



PHOTOGRAPHY & VIDEO CONSENT AND STORAGE POLICY

Policy Reference No	COM008
Review Frequency	Annual
Reviewed	Summer 2026
Next Review Date	Summer 2027
Approved by	TLT

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Change Log

Date	Changes to Policy
Summer 2026	Strengthened safeguarding, privacy and AI controls relating to the use of photographs and videos. Added guidance on the risks of AI-generated image manipulation and online image misuse; introduced annual consent reviews and increased transparency for parents regarding AI-related risks; strengthened image selection requirements to minimise identifiable pupil images; added requirements to remove metadata before publication; prohibited the upload of pupil images to AI tools without Trust approval and DPIA; prohibited the manipulation or generation of pupil images using AI; promoted the use of alternative non-identifiable content where appropriate; introduced annual reviews and deletion of stored and published images; added image misuse and incident response procedures; strengthened requirements for external providers handling pupil images; enhanced staff training on AI risks, image-based abuse and safe image practices; and updated consent information to reflect safeguarding, online sharing and AI-related risks. Section 5.5 – Use and Storage of Media: Clarified that parental recording of school events does not override the academy's phone-free school day for pupils, and that any exception applies only to parents/carers at organised events. This ensures consistency with safeguarding, behaviour and acceptable use policies.
Autumn 2025	Accessibility Statement added • Updated legislation references to include Online Safety Act 2023, Equality Act 2010, KCSIE 2025, and ICO guidance. • Clarified withdrawal rights and compliance with ICO guidance. • Added requirement for encryption and access control for media storage. • Included guidance on AI-generated or edited images and copyright compliance. • Added requirement for Data Processing Agreements with external photographers. • Clarified lawful basis for processing staff images Appendix 1: Updated legislation references to include, UK GDPR, Data Protection Act 2018, and ICO guidance Appendix 3: Added withdrawal notice.

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Accessibility and Language Support

If you require this policy in an alternative format or language, please contact the Trust People Team or your Head Teacher /Manager/Executive Head/ Member of Trust Leadership Team/Member of Trust Executive Team (as appropriate). We are committed to ensuring that all colleagues have access to our policies and can fully understand and engage with them and will work with you to provide the necessary support and resources.

1. Introduction

1.1 The Learning Academy Partnership (hereinafter the Trust) recognises that photographs and videos add colour, life and interest to resources within our schools and articles promoting our school and the Trust. This policy ensures compliance with current UK legislation, safeguarding requirements, and best practices for data protection and online safety. This can include, but is not limited to, the following:

- Displays within our schools of the children's activities
- School websites and Trust website
- Printed publications
 - Prospectus
 - Posters
 - Flyers
 - Newsletters
- Social Media
- Press and media
- Banners

1.2 The use of photographs and videos can increase the children's motivation, boost staff morale and help parents and the local community to identify and celebrate our achievements.

1.3 In order to respect children's and parents' rights of privacy and because of potential safeguarding and child protection issues, all photographs and videos must be used and stored in a responsible way.

1.4 We recognise the increasing risk of images being misused or altered through digital technologies, including artificial intelligence (AI). This includes risks of manipulation, unauthorised sharing, and misuse of images online. Measures are in place to minimise these risks and protect children and staff.

1.5 We are committed to safeguarding and promoting the welfare of children and expects all staff and volunteers to share in this commitment. This policy seeks to achieve a practical balance to secure the above.

2. Scope

2.1 This policy is subject to, and should be read in conjunction with, the following Trust policies:

- Acceptable Use Agreement
- Code of Conduct
- Complaints
- Data Protection and Freedom of Information
- Safeguarding and Child Protection
- Social Media

2.2 This policy applies to:

- All staff
- All children
- All promotional materials

3. Legislation

3.1 Under the terms of the UK General Data Protection Regulations 2018 images of children or staff must not be displayed in a public place without consent. This includes publications such as the school prospectus, website or areas in the school where visitors have access.

This policy complies with the following legislation and guidance:

- UK GDPR and Data Protection Act 2018
- Online Safety Act 2023
- Equality Act 2010
- Keeping Children Safe in Education (KCSIE) 2025
- ICO Guidance on Consent and Data Processing
- Copyright, Designs and Patents Act 1988

4. Parental Consent

4.1 The Trust has a Photo Consent form in Bromcom MCAS (MyChildAtSchool) that must be completed by the parents for all children within our school upon admission also available as a paper copy (see Appendix 1).

4.2 Staff should always check the up-to-date list in Bromcom before publishing photos anywhere to ensure parental consent.

4.3 The consent you give will last for the duration of your child's time at school. However, if you wish to change any of the authorisations or withdraw consent during this time, please use the appropriate form (Appendix 3) or contact the academy office.

4.4 Parents/carers will be informed of the potential risks of images being shared online, including misuse or alteration through AI technologies. Consent will be reviewed regularly (at least annually), and children's views will be considered where appropriate based on age and understanding.

5. Use and Storage of Media

5.1 Photographs and videos should be taken using Trust equipment only (cameras, iPhones, iPads, etc.). Staff should never use their own equipment to take photographs of the children.

5.2 Photographs and videos should not be stored on personal equipment, only on the Trust's secure servers/equipment.

5.3 Staff will only take and use photographs and videos of children in suitable dress to reduce the risk of potential misuse.

5.4 Where possible, images should avoid clearly identifiable facial images of children. Preference should be given to group images, images taken from a distance, or alternative angles to reduce the risk of misuse.

5.5 When a photograph is used a child will not be named, and vice versa. Occasionally names may be requested by local press to accompany a photograph. In these circumstances consent should be gained from the parents prior to publishing.

5.6 Images must not contain embedded metadata (e.g. location, date, device information). All media must be checked and metadata removed before publication.

5.7 Images of pupils must not be uploaded to artificial intelligence (AI) tools or platforms for editing, enhancement, or generation purposes unless this has been formally approved by the Trust and subject to a data protection impact assessment (DPIA).

5.8 Colleagues must not use AI or digital tools to alter, manipulate or generate images of pupils in a way that changes their appearance, context or meaning.

5.9 Consideration must be given to whether images of children are necessary. Where appropriate, alternative content such as work, activities or environmental images should be used.

5.10 The Trust recognises that parents and family members may wish to record events, such as school plays, sports days, etc. to celebrate their child's achievements. Parents should be reminded that these records should remain private and for their own personal use and should not be shared on social media sites. This does not override the academy's phone-free school day for pupils; any exception to this policy applies only to parents/carers at organised events

5.11 The Trust cannot be held responsible if parents allow their children to appear in publications relating to school activities or send photographs direct, without the Trust's knowledge.

5.12 The Trust may securely store and use photos of children for promotional purposes after a child has left a school, if the appropriate permission has been given.

5.13 The Trust will carry out regular reviews (at least annually) of stored and published images to ensure they remain appropriate, necessary, and covered by valid consent. Images that are no longer required will be securely deleted.

5.14 Guidance added for AI-generated or edited images to ensure copyright compliance.

- Verify that AI-generated content is licensed for use (Creative Commons, public domain, or explicit permission).
- Do not use copyrighted material without obtaining permission from the rights holder.
- Check UK Intellectual Property Office (UK IPO) guidance for AI-created works.
- Clearly state when AI tools have been used to create or edit images for transparency.
- Maintain records of the source, license type, and permissions for all AI-generated or edited content to ensure compliance.

5.15 In addition, staff must be aware of safeguarding risks associated with AI-generated or manipulated images, including potential misuse, alteration, or unauthorised distribution. Any concerns must be reported in line with safeguarding procedures.

Image Misuse and Incident

In the event of suspected misuse, alteration, or unauthorised sharing of images:

- The issue must be reported immediately to the Designated Safeguarding Lead (DSL)
- Steps must be taken to remove the content where possible
- Evidence must be preserved in line with safeguarding procedures
- Incidents will be recorded and risk assessed
- The police will be contacted where a criminal offence is suspected
- Appropriate support will be provided to affected individuals

6. External Photographers

External providers must comply with the Trust's requirements on image security, including appropriate handling, storage, and deletion of digital media.

6.1 Commercial and external photographers are invited into our schools on a regular basis to take official photographs of children, and these can often be purchased by parents. A Data Processing Agreement is required under UK GDPR. Such photographers will:

6.1.1 Sign in and wear identification at all times.

6.1.2 Never have unsupervised access to children.

6.1.3 Never solicit photo sessions outside the event or at a child's home.

7. Staff

7.1 As part of our commitment to safeguarding and to ensure staff are easily identifiable, all our teachers and staff on Trust premises and taking part in Trust activities are required to wear a photo ID badge and be displayed on our Staff Photo Boards. Staff images are processed under contractual necessity and consent.

7.2 This processing is necessary for the contract we have with you as members of staff / trainees / volunteers / trustees / committee members.

7.3 Your photograph(s)/words may be used to promote the activities of the Trust and may appear in any of our promotional material in printed or electronic form including websites, in multimedia productions, course leaflets, prospectuses, social media or press releases. Please note that websites can be seen worldwide and not just in the UK where UK law applies.

7.4 The Trust has a Photo Consent form that must be completed by all members of staff / trainees / volunteers / trustees / committee members (see Appendix 2).

7.5 All staff will receive appropriate training and guidance on the safe use of images, including awareness of risks relating to online sharing, AI manipulation, and image-based abuse.

8. Appendix 1 – Pupil GDPR Consent Form

To comply with UK GDPR, Data Protection Act 2018, and ICO guidance, we are required to obtain your consent to carry out certain activities within our School Trust, schools and nurseries.

We use photographs and videos to celebrate achievements and support communication with our school communities.

This may include use in school displays, printed materials, websites, and official social media accounts. We recognise the increasing risks associated with the use of photographs, videos and digital media, including the potential for unauthorised sharing, misuse, or manipulation through emerging technologies such as artificial intelligence (AI). Once images are published, particularly online, they may be copied, altered, or shared without consent and beyond the Trust's control.

The Trust takes a safeguarding-first approach to minimise these risks through secure storage, controlled use of images, clear staff guidance, and robust consent processes. We are committed to ensuring that all use of images is appropriate, proportionate, and in the best interests of children.

Any concerns regarding the misuse or inappropriate sharing of images will be treated as a safeguarding matter and managed in line with the Trust's safeguarding procedures.

Use of Digital Images and Videos

We need your consent to enable photographs and videos to be used for the purposes set out below (please tick to confirm you give permission).

- Only images of children in suitable dress will be recorded and shared.
- Staff are not allowed to take photographs or videos on their personal equipment.
- When sharing photographs, we will not use the name of the child in the accompanying text or caption. If we use the child's name, we will not use their photograph to accompany the text. We will use only children's first names, rather than their full names (except in exceptional circumstances where we may provide the first initial of their surname to distinguish them).
- When sharing video recordings, we will not use the children's names within the video recording and will not use the children's full names in crediting of video recordings.
- If we would like your child's image linked to their name, we would contact you separately for permission (for example, if your child won a competition and wanted to be named in press/literature).

☐ I give permission for my child's **photographs** to be used on **internal displays** within the Trust and school

☐ I give permission for my child's **photographs** to be used in **external printed publications**

— (including but not limited to newspaper/magazine articles and adverts, posters and banners)

☐ I give permission for my child's **photographs** to be used **online**

☐ I give permission for my child's **videos** to be used **online**

(including but not limited to the Trust and school websites, newsletters and online Learning Diary)

☐ I give permission for my child's **photographs** to be used on our **official social media sites**

☐ I give permission for my child's **videos** to be used on our **official social media sites**

(including but not limited to Facebook, Twitter, Instagram and LinkedIn)

☐ I give permission for my child's **photographs** to be used **once my child has left the school**

☐ I give permission for my child's **videos** to be used **once my child has left the school**

☐ I give permission for an external professional photographer to take **photographs** and release to my family for sale. The photographer would have possession of the photos on their equipment, not school equipment.

☐ I give consent for my child to be **photographed** for group photos by an external professional photographer, that may be sent out and then brought by other families who have children in the photo.

Use of Email / Phone Numbers

We need your consent so that we may use your email address and/or mobile telephone number for the purpose set out below (please tick to confirm you give permission).

☐ I give permission for my mobile telephone number and email address to be used for **contact and reminders**

from the school and to keep me informed of events on behalf of the school and PTFA

☐ TRIPS and Visits

I agree to my child taking part in school trips and other off-site activities as detailed. All trips will be notified in advance.

Consent will be deemed to be valid unless and until your child leaves the school or we receive notification that the consent has changed. You are free to withdraw your consent at any time by contacting the school office.

Please note it may take up to 12 months to remove your child's images from our websites, displays, etc., however it may not be possible to remove them from publications already in circulation (i.e. local press and social media). If you have any other questions, please get in touch with the school office.

Child's Name	
School/Setting	
Parent/Carer Signature	
Date	

9. Appendix 2 – Staff GDPR Consent Form

Staff Photo - ID

As part of our commitment to safeguarding and to ensure staff are easily identifiable, all our teachers and staff on Trust premises and activities are required to wear a photo ID badge and be displayed on our Staff Photo Boards.

This processing is necessary for the contract we have with you as members of staff / trainees / volunteers / trustees / committee members.

Permission to use photographs & words

Your photograph(s)/words may be used to promote the activities of the Learning Academy Partnership and may appear in any of our promotional material in printed or electronic form including web sites, in multimedia

productions, course leaflets, prospectuses, social media or press releases. Please note that websites can be seen worldwide and not just in the UK where UK law applies.

General Data Protection Regulation May 2018

To comply with the Regulation, we need your permission before we use any photographs or your words. We will normally store photographs/words securely on our servers for the duration of your employment/training and your consent will expire after this period. However, your photograph(s) may be selected for inclusion in our historical archive and be retained indefinitely. Your words may appear as part of a case study.

Your Consent

Please provide the information requested below which will give us your consent to use your photograph(s)/words in accordance with the purposes and conditions outlined above and the terms of the General Data Protection Regulation 2018.

You have the right to withdraw your consent at any time and this can be done by contacting the People Team Department via people@lapsw.org

Please note whilst consent may be withdrawn it may not be possible to remove photographs/words from all documents/publicity immediately, but future printed versions will be revised when practical.

Print Name:	
Signature:	
Date:	

10. Appendix 3 – Withdrawal Consent Form on behalf of pupil

Please complete and return to the academy office. Withdrawal will be actioned promptly, but removal from websites/displays may take up to 12 months. Published materials cannot always be recalled.

Please complete and deliver this form to the academy office with your signature.

I, (parent/carer name) withdraw consent in respect of
..... (pupil name) for (school name) to

I withdraw consent for the following which was previously granted – list all that apply.

I confirm that I have parental responsibility for the pupil.

Signed:

Dated:

Received by school.

Name academy staff member:

Dated:

Actions: