will only use images of pupils who are suitably dressed.
- Parents should note that websites can be viewed throughout the world and not just in the United Kingdom, where UK law applies.

Notes on Use of Images by the Media

If you give your permission for your child/ren's image to be used by the media then you should be aware that:

- The media will want to use any printed or broadcast media pictures that they take alongside the relevant story.
- It is likely that they will wish to publish the child's name, possibly age and the school name in the caption for the picture (possible exceptions to this are large group or team photographs).
- It is possible that the newspaper will re-publish the story on their website, or distribute it more widely to other newspapers.

Signed: Leanne Dotchin, Headteacher

Signed: Sarah Barnes, Chair of Governors

Date:

Document Record

Version	Reason for Amendments/Update/Review	Date of Adoption by Greenhaugh Primary School	Date of next review
1.0	Updates from KCSIE 2026 included. Avoid Face-On, Identifiable Portraits: Schools are strongly advised to stop publishing clear, frontal face photographs of pupils on public-facing websites and social media. Shift to General School-Life Imagery: alternatives include wide playground or classroom shots, photos taken from a distance, profile shots from behind, or cropped images focusing strictly on hands-on activities, books, and artwork rather than identities. Never Pair Names with Photos: Public captions should never match a child's full name or specific details (such as awards or exact class/year groups) alongside an identifiable face. Strip EXIF Metadata: scrub hidden digital metadata—such as time, date, and location stamps—from image files before uploading them online. Lower Resolutions: Publishing smaller, low-resolution images helps deter direct downloading and misuse. Updated Safeguarding (KCSIE 2026): Updated statutory guidance like <i>Keeping Children Safe in Education</i> explicitly broadens definitions of peer-on-peer abuse to cover AI-generated or manipulated intimate images and deepfakes.	September 2026	

	Primary school image-use and photography policies have shifted significantly following urgent advice issued in mid-2026 by the National Crime Agency (NCA), the Internet Watch Foundation (IWF), and the Online Harms Early Warning Working Group. The updates address a severe emerging threat: criminals lifting clear, face-on photographs of children from public school websites and social media accounts to generate artificial intelligence (AI) manipulation and explicit deepfake material.		
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Greenhaugh Primary School

Photography and Media Consent Form

Name of Child/ren:

Year Group:

Name of Parent/Guardian:

It is important that we protect your child/ren's interests, respect your wishes and comply with the General Data Protection Regulation (GDPR) 2018. Greenhaugh Primary School follows the guidance set out in Keeping Children Safe in Education 2026.

The school confirms that it shall only use photographic images of your child/ren in line with its safer images checklist and in order to demonstrate or promote activities relating to the schools 'curricular and extra-curricular provision (this includes photographs of children kept solely for the purpose of recording curricular activities).

Please delete YES or NO as per your wishes in the boxes below (both columns) in all instances, showing whether you give your consent (or not) for photographic images of your child/ren to be used. Please also indicate whether you consent to your child/ren's name being associated with their image.

This document is to be returned to school as soon as possible after its circulation.

Type of Use	Agree To: Use of Image / Video	Agree To: My child's first name being shown
On Class Dojo	Yes / No	Yes / No
On the school website	Yes / No	Not applicable
In the school materials aimed at the school community e.g. Tarsnet News	Yes / No	Yes / No
In media coverage of the school e.g. Hexham Courant	Yes / No	Yes / No
A specific project involving the media e.g. working with artist in residence at High Green, The Sill	Yes / No	Yes / No

School Facebook & Instagram page	Yes / No	Not applicable
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I confirm that I have read and agree to the terms contained within this consent form (**please see Conditions of Use which follow**).

Signature of Parent / Guardian:..... **Date:**.....