



GATEHOUSE
SCHOOL

Digital Images Policy

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| Approved by: | Governors |
| Date Approved: | TBC (November 2025) |
| Next Review: | November 2026 |

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0. Document Control

The table below contains the changes made between the different final editions of this document set for approval. This is to help provide information to those reviewing and approving the document of the changes being made.

| Document Edition | Section | Details of change |
|-------------------------|----------------|---------------------------------|
| October 2025 | All Sections | Full policy review, formatting. |
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1. Purpose and Scope

This policy explains how Gatehouse School collects, stores, and uses photographic or video images of pupils, staff, and visitors.

It ensures compliance with the **UK General Data Protection Regulation (UK GDPR)** and the **Data Protection Act 2018** by setting out clear standards for image capture, use, storage, and sharing.

This policy applies to:

- All staff, governors, volunteers, pupils, contractors, and visitors.
- All types of digital media (photographs, video, audio-visual recordings, livestreaming, CCTV extracts).
- All school-owned or authorised devices used for capturing or storing images.

The principles in this policy complement the **Data Protection and Privacy Notice**, **Online Safety Policy**, **CCTV Policy**, **Safeguarding Policy**, and **ICT Acceptable Use Policy**. (To link).

2. Legal Framework

This policy operates under:

- **UK GDPR (2018)**
- **Data Protection Act 2018**
- **Children Act 1989 / 2004**
- **Education Acts 1996 and 2002**
- **Human Rights Act 1998** (Article 8 – Right to Privacy)
- **ICO Guidance on Taking Photographs in Schools (2024)**

Under these laws, any image that can identify an individual is considered *personal data* and must be processed lawfully, fairly, and transparently.

3. Lawful Basis for Processing Images

Gatehouse School processes digital images under one or more lawful bases from Article 6 UK GDPR:

| Lawful Basis | Typical Purpose | Examples |
|--------------|-----------------|----------|
|--------------|-----------------|----------|

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| Public Task | Activities carried out in the public interest of providing education | Teaching and learning evidence, pupil work records, safeguarding records |
| Legitimate Interests | Activities that support the school's operation or reputation | School website, prospectus, newsletters, displays, alumni relations |
| Consent | Optional uses where participation is voluntary | Press features, marketing campaigns, third-party publications |

Parents (or pupils who are mature enough to decide) are informed about image use and may **withdraw consent or object** at any time by contacting admin@gatehouseschool.co.uk.

3.1 Respecting Children's Rights and Autonomy

Gatehouse School recognises that, under the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018, children have their own rights as data subjects.

In line with ICO guidance (2024), the School understands that a child who has sufficient maturity to make decisions about their own personal data should be able to exercise those rights independently.

"Where a child has sufficient understanding to make their own decisions about their personal data, the school should respect their wishes even if they differ from those of their parent or guardian."

(ICO, Taking Photographs in Schools and Children and the UK GDPR, 2024)

Accordingly, at Gatehouse School we:

- Respect the rights of children who demonstrate the maturity to make informed choices about the use of their photograph, likeness or image;
- Consider a pupil's wishes if they express that they do not wish to be photographed or identified, even if parental consent has been given;
- Continue to seek parental consent for younger pupils, while recognising that as children mature their views must also be taken into account; and
- Record and communicate any child's objection to ensure it is respected by all staff.

This approach reflects our commitment to the principles of fairness, transparency, and respect for each individual's privacy and dignity.

4. Fair Processing and Transparency

- At the start of each academic year, the school provides parents with an **Image Consent Form** outlining specific purposes and opt-out options.

- The consent register is maintained by the **Admissions Manager** and reviewed termly by the **Data Protection Champion**.
- Additional consent will be sought for new or exceptional uses of images.
- Staff must check the consent register before publishing or sharing any pupil image.

5. Roles and Responsibilities

| Role | Responsibilities |
|---|--|
| Governing Body | Ensures the school meets legal obligations under the UK GDPR and Data Protection Act 2018. Reviews this policy annually. |
| Headteacher | Overall accountability for lawful and safe use of images. Approves external use and ensures staff compliance. |
| Data Protection Officer (DPO) <i>(external or appointed independent advisor)</i> | As needed, we will engage with data protection services to review oversight and advise on lawful practice, DPIAs, and develop any response to data-subject rights requests or breaches. |
| Data Protection Champion (DPC), Bursar, Privacy & Compliance Officer Tracey Sewell | Leads data protection compliance, maintains records of processing, and acts as the point of contact for the ICO. Day-to-day monitoring; keeps consent lists up to date, trains staff, and logs any image-related incidents. Contact: tracey.sewell@gatehouseschool.co.uk |
| All Staff and Volunteers | Must follow this policy, complete training, and use only school-owned devices to capture, store, or share images. |
| Parents and Guardians | Respect other pupils' privacy when taking photographs at events; comply with the school's guidance on social media sharing. |
| Pupils | Follow Online Safety rules, use images responsibly, and respect the privacy of others. |

6. How Images Are Captured and Stored

- Only **school-owned or authorised devices** (e.g. cameras, tablets, laptops) may be used to capture or store pupil images.
- Personal mobile phones, cameras, or USB devices must **not** be used.
- Images must be uploaded promptly to the school's secure **Google Workspace for Education** account or internal servers and deleted from the device after upload.
- Images are stored in accordance with the school's **Data Retention Schedule**, following **IRMS Guidelines for Schools (2023)**.
- Access is restricted to authorised staff and subject to periodic review.
- Any loss, unauthorised access, or accidental sharing of images must be reported to the **DPC** within **one working day** and recorded as a potential **data breach**.

6.1 Uploading and Sharing Videos

Under the **UK General Data Protection Regulation (UK GDPR)** and the **Data Protection Act 2018**, any video showing pupils is classed as *personal data* and may also include *special category data* (for example, if it reveals a child's religion, disability, or other sensitive information). When a video is uploaded to **Google Classroom**, it is considered data processing and internal sharing.

Google Classroom is a secure, closed educational platform used only by authorised staff, pupils, and parents. Parental refusals for *social media use* apply only to *external publication* (such as the school website, marketing materials, or social media platforms). Therefore, uploading to Google Classroom for teaching, learning, or celebrating achievements is permitted, provided it is done securely.

The school relies on a lawful basis for processing:

- **Public Task** (for maintained schools), or
- **Legitimate Interests** (for independent schools).

This covers sharing videos for educational purposes, including review, reflection, and celebration within the school community.

To remain compliant:

- Videos must be uploaded only to the school's secure **Google Workspace for Education** environment.
- Where possible, videos should be **shared as view-only** and **downloading disabled** to reduce risk of unauthorised distribution.
- Access must be limited to relevant pupils, parents, and staff.
- Parents must be reminded that videos are for internal educational use only and must not be copied or shared externally.
- Any accidental sharing or unauthorised access must be reported to the **Data Protection Champion (DPC)** within one working day and recorded as a potential data breach.

7. Use of Images

1. **Educational Use:** classroom displays, assessment evidence, pupil portfolios, safeguarding records.
2. **Internal Publications:** newsletters, yearbooks, internal screens or digital signage.
3. **External Publications:** school prospectus, website, or official social media (e.g. Instagram, Facebook, X).
4. **Press and Third Parties:** only with separate consent or explicit approval from parents and the Headteacher.

Names will not normally appear with images. Where names are included (e.g. competition results), only **first names** will be used, and **never with a full image identifier** unless specific consent is given.

8. Parents and Visitors Taking Photographs

- Parents and guardians may take photos or videos **for personal, non-commercial use** during any school events unless restricted for safeguarding or performance reasons.
 - The school may prohibit photography at any event if it risks child safety, causes distraction, or breaches rights of others.
 - Photos or videos containing other children must **not be posted online or shared publicly** without permission.
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9. Pupils' Access and Use

Pupils may use school-owned devices under supervision for learning projects that involve photography or video.

They must:

- Obtain permission before capturing or sharing another person's image.
 - Not download, reproduce, or distribute images beyond the intended activity.
 - Follow the **Online Safety and ICT Acceptable Use Policies** at all times.
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10. Data Subject Rights

Under the UK GDPR, individuals (or parents on behalf of pupils under 13) have the right to:

- **Be informed** how their image data is used (privacy notices).
- **Access** their images or copies thereof.
- **Rectify** inaccurate information.
- **Request erasure** (“right to be forgotten”) where no lawful basis requires retention.
- **Restrict processing** or **object** to specific uses (e.g. online publication).
- **Data portability**, where applicable (rare for image data).

Requests should be made in writing to the **Bursar** or **Data Protection Officer**. The school will respond within **one month** as required by law.

11. Retention and Deletion

- Routine educational images are retained for the pupil’s time at the school + one academic year, unless needed longer for safeguarding or legal reasons.
 - Marketing or promotional images are reviewed annually; consent is renewed or the image removed.
 - Deletion requests will be actioned promptly unless there is a lawful basis to retain the image (e.g. safeguarding evidence).
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12. Data Protection Impact Assessments (DPIAs)

Before introducing any new technology or project involving image processing (e.g. new app, cloud service, facial-recognition, or live-streaming), a **DPIA** must be completed by the **DPC** to identify and mitigate risks.

13. Training and Awareness

- All staff receive annual data protection and image-use training.
 - Refresher training is provided where new technology or platforms are introduced.
 - Volunteers and temporary staff are briefed before starting work.
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14. Breach Reporting

Any suspected or actual breach (e.g. lost device, unauthorised post, mis-sent email with images) must be reported to the **DPC** immediately and escalated to the **Bursar**. If the breach presents a risk to individuals’ rights or freedoms, the DPC will notify the **Information Commissioner’s Office (ICO)** within **72 hours**.

15. Linked Policies and Documents

- Data Protection and Privacy Notice
- Online Safety Policy
- ICT Acceptable Use Policy
- Safeguarding Policy
- CCTV Policy
- Staff Code of Conduct
- Retention of Records Schedule

16. Contact Details

- **Privacy & Compliance Officer (Bursar):** bursar@gatehouseschool.co.uk
- **Data Protection Champion:** Tracey Sewell
- **Information Commissioner's Office (ICO):** 0303 123 1113 | www.ico.org.uk

17. Policy Statement

Gatehouse School recognises that photographs and video are valuable tools in recording achievement and promoting learning, but they must be used responsibly and lawfully. The School is committed to ensuring the rights and freedoms of all individuals are protected, and that its practices meet or exceed the requirements of the **UK GDPR, Data Protection Act 2018, and ICO guidance**.