HEDNESFORD HILLS FEDERATION

PHOTOGRAPHIC AND VIDEO IMAGES POLICY

Policy owner	Headteacher / Designated Safeguarding Lead
Approved by	Governing Body
Date approved	7.20.26
Review date	September 2027
Review cycle	Annual, or sooner following changes to legislation, safeguarding guidance or Federation practice

1. Purpose

Hednesford Hills Federation recognises that photographs and video can make a valuable contribution to teaching, learning, celebration and communication with families. At the same time, identifiable images of children are personal data and their use must be carefully managed to protect children's privacy, dignity, welfare and safety.

This policy sets out how the Federation will take, use, store and share photographs and video images in a safe, respectful and lawful way. The welfare and best interests of the child will remain paramount.

2. Scope

This policy applies across West Hill Primary School, Hednesford Nursery School and West Hill Pre-School and applies to pupils, children, staff, volunteers, students, governors, visitors, contractors and parents/carers where relevant.

It covers still photographs, video, livestreaming and other identifiable visual recordings created or used for Federation purposes, including images used for teaching and learning, Class Dojo, displays, newsletters, websites, publicity, educational visits, events and media activity.

3. Legal and safeguarding framework

This policy has regard to:

- Keeping Children Safe in Education 2026 (KCSIE 2026);
- Working Together to Safeguard Children 2026;
- the UK General Data Protection Regulation (UK GDPR), Data Protection Act 2018 and relevant data protection legislation;
- Department for Education guidance on taking and using photographs and videos in schools;
- Information Commissioner's Office guidance on photographs and videos in schools;
- the Equality Act 2010; and
- the Federation's safeguarding, online safety, staff conduct and mobile and smart technology arrangements.

KCSIE 2026 requires all staff to follow the setting's safeguarding systems and act immediately where a concern arises. Nothing in this policy prevents information or an image being handled or shared where this is necessary and lawful to safeguard a child.

4. Data protection and lawful use of images

Where an individual can be identified from a photograph or video, the image will normally constitute personal data. The Federation will therefore identify an appropriate lawful basis for taking, using, storing or sharing images and will explain relevant uses through its privacy information and other communications.

Consent or parental permission may be used for particular purposes, but it is not the only lawful basis available under data protection law. Before publishing or sharing an image, staff must check the purpose for which it is being used and any restrictions or preferences recorded for the child.

Parents/carers may contact the setting to discuss or change their preferences about non-essential uses of their child's image. Where a child is sufficiently mature to express their own wishes, staff will also take the child's views into account.

5. Safeguarding considerations

Safeguarding considerations take priority over promotional, celebratory or convenience purposes. Staff must check for any safeguarding restrictions before publishing or sharing identifiable images.

Children who should not be publicly identifiable, including where there is a court order, safeguarding concern or other identified risk, must not be included in images that would identify them contrary to the arrangements recorded for that child.

Staff must be sensitive to the content and composition of images. Children must be appropriately dressed for the activity and photographs must not be taken in circumstances where privacy would reasonably be expected, including changing areas, toilets or similar locations.

Any concern about the creation, possession, use or sharing of an image must be reported promptly to the Designated Safeguarding Lead (DSL) or a deputy and managed under the Child Protection and Safeguarding Policy. Where imagery may involve abuse, exploitation or the sharing of nudes or semi-nudes, staff must follow the Federation's safeguarding procedures and current statutory/UKCIS guidance.

6. Federation photography and video

Images taken for Federation purposes must normally be created using Federation-owned or specifically authorised equipment and accounts. Staff, volunteers and students must not use personal devices to photograph or video children, except in a genuine emergency where this is necessary to protect a child's welfare and the Headteacher/DSL is informed as soon as possible.

Images may be used for appropriate purposes including teaching and learning, displays, assessment or documentation of activities, communication with families, celebration of achievement, newsletters and approved publicity, subject to the safeguards and permissions set out in this policy.

Images will be retained only for as long as there is a legitimate purpose for keeping them and will be stored securely on approved systems. Staff must not copy school images to personal accounts, personal cloud storage or personal devices.

7. Public social media

Hednesford Hills Federation will not publish photographs or video images showing identifiable children's faces on the Federation's public social media accounts.

Images used on public social media will therefore be selected or taken so that individual children are not identifiable through their facial image. Staff should also consider whether other details within an image, including names, uniform information, location information or distinctive personal details, could unnecessarily identify or place a child at risk.

This Federation position applies even where a parent has previously given general photographic permission. It reflects the Federation's safeguarding approach to public social media and does not prevent appropriate photographs from being shared with families through approved, more restricted school communication systems.

8. Class Dojo

Photographs showing children's faces may continue to be shared through Class Dojo for school and class communication purposes where the school holds the relevant parental permission previously provided for that child.

Before posting, staff must check current permissions and any safeguarding restrictions. Class Dojo must be accessed through school-approved accounts and used in accordance with the Federation's Online Safety Policy, Data Protection Policy and acceptable-use arrangements.

Images should be relevant, appropriate and proportionate to the educational or communication purpose. Staff must not assume that permission for Class Dojo permits the same image to be published on public social media or used for a different purpose.

9. Photography at school events

The Federation recognises that parents and carers often wish to take photographs or recordings at events such as sports days, assemblies, celebrations, concerts and school plays. Arrangements will be considered for each event, taking account of safeguarding, privacy, the nature of the activity and the needs of the children involved.

Organisers will communicate photography arrangements to parents and carers in advance of the event. Where the school determines that photographs or recordings should not be taken by parents, carers or other audience members, this will be made clear before the event and those attending will be expected to respect the request.

Where parental photography is not permitted, the school will take appropriate photographs using Federation-owned or authorised equipment and will share suitable images through Class Dojo in accordance with the parental permissions already held for individual children.

Where parental photography is permitted, parents and carers are asked to use images responsibly, to respect the privacy of other children and families, and not to publish identifiable images of other people's children publicly without appropriate permission.

The school may stop photography or recording at any time where it is disruptive, inappropriate or gives rise to a safeguarding or welfare concern. Photography or recording is never permitted in changing areas, toilets or other locations where privacy would reasonably be expected.

10. School website, newsletters and other publications

Any use of identifiable children's images on the Federation website, printed publications, newsletters or external promotional material will be managed in accordance with the lawful basis and permissions applicable to that purpose and any safeguarding restrictions.

The Federation will minimise unnecessary identification of children. A child's full name will not normally be published alongside an identifiable image unless there is a clear, appropriate reason, the relevant safeguards have been considered and the required permission or other lawful basis is in place.

11. Media and external organisations

Where local or national media or another external organisation wishes to photograph or film children, the Federation will consider the purpose, safeguarding implications and data protection arrangements before agreeing.

Parents/carers will be informed where appropriate before planned media activity involving their child. Any restrictions on identification or publication will be communicated to the organisation. The Federation may decline or limit photography where this is necessary to safeguard a child or protect privacy.

External organisations using Federation premises are responsible for their own compliance with data protection and safeguarding requirements, but must also comply with any conditions imposed by the Federation while on site.

12. Mobile phones and personal devices

The use of mobile phones and smart technology is governed by the Federation's Use of Mobile Phones and Smart Technology Policy.

Staff may take personal mobile phones on educational visits where this supports safe and effective management of the trip. They may be used, where necessary and preferably away from pupils, to communicate with school staff, the school office or other relevant contacts in connection with the visit. Personal phones must not be used to take photographs, videos or recordings of pupils.

Pupil access to mobile phones and smart technology during the school day will be managed in accordance with the relevant setting's policy and agreed reasonable adjustments.

13. Teaching children about images and consent

Children will be taught in an age-appropriate way to respect other people's privacy and to understand that photographs and recordings can be personal information. They will be encouraged to ask before photographing another person and to tell a trusted adult if an image or recording makes them uncomfortable or is being used inappropriately.

Online safety education will address the risks associated with creating and sharing images, including non-consensual sharing, manipulation of images, harmful online content and age-appropriate understanding of consent.

14. Storage, retention and deletion

- Images created for Federation purposes will be stored on approved, secure systems.

- Access will be limited to those who need it for their role.
- Images will not be retained for longer than necessary for the purpose for which they are held, subject to any appropriate record-retention requirement.
- Images on school devices should be reviewed and deleted when no longer required.
- Where an image forms part of a safeguarding record or evidence, it will be handled in accordance with safeguarding procedures and must not simply be deleted under routine image-management arrangements.

15. Concerns, complaints and breaches

Concerns about the inappropriate taking, use or sharing of images should be reported to the Headteacher, DSL or Data Protection Lead as appropriate. Safeguarding concerns will be dealt with immediately under safeguarding procedures.

A concern involving the conduct of a member of staff, supply staff member, volunteer, student or contractor will be managed under the appropriate safeguarding/allegations or low-level concerns procedures where relevant.

Data protection incidents will be reported and managed under the Federation's Data Protection Policy and breach procedures. Parents/carers may raise other concerns through the Federation's Complaints Policy.

16. Roles and responsibilities

Headteacher

- ensures the policy is implemented consistently;
- ensures staff understand expectations concerning personal devices, publication and safeguarding;
- ensures appropriate systems are available for secure storage and sharing; and
- ensures concerns are escalated appropriately.

Designated Safeguarding Lead

- advises on safeguarding restrictions relating to images;
- ensures image-related safeguarding concerns are recorded and acted upon;
- supports staff in decisions where publication may place a child at risk; and
- liaises with external agencies where required.

Staff

- check permissions and restrictions before using or sharing images;
- use approved devices, systems and accounts;
- respect children's dignity, privacy and expressed wishes; and
- report concerns immediately.

Governing Body

The Governing Body will receive appropriate assurance that safeguarding, online safety and data protection arrangements relating to images are effective. Relevant issues may be considered through safeguarding governor visits, Headteacher/DSL reporting and policy review.

17. Monitoring and review

This policy will be reviewed annually, and sooner where changes to KCSIE, data protection guidance, technology, Federation practice or identified safeguarding risks require it. The Federation will consider relevant incidents, safeguarding themes, parental feedback and emerging online risks when reviewing its approach.

18. Related policies

- Child Protection and Safeguarding Policy;
- Online Safety Policy;
- Use of Mobile Phones and Smart Technology Policy;
- Staff Code of Conduct;
- Data Protection Policy and Privacy Notices;
- Acceptable Use Policy / Agreements;
- Behaviour Policy;
- Anti-Bullying Policy; and
- Complaints Policy.