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FIERTÉ
MULTI-ACADEMY TRUST
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Safe Use of Images and Videos



Document and Version Control

Document Title	Safe Use of Images and Videos
Effective Date	1st August 2026
Policy Owner	DPO
Policy Approver	Trust Board

Version	Date	Amended by	Comments
1.0	Summer 2026	Ryan Byrne (DPO)	New policy replacing similar policy following appointment of new DPO. Updated to accurately reflect practice and new consents introduced via Arbor MIS. Re-naming of policy to expand scope to incorporate videos as well as staff.

Section	Changes Made
Throughout	Policy rewrite.

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Scope and Rationale

For the purposes of this policy, the term “*images*” should be understood to include photographs and videos (*recordings and livestreamed*). This policy applies to all staff, volunteers, contractors and visitors who may capture, access or otherwise process images - this policy will refer to these groups collectively as the “*workforce*”. For the purposes of this policy, references to “*the Trust*” includes the Fierté Multi-Academy Trust and its subsidiary, Our Pride, Our Joy Nurseries and Care Clubs.

This policy sets out the principles, expectations and procedures for the safe and lawful use of images of children and adults. It ensures compliance with Data Protection law, Department for Education (DfE) expectations and ICO guidance on the use of images in educational settings.

Images in which an adult or child is **identifiable** are classed as personal data and must be handled accordingly.

When images are shared via the internet, there may be a loss of control as content can be copied, reshared, cached or stored by others online. As educators, we have significant responsibilities when it comes to safeguarding children’s digital footprints. [The NSPCC’s website](#) details several potential risks involved.

***Note:** Images taken by guardians and other visitors, such as at sports days or school performances, are classified as ‘personal use’ and are therefore not covered under UK GDPR. However, we ask guardians not to share or publish images on social media or elsewhere online for safeguarding reasons. In some instances, academies may not allow images to be taken during events to protect the privacy of those in attendance.*

Why Use Images?

Images play an important role in capturing children’s learning, progress and experiences. They support effective assessment, help staff reflect on practice and enable guardians to engage more fully with their child’s development. Images can also be valuable for celebrating achievements, documenting activities and showcasing the richness of the curriculum. When used responsibly and lawfully, they provide an important record of children’s educational journeys while strengthening communication between the setting and families.

Likewise, images can play a valuable role in sharing the *life* of the setting with the wider community. When appropriate consent is in place, visual content helps illustrate high-quality learning environments, the breadth of activities on offer and the positive experiences children enjoy when attending. Carefully selected photographs and recordings can support responsible marketing by giving prospective families an authentic sense of the setting’s ethos, atmosphere and practice. Used thoughtfully and in line with data protection and safeguarding expectations, these materials help celebrate success and strengthen engagement with current and future families.

Special Category Data

[Special category data](#) is “personal data that needs more protection because it is sensitive” for which there are unique conditions in law. Where additional context such as disability or health information is **revealed** or **implied**, images may be considered as special category data. However, an *assumption* simply based on appearance is not enough - the image or context around the image must reveal the special category characteristic.

The table below provides example scenarios:

Examples of images that <i>are</i> likely to be considered as special category data:	Examples of images that <i>are not</i> likely to be considered as special category data:
An image accompanied by the caption “ <i>pupil using wheelchair to support daily mobility needs</i> ”.	A standard school portrait image of a child.
A newsletter article listing severe allergens at school accompanied by an image of a child who has an allergy.	An image of a child or adult with a hearing aid visible. (<i>without additional context</i>).
An image of a child/ren accompanied by the caption “ <i>pupils celebrating Eid</i> ”.	An image of a child or adult wearing a Kippah, glasses or ear defenders (<i>without additional context</i>).
An image of an adult in a church accompanied by the caption “ <i>Mr Smith explaining his faith to learners</i> ”.	An image of a class attending a Diwali workshop.
A trade union membership poster displaying an image of a staff member.	An image of a child or adult wearing cultural attire (<i>without additional context</i>).

Whenever images containing special category data *may* be processed, the Trust Data Protection Officer must be consulted first.

Consent

A common misconception is that freely given consent is *always* required before personal data can be processed. In fact, depending upon the type and context, there are several [lawful bases](#) under which we may process data without consent. As an example, we do not seek consent when using images for identification purposes across school as this falls within the lawful basis of “*public task*”.

Where we do not require consent, we commonly process images under one of the following [lawful bases](#):

- **Public task:** *where use of images is necessary for delivering education or safeguarding.*
- **Legal obligation:** *where required by law.*
- **Contract:** *where use of images is necessary for exercising of a contract, employment or engagement.*

For **optional** uses of images, written or electronic consent will be obtained. For children, consent will usually be sought from a parent unless the child is deemed to have a sufficient understanding and intelligence. At time of writing, the [Arbor Parent App / Portal](#) is used to

obtain consent from guardians. For the workforce, consent will be recorded within Arbor under User Defined Fields.

Consent [may be withdrawn at any time by contacting the school office or the setting's admin team](#). Once withdrawn, the **optional** use of images will cease immediately as far as is reasonably practical. Materials and publications created prior to withdrawal will not ordinarily be altered unless a specific safeguarding, legal or other concern requires this.

To explain our use of consent further, we have provided three appendices to this policy:

a) [Appendix A - Definitions of Consent Requests for Children](#)

An explanation of each of the **four** optional image consents which we request from guardians on behalf of children.

b) [Appendix B - Definitions of Consent Requests for Workforce](#)

An explanation of each of the **two** optional image consents which we request from the workforce.

c) [Appendix C - Use of Images not Requiring Consent](#)

Examples of image processing for which we do not request consent.

Binding Principles

The Trust has identified the following four core **binding principles** by which all members of the workforce must abide:

1. Images must only ever be taken on a managed Trust device (*such as a managed iPad*) and should not be stored for longer than is necessary.
2. Before an image of a child is shared externally, at least **two** members of the workforce must check the image to ensure all individuals present have given the relevant consent. See [Appendix A](#) and [Appendix B](#).
3. Children's names and other personal identifying details **must not** be published alongside images unless this is clearly necessary, properly justified and the parent (*or child if deemed to have a sufficient understanding and intelligence*) has been informed and provided the opportunity to refuse.
4. If an identifiable photo is displayed or shared externally without consent – *even momentarily* – this must be handled as a data breach and reported to the Data Protection Officer without delay. This allows swift containment action and risk assessments to be undertaken.

Regular reminders of these principles are shared with leaders across the Trust for dissemination.

Other Notable Restrictions

1. Images will not be taken in areas where individuals have a heightened expectation of privacy (*such as toilets or changing rooms*) except where there is an overriding safeguarding or security reason.

2. Images must not be altered, edited or combined in a way that is misleading, demeaning or unsafe.
3. Livestreaming of events must only take place where appropriate safeguards are in place and consent has been obtained where necessary.
4. Members of the workforce are prohibited from taking, storing or sharing images of children in a personal capacity and must not use their position of privilege / access to take images for personal use where other parents would otherwise be unable to do so. This also applies to images of colleagues where a clear distinction between social / professional boundaries must be made.
 - *For example, where a member of the workforce is also a parent or has a personal relationship with a child's parent, they must not take images for use or sharing in a personal capacity.*

Safeguarding

As educators entrusted with the care of children and their personal data, we have an enhanced duty of care. Under Recital 38 of the UK GDPR, "*children merit specific protection with regard to their personal data as they may be less aware of the risks, consequences and safeguards concerned and their rights in relation to the processing of personal data*".

At all times, decisions relating to the use of images must prioritise the child's best interests.

Additional caution will be exercised when capturing or using images of children where there are known, elevated risks. In such circumstances, the taking and/or publication of images may be restricted or prohibited, even where consent has been provided.

Children must be appropriately dressed for the activity being undertaken before any images are captured. One-to-one photography or videography with a child should be avoided unless there is a clear, legitimate and approved purpose and it takes place in an open, visible or otherwise observable environment.

Images Taken by Guardians and Visitors

Guardians and invited visitors may be permitted to take informal images of their own children during events - subject to safeguarding considerations. In these situations, they should be reminded that images including other children **must not** be shared publicly (*including on social media*) without consent.

Staff may restrict or prohibit photography and filming at specific events if this is necessary for safeguarding, operational or legal reasons.

School Photographers

External school photographers are routinely utilised to capture individual, class or group photographs of learners and the workforce. These photographers are engaged by the Trust and

are required to comply with data protection law - including secure handling, storage and deletion of images.

Photographers are only permitted to use images for the agreed purpose, which is typically the production of official school portraits. They must follow the instructions of the Trust and may not use the images for any other reason. The photographer will process images under a contract with the Trust and must implement appropriate technical and organisational measures to keep personal data secure.

We do not seek consent for individual portraits taken by external photographers as this activity forms part of normal school operations and is justified through a separate lawful basis. However, families may often be provided an opportunity to purchase these individual portrait photographs but doing so is entirely optional.

Often, alongside capturing individual portraits, school photographers will also photograph class, group or family photographs. As these photographs are optional, they are treated separately and are only taken where the relevant consent has been provided as described in [Appendix A](#) (consents 3 and 4).

General Use of External Photographers, Videographers and Media

Where external photographers, videographers or media organisations are engaged, they must be given clear instructions about what they **can** and **cannot** photograph or film. They must be supervised while on site and must not have unsupervised access to children, unless all appropriate checks and arrangements are in place as directed by the DSL.

The use of photographs in the press is already subject to strict guidelines. All publishers regulated by [the IPSO](#) have agreed to follow the [Editors' Code of Practice](#). Under Clause 6 of this framework, "*children under 16 must not be interviewed or photographed on issues involving their own or another child's welfare unless an adult with legal parental responsibility or similarly responsible adult consents*". Additionally, children "*must not be approached or photographed at school without permission of the school authorities*" – in this case, the Trust.

Individuals' Rights

Under data protection law, individuals have rights in relation to their personal data, including images and videos. This is explored more fully within the Data Protection Policy (*please refer to this for further details*). These rights include:

- the right to be informed about how their images are used
- the right of access to copies of images in which they are identifiable, subject to lawful exemptions
- the right to request rectification or restriction of processing where appropriate
- the right to object to certain uses of their images including where consent is not the lawful basis for the processing

Appendix A

Consent Requested for Children

In certain scenarios, we will only process children's images where consent has been freely given by a parent or by the child themselves where they are assessed as having sufficient understanding and intelligence.

For each of the optional image use consents, we have provided a clear definition below:

Consent 1: Internal Displays and Presentations

This consent allows images or videos of your child to be used on displays within the setting (*such as in classrooms, corridors and on slideshows*). These displays are used to celebrate children's work, support learning and create an engaging environment that reflects the curriculum. Likewise, end-of-year assemblies and "*graduation*" ceremonies often incorporate slideshows of images throughout the year highlighting activities which have taken place. Please note that other guardians and visitors to settings may view these displays or attend assemblies.

Consent 2: External-facing Publication (*inc. newsletters*)

This consent allows images or videos of the child to be used in publicly accessible materials by the Trust and / or Our Pride, Our Joy Nurseries and Care Clubs. This may include official newsletters, official websites, official social media channels, prospectuses or marketing materials.

Consent 3: School Photographers - Class and Group Photographs (*shared with other families*)

This consent allows your child to be included in class or group photographs taken by an approved school photographer. These photographs are shared with families of other children in the same class or group and may be provided free of charge or offered for purchase (*often directly via the photographer*). If consent is not given, your child will not be included in class photographs.

Consent 4: School Photographers - Sibling or Family Group Photos

This consent allows your child to be included in sibling or family group photographs which *may* be taken by an approved school photographer while taking official, individual school portraits. These family group photographs may be provided to guardians free of charge or offered for purchase (*often directly via the photographer*). If consent is not given, your child will not be included in family group photographs.

Consent 5: Sharing with Press, Media and Third-Party Requests

This consent allows the organisation to share images or videos directly with external media organisations such as newspapers, broadcasters, journalists or third-party event organisers. Such sharing may also involve the **first** name of children and/or the **full** name of workforce (*for example, when shared with the press*). Once shared, the Trust and Our Pride, Our Joy Nurseries and Care Clubs may no longer have full control over reuse or further publication.

Consent 6: Online Learning Journal (Tapestry) - Group Images

Only applies where the Tapestry app is used (usually Nursery and Early Years).

This consent allows your child to be included in group images on the [Tapestry](#) platform when they have been learning or playing alongside other children.

Tapestry is a secure, password-protected learning journal platform used to record children's experiences, progress and achievements. Authorised guardians of the children appearing in a group image will be able to view the image from their own Tapestry accounts. Tapestry is **not** publicly accessible.

Because children often learn and play together, naturally your child may occasionally appear in images or videos with other children image or video that is uploaded to Tapestry as part of a group activity. By providing this consent for Tapestry, you'll allow the school or nursery to use your child's image securely within this closed system to support assessment, communication and learning when they appear as part of group activities. By providing this consent, you are also agreeing not to share any group photographs for purposes beyond your own personal use (*such as via social media*).

This consent must be freely given and can be freely withdrawn without detriment. However, by not granting this consent, please note that:

- Your child **will not** be included in other children's Tapestry images.
- Other children **will not** be included in your child's Tapestry photos.

As a result, while your child will not be placed at a disadvantage, you will not receive images of your child participating in group play / activities.

Appendix B

Consent Requested from the Workforce

The Trust recognise that members of the workforce may not always feel able to refuse consent freely. For this reason, consent is only relied upon where the data processing is genuinely optional.

Refusing or withdrawing consent **will not** result in any disadvantage or negative impact on employment. The Trust respects and upholds individuals' right to make decisions regarding their data privacy.

For both optional workforce image use consents below, we have provided clear definitions:

Consent 1: External-facing Publication (*inc. Newsletters, Websites and Promotional Materials*)

This consent allows photos or videos in which you are identifiable to be used in external-facing Trust or Our Pride, Our Joy channels. This may include newsletters, websites, social media accounts, prospectuses and other promotional materials produced.

You can refuse or withdraw this consent at any time without detriment by contacting the school office or setting's admin team. If withdrawn, we will stop future optional use as soon as reasonably practical.

Consent 2: Sharing with Press, Media and Third-Party Requests

This consent allows photos or videos in which you are identifiable to be shared with external organisations such as newspapers, broadcasters, journalists, partner organisations, award bodies or third-party event organisers. Once shared externally, the Trust and Our Pride, Our Joy may no longer have full control over how the image/video is reused or further published.

You can refuse or withdraw this consent at any time without detriment by contacting the school office or setting's admin team. If withdrawn, we will not share your image for future third-party requests - noting that we may not be able to retract material already published by external parties.

Appendix C

Use of Images not Requiring Consent

In some situations, we do not request consent for processing of images where children / adults are *identifiable* as this processing is carried out under a different [lawful basis](#).

Images necessary for education and safeguarding purposes.

This includes images and videos used for purposes such as:

- classroom activities
- documenting learning and development
- assessment and moderation
- SEND or pastoral support including specialist interventions such as speech and language
- documenting images relevant to child protection concerns
- sharing images of adults approved for collection
- staff images displayed internally so children and guardians can recognise trusted adults

Images used internally for workforce training or quality assurance.

This includes internal professional development, reflective practice, coaching, mentoring or moderation meetings. For example, recordings of lesson delivery or small group work with children highlighting good practice upon which other staff can study. Workforce training materials are used solely within the Trust and Our Pride, Our Joy Nurseries and Care Clubs.

Workforce images required for employment purposes.

This includes ID badges, signing-in systems, safeguarding requirements such as confirming staff identity, internal directories and HR records.

CCTV and security footage.

This includes site security, crime prevention and health and safety monitoring.

Images used to meet legal requirements.

This includes documentation for accidents, incidents, health and safety investigations, or evidential images required by law enforcement.

Images necessary for equality, inclusion or SEND support.

This includes recording evidence for EHCP processes, documenting accessibility needs or keeping visual records needed for multi-agency support.