Photography and Filming Policy

This Policy has been approved and adopted by the Xavier Catholic Education Trust in October 2026

Committee Responsible: Risk & Audit Committee
To be reviewed in October 2028

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Purpose

The purpose of this policy is to:

- Ensure images and videos taken within St Polycarp's Catholic Primary School are taken and held legally and the safeguarding of children and young people is prioritised.
- set out the overarching principles that guide our approach to photographs/videos being taken of children and young people during our events and activities.
- to ensure that we operate in line with our values and within the law when creating, using and sharing images of children and young people.

This policy statement applies to all staff and volunteers associated with St Polycarp's Catholic Primary School as well as children and parents/carers.

This policy applies to all images, including still and video content taken by St Polycarp's Catholic Primary School.

St Polycarp's Catholic Primary School does not permit staff to use any personal equipment to take photos and recordings of children. Only cameras or devices belonging to St Polycarp's Catholic Primary School should be used.

Legal framework

This policy has due regard to:

UK General Data Protection Regulation (UK GDPR)
Data Protection Act 2018

Photographs and video recordings may constitute personal data under the UK GDPR and the Data Protection Act 2018. The school will process such data lawfully, fairly and transparently.

All images taken by St Polycarp's Catholic Primary School will be processed in accordance with the principles of data protection legislation.

This means that images will be:

- processed lawfully, fairly and transparently;
- collected for specified, explicit and legitimate purposes;
- adequate, relevant and limited to what is necessary;
- accurate and, where necessary, kept up to date;
- retained only for as long as necessary;
- processed in a manner that respects individuals' rights;
- kept secure and protected against unauthorised or unlawful processing, accidental loss, destruction or damage;

- transferred internationally only where appropriate safeguards are in place.

The school's Local Data Protection Officer (DPO) is responsible for providing advice and guidance on the lawful processing, storage and disposal of images and recordings.

Related policies and procedures

This policy takes into account the DfE statutory guidance 'Keeping Children Safe in Education' 2026,'Working Together to Safeguard Children' 2026 'Teaching Online Safety in Schools' 2023, DfE guidance and the local Surrey Safeguarding Children Partnership Procedures.

This policy should be read in conjunction with other relevant school policies including, but not limited to:

- Child protection and Safeguarding Policy
- Code of Conduct
- Online Safety Policy
- Technology and Online Safety User Requirements
- Data Retention Policy
- Trust Data Privacy Notices

Context

We believe that:

- we have a responsibility to promote the welfare of all children and young people and to take, share and use images of children safely.

We recognise that:

- sharing photographs and films of our activities can help us celebrate the successes and achievements of our children and young people, provide a record of our activities and raise awareness of our school.
- the welfare of the children and young people taking part in our activities is paramount.
- children, their parents and carers and staff have a right to decide whether their images are taken and how these may be used.
- consent to take images of children is only meaningful when children, their parents and carers and staff understand how the images will be used and stored and are fully aware of the potential risks associated with the use and distribution of these images.
- there are potential risks associated with sharing images of children online.
- there are also risks associated with the misuse, manipulation, redistribution or unauthorised sharing of images through social media, artificial intelligence (AI) tools and other digital technologies.

We will seek to keep children and young people safe by:

- considering the potential risks associated with publishing images online, including the possibility of images being copied, altered, shared or used without consent.
- obtaining and recording appropriate parental consent for the use of pupil images in accordance with our data protection procedures.
- never publishing identifiable images of primary aged children on social media channels.
- keeping a copy of the consent where children's images are used for publicity purposes (such as the school prospectus or publications) until the image is no longer in use.
- always explaining what images will be used for, how they will be stored and what potential risks are associated with sharing images of children.
- making it clear that if a child or their family withdraw consent for an image to be shared, it may not be possible to delete images that have already been shared or published.
- only using the first names of children whose images are being used in our published material when we identify children.
- making sure children, their parents and carers understand how images of children will be securely stored and for how long (including how we will control access to the images and their associated information).
- reducing the risk of images being copied and used inappropriately by:
    - only using images of children in appropriate clothing
    - avoiding full face and body shots of children taking part in activities such as swimming where there may be a heightened risk of images being misused
- using images that positively reflect children and young people's involvement in the activity.
- ensuring all children are taught to understand and manage risk through personal, social, health and economic (PSHE) education and relationship and sex education (RSE) and through all aspects of school life. This includes online safety and the safe and appropriate use of images.
- ensuring all staff receive information regarding the safe and appropriate use of images as part of their safeguarding training.

Artificial Intelligence (AI) and Digital Manipulation

The school will not use artificial intelligence or digital editing tools to create misleading representations of children. Any use of image enhancement technology will be proportionate and in accordance with safeguarding and data protection requirements.

Photography and/or filming for personal use by parents/carers

When parents/carers are permitted to take photographs or film at school events and the images are for personal use, we will publish guidance about image sharing in the event program and/or announce details of our photography policy before the start of the event. We will make it clear from the start of the event that any images taken must be for personal use only. This includes:

- reminding parents/carers that the right to withdraw consent will be maintained and any photography or filming on site will be open to scrutiny at any time.

- Reminding parents/carers they are only permitted to take photographs and recordings in designated areas. Photography and recording are not permitted in sensitive areas such as changing rooms, swimming areas etc.
- asking for photos taken during the event not to be shared on social media or asking people to gain permission from children, their parents and carers before sharing photographs and videos that include them.
- recommending that people check the privacy settings of their social media account to understand who else will be able to view any images they share.
- reminding parents/carers who are using photographic equipment that they must be mindful of others, including health and safety concerns, when making and taking images.
- reminding children, parents and carers who they can talk to if they have any concerns about the use of images.

Photography and/or filming by children

- The setting will discuss and agree age-appropriate acceptable use rules with children regarding the appropriate use of cameras, such as places children cannot take the camera (e.g. unsupervised areas, toilets).
- All staff will be made aware of the acceptable use rules regarding children's use of cameras and will ensure that children are appropriately supervised when taking images for official or curriculum use.
- Only school owned equipment (school devices, digital or video cameras) will be used by children to capture images.
- Photos taken by children for official use will only be taken with parental consent and will be processed in accordance with the Data Protection Act 1998.
- Still and video cameras provided for use by children and the images themselves will not be removed from the school.

Photography and/or filming for St Polycarps School **use**

We recognise that photography and filming may be used for a range of legitimate educational and operational purposes, including curriculum activities, performances, educational visits, school promotion and communications, and professional activities such as staff training, coaching, mentoring, quality assurance and the development of teaching and learning. Any photography or filming will be carried out using school-approved equipment, and managed in accordance with data protection, safeguarding and consent requirements. Children, young people, parents and carers must also be made aware that photography and filming are part of the programme and have given consent.

If we hire a photographer for one of our events, we will seek to keep children and young people safe by:

- providing the photographer with a clear brief about appropriate content and behavior.
- ensuring the photographer wears identification at all times.
- informing children, their parents and carers that a photographer will be at the event and ensuring they give written consent to images which feature their child being taken and shared.
- Where photographers or videographers will have unsupervised access to children, the school will ensure that appropriate safeguarding arrangements are in place, including undertaking any necessary vetting checks in accordance with Keeping Children Safe in Education 2026.
- not allowing the photographer to carry out sessions outside the event.
- reporting concerns regarding inappropriate or intrusive photography in line with our Safeguarding and Child Protection Policy.

Photography and/or filming for wider use

If people such as local journalists, professional photographers not hired by **St Polycarps School** or students wish to record one of our events and share the images professionally or in the wider world, they should seek permission in advance.

They should provide:

- the name and address of the person using the camera.
- the names of children they wish to take images of (if possible).
- the reason for taking the images and/or what the images will be used for.
- a signed declaration that the information provided is valid and that the images will only be used for the reasons given.

St Polycarps School will verify these details and decide whether to grant permission for photographs/films to be taken.

We will seek consent from the children who are the intended subjects of the images and their parents or carers and inform the photographer of anyone who does not give consent.

At the event we will inform children, parents and carers that an external photographer is present and ensure they are easily identifiable, for example by providing them with a visitor lanyard.

The identity of any press representative will be verified, and access will only be permitted where the event is planned, and where press are to be specifically invited to attend. No authorisation will be given to unscheduled visits by the press under any circumstances.

If **St Polycarps School** is concerned that someone unknown to us is using their sessions for photography or filming purposes, we will ask them to leave and (depending on the nature of the concerns) follow our child protection procedures.

Storing images

We will store photographs and videos of children securely, in accordance with our Child Protection and Safeguarding policy and data protection law.

We will never store images of children on unencrypted portable equipment such as laptops, memory sticks and mobile phones.

We will keep hard copies of images in a locked drawer and electronic images in a protected folder with restricted access. Retention periods will be determined in accordance with the Trust's Data Retention Policy The data controller will ensure that all photographs are permanently wiped from memory cards, hard drives and portable drives or other relevant devices once the images will no longer be of use.
The school is part of Xavier Catholic Education Trust, which acts as Data Controller for the purposes of data protection legislation.