



Photographic Image Consent [Group]

Policy Owner: Chief Operating Officer (COO)

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Version Control Information

Reason for Amendment	Role	Date	Main Changes
Annual review	Chief Operating Officer	Michaelmas 2024	Transfer to new template
Interim review	Chief Operating Officer Director of Marketing, Admissions and Communications	Trinity 2025	Updated consent categories Conversion to Group policy
Annual review	Chief Operating Officer	Spring / Lent 2026	Reference to photos in EYFS Clarification regarding use of personal devices for photos

Contents

1. Introduction and aims	4
2. Legislation	4
3. Roles and responsibilities	4
4. Use of images and consent	6
5. Data retention.....	8
6. Monitoring arrangements	9
7. Links to other policies.....	9

St Dunstan's Education Group Photo Consent Policy

1. Introduction and aims

The purpose of this policy is to outline how St Dunstan's Education Group (the Group), uses, stores and shares photographic and video images of pupils in compliance with the UK General Data Protection Regulation (UK GDPR) and relevant guidance from the Information Commissioner's Office (ICO).

The Group recognises the value of photography and videography in celebrating pupil achievement, communicating with parents/carers and the wider community, and promoting our schools. In accordance with the Group's Data Protection Policy, we are committed to processing personal data lawfully, fairly and transparently.

2. Legislation

This policy is informed by the following legislation and guidance:

- UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- ICO Guidance: Taking photographs in schools
- Early Years Foundation Stage (EYFS) Framework

The processing of pupil images constitutes personal data processing and will only occur where a lawful basis is established. In most cases, the lawful basis will be consent.

3. Roles and responsibilities

3.1 The Director of Communications and Marketing

The Director of Communications and Marketing is responsible for:

- Ensuring that the collection and use of images align with Group marketing strategies and complies with this policy
- Ensuring staff are trained to understand and apply this photo consent policy

- Managing the publication of images on the websites, social media, printed marketing materials and other promotional platforms
- Maintaining records of consent and ensuring that only approved images are used
- Liaising with external media and third-party photographers to ensure compliance with safeguarding and data protection standards.

3.2 Staff

All staff, including contractors and agency staff, and volunteers are responsible for:

- Following this policy and related data protection guidance when taking or using images of pupils
- Confirming and respecting individual pupil consent preferences prior to capturing or sharing image
- Reporting any concerns, breaches, or misuse of images immediately to their school's data protection lead and in accordance with the Group's Data Breach Policy
- Ensuring images are stored securely and deleted when no longer required.

3.3 Parents and carers

Parents and carers are expected to:

- Provide clear consent preferences through the official consent form
- Notify the relevant school promptly if they wish to amend or withdraw consent
- Respect other families' privacy and the Group's data protection standards by not sharing other pupils' images on personal social media or public platforms without permission and adhering to the Group's request to not take photographs or film school events.

3.4 Pupils

Pupils are expected to:

- Where appropriate (usually age 12+), exercise their own data protection rights regarding consent for image use
- Inform staff if they do not wish to have their photograph taken in particular situations, even where consent has been previously granted
- Use personal devices responsibly in line with their school's IT Policy and respecting other families' privacy and the Group's data protection standards by not sharing other pupils'

images on personal social media or public platforms without permission and adhering to the Group's request to not take photographs or film school events.

4. Use of images and consent

4.1 Use of images

The Group may take and use photographs or video recordings of pupils in the following circumstances:

- On the website to share updates and promote the relevant school and / or Group
- On official social media platforms including Facebook, Instagram, LinkedIn, and YouTube
- In newsletters, brochures, prospectuses, flyers and other promotional materials for current and prospective families
- In banners, signs and displays around the relevant school's site
- In external media publications where a school / the Group is featured
- In historical and archival materials that reflect the life and heritage of the relevant school
- Through official school photographers who take annual individual and class photos.

Images are typically used without naming pupils. Where naming is required, specific consent will be obtained.

4.2 Safeguarding and appropriate use

Any use of pupil images will prioritise safeguarding and pupil welfare. Accordingly:

- Images will be captured respectfully and in an appropriate context
- Pupils will not be photographed in situations that may be considered sensitive or inappropriate
- Staff will check consent preferences prior to capturing or publishing images
- Images will be stored securely on authorised Group systems
- Images will not be stored on personal devices
- Any concerns regarding misuse of images will be reported immediately in line with both the Group's Safeguarding and Data Breach Policies.

Where external photographers are engaged, they will be required to comply with both the Group's safeguarding and data protection standards.

4.3 Early Years Foundation Stage (EYFS)

Specifically, in EYFS settings:

- Staff will not use personal mobile phones or personal devices to take photographs of children
- Only authorised, school-issued devices will be used for capturing images
- Images will be transferred promptly to secure Group systems and deleted from devices in accordance with internal procedures
- The use of images for learning journals or assessment purposes will be managed separately from this photographic consent policy.

4.4 Consent

Consent to use a pupil’s image will be sought at the point of enrolment and will remain valid throughout the pupil’s time at the relevant school and for a short period after they leave.

Pupils aged 12 and above may be asked to provide consent themselves, in accordance with their rights under data protection law.

Parents and carers may withdraw consent at any time by contacting:

communications@stdunstans.org.uk

Once consent is withdrawn, the Group will cease using the pupil’s images in future publications but cannot recall or alter materials already in circulation.

If no response to an updated consent request is received, the Group will assume that the previously granted permissions remain in place.

Parents/carers and pupils (where applicable) can provide or withhold consent for the categories listed below. If the Group already hold consent for the use of a pupil’s image and do not receive a response to a follow-up request, we will assume that existing permission remains in place.

Where external media (e.g. newspapers or broadcasters) are present on site, the relevant school will take reasonable steps to inform parents and obtain necessary permissions. However, images captured by third parties may be outside the Group’s direct control.

I agree to consent to images of my child being used in the following format:	Agree	Disagree
Opt-out of all image usage		
Opt-in to social media use: This allows for images to be used on all social media platforms used by the Group* including Facebook, LinkedIn, Instagram, and YouTube.		

<p>* Should the Group decide to use any additional social media platforms beyond those listed here, we will seek further consent.</p>		
<p>Opt-in to all marketing and publishing: This allows for images to be used in all Group internal and external publications, including newsletters, brochures, prospectuses, flyers and leaflets, website, and other promotional materials (e.g. banners, signs, and displays), including displays in and around the school buildings. External advertising campaigns* including newspapers, external media, and promotional materials that showcase the history or achievements of the relevant school.</p> <p>* We will always seek additional parental permission for any external advertising campaigns, including those on bus stops, train stations, billboards etc, which feature easily identifiable or individual children.</p>		
<p>Opt-in to My School Portal Only: This allows for images to be published within My School Portal and only accessible to the school’s parents/carers/pupils.</p>		

5. Data retention

Images will be retained only for as long as necessary which will be a maximum of the time the student is enrolled at the school, plus an additional academic year after they leave. Images used for historical or archival purposes may be kept indefinitely as part of the relevant school’s heritage records. Please note that once an image has been published online or in print, the school cannot always control how long it remains accessible.

Digital images will be stored securely on the Group’s systems with access limited to authorised staff. Images in print will be stored and displayed in controlled environments.

Any third-party photographers or media representatives will be required to comply with Group safeguarding and data protection standards.

6. Monitoring arrangements

This policy will be reviewed by Director of Marketing and Communications annually and reviewed by the Full Governing Body.

7. Links to other policies

This Photo Consent Policy links to the following policies:

- Data Protection Policy [Group]